

GOVERNMENT OF SOMALILAND



**MINISTRY OF AGRICULTURAL DEVELOPMENT, MINISTRY OF
LIVESTOCK AND FISHERIES AND MINISTRY OF ENVIRONMENT AND
CLIMATE CHANGE**

**Food Systems Resilience Project
(P178566)**

Environmental and Social Management Framework (ESMF)

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Abbreviations and Acronyms

ASAL	Arid and Semi-Arid Lands
AWD	Acute Watery Diarrhea
AIC	Artificial Insemination Center
APFS	Agro-Pastoralist Field Schools
BMP	Biodiversity Management Plan
CBO	Community Based Organization
CDD	Community Driven Development
CERC	Contingency Emergency Response Component
CHMP	Cultural Heritage Management Plan
CIG	Common Interest Groups
CIM	Capacity Injection Manual
CSA	Climate Smart Agriculture
CSO	Civil Society Organization
DAT	Disruptive Agriculture Technology
DG	Director General
DCAS	Digital Climate Advisory System
DEWC	District Environment Watch Council
DRIVE	De-risking, Inclusion and Value Enhancement
EDP	Enterprise Development Plans
EDMU	Epidemiology and Data Management Units
ESIRT	Environmental and Social Incident Reporting Tool
EHSG	Environmental Health and Safety Guidelines
EHS	Environmental Health and Safety
ESCP	Environmental and Social Commitment Plan
EIA	Environmental Impact Assessment
IEE	Initial Environmental Examination
IESE	Initial Environmental and Social Examination

ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FAO	Food and Agriculture Organization
FCV	Fragility, Conflict & Violence
FFS	Farmer Field Schools
FGM/C	Female Genital Mutilation/Circumcision
FLID	Farmer Led Irrigation Development
FPOs	Farmer Producer Organizations
FSRP	Food Systems Resilience Project
GIIP	Global International Industry Practice
GBV	Gender Based Violence
GBVP	Gender-based Violence Plan
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GIS	Geographic Information System
GM	Grievance Mechanism
GRS	Grievance Redress Service
GRC	Grievance Redress Committee
GoSL	Government of Somaliland
IA	Implementing Agency
IDA	International Development Association
IDMC	Internal Displacement Monitoring Centre
IDP	Internally Displaced People
IFC	International Finance Corporation
IGAD	Intergovernmental Authority on Development
ILO	International Labor Organization

ILRI	International Livestock Research Institute
IPCC	Intergovernmental Panel for Climate Change
IPF	Investment Project Financing
IPMP	Integrated Pest Management Plan
IRM-OM	Immediate Response Mechanism Operation Manual
ITCZ	Inter-Tropical Convergence Zone
LDN	Land Degradation Neutrality
LUP	Land Use Plan
LMP	Labor Management Plan
LRP	Livelihood Restoration Plan
LWC	Labor and Working Conditions
MDA	Ministries Departments and Agencies
MoECC	Ministry of Environment and Climate Change
MoLFD	Ministry of Livestock and Fisheries Development
MOAD	Ministry of Agriculture Development
MoWR	Ministry of Water Resources
MoF	Ministry of Finance
MoU	Memorandum of Understanding
MIS	Management Information System
MPA	Multi-phase Programmatic Approach
M&E	Monitoring and Evaluation
NCCP	National Climate Change Policy
NEP	National Environment Policy
NDC	National Determined Contribution
NDP	National Development Plan
NEWC	National Environmental and Water Councils
NEG	National Eviction Guidelines
NESIA	National Environmental and Social Impact Assessment
NGO	Non-governmental Organization
NOAA	National Oceanic and Atmospheric Administration

OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PCU	Project Coordination Unit
PDO	Project Development Objective
PET	Annual Potential Evapo-Transpiration
PPE	Personal Protective Equipment
PPP	Public Private Partnerships
POM	Project Operation Manual
OHS	Occupation Health and Safety
OP	Operational Policy
PRMN	Protection Return Monitoring Network
PSC	Project Steering Committee
RAP	Resettlement Action Plan
REWC	Regional Environmental Watch Councils
RPF	Resettlement Policy Framework
RVI	Rift Valley Institute
SDG	Sustainable Development Goal
FSRP	Food Systems Resilience Project
SOC	Social Organic Carbon
SEAH	Sexual Exploitation Abuse and Harassment
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SOGI	Sexual Orientation and Gender Identity
SESA	Strategic Environmental and Social Assessment
SEP	Stakeholder Engagement Plan
SLM	Sustainable Land Management
STEP	Systematic Tracking of Exchanges in Procurement
SMP	Security Management Plan
PCU	Project Coordination Unit

SRA	Security Risk Assessment
SRM	Social Risk Management
TAD	Transboundary Animal Disease
TOT	Training of Trainers
TIMP	Technology, Innovations and Management Practices
TPM	Third-Party Monitoring
UNDP	United Nations Development Program
UNFPA	United Nations Population Fund
UNHCR	United Nation High Commission for Refugees
UNICEF	United Nation Children Emergency Fund
UNOCHA	United Nation Office for the Coordination of Humanitarian Affairs
VDC	Village Development Committee
WALP	Water for Agro-pastoral Livelihoods Project
WBG	World Bank Group
WFP	World Food Program
WOAH	World Organization for Animal Health
WET	Web Automation Testing

EXECUTIVE SUMMARY

1. This Environmental and Social Management Framework (ESMF) was prepared by the Government of Somaliland (GoSL) as one of a set of instruments required to address and manage environmental and social (E&S) risks and impacts associated with the Food Systems Resilience Project (S-FSRP P177816). The project, to be financed by the World Bank, will be implemented by the Government of Somaliland through the Ministry of Agricultural Development (MoAD), in close collaboration with the Ministry of Livestock and Fisheries, and the Ministry of Environment and Climate Change (MoECC).

Project Description

2. The Project Development Objective (PDO) for FSRP will be *'to increase the resilience of food systems and the Somaliland's preparedness for food insecurity in project target areas'*. Progress toward the PDO will be measured using five PDO indicators and intermediate indicators. All relevant indicators will be disaggregated by gender (men and women) and age (youth and adult).

3. **FSRP will support investments across 5 Is-Infrastructure, Institutional Capacity, Innovation, Inclusion, and Integration to comprehensively address food systems resilience.**

4. The Food Systems Resilience Program (FSRP) is part of a regional initiative by the World Bank to provide a comprehensive framework to intervene at both the national and regional levels. This Multi-phase Programmatic Approach (MPA) aims to tackle the underlying structural challenges of food insecurity and reduce beneficiaries' vulnerability to unpredictable climate, crisis, and conflict events. It seeks to achieve this by rejuvenating Somaliland's agri-livestock research institutions, seed systems, and extension services and developing community institutions that can anchor adaptation of climate smart agri-livestock practices; strengthening the availability of water and improved rangelands management for resilient agriculture and livestock production; strengthen animal health services, strengthening the integration of the production systems to domestic and regional markets, with appropriate investments in food safety and value addition, and establishing an enabling policy and institutional framework capable of supporting food systems resilience for Somaliland at national and regional levels.

5. FSRP will support investments across the '5Is'- Infrastructure, Institutional Capacity, Innovation, Inclusion, and Integration to address food systems resilience comprehensively. **Infrastructure investments** will support the revival of flagship agriculture and livestock research institutions, automated weather stations and early warning systems, small scale irrigation infrastructure, produce testing and certification facilities for export-oriented commodities, value addition and processing infrastructure, post-harvest storage, and cold chains. These infrastructure investments are envisaged as foundational to the agenda of food systems resilience.

6. **Institutional Capacity** building will be undertaken at various levels, including farmer institutions, staff of implementing ministries, and stakeholders, including private sector players and enterprises in key value chains. This will enable key institutions to play sectoral leadership roles at various levels. The use of innovations is expected to drive the development and application of climate resilient breeds and inputs, digitally enabled information and extension services, development of locally relevant and climate smart technologies, innovations and management practices (TIMPs), scaling up innovations through technology transfer and demonstrations at community level, new age conservation agriculture approaches, innovations in rangeland management and sustainable charcoal production, development of new fodder varieties, innovative intensification of livestock production systems, low cost innovations in post-harvest storage, and traceability systems in livestock and livestock products.

7. The Project will make investments at all levels to support inclusive farmer institutions and producer organizations, extension and advisory services, access to finance and markets through digital channels, and incubation support for women owned enterprises. The investments will integrate and build on existing or completed investments that support resilience building, including but not limited to the Biyoole and Barwaaqo (Water for Resilience Project) investments into water infrastructure and multi-use water points, Horn of Africa (HoA) Groundwater project investments, and others.

8. Investments in building resilient food systems in Somaliland will be made through four primary pathways; i) rejuvenating Somaliland's agri-livestock research institutions, seed systems, extension services, and develop community institutions that can anchor adaptation of climate smart agri-livestock practices, ii) strengthening the availability of water and improved rangeland management for resilient agriculture and livestock production, iii)

strengthening the integration of the production systems to domestic and regional markets, with appropriate investments in food safety and value addition, and iv) establishing an enabling policy and institutional framework at sub-national, national and regional level capable of supporting food systems resilience for Somaliland. To support these investment pathways, FSRP comprises five technical components in addition to the Contingent Emergency Response Component (CERC). The project components, sub-components, and resource allocation is outlined below:

9. The project has four components:

Component 1: (Re-)Building Resilient Agricultural Production Capacity: This component is focused on strengthening the foundation for resilient production capacity and productivity in agriculture and livestock sector by rejuvenating Somaliland's Agri-livestock research institutions and seed systems and building capacity for improved extension and advisory service delivery to small-holders at scale.

Component 2: Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes: This component aims to enhance water availability for crop and livestock value chains and support rangeland rejuvenation and management. It will be implemented in coordination with ongoing World Bank-financed projects that share these objectives. For example, the Project will complement activities carried out under other projects in water infrastructure development¹ mainly through its investments in energy efficient water pumping, and promotion of climate-smart crop and livestock farming practices around farmer fields near already established water points.

Component 3: Getting to Market: This component will strengthen the agriculture and livestock sector's market orientation, helping it cater to both domestic and regional markets. It will do this by supporting existing and new farmer producer organizations (FPOs)² and agrifood enterprises, the development and upgrading of market infrastructure and export-oriented testing and certification capacity, and rural producers' access to savings and credit services.

Component 4: Promoting a Greater Focus on Food Systems Resilience in National and Regional Policymaking: component will build food systems resilience at the national and regional levels by focusing on building the capacity of public institutions and identifying relevant policy reform opportunities within the implementing three ministries. In the crops, livestock, and environment sectors it will: (a) build the capacity of government institutions; and (b) carry out comprehensive assessments of agrifood policies for Somaliland.

Component 5: Contingent Emergency Response Component: The component will finance eligible expenditures in the event of an emergency precipitated by a disaster. The activation of CERC, by request of the government, will allow funds to be disbursed rapidly to reduce damage to productive infrastructure, ensure business continuity, and speed up recovery. An immediate response mechanism operation manual (IRM-OM) will be developed by the government stipulating the fiduciary, safeguards, monitoring, and reporting requirements relating to CERC as well as other coordination and implementation arrangements. In the event of CERC activation, funds from other project components may be reallocated to finance immediate response activities as needed.

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

¹ Mainly Biyoole, Barwaaqo, and Horn of Africa Groundwater projects.

² FPO refer to both farmer and livestock producer organizations

Project Beneficiaries

10. The project will directly benefit an estimated 65,000 small farmers, agro-pastoralists, and nomadic pastoralists, of which at least 30 percent will be female.

Objectives and Rationale of ESMF

The objective of the Environmental and Social Management Framework (ESMF) is to assess and mitigate potential negative environmental and social (E&S) risks and impacts of the project in line with the Environmental and Social Standards (ESSs) of the World Bank Environmental and Social Framework (ESF). Achieve compliance to the project's environmental and social commitments and comply with World Bank Environmental and Social Framework and EHS guidelines in order to ensure sound environmental, health, safety and social management. The ESMF also provides principles and specific process to ensure that disadvantaged, minority and vulnerable individuals or groups have access to the project's benefits.

11. The ESMF clarifies appropriate E&S management policies, processes, and mitigation principles, organizational arrangements, and design criteria to be applied to subprojects, which are to be prepared during project implementation by the PCU and private sector companies participating in the Food Systems Resilience Project. It also, provides a list of conditions upon which sub-projects and activities should be excluded from investment (Section 5.3 in the main report). The PCU will apply this ESMF during implementation of the project. Where appropriate, Environmental and Social Management Plans (ESMPs) and other ESS instruments for moderate risks and full-scale ESIA for substantial risks will be prepared during project implementation following guidelines in the ESMF through the risk assessment procedures and monitoring protocols.

Environmental and Social Baseline

12. Somaliland's environmental baseline focuses on climate and physical environment, water resources, ecosystem and current and projected climate change and variability. Somaliland 's terrain consists mainly of arid and semi-arid plateaus, plains, and highlands. The northern highlands are characterized by rugged mountain ranges that rise from the Guban region and contains the country's highest peak (2407m). Somaliland's landmass is about 80% Arid and Semi-Arid Lands (ASALs), which is more prone to extreme weather conditions including high mean surface temperatures, periods of extended drought, highly erratic rainfall, and strong winds. Approximately 98.6% of Somaliland's land area can be considered permanent pasture while 1.4% is suitable for cultivation (NIWMI 2019).

13. Somaliland's climate is typically hot and semi-arid and arid, with two annual rainy seasons - Gu', which spans from April to June, and Deyr, which takes place from October to November. Average annual rainfall is of about 200 mm (NIWMI 2019). There are spatial and temporal variations in distributions of rainfall, with about 500 mm recorded annually in the northern highlands and between 300 mm and 500 mm in the southern regions. The coastal plains register only between 50 mm and 150 mm. A few small areas along the coastal strip of Somaliland are classified as sub humid. Annual Potential Evapotranspiration (PET) is high, exceeding 2,000mm in the Somaliland basin and can be as high as 3,000 mm in the Gulf of Aden. The mean annual temperatures are projected to increase by around 3°C across all areas of Somaliland by the end of the century. Precipitation projections indicate a general increase in annual rainfall by the end of the century with increase in variability, extreme precipitation and frequent low precipitation leading to increased droughts and floods.

Livestock

14. The economy of Somaliland mainly depends on livestock production, which has historically and culturally been the mainstay livelihood for most of the people. Livestock Production System in Somaliland is predominantly pastoral and agro-pastoral, employing over 70% of the population. Livestock production contributes to 60% of the GDP and about 85% of foreign export earnings. It is the source of livelihood for pastoralists, contributes to the government revenues, and provides employment to a wide range of professionals and other service providers. Somaliland has a long history of live animal export to the Arabian Gulf States through Berbera Port on the Red

Sea. In the past several decades, however, these exports have been disrupted by two embargos imposed by Saudi Arabia allegedly due to Rift Valley Fever and Rinderpest infections.

15. Livestock is the principal product that Somaliland exports to the foreign markets – mainly to Gulf Countries such as Saudi Arabia and Yemen. Between 2010 and 2014, the country’s livestock exports were estimated to be around 16.3 million heads, 3.5 million heads of which were exported in 2012 alone. Livestock exports are often accompanied by its byproducts (i.e. hides and skins); in 2011, approximately 13.6 million pieces were exported.

16. There are several types of livestock production and management systems in Somaliland, depending on several factors such as the area, availability of labour, and the size and types of livestock raised. However, in general, there are two main production systems: one based on nomadic pastoralism and the other on agro-pastoralism. The types of animals kept by nomadic families depend on several factors, including the area inhabited and the availability of labour. **Cattle** are predominant in the western parts of the country, which receive relatively large amounts of rainfall, while **goats, sheep, and camels** are bred mainly in the drier eastern, central and northern regions of the country.

Agriculture

17. In Somaliland agriculture contributes 15% of GDP and is currently the second most important economic activity in the country, coming after livestock, with up to 20-25% of the population depending on it for their livelihoods. Though an underdeveloped sector, it has a considerable potential, especially for both cereal and horticultural production, and for the creation of employment opportunities, mainly in the rural areas.

18. The agricultural system in Somaliland is predominantly subsistence in nature. The principal crops are sorghum and maize grown mostly for household consumption. Fruit and horticultural farming, which is relatively small, is mainly commercial. Farmers mostly grow tomatoes, lettuce, onions, peppers, cabbages, oranges, lemons, and papaya. Rain-fed farming accounts for 90% of the total area cultivated, while the area under irrigation constitutes only 10%, supporting about 4,000 farm families. The sector is dominated by smallholder farmers who own farms ranging from 2 to 30 hectares in area. The average farm size is approximately 4 hectares. During the dry season, irrigated farms make good profits as the supply in the vegetable and fruit markets is low in this period (Ministry of Investment of Somaliland, 2023). The two main agricultural seasons in Somaliland are: Gu (rainy season) from April to June and Dayr (Autumn) from September to October-November though the amount of rain during Dayr is often not sufficient.

Biodiversity

19. Somaliland has a rich and very interesting flora and fauna with many endemic species. In particular, it has an exceptionally rich assembly of species adapted to the arid and hyper-arid zones. The percentage of endemic species of its flora and fauna are very high. It is a part of geographic region of plant endemism (savannas and shrub lands) and has 24 important bird areas. Generally, fauna has been depleted due to hunting and culling to protect livestock. Invasive species (e.g., *Prosopis* spp. and the Indian House crow, *Corvus splendens*) have widespread effects on local fauna and flora and important to address, although *Prosopis* could be used to substitute endemic trees for charcoal production.

Social Baseline

20. The population is predominantly young with 72% of it estimated to be under the age of 30, and almost 50% under the age of 15. It is also rapidly urbanizing, 40% of the population reside in urban areas, while nomadic pastoralists make up 2%, and agro-pastoralist communities, 23% of the population has more than 570,000 internally displaced persons who continue to face serious risks of marginalization, forced eviction and exclusion. Drought conditions, conflict and other climatic shocks are contributing to already pronounced rates of acute and protracted displacement. According to the latest World Bank economic updates, Somaliland’s economy is

rebouncing from the “triple shock” of drought/floods, Covid-19 and locust infestation experienced in 2019 -2020. Protracted conflict and frequent natural disasters have also contributed to sustained poverty (UNFPA, 2021).

21. Clan and clannism determine one’s social standing and access to property, and to a large extent, power at the societal, economic, and state levels. Clannism has been a source of conflict, but clan elders help conflict mediation and clan-based customary laws used for negotiated settlement and clan-based blood-payment serve as a deterrent to armed violence.

22. Minority groups (occupational groups such as Midgan/Gaboye, Tupal, Yibiro), are generally excluded from political participation, and have limited access to justice, are denied multiple rights and are disproportionately affected by natural hazards and conflicts.

23. UNDP reports that Somaliland has one of the highest levels of gender inequality in the world, at 0.776 (with a maximum of 1 denoting complete inequality), which ranks it fourth in the world (UNDP 2014, p.3). The country has extremely high maternal mortality, rape, female genital mutilation and child marriage rates, and violence against women and girls is common. The participation and roles of women in politics and decision-making is minimal, and although this is improving, it limits female roles and perpetuates inequality. The gender gap is deeply linked to water insecurity. There is a vast literature on the role of women and girls in Somaliland, and the underlying factors contributing to the gender gaps. Women make up 57% of the workforce in agriculture and pastoralism (both of which constitute nearly 70% of the local economy). They are significantly involved in trading and commerce, from micro-enterprises to large-scale businesses.

24. In relation to child labor and trafficking, in Somali culture, girls and boys are expected to take part in household chores from around the age of five years, especially in rural areas. The distribution of such tasks is highly gendered, and the burden skewed towards girls.

Positive Impacts

25. The project will have several potential benefits including improved food security and safety through environmental and social compliance, improved average farm household incomes, community institutions will be strengthened, the project will boost social and child protection, community infrastructural development will be improved, increased employment for the youth, food safety and enhanced capacity building to all government ministries and departments working on the project. Positive environmental outcomes include resilient and productive food system and water and soil moisture conservation investments. Projects investments in environmental restoration approaches integrated with climate change mitigation and adaptation measures are expected to contribute towards positive environmental benefits including addressing vulnerabilities to floods and droughts and enhancing the benefits from the sustainable management of upstream catchments, promotion of rangelands restoration, contributing to land degradation neutrality (LDN), and introduction of appropriate practices for Sustainable Land Management (SLM) (thus reinforcing national climate mitigation measures to increase forest cover and SLM). The project will also invest in efforts to restore ecosystems and mitigate, as well as adapt to, climate change. This will not only improve livelihoods and contribute to poverty reduction, but also help to mitigate the effects of Somaliland’s variable climate, by increasing much needed water harvesting opportunities. It will further strengthen the capacity of the different government and community institutions to develop and implement environmental activities and regulations.

Potential Environmental and Social Risks and Impacts

26. The environmental and social risks of the Project are both rated Substantial. The use of Community Driven Development (CDD) approaches will help mitigate risks, by promoting community buy-in, conflict mitigation and sustainability. While the proposed individual works may be small in terms of footprint and with limited impact; overall, the project will have impacts and risks that may lead to water diversions, impact riverbeds, and floodplain, limit access, or decrease water through put to users downstream, water pan safety risks, exposure to natural disasters, and potential biodiversity impacts; and including issues on cultural heritage. Potential activities around development

of multiple water sources, activities around food security and livelihoods development around water points through provision of small-scale irrigation activities and water lifting via solar units may present environmental risks around disposal and improper management of batteries; the project's small scale irrigation activities may use pesticides that potentially generate waste, and cause pollution and can cause erosion and excessive water consumption. Potential risks also present around water resources including impacts due to ground water extraction (including on surface waters, e.g., groundwater fed rivers), excessive use of water and energy, increased Green House Gas (GHGs) emissions, conflicts and impacts on other water users, and potential impacts from use of water extracted in terms of contamination (e.g., discharge of wastewater from community systems, discharges, and waste from livestock, impacts from irrigation).

Table 1: Summary E&S Risks and Impacts and Mitigation Measures

Impacts	Project components	PP			Mitigation & monitoring measures
		PC	C	O	
Biophysical Environment					
Impact on Biodiversity and Vegetation Cover	1,2,3	√	√		<ul style="list-style-type: none"> • Implement the project in a manner that will enhance or sustain biodiversity. • Careful and suitable site selection for setting up of all subcomponent infrastructures. • Locate borrow pits outside of important biodiversity areas. • Do not undertake construction activities at night, including use of lights, to avoid disturbance to nocturnal fauna from increased noise and vibration. • Avoid accidental machinery and vehicle collisions with wildlife. Vehicle operation shall be restricted to daylight hours to minimize the risk of vehicle collisions with wildlife. • Signs shall be installed to identify wildlife crossing point to vehicle traffic. • Avoid introduction of invasive species and pests. • Non-invasive local plant species shall only be used for re-vegetation and biological mitigation measures to be used as parts of integrated watershed management program subcomponent. • Avoid sensitive ecosystems and check no sensitive fauna and flora species are found within and around the construction area. • Ensure proper demarcation of working area and avoid spillover effects to the neighboring areas. • All rubbish and waste materials within the project area (including the project footprint, the working width, borrow pits, stockpiling areas and contractor facility area), quarry sites shall be cleared of all rubbish and waste material in accordance with the project’s waste management principles. • The physical landscape of the project area shall be restored by clearing the area of debris, filling holes with recycled material, and re-vegetating. • Sensitize beneficiaries to co-exist with nature, i.e., bird species, other fauna and flora.
Noise and Vibration	1,2,3		√		<ul style="list-style-type: none"> • Activities producing excessive noise levels shall be restricted to the daytime and working hours, and equipment producing high levels of noise shall be avoided or screened when working within close proximity to any sensitive noise receptors in compliance with national standards or EHS guidelines standards for ambient noise, whichever are more stringent. • Installing portable barriers and fencing off the construction site. • Switching off equipment and vehicles when not in use to avoid noise emissions. • Monitor noise and vibration levels during construction on a weekly basis, and safeguard against standard thresholds.
Air Pollution	1,2,3		√		<ul style="list-style-type: none"> • Dust control and suppression measures including regular application of water on or near construction sites, settlement areas to reduce dust generation and practicing traffic speed limit. • Regularly spray or sprinkle water on or near construction sites and settlement areas especially in windy and dry weather to reduce dust generation, when necessary. • Avoid open burning of debris, cut vegetation (trees, undergrowth) or construction waste materials. • Ensure regular maintenance of vehicles, machinery and equipment used at project site and • Practicing traffic speed limit. • Monitor levels of dust and gaseous emissions during construction on a weekly basis, and safeguard against standard thresholds.

Impacts	Project components	PP			Mitigation & monitoring measures
		PC	C	O	
Soil Erosion	1,2	√	√		<ul style="list-style-type: none"> • The project infrastructure design shall ensure that provision is made for suitable and adequate drainage facilities. • Construction activities shall be concentrated as much as possible in the dry season to reduce the environmental damage and soil erosion. • Safe disposal of cart away soil and minimize soil excavation; rehabilitation of areas where soil, excavation done. • Excavated areas and temporary access roads not suitable for future maintenance activities shall be rehabilitated and reinstated after completion of the works. • Monitor levels of key pollutants that could contaminate the soil during construction on a monthly basis, and safeguard against standard thresholds.
Water Pollution	2		√		<ul style="list-style-type: none"> • Adequate provision for treatment and disposal of sanitary and other liquid waste in such a way as will not result in any form of pollution of water resources. • Take all reasonable precautions to prevent spillages and leakage. • Do not wash vehicles into wetlands, lakes, streams, or rivers, etc. • Vehicle maintenance and servicing shall be done only on purpose-built impervious concrete platforms with oil and grease traps. • Ensure adequate provision of toilets with temporary septic facilities and collection tanks camp sites. • Monitor levels of key water pollutants that could reach water sources during construction on a monthly basis, and safeguard against standard thresholds.
Risk of Groundwater Table and Water Logging	2		√		<ul style="list-style-type: none"> • implementing good irrigation water management practices, closely matching irrigation demands and supply can reduce seepage and increase irrigation efficiency thereby reducing the groundwater recharge. The provision of proper drainage will alleviate the problem locally but may create problems if the disposal water is of a poor quality. Apart from measures to improve irrigation water management, other options to reduce seepage are to line canals in highly permeable areas and to design the irrigation infrastructure to reduce wastage. • Monitor levels of key water pollutants that could reach water sources during construction on a monthly basis, and safeguard against standard thresholds.
Fertilizers and Pesticides	2		√	√	<ul style="list-style-type: none"> • Prepare and properly implement IPMPs. • Select pesticide application technique and operating procedures to avoid contamination of water bodies. • Develop and implement procedure for notification of potentially affected farmers and adequately select and apply pesticides and monitor the weather when applying pesticides and avoid very hot or windy days. • All empty pesticide containers must be collected from farmers and safely disposed in the proper place and never be reused. • Follow label directions when using pesticides. • Wear adequate personal protective equipment when applying pesticides or nearby application zones of pesticides. • Ensure that all equipment is in good condition and properly calibrated to apply the correct dosage. • Use only approved pesticides with prescribed doses. • Adequate disposal of obsolete pesticides. • Control of the periods of pesticide application. • Promoting the use of organic manure and other conservation agriculture practices. • Observance of recommendations for the use of fertilizers and pesticides bio control.

Impacts	Project components	PP			Mitigation & monitoring measures
		PC	C	O	
					<ul style="list-style-type: none"> • Awareness creation and training on the use of agrochemical inputs. For the detail about pesticide use and management refer to the FSRP –IPMP.
Overuse of Pesticides	2		√	√	<ul style="list-style-type: none"> • Use PPE while farm workers apply pesticides. • Sensitize agro-dealers to refrain from selling pesticide products together with food items in same places. • Refocus on safe use of chemicals to ensure efficiency in production while ensuring environmental sustainability. I
Low flow regime	2		√	√	<ul style="list-style-type: none"> • Minimum demands from both existing and potential future users need to be clearly identified and assessed in relation to current and future low flows. • Undertake assessment of minimum environmental flow and water needs. Once minimum flow is determined, monitoring should be undertaken to ensure it is not exceeded on a regular basis. • Integrating low flow release strategies into water site operation or management plans.
GHGs	1,2,3		√	√	<ul style="list-style-type: none"> • Minimize, for example opening of new land for agricultural activities, which is associated with increased CO2 in the atmosphere. • Control deforestation through sensitizing beneficiaries. • Improved livestock production systems other than changes in total animal numbers. • Use appropriate TIMPs to minimize soil degradation. • Encourage forest and other vegetative regrowth for it takes CO2 out of the atmosphere.
Improper Waste disposal	1,2,3		√		<ul style="list-style-type: none"> • Handle all waste in a way that protects the environment and complies with applicable standards and regulations. • Proper waste segregation and store properly with no impacts to be generated from the storage area. • Provide solid waste handling facilities such as separate waste bins for biodegradable and non -degradable wastes until waste generated is disposed at authorized dumping sites. • Maximize the re-use of all excavated materials in the construction works. • Disposal of surplus material (spoil) only at designated sites approved by the responsible local authority and only by approved methods. • No spoil shall be disposed of in wetlands, near watercourses and other important habits. • All wastes shall be properly disposed of in accordance with the national legislative requirements. • The contractor should erect warning signs against littering and dumping sites within the construction site. • Excavated topsoil shall be used as backfill by the contractor. • Implement general waste management hierarchy avoid, minimize, re-use, recycle and dispose properly wastes). • The contractor shall develop a waste management plan in line with the national policies, standards and guidelines as well as international standards, including World Bank Group Environmental, Health, and Safety Guidelines.
E-waste	1,2,3	√	√	√	<ul style="list-style-type: none"> • The e-waste guidelines provide a framework for identification, collection, sorting, recycling, and disposing of electrical and electronic waste (e-waste).
Charcoal burning	1,2		√	√	<ul style="list-style-type: none"> • Continued sensitization of the rural community to reduce use of charcoal for domestic cooking. • Sensitize communities and the government to reduce charcoal export-share. • Adopt clean energy for sustainable livelihoods. • Help build capacity of law enforcers to reduce the effects of charcoal making and use and develop the right charcoal policy. • Work with other like-minded organizations that are working against charcoal use. • Promotion of fuel-efficient stoves that would reduce demand for charcoal.

Impacts	Project components	PP			Mitigation & monitoring measures
		PC	C	O	
Socioeconomic Environment					
Gender inequality	1,2,3		√		<ul style="list-style-type: none"> • Sensitize all beneficiaries on gender equality. • Project labor Management Procedures should be adopted to ensure gender-gap is narrowed. • Avoid discrimination of any form. • Encourage women to be members of the project CIGs and FPOs.
Exclusion from project	1,2,3	√	√	√	<ul style="list-style-type: none"> • Adopt affirmative action for these ethnic minorities. • Use the project SEP to engage them. • Ensure inclusion to project benefits.
Clan-based conflicts	1,2,3	√	√	√	<ul style="list-style-type: none"> • Ensure inclusion and participation for all people. • Adopt Project SEP for guidelines on community consultation and participation. • Introduce the GM so that thorny issues are discovered early and addressed before escalation.
GBV/SEAH	1,2,3		√		<ul style="list-style-type: none"> • Project to sensitize the community on the importance of avoiding GBV issues/cases. • Contractor workers to sign code of conduct that stipulates how not to get involved in any of the GBV risks. • The procurement office includes these E&S clauses in the contractors' bids.
Child labor and sexual abuse	1,2,3		√		<ul style="list-style-type: none"> • SFSRP has prepared an LMP, ESMF, that addresses these child risks. • Project to sensitize the community on the importance of child protection. • Contractor workers to sign code of conduct that stipulates how not to get involved in any of the risks. • The procurement office to include these E&S clauses in the contractors' bids.
OHS	1,2,3		√	√	<ul style="list-style-type: none"> • Ensure installation of required safety facilities (chemical fume hood, fume cupboard, emergency eyewash stations; safety shower, etc.) as necessary recommended by Manufacturer Safety Data Sheet of all chemicals and materials used. • Ensure contractor workers are capacity build. • Each contractor's site introduces and maintains an Accident Incident Register. • Procure First Aid Kit and firefighting equipment. • Use appropriate personal protective equipment (such as safety goggles, respirator, safety boots and shoes, chemical-resistant gloves and apron, face masks as necessary and make first aid kits available. • Provide appropriate warning signs for staff and public. • Conduct awareness trainings including PPE usage for the safety of laboratory staff. • Establish EHS standards and procedures according to WBG's EHSGs, and ensure that the developed guidelines and standards are properly implemented. • Capacity building for all actors.
Incidents and accidents	1,2,3		√	√	<ul style="list-style-type: none"> • Train all contractors on OHS • Ensure contractor workers are capacity build. • Each contractor's site introduces and maintains an Accident Incident Register. • Procure First Aid Kit. • Each contractor procures and issues PPEs to all workers.
Community health and safety	1,2,3		√	√	<ul style="list-style-type: none"> • Sensitize contractors' workers to avoid risks of labor misconduct; related sexual exploitation and abuse. Sensitize all stakeholders to avoid risks of insecurity.

Impacts	Project components	PP			Mitigation & monitoring measures
		PC	C	O	
					<ul style="list-style-type: none"> • Prepare and implement emergency preparedness and response plan in case of significant incident/accident and/or chemical spills or other health and safety related incidents.
Communicable and water-borne diseases	1,2,3		√	√	<ul style="list-style-type: none"> • Regularly fluctuating water levels/Periodic reservoir fluctuation, • Preventing or removing aquatic vegetation • Design and operation of reservoirs/ ponds/ irrigation canals/ other water harvesting structures to decrease habitat for vector. • Identify and manage COVID-19 related risks that include application of the World Bank's ESF Safeguards Interim Note, Construction Civil Works COVID, and as well compliance towards the government and other relevant international COVID 19 protocols/measures.
Traffic	1,2,3		√	√	<ul style="list-style-type: none"> • Prepare a traffic management plan detailing traffic control procedures, train personnel on traffic management procedures, travel speed limits and related control measures. • Make every reasonable effort to minimize road safety hazards and inconvenience to other road users, resulting from the passage of his haulage vehicles, and shall impose and enforce compliance with company speed limits. • Drivers shall be trained at the start of the project, about road safety and due diligence to ensure safety of other road users. • Limit maximum speed to 50 km/hr on access roads and 30km/hr in the work areas, installations, workshops, offices, camps, etc.. • Incidents or accidents that involve project vehicles must be immediately reported. • Conduct sensitization programmer to obey the traffic management rule and keep everyone safe on site. • Don't allow unauthorized person to drive Project vehicles'. • No unauthorized passengers shall be carried on project vehicles.
Vulnerability	1,2,3	√	√	√	<ul style="list-style-type: none"> • S-FSRP has prepared this ESMF that will address common vulnerabilities under ESS1. Site-specific vulnerabilities will also be analyzed and mitigated in other instruments, such as ESIA's, ESMP's, and GBV/ SEAH plans. • The project has also prepared a SEP that will guide stakeholder consultation to ensure inclusion for all. • A social assessment will also be undertaken in the first 6 months of project effectiveness.
Forced eviction and displacement	1,2,3	√	√	√	<ul style="list-style-type: none"> • Support livestock with feeds, hay, and fodder. • Ensure inclusion for all in project benefits. • Application of ESS5.
Conflicts/ security	1,2,3		√		<ul style="list-style-type: none"> • Community sensitization. • Avoid all forms of discrimination. • Ensure inclusion and participation for all people. • Adopt Project SEP for guidelines on community consultation and participation. • Introduce the GM so that thorny issues are discovered early and addressed before escalation.
Land acquisition			√	√	<ul style="list-style-type: none"> • To mitigate any potential negative social impacts related to land, MoAD through PCU should work closely with relevant stakeholders to ensure implementation of the following: • Preparation of sub-project specific Resettlement Action Plans (RAPs)/ Abbreviated RAPs, as necessary, based on the Project's RPF, according to ESS5 requirements. • Project affected people shall be consulted and be involved in decision-making at different stages of the program.

Impacts	Project components	PP			Mitigation & monitoring measures
		PC	C	O	
					<ul style="list-style-type: none"> • Compensation for properties and land replacement shall be implemented as per pertinent land acquisition laws and WB ESS5. • Compensation shall be paid prior to the start of the construction works.
Drought	1,2		√	√	<ul style="list-style-type: none"> • Avail water sources for both human and livestock. • Support livestock with feeds, hay, and fodder. • Capacity build the community to identify land for which eviction is not eminent. • S-FSRP has prepared a SMP and will employ a Security Expert who will assist project beneficiaries avoid such risks.
Cultural, Historical and Archaeological Importance sites	1,2,3	√	√		<ul style="list-style-type: none"> • Screen and identify known heritage sites in consultation with local communities and relevant institutions. • Avoid locations where the project would displace, alter or render inaccessible important cultural heritage sites including historical sites/monuments, graves, churches and mosques etc.. • A chance finds procedure shall always be in place, even where sites are identified, in case anything unexpected is found.
Conflict and Security Risks	1,2,3		√		<ul style="list-style-type: none"> • Implementing access control system - secure and monitor entrance and outlet points of the workplace, proper badge and visitor card system • Work closely with the national information network security agency and local security offices • Conduct regular training on clashes and conflicts resolution within work environment security awareness programs for project staff

PC: Pre-construction phase, C: Construction, O: Operation

27. **Implementation of ESMF and Budget:** The ESMF is to be prepared during project preparation by the PCU and private sector companies participating in the FSRP. The PCU will use and refer to this ESMF during implementation of the project. Where appropriate, ESMPs for moderate risks and ESIA for substantial risks will be prepared during project implementation following guidelines in the ESMF. It remains the responsibility of the E&S specialists of the PCU to ensure that the necessary mitigation plans are developed, implemented, and adhered to by the project beneficiaries.

28. The total estimated amount needed to cover all the work to be carried out under the ESMF preparation and implementation for the sub-projects is US\$ 800,000 for 5 years, which primarily covers cost of studying E&S impacts, screening, field surveying, consultations, communication, and instrument preparation. It doesn't include cost of E&S mitigation and monitoring measures. The key indicative aspects that would require a cost budget include training and capacity building for the project PCU. Despite the potential risks that have been identified in this ESMF, the project activities are expected to have positive impacts and positive developmental and social outcomes related to economic resilience of pastoralists and vulnerable households.

29. There is a need for targeted capacity building and training on ESS implementation and monitoring at the National, District, and community levels (VDCs), to include the private sector. Capacity building activities include, but not limited to, Train of Trainers, screening and prioritizing projects, implementation of E&S instruments, LMPs, RAPs, IPMPs, GBV AP, ESIA, ESMPs, as well as GM establishment and operationalization. Other specialized programs could also include quality assurance on value chains (e.g., Milk and Meat production), see Ch8/Table 9 in the body report.

CHAPTER 1 - INTRODUCTION

1.1 Background

30. The vulnerability to several natural hazards, including drought and floods, and is projected to be at even greater risk in the future due to climate change. The climate is mainly arid to semi-arid, and has one of the highest inter-annual variations of rainfall in Africa. It is this variability that influences pastoral and agro-pastoral production systems. Notably, elders, pastoralists and agro-pastoralist communities surveyed in 2013 expressed that predicting seasons has become harder.³ The country is prone to recurring droughts, having experienced 14 since the 1960s, at least one every four years, which have caused severe food insecurity. Historical trends show droughts occurring regularly at intervals of two or three years in the deyr season and eight or 10 years in consecutive deyr and gu seasons, not only extending seasonal hardships, but also contributing to land degradation, which severely reduces agricultural production.

31. The economy of Somaliland is largely natural resources dependent, with agriculture, livestock and fisheries contributing over 70 percent of the gross domestic product (GDP). Somaliland encompasses large areas suitable for livestock grazing, browsing, and fodder production; fertile alluvial soils for staple cereals, oil seeds, legumes, and horticulture crops; forests that provide prized gums and resins, as well as charcoal for cooking. The agriculture and livestock sectors are dependent on water of sufficient quantity, quality, and affordability. Many rural pastoral and agro-pastoralists earn their living from agriculture (notably animal husbandry and crop farming). However, water scarcity has led to widespread crop devastation as well as livestock and human deaths.

32. Water insecurity is growing and continues to impact the lives of millions, inhibiting economic and human development. Shocks from recurrent and prolonging droughts and flooding coupled with land degradation have contributed to poverty, displacement, biodiversity loss, and conflict. Areas without alternative, decentralized sources of water are likelier to be classified as being food insecure when compared to those with groundwater resources. Expansion in recent decades of private enclosures on traditionally open communal rangelands, especially along livestock migration routes, increasingly jeopardizes the mobility of pastoralist communities, thereby weakening their capacity to cope with adverse climate conditions. Existing tensions and conflict risks are amplified during extended dry periods - the frequency and intensity of which have increased in recent decades—when pastoralist livelihoods become particularly precarious.

33. In Somaliland agriculture contributes 15% of GDP and is currently the second most important economic activity in the country, coming after livestock, with up to 20-25% of the population depending on it for their livelihoods. Though an underdeveloped sector, it has a considerable potential, especially for both cereal and horticultural production, and for the creation of employment opportunities, mainly in the rural areas. As stated above, the majority of Somalilanders (about 85%) are agro-pastoralists who practice rain-fed farming. Agro-pastoralists typically raise small herds of livestock out of which they sell milk, ghee and live animals. This way, they are able to generate most of the cash they need for purchasing other essential goods such as sugar, vegetables, cooking oil, clothes, and medicines. Some cash is also earned from the sale of surplus grains, especially in good harvest years.

34. There are several environmental challenges affecting the rural economy that directly impact the urban economy. Over one quarter of land is considered degraded, with forest and soil degradation and deforestation having taken place for decades and posing a major threat to rural livelihoods. Impacts of drought to livelihoods in the rural areas are also significant and multidimensional—pastoralists lose their livestock, their main source of wealth; farmers and agro-pastoralists lose their harvest, their main source of food. In a country where agriculture and pastoralism are the backbones of the economy, land degradation and the associated loss of production has a negative

³Eklöw, K. and Krampe, F. (2019) Climate-related security risks and peacebuilding in Somaliland, SIPRI Policy Paper 53, October 2019 https://www.sipri.org/sites/default/files/2019-10/sipripp53_2.pdf [accessed 1 March 2022]

impact on income sources for the most vulnerable communities and negatively impacts on the country's overall carbon stocks, food security and livelihoods.

35. The World Bank, in collaboration with the Ministry of Agricultural Development (MoAD) in collaboration with the Ministry of Livestock and Fisheries, Ministry of Environment and Climate Change (MoECC) is preparing Food Systems Resilience Project (FSRP) targeting rural communities in Somaliland. The proposed project is building on the progress made under Barwaaqo and Biyoole projects which are under implementation seeking to address the climatic shocks faced by the Somaliland communities to reduce risks associated and the impact of these shocks on livelihoods; through investing not only in water, agriculture, livestock, and environmental services but also in the institutions that manage them so that the whole is greater than the sum of the parts.

36. The proposed project, which seeks to scale up activities support investments across 5 Is- Infrastructure, Institutional Capacity, Innovation, Inclusion, and Integration to comprehensively address food systems resilience will support investments in building resilient food systems in Somaliland, through four primary investment pathways; i) rejuvenating Somaliland's agri-livestock research institutions, seed systems, extension services, and develop community institutions that can anchor adaptation of climate smart agri-livestock practices, ii) strengthening the availability of water and improved rangelands management for resilient agriculture and livestock production, iii) strengthening the integration of the production systems to domestic and regional markets, with appropriate investments in food safety and value addition, and iv) establishing an enabling policy and institutional framework at sub-national, national and regional level capable of supporting food systems resilience for Somaliland. To support these investment pathways, FSRP comprises of five technical components in addition to the Contingent Emergency Response Component (CERC).

1.2 Project Description – PDO and Components

Project Development Objective (PDO)

37. The Project Development Objective (PDO) is 'to increase preparedness against food insecurity and improve the resilience of food systems in targeted project areas of Somaliland'. Progress toward the PDO will be measured using five PDO indicators and intermediate indicators. All relevant indicators will be disaggregated by gender (men and women) and age (youth and adult).

The Project Components

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

Subcomponent 1.1: Crop and Livestock Research, Extension, and Seed Systems

39. This subcomponent will build the capacity of Somaliland's research, extension, and seed systems by: (a) helping leading crop and livestock research institutions upgrade their research infrastructure (informed by climate design standards, taking into consideration renewable energy use) for testing, providing certification services and technical training capacity on research related to climate-resilient practices (addressing climate vulnerabilities as recurrent droughts and land degradation)⁴, while reducing GHG emissions of the crop and livestock sectors; (b) upgrading crop extension infrastructure including soil testing, early warning, and weather and market information systems; (c) expanding the network of epidemiology and data management units (EDMUs); (d) strengthening public veterinary services including supporting mass vaccination campaigns to address transboundary animal diseases

⁴ FAO (2022) Somalia Country Profile. Available at: <https://www.fao.org/3/cc0074en/cc0074en.pdf>

(TADs). As climate change have a significant impact on animal health and diseases, including diseases outbreaks due to extreme temperatures, and vector-borne diseases, this activity will address these challenges by preventing and promptly responding to livestock diseases outbreaks, while providing access to improved animal housing, disease surveillance and control, and enhanced veterinary services; (e) strengthening seed systems through large scale field trials of drought-tolerant and high-yielding varieties; (f) developing new and existing climate-adapted seed certification capacity; (g) building the capacity of climate-adapted seed grower groups and strengthening their linkages to agro-dealers; (h) developing and validating climate-smart and gender sensitive technologies, innovations, and management practices (TIMPs); and (i) integrating climate smart TIMPs into extension content delivered through the public and community-based extension systems.

40. In relation to crop farming, the project will support establishment of seed multiplication centers and fruit tree nurseries. For livestock, the project will help operationalizing Wajaale livestock centre of excellence for adaptive research and demonstration of fodder varieties and experiments, fodder seed multiplication, and seed storage facility. It will also support operationalization of Artificial Insemination Center (AIC) for breed improvement, which will anchor research and extension, and good animal husbandry practices, animal health and disease surveillance, and herd management, and handle the accreditation and supervision of educational institutions for veterinary science and animal husbandry. Scholarships for technical education will be awarded each year to strengthen human resources. The prioritization of investments in research institutions will be guided by comprehensive technical assessments, while investments in public veterinary services will be identified by World Organization for Animal Health (WOAH) assessment. The FSRP will consider the work being done by other regional and national research institutions such as the International Livestock Research Institute (ILRI), the Kenya Agriculture and Livestock Research Organization (KALRO), and the Ethiopian Agriculture Transformation Institute (ATI).

41. The subcomponent will invest in research on areas such as low-carbon technologies, which are instrumental to achieving full decarbonization, as well as climate-smart technologies and extension services that will build climate resilience and reduce emissions (e.g., seeds with enhanced yields will lead to more efficient use of land, reducing the need for land-clearing and subsequent emissions from deforestation). Moreover, improved seeds, drought-tolerant or with other climate-resilient traits, will also reduce emissions by reducing the need for inputs such as irrigation, fertilizer, and pesticides. This subcomponent will provide training on best management practices, such as improved feed and animal health, that can lead to increased animal productivity and reduced emissions per unit produced in the country.

Subcomponent 1.2: Community Engagement and Technology Transfer

42. This subcomponent will support: (a) crop and livestock producers' capacity for collective action; (b) build their capacity to adopt climate-smart agriculture (CSA) technologies and management practices; and (c) recover from climate shock-related asset losses and establish a strong community-based extension system. The project will build producers' capacity for collective action by supporting the mobilization of farmers, agro-pastoralists, and pastoralists into common interest groups (CIGs), placing a strong emphasis on the inclusion of women and young smallholder farmers. Each CIG will comprise 15–25 producers from a given value chain and will be intensively trained and supported to identify key challenges within their value chain and undertake micro-projects involving the adoption of climate-smart TIMPs. The latter could, for example, involve the demonstration and adoption of conservation agriculture, drip irrigation, and other water conservation techniques, or the timely planting and use of early-maturing and drought-tolerant varieties. The project will support development of strategic action plan to double up the existing Farmer Field Schools (FFS) to increase the number of farmer groups in CIGs which will act as local nodes linking producers to producer organizations involved in marketing crop and livestock products. The project will also support establishment of village development committee (including water harvesting subcommittee, conflict, and resolution subcommittee) to support the work of CIGs.

43. The project will build farmer knowledge and capacity to adopt climate-smart TIMPs by supporting the scaled-up deployment of FFSs and agro-pastoralist field schools (APFSs), demonstration plots, and community-

based extension services. The project will support a hybrid extension approach wherein lead farmers or community-based facilitators will be identified within farmer groups and further trained through Training of Trainers (TOTs) to facilitate FFSs or APFSs locally. These community-based extensionists will be backstopped by public extension officers through phone and (bi-)monthly visits. Every FFS will be supported to develop demonstration plots and become the epicenter of extension service delivery, training farmers on climate smart TIMPs, and supporting adaptive research and field trial activities. The community-based facilitators will be supported to evolve into digitally enabled local agro-entrepreneurs offering producers a range of support services. Additionally, the project will support asset restoration for farmers and pastoralists affected by climate-related shocks, including small-scale animal restocking, the purchase of seasonal inputs and community-based assets.

Subcomponent 1.3: Digital Agriculture and Rangeland Solutions and Data

44. This subcomponent will support: (a) the development of a national database of farmers and pastoralists that will enable more data-driven policymaking; (b) the expansion of the livestock identification and traceability system initiated under the DRIVE project; (c) the development of a national digital climate advisory system (DCAS) serving registered farmers, with a special focus on women; (d) the development, or incubation, of disruptive agriculture technology (DAT) platform, including hydromet data to increase producers' resilience to extreme weather events and other climate vulnerabilities such as climate variability and unpredictability of rain that drives production losses in crops and livestock; (e) the mapping of emerging digital solutions in Somaliland's agricultural sector, and the selective scaling up of promising ones, leveraging the national farmer registry and DCAS to inform farmers of available digital technologies and services. Supported DAT solutions will include ones that offer farmers customized, demand-driven and climate informed advisory services (e.g., related to climate-adapted seeds and livestock production systems), support access to financial services including climate risk management.

45. The project will support the establishment of Agriculture Data Base Management Center and support several surveys and assessments including crop yield assessment, arable land survey, rangeland data systems, assessment of productivity irrigated and rainfed farms, assessment of crop data, and livestock population census survey.

46. **Component 2: Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes:** This component aims to enhance water availability for crop and livestock value chains and support rangeland rejuvenation and management. It will be implemented in coordination with ongoing World Bank-financed projects that share these objectives. For example, the Project will complement activities carried out under other projects in water infrastructure development⁵, mainly through its investments in energy efficient water pumping, and promotion of climate-smart crop and livestock farming practices around farmer fields near already established water points.⁶

Subcomponent 2.1: Water Availability for Crops and Livestock

47. This subcomponent will enhance water availability for crop and livestock production by: (a) building and rehabilitating water collection and management infrastructure; and (b) helping to improve its management by users and communities. The project will enhance small water works in both rainfed and irrigated areas, working with CIGs and community groups to identify hardware investment needs, and supporting participatory planning processes at the ministry and community levels to prioritize infrastructure investments. In rainfed areas, the project will invest in complementing efforts of other ongoing, as well as in developing multipurpose water harvesting and water catchment structures. These may include solar pumping solutions, irrigation networks extending from rainwater harvesting

⁵ Mainly Biyoole, Barwaaqo, and Horn of Africa Groundwater projects.

⁶ Any activities that involve the use or potential pollution of international waterways, i.e., Juba- Shebelle system and connected aquifers, will not be eligible for Project financing. The POM will reflect this as part of the eligibility criteria.

reservoirs to farmers' fields, and conservation agriculture technologies such as drip irrigation. In improved irrigation zones, the project will fund farmer-led fodder production efforts as well as the introduction of energy saving and water-use efficient technologies and devices, and equipment used in spate irrigation and, construction of check dams, gabions, contour bunding and terracing to reduce soil erosion. Weir will also be constructed, and canal rehabilitated to improve fodder and seed production. Water harvesting infrastructure including Balleys. Sand dams and construction of shallow wells around the torrential rivers will be built to increase livestock and crop productivity. Finally, to improve water management by communities, the project will build the capacity of water users' associations and other community organizations and facilitate the development of detailed plans to govern the operation and maintenance of community-based water works and multi-use water points. It will also identify and disseminate climate-smart practices already used locally to mitigate the evaporation of water and siltation. Proposed infrastructure will be informed by climate-resilient standard considerations for design and construction.

Subcomponent 2.2: Rangeland Management

48. This subcomponent will contribute to restoring degraded rangelands by supporting: (a) large-scale reforestation efforts around pastoral and agropastoral settlements; (b) community-based rangeland management practices; (c) sustainable rangeland-based livelihoods, including key activities to mitigate climate change (including the creation of new rotational grazing reserves, soil conservation, and agroforestry, increasing soil carbon sequestration) and enhancing climate resilience (including improving water conservation through pasture pitting coupled with re-seeding of declining grass species, diversifying rainfed crops and livestock production systems) to help pastoralists and agropastoralists overcoming vulnerabilities to the recurrent drought-related shocks; (d) and extensive fodder production and storage which will address further climate vulnerabilities related to uneven seasonal rainfall. To support large-scale reforestation, afforestation, and pasture re-seeding efforts, the project will make use of drought-resistant, fast-growing, and nitrogen-fixing grasses and forage varieties identified and validated by crop research institutions.

49. The help communities sustainably manage their natural resources, the project will provide technical assistance to Common Interest Groups (CIGs) and other community institutions to address several climate vulnerabilities, such as soil-erosion, developing and effectively managing micro-catchments, which can help improve water filtration, enhance soil moisture retention, and reduce soil erosion in rangelands. Project will establish rangeland and forestry association to build community capacity for sustainable rangeland management. It will also establish community groups among frankincense producers to promote sustainable tapping and harvesting. A range of training and awareness campaigns, and provision of necessary tools and equipment all aimed at promoting sustainable rangeland and forestry management practices at a community-level will be channeled through the CIGs. Women will be empowered to actively participate all project activities through a proper representation in CIGs. Furthermore, the project will support applied research on approaches to rangeland rehabilitation, including opportunities for resting pastureland, deferring (delaying) grazing, and configurations and uses of water points that help prevent overgrazing. To support rangeland-based livelihoods⁷, the project will incubate enterprises and technically assist private sector players making sustainable and productive uses of local resources to develop viable business models. As part of this, the project will promote the utilization of invasive *Prosopis juliflora* to produce charcoal and other marketable products. To promote rangeland-compatible water management and fodder production practices, the project will support the development of community-driven enforcement of rotational grazing regime, the distribution of drought-resistant seeds to fodder production groups and enterprises, improvements in fodder and feed productivity, and aggregation, processing, and storage capacity.

50. The subcomponent includes agropastoral farming activities that contribute to increasing the carbon stock in the soil. Agroforestry, reforestation, restoration of degraded lands can provide GHG emission reduction and improved carbon sequestration. Mitigation opportunities lie in improving or restoring watershed functions through activities such as afforestation and protected area management that also restore soil carbon pools; developing guidelines on watershed management and erosion control; developing a long-term watershed conservation and restoration plan that aims to

achieve in sustainable soil aggregation, land restoration, and reforestation in target areas. Additionally, this subcomponent includes activities that improves carbon sequestration through sustainable rangeland management practices.

Component 3: Getting to Market: This component will strengthen the agriculture and livestock sector’s market orientation, helping it cater to both domestic and regional markets. It will do this by supporting existing and new farmer producer organizations (FPOs)⁸ and agrifood enterprises, the development and upgrading of market infrastructure and export-oriented testing and certification capacity, and rural producers’ access to savings and credit services.

Subcomponent 3.1: Farmer Producer Organizations (FPO) and Agrifood Enterprises

51. This subcomponent will work with private, market-facing organizations, helping to: (a) establish and strengthen existing FPOs; and (b) develop small and medium agrifood enterprises. FPOs will be selected to receive project support based on their business performance, inclusiveness, technical and managerial capacity and, as a priority criterion, the adoption of CSA technologies and practices in their plans. FPOs will receive “inclusion grants” to expand their membership, digitize their operations, strengthen their governance and management systems, and prepare bankable enterprise development plans (EDPs). FPOs with strong EDPs may receive a matching grant to expand their processing, value-addition, and marketing activities, as well as strengthening their ability to include the adoption of CSA technologies. The subcomponent will build the capacity of small and medium agrifood enterprises for value addition, marketing, and branding by providing them with matching grants, and technical assistance, linking them to CIGs and FPOs, and helping them develop climate-informed business plans to access commercial lines of credit and other financial services. FPOs can provide farmers with access to up-to-date information and knowledge about best practices for adapting to changing climatic conditions, such as drought-resistant crops, irrigation technologies, and soil conservation methods. Additionally, they provide peer-to-peer learning experiences and improved access to diversified markets. Enterprises selected for support will have to demonstrate potential the adoption of climate smart practices, job creation, and co-financing. Value chain assessments will be carried out in every region to identify and target value chains based on where the greatest market opportunities lie, including opportunities for value addition, productivity enhancement, and the inclusion of women and youth.

Subcomponent 3.2: Market Infrastructure and Enterprise Development

52. Using a cluster-inspired approach, this subcomponent will support the safety and marketability of crop and livestock products, including for export, by: (a) developing and upgrading physical infrastructure and quality assurance services, and (b) training value chain actors on food safety. Under this subcomponent, the project will broadly adhere to the One Health approach, investing in improved market climate-resilient facilities supporting enhanced productivity, reduced post-harvest losses, greater use of renewable energy, and increased value of the products, while at the same addressing climate vulnerabilities to extreme weather conditions or energy disruption for producers. Facilities helping to improve the handling of crop and livestock products, mitigating post-harvest losses and food contamination, and facilitating adherence to SPS standards will be also invested. The project will support value chain actors’ adherence to SPS and other food safety standards by working with CIGs, agro-processors, and exporters, and training them on safe food handling best practices and standards. This subcomponent will invest in technologies helping avoiding food losses along the value chain. To address this issue, improving market access and product transportation is key to reducing post-harvest losses. By doing so, GHG emissions along the food supply chain can be reduced.

53. Infrastructure and service upgrades will be supported through direct investments and the development of public-private partnerships (PPPs) and target climate-resilient infrastructure and services used in post-harvest

⁸ FPO refer to both farmer and livestock producer organizations

handling⁹, storage, transportation, and testing and certification of agricultural products. The infrastructural investments may include rural trunk and feeder roads¹⁰; cold storage; facilities and associated services used to trade live animals (such as holding grounds and veterinary health-certification services) and animal products (slaughterhouses and meat processing facilities); and grading, sorting, processing, and storage facilities. The project will specifically support the development of a reliable public animal health certification system, which is critical for expanding exports of live animals. Proposed infrastructure will be informed by climate-resilient and energy-efficient design standard considerations.

Subcomponent 3.3: Access to Finance

54. This subcomponent is focused on enhancing access to finance at various levels to catalyze adoption of climate-smart TIMPs by smallholder farmers and pastoralists with special incentives that target female farmers. At CIG level, the project will support intensive capacity building in financial literacy and business planning and project management to promote member savings which will be matched by the project funds. The combined funds (farmer savings plus matching grants) will be used to establish a revolving fund that extends small loans to group members for the adoption of climate-smart TIMPs developed under the project. At the FPO level, the project will provide capital support to enable advance collective purchase of key inputs and services and provision of the same to CIG members. To the extent possible, financial transactions at CIGs and FPO level will be digitized to develop credible performance metrics for small farmers, pastoralists and FPOs. This performance data will be shared with formal financial institutions and other service providers to build sustainable access to credit and other financial services.

Component 4: Promoting a Greater Focus on Food Systems Resilience in National and Regional Policymaking: This component will build food systems resilience at the national and regional levels by focusing on building the capacity of public institutions and identifying relevant policy reform opportunities within the implementing three ministries. In the crops, livestock and environment sectors it will: (a) build the capacity of government institutions; and (b) carry out comprehensive assessments of agrifood policies.

55. Subcomponent 4.1: Ministerial Capacity Building and Agrifood Policy Assessments for the Crops Sector

56. First, the subcomponent will build the capacity of the Ministry of Agricultural Development (MoAD) to provide high quality public services to the agrifood sector. It will do this by building human resources and constructing or rehabilitating key government facilities (such as research and extension centres and laboratories), prioritizing climate-resilient infrastructure designed and built in a way that anticipates, prepares for, and adapts to changing climate conditions (raising temperatures, change in precipitations and extreme weather events¹¹) through improved drainage systems, reinforced with appropriate materials, and including the use of renewable energy and thermal insulation. To guide its investments and those of subsequent efforts, the project will carry out a comprehensive needs assessment, building on the work of previous projects. The subcomponent will build human resources by sponsoring higher and continued education for ministerial staff, recruiting technical specialists, training new and existing staff, and establishing knowledge partnerships with CGIAR institutions, KALRO, Ethiopia's ATA, and other organizations in the region (this also applies for subcomponents 4.2 and 4.3 below).

⁹ With current trends and future projections of extreme precipitation, post-harvest handling infrastructure is vulnerable to damage which could lead to entire harvest losses and increased GHG emissions. Therefore, investments in climate-resilient and energy efficient post-harvest infrastructure will enable the infrastructure to withstand weather extremes, thereby reducing food loss and waste, GHG emissions.

¹⁰ Rural roads are vulnerable to damage from extreme weather events such as floods, landslides, storms, and cyclones. This activity will prioritize climate-resilient infrastructure and planning (e.g., improving drainage systems, reinforcing roads with appropriated materials, and protecting coastal roads from erosion), that is designed and built in a way that anticipates, prepares for, and adapts to changing climate conditions while improving the resilience of rural communities that depends on these roads for access to critical services and economic opportunities.

¹¹ <https://climateknowledgeportal.worldbank.org/country/somalia/trends-variability-historical>

57. Second, the subcomponent will carry out an assessment of “gaps” and opportunities to mainstream climate resilience in national agrifood policy and identify where technical assistance is immediately needed to formulate or update policies and action plans relating, among other topics, to seed systems, food security, marketing, cooperatives, plant protection, extension services, land tenure, food safety, biosecurity, and other One Health arrangements. This subcomponent will invest on national and territorial cross-sectoral policies that aim to lead to climate change mitigation actions or technical support for such actions.

58. Subcomponent 4.2: Ministerial Capacity Building and Agrifood Policy Assessments for the Livestock Sector

59. Following a similar approach to that used in the crops sector, this subcomponent will focus on the Ministry of Livestock and Fisheries Development (MOLFD), building its human and organizational capacity, rehabilitating its physical facilities (including research and extension centres and laboratories), prioritizing climate-resilient infrastructure and planning (e.g., improving drainage systems, reinforced with appropriated materials, and including the use of renewable energy and thermal insulation) designed and built in a way that anticipates, prepares for, and adapts to changing climate conditions, such as raising temperatures, change in precipitations and extreme weather events¹². The latter may include new legislation governing climate-smart animal health and welfare, meat inspection, and pesticides, and the regulatory framework for the animal health certification system to be developed under Component 3 to facilitate livestock exports.

60. Subcomponent 4.3: Ministerial Capacity Building and Rangeland Policy Assessments for the Environment Sector

61. This subcomponent will build the human and organizational capacities of the Ministry of Environment and Climate Change (MoECC). It will also support the construction and rehabilitation of government facilities rangeland management centres, plan nursery and associated facilities and regional offices. The subcomponent will also support the development of institutional frameworks for sustainable rangeland management (including legal framework for rangeland protection and bylaws and guidelines for community-led governance models).

Component 5: Contingent Emergency Response Component: This component will finance eligible expenditures in the event of an emergency precipitated by a disaster. The activation of CERC, by request of the government, will allow funds to be disbursed rapidly to reduce damage to productive infrastructure, ensure business continuity, and speed up recovery. An immediate response mechanism operation manual (IRM-OM) will be developed by the government stipulating the fiduciary, safeguards, monitoring, and reporting requirements relating to CERC as well as other coordination and implementation arrangements. In the event of CERC activation, funds from other project components may be reallocated to finance immediate response activities as needed.

Component 6: Project Management

Subcomponent 6.1: Project Coordination and Management

62. This subcomponent will help establishing and strengthening project coordination and management structures within in line with the agreed upon project implementation arrangements. The subcomponent will fund all full-time staff, office infrastructure, transportation, and operating costs of the Project Coordination Unit (PCU), which will be established to oversee the Somaliland FSRP’s implementation. Additionally, the subcomponent may support the onboarding of third-party implementing agencies.

Subcomponent 6.2: Monitoring and Evaluation

63. This subcomponent will fund the establishment of a full-fledged management information system (MIS) with requisite data collection and analysis systems and digital dashboards for decision support at all levels of

¹² <https://climateknowledgeportal.worldbank.org/country/somalia/trends-variability-historical>

implementation. The subcomponent will also support the onboarding of competent technical agencies to carry out impact evaluations and training on data-driven decision making and performance management.

1.3 The Project Area

64. In terms of geographic coverage, the project activities within a sector will be implemented up to 8 districts of Somaliland to avoid resources dissipation and diluted impact: Within each sector, the project will be implemented in up to 8 selected districts, to be identified based on several “exclusion” and “inclusion” criteria. Excluded from consideration will be districts that: (i) are inaccessible due to high levels of insecurity; (ii) have large areas of contested lands leading to significant challenges in complying with environmental and social safeguards, and (iii) have large investment projects similar to FSRP. Districts to be targeted by FSRP will be selected on the basis of the following “inclusion” criteria: (i) the potential for impact within priority value chains in terms of farmer and pastoralist coverage, potential productivity gap to be bridged, and maturity of specific value chain within the district; (ii) implementation readiness in terms of systems, existing institutions, and infrastructure;¹³ (iii) level of community vulnerability and marginalization (including high share of rural population under IFC3+); (iv) the existence of ongoing, complementary investments; (v) potential for investments to have national and regional spillover effects, notably in the control of transboundary animal disease and population displacement, and the development and resilience of regionally-significant value chains.

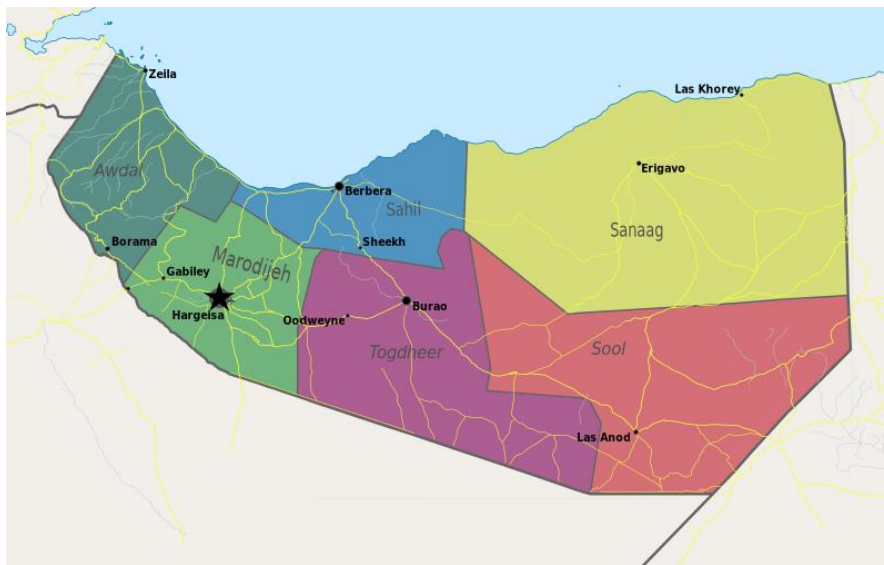


Figure 1: The Somaliland Map

65. A highly inclusive and participatory approach has been undertaken to agree on critical issues including, i) states and districts to be prioritized for support, ii) value chains to be prioritized, iii) key institutions to be supported at national and state level, iv) various projects to be integrated and coordinated with, and v) Implementation arrangements including utilization of third-party agencies in select areas.

66. Gender is a key factor determining the current and future of resource use and management in Somaliland and given much attention in project implementation. The project aims to contribute to women’s and girls’ socioeconomic empowerment by reducing gender gaps in the agricultural and livestock sector where women play

¹³ The project may choose to adopt a phased implementation approach wherein districts with low implementation readiness will be entered into after initial systemic capacity building.

important roles but have limited access to extension, training, inputs, information, credit as well as little voice in decision making, and few opportunities for income generation given their heavy domestic responsibilities, particularly for water collection. Project activities to reduce the gender gaps include female facilitators who will ensure that women have a voice in decision making. A quota of minimum 30 percent female leadership of Village Development Committee (VDC) will be established. Selected Female VDC Project beneficiaries will be trained to enhance their capacity for active participation in VDCs.

1.4 Project Beneficiaries

67. The Somaliland FSRP will directly benefit an estimated 65, 000 of small farmers, agro-pastoralists, and nomadic pastoralists, at least 30 percent of which will be women across Somaliland. In addition, the project will support value chain stakeholders including women-owned agribusiness enterprises, financial services providers, DAT startups, and agricultural research and extension institutions. Within the public sector, the project will also build the capacity of MoAD, MoLFD and MoECC, and other institutions to implement resilience-focused policies. The latter is expected to indirectly benefit all agricultural stakeholders who have access to public services.

CHAPTER 2 - PREPARATION OF PROJECT ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

2.1. Purpose and Scope of the ESMF

68. This document presents the ESMF for the proposed Food Systems Resilience Project (FSRP) for Somaliland. This ESMF is a management tool to assist in managing potential adverse E&S impacts associated with activities of the project. The implementing agencies of the Project (incl. the Ministries of Agricultural Development, the Ministry of Livestock, and Fisheries, and the Ministry of Environment and Climate Change) and the PCU will follow this ESMF to ensure the E&S risks and impacts are fully assessed and mitigation measures are in place prior to the implementation of the relevant and proposed community Project activities. The ESMF identifies the steps for detailed screening and assessment for the project's potential E&S risks, and for preparing, and approving the required management plans for avoiding, and where avoidance is not possible, reducing, mitigating, and managing these potential adverse impacts (See Annex I for E&S screening checklist).

2.2. Objectives of ESMF

69. The ESMF sets out the principles, rules, guidelines, and procedures to assess the E&S risks and impacts of the proposed project. The ESMF only applies to those activities that will be financed, either directly or indirectly, by Food Systems Resilience Project, and not to any other activities. The ESMF will also guide through the preparation of full Environmental and Social Impact Assessment (ESIA) for sites identified with significant E&S risks, as well as the preparation of site-specific Environmental and Social Management Plans (ESMPs), where applicable (Templates in Annexes II and III). Specifically, this ESMF covers the following aspects:

- a Achieve compliance to the project's environmental and social commitments and comply with World Bank Environmental and Social Framework and EHS guidelines in order to ensure sound environmental, health, safety and social management.
- b Ensure compliance with international and national legal and regulatory ESHS requirements and management systems applicable to activities under this project.
- c Identify World Bank Environmental and Social Standards applicable to the project as guided by the FSRP Environmental and Social Summary Review done during project concept stage.
- d Assess the potential risks and impacts that may occur
- e Propose measures and plans to avoid, reduce, mitigate and/or offset adverse risks and impacts.
- f Make provisions for estimating and budgeting the costs of such measures.
- g Provide information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts.
- h Include adequate information on the general area/locations in which subprojects are expected to be sited, including any potential environmental and social vulnerabilities of the area.
- i Provide the project implementers with an E&S screening process and risk management procedures that will enable them to identify, assess and mitigate potential E&S impacts of subproject activities, including through the preparation of a site-specific Environmental and Social Impact Assessments (ESIA) and/or ESMP where applicable.
- j Identify relevant laws, policies, regulations that may be applicable and that the project activities scheduled for implementation are compliant with as well as the World Bank Environmental and Social Frameworks and standards; and
- k Provide for how stakeholders will be engaged and consulted, how information will be disclosed and how project related grievances will be received and addressed.

2.3. ESMF Rationale

70. The ESMF clarifies appropriate E&S management policies, processes, and mitigation principles, organizational arrangements, and design criteria to be applied to subprojects, which are to be prepared during project implementation by the respective PCUs and private sector companies participating in the Food Systems Resilience Project. The PCU will use and refer to this ESMF during implementation of the project. Where appropriate, ESMPs for moderate risks and ESIA for substantial risks will be prepared during project implementation following guidelines in the ESMF. It remains the responsibility of the E&S specialists of PCU to ensure that the necessary mitigation plans are developed, implemented, and adhered to by the project beneficiaries.

2.4. ESMF Development Methodology and Consultations

71. The ESMF was prepared through information generated through extensive literature review and stakeholder discussions. The main reference documents included World Bank ESF and ESS good practice documents and guidelines and Project Appraisal Document (PAD) for the Food Systems Resilience Project for Somaliland which is annexed to the overall project PAD, WB ESSs and their relevancy to the project (Table 3), among others. Consultation with key stakeholders in the application and implementation of the ESMF for the Project was conducted on the 10th of August 2023. The aim was to provide input to the ESMF broad content areas of E&S baseline information, social and environmental risks and how to mitigate it, legal and policy environment, stakeholders' engagement mechanisms, and handling of project related grievances. The participants during the consultation were representatives of relevant organizations in the PAPs, beneficiaries, and vulnerable and disadvantaged groups. The participants provided input and suggestions on improving the ESMF. The main suggestions and how they will be addressed are enumerated in Annexes VII. The ESMF will be disclosed in country not later than effectiveness date and will be implemented throughout the project life cycle. (Chapter 7).

3.1. **CHAPTER 3 - POLICY, LEGISLATIVE, REGULATORY, AND INSTITUTIONAL FRAMEWORKS**

3.2. **Introduction**

72. This section describes the existing policy, legislative, regulatory, and institutional frameworks that will be important for consideration in the design, implementation, monitoring and evaluation of the Food Systems Resilience Project for Somaliland and ESF documents. It is instructive to note that the general policy and legislative environment in Somaliland is nascent and under developed. It is for this reason that one of the project components will focus on investment in institutional capacity including policy development. Where national policies and legislations is nonexistent, World Bank ESS and other relevant International Agreements and Covenants will guide the implementation of the project.

3.3. **Somaliland Government Laws, Policies, Regulations, and Institutional Frameworks.**

73. There are laws, policies, regulatory, and institutional frameworks that are relevant to the Food Systems Resilience Project generally and for ESMF.

The Constitution of the Republic of Somaliland

Article 8: Equality of Citizens

1. All citizens of Somaliland shall enjoy equal rights and obligations before the law, and shall not be accorded precedence on grounds of colour, clan, birth, language, gender, property, status, opinion etc.
2. Precedence and discrimination on grounds of ethnicity, clan affiliation, birth and residence is prohibited; and at the same time programmes aimed at eradicating long lasting bad practices shall be a national obligation.
3. Save for the political rights reserved for citizens, foreigners lawfully resident in Somaliland shall enjoy rights and obligations before the law equal to those enjoyed by citizens.

Article 12: Public Assets, Natural Resources, and Indigenous Production

1. The land is a public property commonly owned by the nation, and the state is responsible for it.
2. The care and safeguarding of property, endowments and public assets is the responsibility of the state and all citizens; and shall be determined by law.
3. The Government shall have the power to own and possess movable and immovable property; and to purchase, sell, rent, lease, exchange on equivalent value, or otherwise expend that property in any way which is in accordance with the law
4. The national government is responsible for the natural resources of the country and shall take all possible steps to explore and exploit all these resources which are available in the nation's land or sea. The protection and the best means of the exploitation of these natural resources shall be determined by law.
5. Where it is necessary to transfer the ownership or the benefits of a public asset, the transfer shall be effected in accordance with the law.
6. The state shall encourage indigenous economic production such as agriculture, livestock, fisheries, minerals, production of frankincense and myrrh and gum etc., and manufacture based on indigenous products.

Article 18: The Environment and the Relief of Disaster

7. 1. The state shall give a special priority to the protection and safeguarding of the environment, which is essential for the well being of the society, and to the care of the natural resources. Therefore, the care of and (*the combating of*) the damage to the environment shall be determined by law.
8. 2. The state shall undertake relief in disasters such as famine, storms, epidemics, earthquakes, and war.

Article 20: Work, Trade, and the Welfare of Employees

1. All able citizens have a right and a duty to work. The state shall, therefore, be responsible for the creation of work and the facilitating of the skills training of employees.
2. The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law.

3. All employees have a right to payment appropriate to the work they undertake, and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited.
4. The state shall endeavour to create understanding and clear rights between employees and employers and shall accordingly introduce a law (in this respect).
5. State employees and members of the armed forces shall be entitled remuneration for their duties and to payments for sickness, injury, or disability in accordance with the law.
6. The state shall promote the support systems, insurance and safety of employees and shall strengthen the relevant responsible bodies.

Article 23: Freedom of Movement and Association: states that all citizens have the right to form, in accordance with the law, political, educational, cultural, social and occupational or employees' associations

Article 36: The Rights of Women

7. The rights, freedoms and duties laid down in the Constitution are to be enjoyed equally by men and women save for matters which are specifically ordained in Islamic Sharia.
8. The Government shall encourage, and shall legislate for, the right of women to be free of practices which are contrary to Sharia and which are injurious to their person and dignity.
9. Women have the right to own, manage, oversee, trade in, or pass on property in accordance with the law.
10. In order to raise the level of education and income of women, and also the welfare of the family, women shall have the right to have extended to them education in home economics and to have opened for them vocational, special skills and adult education schools.

Legislations

Somaliland Environmental Management Act 2014

74. Some provisions of the environmental management act are relevant to the World Bank's ESS1:
 - i. **Article 23:** Environmental impact assessment must be carried out by a competent person(s) or institution before carrying any of the following activities of a major scale:
 - a. Land use and transformation;
 - b. Water use and disposal;
 - c. Resource removal, including natural living resources;
 - d. Resource renewal;
 - e. Agricultural processes;
 - f. Industrial processes;
 - g. Transportation;
 - h. Energy generation and distribution;
 - ii. **Article 35:** The Authority shall be responsible for carrying out environmental audit of all activities that are likely to have significant effect on the environment.

Agriculture Land Law (8/1999)

75. **In Article 2**, this law transfers all land from traditional authorities to the government and clearly states that all the agricultural land is commonly owned by the state and the Government of Somaliland is responsible for it . The law does not recognize customary land holdings.

76. **Article 3** states that the Ministry of Agricultural Development is the government responsible authority for management of agricultural land. The ministry has the mandate to give agricultural land permission to individuals desiring land for agricultural purposes. This law also requires from people who used to own agricultural land before this law should register their land with the ministry within a year from the date this law comes into force.

77. **Article 7** states that the size of the new agricultural land to be given to a person or family (maximum) is 8 hectares of rainfed land and 4 hectares of irrigated land

78. In 2001, the land management law (act) was prepared detailing National Eviction Guidelines and the Interim Protocol on Land Distribution for Housing to Eligible Refugee-Returnees and IDP. The law codifies the roles and responsibilities between the different levels of government (national and sub-national). The National Eviction Guidelines (NEG) address the human rights implications of evictions in urban and rural areas by preventing arbitrary and forced eviction of occupiers of public and private properties, from homes, encampments and other lands.

Land Management Act 17/2001

79. This law gives local council cities in Somaliland mandate regarding land management

80. **Article 1: Power of Land Administration**

1. In addition to God, the entire territory of the Republic of Somaliland belongs to the Government of Somaliland (as stipulated in Article 12, Clause 1 of the Constitution) and therefore its administrative powers, transfers and legislative proposals belong to the Council of Ministers.
2. The President of the Republic of Somaliland, upon hearing the advice of the Council of Ministers and the National Urban Design Commission of the Republic of Somaliland, shall issue a Presidential Decree on the acquisition of land or buildings for the common good.
3. Public purpose means: construction sites, New Roads, Broadway, bridges, power lines, telecommunications, government offices and other public buildings and shall be published in the Official Gazette of the Government.

81. **Article 2: Power of Land Permission**

1. The administration and permissions of construction positions in the cities (districts) of Somaliland, are owned by the local government (Executive Committee of the local government)
2. The management of any public interest such as; The land of government offices, houses, diplomats, factories, and all the former public places (public areas) is owned by the central government.
3. There shall be an office representing the National Commission for General Designs, located at the headquarters of the Ministry of Public Works at the District, Regional, and National.

4. The office referred to in paragraph 3 of this Article shall verify that the land deeds completed by the land administration of the municipality are in accordance with the general design of the city.
5. It is prohibited for the Armed Forces and other government agencies other than those mentioned in Clauses 1 and 2 of this Article to interfere in any way with the administration of land matters.

82. **Article 20** declares that any structures, whether permanent or temporarily constructed without being in accordance with the land allocation process will be considered to be illegal

83. **Article 21** addresses eviction and demolition of illegal property. Section 1 of this article indicates “The Municipal government while implementing the city urban plan will have the authority to demolish illegally constructed structures be, they temporary or permanent”. In Section 2 of this article eviction from temporary structures can arise if the said land is part of a plan in which it is set aside and it is needed for purposes other than residential use and in which case the evicted parties will be settled in a suitable land and their eviction and settlement costs will be covered by the local government. As per Section 3 “Illegal structures cannot be constructed for the purpose of acquiring land and eviction of such structures will not be due for compensation”. Section 4 mentions that “Parties affected by eviction or demolition of single structures or whole estates will have priority in any land allocation resulting from such activity”.

84. **Article 22** addresses demolition of legal property stating “When the demolition of a legal property results from needs arising due to City Planning, the following will apply: a) The affected party will be compensated for the value of their property. b) The affected party will be allocated with land not less than size to his evicted land and will be offered legal documents”.

85. **Article 23** addresses expropriation of land for the purpose of common good pointing out: a) Following consultation with the permanent national planning committee and having gained their approval, the Mayor will have the authority to issue an order to take over legally allocated built land or otherwise for the purpose of common good. b) Any party affected by section 1 above will have a right to the following: I) compensation in value similar to the said property and II) be provided with similar property that is equal in value and size to the said property.

86. **Article 31: The Right to Own Private Property**

1. Every person shall have the right to own private property, if it is acquired lawfully.
2. Private property acquired lawfully shall not be expropriated except for reasons of public interest and provided that proper compensation is paid.
3. The law shall determine matters that are within the public interest, which may bring about the expropriation of private property.

National Water Act for the Somaliland (49/2011)

87. The purpose of this Water Act is to improve availability and access to water in a sustainable and equitable way for all different types of uses, in a manner that is environmentally safe. The specific objectives therefore are:

- To recognise, legitimise, empower, and endorse the Somaliland’s customary laws and institutions and Somaliland’s traditional leaders in water-related administrative, fiscal, and judicial affairs;

- To govern the management of water resources and the provision of water services through the implementation and enforcement of the Water Code, its laws and regulations;
- To provide coordination among the government Ministries and autonomous agencies which are concerned with the development and administration of water resources and their uses;
- To define the rights and obligations of persons, concerning socially wise and economically beneficial uses of water, and harmonise them with the general welfare.
- MOWR is responsible to develop and enforce technical and non-technical means and standards to conserve water such as the utilisation of efficient and appropriate technology and techniques for use of natural water resources, as well as of education, information, economic, and ethical means and measures;

88. **Article 14 Settlement of Disputes Relating to Water Rights**

1. In case of disputes related to water rights the community mechanism shall be empowered to resolve the issues according to customary law.
2. In the event of failure to settle the dispute under Article 14.1, the dispute shall be referred to the competent Court

The Somaliland Labor Code

89. Some provisions of the labour code are relevant to the World Bank's ESS2:

- i. It stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.
- ii. In regards to OHS, the employer is obligated to provide adequate measures for health and safety for protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.
- iii. The Code further stipulates that workers have the right to submit complaints and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory with regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.
- iv. Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weights or working at night.
- v. The Labor Code further forbids work for children below the age of 15.
- vi. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade unions.

- vii. The Labor Code stipulates the right to equal pay for women for the same work as men and paid maternity leave. Women are entitled to 4 months of maternity leave at half pay.

The Somali Penal Code of 1962

90. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that ‘carnal intercourse’ and ‘acts of lust committed with violence’ are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401.

National Policies

91. Somaliland’s National Climate Change Policy (NCCP). The overall aim of the Somaliland’s National Climate Change Policy (NCCP) is to enhance the resilience and improve adaptive capacity of the country as whole, and the vulnerable communities and the ecosystems on which they depend, to the adverse effects of climate change, whilst equally, pursuing a path of economic growth that uses natural resources in a sustainable manner. This policy is intended to guide the development policies and operations of those concerned with development matters in Somaliland, including government institutions, non-governmental international and local organizations, with the intention of enhancing coping and recovery mechanisms of the Somaliland citizens to the risks of climate change.

92. Somaliland National Gender Policy: The overall objective of the National Gender Policy is to facilitate the mainstreaming of the needs and concerns of women and men, girls and boys in all areas for sustainable and equitable development and poverty eradication. Policy refers to guiding principles to a course of action arrived at by decision-makers to address a particular issue or issues. The following are the 9 priority areas, (i) Poverty Reduction and Economic Empowerment (livelihoods), (ii) Education and Training, (iii) Health and Reproductive Health, (iv) Nutrition Security, (v) Water Resources And Supply, (vi) Employment, (vii) Political Participation And Decision-Making; (viii) Democratic Governance And Human Rights and (ix) Sexual and Gender Based Violence (SGBV). The ultimate objective of this sector is to ensure that opportunities for education and training for all citizens, male as well as female, are guaranteed so that they may develop their individual potentials to the optimum and that they may be able to play a more meaningful role as productive and upright citizens.

93. Somaliland National Environment Policy (NEP) provides a framework for the sustainable management of the territory’s environment and natural resources. The policy seeks to ensure that the territory’s natural resource assets retain their integrity to support the needs of the current and future generations. This policy, developed in 2015 by the Ministry of Environment and Rural Development, addresses the nexus between poverty alleviation, food security and national development objectives. The policy emphasizes the need to establish new prospects for the improvement to the standard of living, which enable people to become self -sufficient and realize their own potential without damaging the environment. The policy seeks to catalyze the implementation of sustainable environmental, social, and economic development initiatives for equitable benefits sharing. The policy advocates for community participation, information dissemination, environmental education and awareness raising and gender equality in order to fully harness the Somaliland’s “latent capacity” in this regard.

94. The guiding principles of the NEP state that “EIAs [are] necessary to ensure that public and private sector development options are environmentally sound and sustainable and that any environmental consequences are recognized early and taken into account in project design, and implementation.” The project activates proposed in SESRP is expected to incorporate EIA as an essential tool in aid of development programs and projects. These provisions state to develop a system and guidelines for Environmental and Impact Assessment (EIA) and Initial Environmental Examination (IEE), Approval, audits and monitoring and evaluation so that adverse environmental

impacts can be eliminated or mitigated, and environmental benefits enhanced. There are also some provisions declaring to mobilize initiatives and resources in the private sector, NGOs and CBOs to achieve sustainable environmental management. To involve civil society in general and local communities in particular, in environmental planning and actions at all levels and empower them to protect, conserve and sustainably utilize and benefit from the Nation's natural resources

95. The environmental licensing process in Somaliland is relatively straightforward. The Ministry of Environment and Climate Change (MoECC) control the licensing procedures.

- i. The Ministry of Environment and Climate Change has the power to grant any of the licenses sought. ii. Every license shall be subject to such conditions as may be specified therein during the issuance stage.
- iii. The minister (or any person authorized by him or her) may at any time cancel or suspend any license granted by or on behalf of the minister:
- iv. Grounds for cancellation include suspicions of infringement of any of the conditions upon which said license has been granted,
- v. The minister may, at any time, also vary the conditions of any such license.
- vi. Any person aggrieved by any order under this clause may appeal to the minister whose decision shall be final.

96. Land Use Planning Guideline for Somaliland: The Government of Somaliland recognizes the importance of land use planning. The Ministry of Agricultural Development (MoAD) mentions integrated land use planning as one of the tools to promote sustainable agricultural resource use and management and LUP is listed as one of the short-term interventions (MoAD, 2007). The same Ministry, in its Draft National Agriculture Policy (MoAD, 2008), also advocates village land use planning as a tool for implementing policies for better land use and management and a basis for agricultural extension services. The Ministry of Environment in its Strategic Plan 2008-2010 recognizes that land is a primary natural resource that requires wise usage for sustainable development, and land use planning based on accurate and reliable data. And both Ministry in their Somaliland land tenure policy (2008) give local authorities and district governments the authority to undertake land use planning and enforcement of approved development plans in collaboration with representatives from the respective line ministries.

97. Resettlement is addressed by Somaliland's Urban Regulatory Framework passed by the cabinet as policy in November 2016. Section 3.9.13 covers involuntary relocation beginning with the need to avoid or minimize resettlement. This Policy indicates: "When direct economic and social impacts are caused by taking of land resulting in involuntary relocation or loss of shelter, loss of assets or access to assets, loss of income sources or means of livelihood whether or not the affected persons must move to another location or the restriction of access to legally designated parks and protected areas result in adverse impacts on the livelihoods of the displaced persons, the following guidelines shall be required:

1. Where relocation cannot be avoided, displaced persons shall be meaningfully consulted throughout the entire project cycle individually and collectively, with a right to appeal, and receive the opportunity to participate in the project activities, and share the project benefits;
2. The property or use rights of owners and users shall be registered;
3. Compensation for any loss of private property, such as built structures, crops and trees, and for the type of any use rights, shall be determined at the time of relocation and paid before relocation commences;
4. Compensation shall be according to the market value of the land and the property, or the interest therein of the claimant at the valuation date. The assessment of compensation is by an independent evaluator appointed by the

Local Council or the General Works Sub-Committee; and The relocated persons shall be assisted in restoring their livelihoods and standards of living.

98. Presently, due to the socio-political situation of the country, land resources are mostly used and managed by individual land users, without much consideration for the welfare and future of the wider population. However, the current Government has identified Land Use Planning as a tool that could guide the implementation of policies, programs and projects based on a sound technical framework towards sustainable natural resources management. Land Use Planning is a tool that is successfully used by many countries in the world for natural resources management and the improvement of livelihoods.

99. National Environmental and Social Impact Assessment (NESIA) Operational and Standard Guidelines: This guidelines were developed by the Ministry of Environment and Climate Change to achieve better planning and integration of environmental concerns into the policy and project planning process at the earliest possible planning and design stages. This will address concerns related to identifying, predicting, and evaluating the foreseeable environmental impacts, both beneficial and adverse, of public and private development policies and projects, with a view to eliminating, where possible, or minimizing the negative impacts while optimizing the positive impacts.

Institutional Framework

100. The Ministry of Environment and Climate Change (MoECC) was established in 1997 as a national environmental watchdog fulfilling constitutional obligations on environmental protection, as per provisions of article 18 of the constitution which states; the state shall give special priority to the protection and safeguarding of the environment, which is essential for the wellbeing of the society, and to the care of the natural resources. The Ministry is the mandated government authority responsible for the management and conservation of the environment to ensure sustainable utilization of natural resources of the country with the aim of reducing poverty levels among citizens and fostering economic development and promoting climate change resilience.

101. For Somaliland, the institutions at National, Regional and District Levels responsible for the implementation and monitoring environmental compliance are shown below and include:

- i. The Minister, in consultation with the Parliamentary Environment committee and civil society organizations working in the environment shall establish Environmental Watch Councils at National level (NEWCs).
- ii. The Ministry of Environment and Climate Change (MoECC) in Somaliland in consultation with Regional Authorities, the civil society at the regional level and communities, shall establish the Regional Watch Councils (REWC).
- iii. The MoECC in consultation with the Local Government Councils/ District Governor, local Community-Based Organizations (CBOs) and the community shall establish the District Environment and Environment Watch Council (DEWC).
- iv. The Project beneficiaries of the Council shall come from both genders and should be Somaliland citizens in good standing in the community and are environmentally conscientious. The council shall serve five-year terms at a time and can be re-appointed.

102. The environmental licensing process in Somaliland is regulated by the Ministries. The key principles are:

- i. The MOECC (Somaliland) or any person authorized by him/her may grant any of the licenses enumerated. Every license shall be subject to such conditions as may be specified therein.
- ii. The Minister or any person authorized by him/her may at any time cancel or suspend any license granted by or on behalf of the Minister, the holder of which has been on reasonable grounds suspected by the Minister or such other authorized person, to have infringed any of the conditions upon or subject to which said license has been granted and may at any time vary the conditions of any such license. iii. Any person aggrieved by any order under this Article may appeal to the Minister of MOECC for Somaliland whose decision shall be final.

The Ministry of Employment, Social Affairs and Family

103. The Ministry is mandated to provide policy direction and guidance on all labor administration and vocational training matters. It is also mandated to protect and develop the labor force to contribute to the socio-economic development of the Somaliland. The Ministry is in the process of developing relevant laws and policies most of which are in draft form. The ministry is also responsible for promotion of rights of women, children, and people with disabilities. It is mandated to develop relevant policies and programs to protect women, children and persons with disabilities and put in place measures to address GBV/SEAH.

The Ministry of Livestock and Fisheries Development

104. The ministry is mandated to ensure that livestock and fisheries resources are collaboratively developed and managed sustainably without damaging the environment' to enhance food security, increase income, reduce poverty, improve livelihoods, and contribute to the national economy. The Ministry is also responsible in formulating policies, strategies, and programs for supporting livestock and fisheries development, coordinating research, and disseminating results to stakeholders including pastoralist communities.

The Ministry of Agricultural Development

105. The Mandate of the Ministry of Agriculture Development (MOAD) is to create an enabling environment for sustainable social and economic development of the sector with a view to an improved food security of the growing population. Develop a competitive and sustainable agriculture sector that meets the household and national food security and ensures prosperity of the agricultural and agro-pastoral communities in Somaliland.

3.4. The World Bank Environmental and Social Framework and Standards

106. The World Bank Environmental and Social Policy for Investment Project Financing sets out the Bank's requirements regarding projects it supports through Investment Project Financing. The Banks' Environmental and Social Framework (ESF) has ten (10) Environmental and Social Standards (ESSs) that set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing (Table 3). The Bank believes that applying these standards will support Borrowers in their goal to reduce poverty and sustainably increase prosperity for the benefit of the environment and their citizens. Applicable ESS for the FSRP project is 8 out of 10.

Table 2: World Bank ESF – Applicable ESS

No	ESS	Relevance	Applicability
1	ESS1 Assessment and Management of Environmental and Social Risks and Impacts	Relevant	<p>The client will conduct environmental and social assessment of projects proposed for Bank financing to help ensure that projects are environmentally and socially sound and sustainable. The environmental and social assessment will be proportionate to the risks and impacts of the project. It will inform the design of the project, and be used to identify mitigation measures and actions and to improve decision making under components 1 and 2 (https://projects.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards).</p> <p>Under this ESS1, it is also good practice to consider:</p> <ul style="list-style-type: none"> • Addressing Sexual Exploitation and Abuse/Sexual Harassment. • Assessing and Managing the Risks and Impacts of the Use of Security Personnel. • Gender. • Labor • Security issues in project areas • Non-Discrimination and Disability • Non-Discrimination: Sexual Orientation and Gender Identity (SOGI) /GBV/SEAH/P • Road Safety • Third Party Monitoring • Targeting/Inclusivity <p>Cultural resources/chance Finds</p> <ul style="list-style-type: none"> • Vulnerability and minority communities

No	ESS	Relevance	Applicability
2	ESS2 Labor and Working Conditions is also relevant in the project activities.	Relevant	This ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions especially components 1, 2, 3, and 5. ESS 10 is also applicable. The S-FSRP will apply this standard in component 1, 2, 3 and 5.
3	ESS3 Resource Efficiency and Pollution Prevention and Management.	Relevant	This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle especially subcomponent 2.2 promotion of climate smart crop and livestock subsystems and component 1. Component 2 may be relevant to some extent in case of sensitive ecosystems, pollution in the markets under component 3 including e waste and component 1.
4	ESS4: Community Health and Safety	Relevant	Addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with attention to people who, because of their circumstances, may be vulnerable mainly component 1, 2, and 3.

No	ESS	Relevance	Applicability
5	ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Relevant	Involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented. S-FSRP is to operate in a landscape where land volatility/conflicts are high and therefore, investment of public goods and services will be well defined in the way the S-FSRP will be operationalized through due diligence in documentation. Components 1, 2 and 3 will be relevant and this ESS will be applicable.
6	ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Relevant	ESS6 also addresses sustainable management of primary production and harvesting of living natural resources and recognizes the need to consider the livelihood of project-affected parties including Indigenous Peoples, whose access to, or use of, biodiversity or living natural resources may be affected by a project in implementation of subcomponent 2.2, the large scale reforestation efforts, issues of GHGs as a result of livestock populations, build up of CO ₂ , and alien and evasive species out reforestation efforts (https://projects.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards). Component 2 mainly and 3 to some extent due to the digital and e-waste issues.
7	ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved	Not applicable	-
8	ESS8: Cultural Heritage	Relevant	ESS8 sets out measures designed to protect cultural heritage throughout the project life-cycle component 1 especially if ground spraying is targeting places of traditional worship and subcomponent 2.3 in the assessment studies and ESS

No	ESS	Relevance	Applicability
			10 will also be applicable Components 2 and 3 are key and the chance Finds procedure will be applicable as
9	ESS 9	Not relevant	-
10	ESS10: Stakeholder Engagement and Information Disclosure	Relevant	Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation especially targeting for subcomponents 2.3, 2.2 and 2.1

107. Eight of the Bank’s ESSs are deemed relevant to the Somaliland FSRP (Table 3). Compliance with these ESSs is required to, among others, to avoid, minimize, and mitigate the adverse effects of projects it is financing and to assure that the Project is eligible for World Bank support. To ensure total compliance with the World Bank ESS, the following documents have been prepared:

- i. Environmental and Social Management Framework (ESMF), including Sexual Exploitation, Abuse and Harassment (SEAH) Prevention and Response Plan;
- ii. Integrated Pest Management Plan (IPMP);
- iii. Resettlement Policy Framework (RPF);
- iv. Stakeholder Engagement Plan (SEP);
- v. Labor Management Procedures (LMP); and
- vi. Security Management plan.

108. During implementation, subproject instruments will be developed and implemented including full Environmental and Social Impact Assessment (ESIA) should E&S impacts deemed significant, and site-specific ESMP (including social summary report), as well as Security Management Plan (SMP).

World Bank Group EHS Guidelines

109. WBG has guidelines for Environment, Health, and Safety (EHS) that projects it finances are expected to comply with. The EHS Guidelines contain the performance levels and measures that are acceptable to the WBG, and that are generally considered to be achievable in new facilities at reasonable costs by existing technology. The guidelines contain information on many crosscutting areas, potentially covering all sectors including environment (waste management, ambient air quality, noise, and water pollution); occupational health and safety; community health and safety; construction and decommissioning; among others. The relevant EHS guidelines are applicable to subprojects to be implemented under the Biyoole project. The information on the EHS can be found on this website.

http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/our+approach/risk+management/ehsguidelines

3.5. Gaps between Somaliland Laws and Policies and World Bank ESF/ESSs

110. This section compares the different laws and policies of the Republic of Somaliland, with the World Bank’s ESSs that are found relevant to the Project. Specifically addressed are consultation requirements, eligibility for compensation, valuation method, grievance redress mechanism, disclosure of information and the timing of compensation payments (See Table 4). For the FSRP project, the Bank's ESSs will take precedence over any of these other laws.

Table 3: Comparative Gap Analysis of Somaliland Laws/Policies and World Bank ESF/ESS¹⁴

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
ESS1 (“Assessment and Management of Environmental and Social Risks and Impacts”)				
EIA instruments	Range of instruments to satisfy the Bank include EIAs, regional or sectoral EAs, EMPs, etc.	<p><u>The Constitution of Republic of Somaliland:</u> Article 18: The Environment and the Relief of Disaster The state shall give a special priority to the protection and safeguarding of the environment, which is essential for the well being of the society, and to the care of the natural resources. Therefore, the care of and (<i>the combating of</i>) the damage to the environment shall be determined by law.</p> <p>Article 12 of the Constitution of Somaliland address the Duties of the Citizen sub section 4: Every person shall have the duty to care for, protect and save the environment.</p> <p><u>Somaliland Environmental Management Act:</u> Some provisions of the environmental management act are relevant to the World Bank’s ESS1:</p> <p>Article 23: Environmental impact assessment must be carried out by a competent person(s) or institution before carrying any of the following activities of a major scale:</p> <ul style="list-style-type: none"> • Land use and transformation; • Water use and disposal; • Resource removal, including natural living resources; 	EIAs not incorporated into other laws, and national policies and the capacity for implementation is very weak	ESMF to guide the borrower because ESS1 will prevail in the project.

¹⁴ Somaliland PCU will ensure proper sharing of this Gap Analysis with PCUs for adoption and further application

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<ul style="list-style-type: none"> • Resource renewal; • Agricultural processes; • Industrial processes; • Transportation; • Energy generation and distribution; <p>Article 35: The Authority shall be responsible for carrying out environmental audit of all activities that are likely to have significant effect on the environment.</p> <p><u>Somaliland National Environment Policy:</u> The guiding principles of the National Environment Policy state that “EIAs [are] necessary to ensure that public and private sector development options are environmentally sound and sustainable and that any environmental consequences are recognized early and taken into account in project design, and implementation.” These provisions state to develop a system and guidelines for Environmental Impact Assessment (EIA) and Initial Environmental Examination (IEE), Approval, audits and monitoring and evaluation so that adverse environmental impacts can be eliminated or mitigated and environmental benefits enhanced.</p> <p><u>National Environmental and Social Impact Assessment (NESIA) Operational and Standard Guidelines:</u> This is developed by the Ministry of Environment and Climate Change to</p>		

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>address concerns related to identifying, predicting and evaluating the foreseeable environmental impacts, both beneficial and adverse, of public and private development policies and projects, with a view to eliminating, where possible, or minimizing the negative impacts while optimizing the positive impacts.</p> <p><u>Somaliland National Climate Change Policy:</u> Somaliland National Climate Change Policy enhance the coping and recovery mechanisms of the Somaliland citizens to the risks of climate change.</p>		
Environmental impact screening	Screening procedures developed for projects involving sub-projects, as is likely to be the case in the other related projects.	There are no clear procedures for screening under the statutes of Somaliland.	Screening procedures are absent in the laws and policies of Somaliland.	ESMF to guide the borrower because ESS1 will prevail in the project.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
Social impact screening	Screening procedures developed for projects involving sub-projects, as is likely to be the case in the Somalia education project.	There are no clear procedures for screening under the statutes of Somaliland.	Screening procedures are absent in the laws and policies of Somaliland.	ESMF to guide the borrower because ESS1 will prevail in the project.
Public consultations	The Bank requires the Borrower to initiate consultations with project-affected persons and other interested parties	<p>The Constitution of the Government of Somaliland defines access to information as a right. It states that every person has the right of access to information held by Somaliland.</p> <p>There are no policies and legislations specifically addressing public consultations and the right of access to information.</p> <p>The Somaliland Parliament shall enact a law to ensure public engagement and the right of access to information.</p>	Procedures for public consultations not explicitly stated.	The project SEP to guide the borrower because ESS10 will prevail in the project.
Monitoring of environmental and social data	Bank requires regular monitoring of environmental and social safeguards data to evaluate the success of mitigation and to foster corrective measures at the earliest possible juncture.	There are no procedures provided in regulations of the country on the conduct of monitoring activities in the collection of environmental and social data.	There are no procedures provided in regulations of the country on the conduct of monitoring activities in the collection of environmental and social data.	ESMF to guide the borrower because ESS1 will prevail in the project.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
Institutional arrangements	Requirement by the Bank for specific description of institutional arrangements and implementation schedule for monitoring and mitigation measures.	<ul style="list-style-type: none"> MoAD acts as the lead project implementing partner for Somaliland in collaboration with the MoLF and MoECC. The Ministry of Environment and Climate Change is the mandated government authority responsible for the management and conservation of the environment so as to ensure sustainable utilization of natural resources of the country 	<ul style="list-style-type: none"> MoAD including MoLF and MoECC has the capacity for technical implementation of project interventions but will require Safeguards support. The Ministry of Environment and Climate Change may be responsible for coordinating institutional responses under this ESMF, but may still lack technical capacities regarding this areas 	PCU to work with the respective ministries and agencies responsible for management of environmental and social matters for development projects as the focal points for administration of this ESMF.
ESS2 (“Labour and Working Conditions”)				
Management of different types of project workers	The Bank puts emphasis on the identification and characterization of different types of workers (project workers, direct workers, contracted workers, community workers, primary supply workers) to manage different types of labour risks.	<p><u>The Constitution of Somaliland:</u> Article 20 of the Constitution of Somaliland: Work, Trade, and the Welfare of Employees with the following provisions:</p> <ol style="list-style-type: none"> All able citizens have a right and a duty to work. The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law. All employees have a right to payment appropriate to the work they undertake, and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited. <p>Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.</p>	The Labour Code is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.	Labour Management Procedures (LMP) to guide the borrower on the issues related to labor management.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>Article 19: The Care of the Vulnerable of the Society. The state shall be responsible for the health, care, development and education of the mother, the child, the disabled who have no one to care for them, and the mentally handicapped persons who are not able and have no one to care for them.</p> <p><u>Somaliland prepared bill drafting</u> Human trafficking: A person may not be subjected to slavery, servitude, and trafficking or force labour offences.</p> <p>Every labour law shall comply with gender equality.</p> <p>All women have a special right of protection from discrimination.</p> <p><u>Somaliland Labor Code (Law):</u> The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade union.</p>		
Labour standards	Several provisions made under ESS2 to safeguard the workers, promote safety at work and ensure that they have a viable means of communicating grievances and receiving redress.	<p><u>Somaliland Labor Code (Law):</u></p> <ul style="list-style-type: none"> The Labour Code stipulates that all contracts of employment must include: (a) the nature and duration of the contract; (b) the hours and place of work; (c) the remuneration 	The Labour Code is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.	World Bank LMP to guide the implementation of ESS2. The PCU will have overall responsibility to monitor the implementation of the LMP and thus ESS2.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>payable to the worker; and (d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labour inspector for pre-approval.</p> <ul style="list-style-type: none"> • In regard to OHS, the employer is obligated to provide adequate measures for health and safety for protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety. • The Code further stipulates that workers have the right to submit complaints and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory with regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week. • Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weights or working at night. 		<p>The Project will fully comply with WB ESS 2.</p>

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<ul style="list-style-type: none"> • The Labor Code further forbids work for children below the age of 15. • The Labor Code stipulates the right to equal pay for women for the same work as men and paid maternity leave. Women are entitled to 4 months of maternity leave at half pay. • 		
ESS3 (“Resource Efficiency and Pollution Prevention and Management”)				
Pollution prevention and management	This ESS requires the Borrower to undertake a health and safety risk assessment of any existing pollution which may affect communities, workers and the environment, especially in the school environment which will be the main arena for project implementation.	<p><u>The Constitution of the Republic of Somaliland</u>. Somaliland passed its Provisional Constitution in 2012.</p> <p>Article 12 of the Constitution addresses public assets and natural resources. The central state is responsible for the natural resources of the country, and shall take all possible steps to explore and exploit all these resources which are available in the nation’s land or sea. The protection and the best means of the exploitation of these natural resources shall be determined by <i>law</i>.</p> <p>Article 18 of the Somaliland Constitution: The Environment and the Relief of Disaster s that “The shall give a special priority to the protection and safeguarding of the environment, which is essential for the well-being of the society, and to the care of the natural resources.</p>	There are no supporting legislative frameworks specifically addressing pollution prevention and management.	ESMF to guide the borrower on pollution prevention and management and that ESS3 will prevail in the project.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
Management of hazardous wastes	<p>The Bank requires the Borrower to undertake specific measures to manage both hazardous and non-hazardous wastes. Specific emphasis is given in this ESS with respect to transportation and disposal, obtain chain of custody documentation to the final destination. Approved disposal sites are required for this ESS.</p>	<p><u>Somaliland Environmental Management Act:</u></p> <p>Article 39 on water pollution states that Any person, who upon the coming into force of this Act, discharges or applies any poison, toxic, noxious or obstructing matter, radioactive waste or other pollutants or permits any person to dump or discharge such matter into the Aquatic environment in contravention of water pollution control standards established under this Part shall be guilty of an offence and liable to imprisonment for a term not exceeding two years or to a fine not exceeding one million shillings or to both such imprisonment and fine.</p> <p>All people have a duty to safeguard and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment.</p>	There are no approved hazardous waste disposal sites in Somaliland.	ESMF to guide the borrower on the management of both hazardous and non-hazardous wastes including the fact that ESS3 prevails in the project..
ESS4 (“Community Health and Safety”)				

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
Health of community members	The ESS anticipates that the project will put measures in place to anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances. Further, it provides for the avoidance or minimization of community exposure to project-related traffic and road safety risks, diseases and hazardous materials.	<p><u>The Constitution of Somaliland:</u> Article 17: Health: In order to fulfil a policy of promoting public health, the shall have the duty to meet the country’s needs for equipment to combat communicable diseases, the provision of free medicine, and the care of the public welfare.</p> <p><u>Somaliland Labor Code:</u> In regards to OHS, the employer is obligated to provide adequate measures for health and safety for protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers’ health and safety.</p> <p><u>Somaliland’s National Gender Policy (2016)</u> includes strategies to eradicate harmful traditional practices such as FGM/C and child marriage and to improve services for the management of GBV/SEAH cases.</p> <p><u>The Somali Penal Code of 1962.</u> The Code criminalizes rape and other forms of sexual violence as well as forced prostitution.</p> <ul style="list-style-type: none"> Articles 398-9 provide that ‘carnal intercourse’ and ‘acts of lust omitted with violence’ are punishable with 5-15 years and 1-5 years of imprisonment. Abduction 	<p>The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators for GBV/SEAH/SEA crimes as it isn’t strictly implemented.</p> <p>The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and GBV/SEAH.</p> <p>Furthermore, in practice however it has been documented that women complaining about a rape may find themselves trapped by the Article 426 prohibition against adultery that makes no exception for the case of rape. In practice provisions under Art 39(i) offer little more than theoretical protection.</p>	The LMP, SEP and the GBV Protection and Response Plan developed for this project will guide the reduction of harm to communities affected by the project including ESS2, ESS10, ESS4, and ESS1.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>for the purpose of lust or marriage is prohibited under Art 401.</p> <ul style="list-style-type: none"> Article 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Article 33 provides that when a superior officer orders the commission of an offence both the perpetrator and his superior will be liable. 		
Security personnel	<p>ESS4 states that when the Borrower retains security personnel to safeguard workers and property, it will assess the risks posed by these security arrangements to those within and outside the project sites.</p> <p>The Borrower will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.</p>	<p>District police will likely provide security services in the implementation of the project. The civil servants in Somaliland are governed by Provisional Constitutions and Labor Code.</p> <p>However, there are no security protocols guiding their deployment, and there is possibility of violence meted out on civilians or workers or even the possibility of rent-seeking.</p>	<p>While the security protocols guiding the deployment and use of force are broadly unknown, the project will coordinate with the law enforcement authorities in each municipality to manage associated risks.</p>	<p>World Bank ESS will be applicable.</p> <p>The project will also develop and implement a Security Management Plan (SMP).</p>
ESS5 (“Land Acquisition, Restrictions on Land Use and Involuntary Resettlement”)				

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
Physical and economic displacement	ESS5 covers the involuntary taking of land, resulting in loss of shelter or loss of assets: a hierarchy has been provided that seeks to minimize losses to affected persons. It forbids forced evictions.	<p><u>The Constitution of the Republic of Somaliland:</u></p> <p>Article 12: Public Assets, Natural Resources and Indigenous Production</p> <ul style="list-style-type: none"> • The land is a public property commonly owned by the nation, and the state is responsible for it. • The care and safeguarding of property, endowments and public assets is the responsibility of the state and all citizens; and shall be determined by law. • The Government shall have the power to own and possess movable and immovable property; and to purchase, sell, rent, lease, exchange on equivalent value, or otherwise expend that property in any way which is in accordance with the law <p>Article 31: The Right to Own Private Property</p> <ul style="list-style-type: none"> • Every person shall have the right to own private property, provided that it is acquired lawfully. • Private property acquired lawfully shall not be expropriated except for reasons of public interest and provided that proper compensation is paid. • The law shall determine matters that are within the public interest, which may bring about the expropriation of private property. 	<p>Land Management Act seems to cover most important areas regarding land ownership, and resettlement, while there is a significant gap in the enforcement aspect of the legislation.</p> <p>There are no functional national or state procedures guiding involuntary resettlement of persons that may be affected by the project. More details are provided in the RPF.</p>	<p>World Bank ESS will be applicable.</p> <p>RPF to guide the borrower and ESS5 because it prevails in the project.</p>

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p><u>Land Management Act (2001)</u> Article 1: Power of Land Administration states that the entire territory of Somaliland belongs to the Government of Somaliland (as stipulated in Article 12, Clause 1 of the Constitution) and therefore its administrative powers, transfers and legislative proposals belong to the Council of Ministers.</p> <p>Article 20 declares that any structures, whether permanent or temporarily constructed without being in accordance with the land allocation process will be considered to be illegal</p> <p>Article 21 addresses eviction and demolition of illegal property. Section 1 of this article indicates “The Municipal government while implementing the city urban plan will have the authority to demolish illegally constructed structures be, they temporary or permanent”. In Section 2 of this article eviction from temporary structures can arise if the said land is part of a plan in which it is set aside and it is needed for purposes other than residential use and in which case the evicted parties will be settled in a suitable land and their eviction and settlement costs will be covered by the local government. As per Section 3 “Illegal structures cannot be constructed for the purpose of acquiring land and eviction of such</p>		

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>structures will not be due for compensation”. Section 4 mentions that “Parties affected by eviction or demolition of single structures or whole estates will have priority in any land allocation resulting from such activity”.</p> <p>Article 22 addresses demolition of legal property stating “When the demolition of a legal property results from needs arising due to City Planning, the following will apply: a) The affected party will be compensated for the value of their property. b) The affected party will be allocated with land not less than size to his evicted land and will be offered legal documents”.</p> <p>Article 23 addresses expropriation of land for the purpose of common good pointing out: a) Following consultation with the permanent national planning committee and having gained their approval, the Mayor will have the authority to issue an order to take over legally allocated built land or otherwise for the purpose of common good. b) Any party affected by section 1 above will have a right to the following: I) compensation in value similar to the said property and II) be provided with similar property that is equal in value and size to the said property.</p>		

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>Resettlement is also addressed by <u>Somaliland's Urban Regulatory Framework</u> passed by cabinet as policy in November 2016. Section 3.9.13 covers involuntary relocation beginning with the need to avoid or minimize resettlement.</p> <p><u>The Somaliland Agricultural Law 8/1999:</u></p> <p>Article 8 transfers all land from traditional authorities to the government. Individuals desiring land were to register their holdings within a 6 months period. The law does not recognize customary land holdings</p>		
ESS6 (“Biodiversity Conservation and Sustainable Management of Living Natural Resources”)				
Biodiversity restoration	In accordance with the mitigation hierarchy provided in ESS1 and with the requirements of this ESS, Borrower is required to ensure that biodiversity expertise is utilized to develop and implement a Biodiversity Management Plan.	<p><u>The Constitution of the Republic of Somaliland</u>. Article 18 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem.</p> <p>Furthermore, all people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment.</p>	There is no specific laws or policies on Biodiversity Conservation in Somaliland	World Bank ESS will be applicable.
ESS8 (“Cultural Heritage”)				
Management of risks on tangible and intangible cultural heritage, including	This ESS requires the Borrower to manage risks on tangible and intangible cultural heritage, including	<p><u>Article 16 of the constitution of Somaliland:</u> Promotion of Knowledge, Literature, Arts and Culture. Sub Article 3 states that “The state shall</p>	There are no explicit laws or regulations known to be delineating sites as places of cultural importance.	World Bank ESS will be applicable.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
legal protection to cultural heritage sites	identification of the presence of all listed legally protected cultural heritage areas affected by the project.	promote the Arts and the modest culture of the society whilst at the same time benefiting from the knowledge of other world societies. Literature, the arts, and indigenous sports shall be specifically encouraged whilst Islamic behaviour is observed..		
ESS10 (“Stakeholder engagement and information disclosure”)				
Meaningful engagement of stakeholders in the project activities from planning to implementation levels	The World Bank anticipates that the project will establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. Further, the project will promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them. The project affected persons should be provided with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.	<p><u>The Constitution of the Republic of Somaliland</u>: defines access to information as a right. It states that every person has the right of access to information held by the Somaliland; as well as every person has the right of access to any information that is held by another person which is required for the exercise or protection of any other just right. It also states that every citizen have freedom, in accordance with the law, to express his opinions orally, visually, artistically, writing or any other form. And press and other media are part of fundamentals of freedom of expression and all acts to subjugate them are prohibited</p> <p>Art. 8 provides that all Somaliland citizens have equal rights and obligations before the law, regardless of color, clan, birth, gender, property, status and opinion. This article also states that precedence and discrimination on grounds of ethnicity, clan affiliation, birth, gender is prohibited.</p>	Currently, policies and legislation with respect to stakeholder consultation are yet to be developed. There is a need for the Somaliland Government to enact laws to ensure the right of access to information is enjoyed by all.	World Bank ESS will be applicable.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>Article 23 on freedom of movement and association clearly states that all citizens have the right to form, in accordance with the law, political, educational, cultural, social and occupational or employees' associations.</p> <p>Article 36 on the rights of women states that women shall have equal rights as men particularly on issues related to own, manage, oversee, trade in, or pass on property in accordance with the law</p>		

3.6. Applicable International Conventions and Agreements

111. There are several international treaties, agreements and conventions which are relevant for the Food Systems Resilience Project which Somaliland is also enforcing as a result of Somalia being a signatory. These conventions and agreements are aimed at halting environmental degradation and improving the sustainable use of natural resources, climate change adaptation and mitigation, labor management, among others. Among the relevant conventions the following are applicable:

i. African Convention on the Conservation of Nature and Natural Resources adopted in 2003 and entered into force on 2016:

This convention affirms that African States are responsible for protecting and conserving their environment and natural resources and for using them in a sustainable manner with the aim to satisfy human needs according to the carrying capacity of the environment. The main objectives of this convention are:

- to enhance environmental protection;
- to foster the conservation and sustainable use of natural resources; and
- to harmonize and coordinate policies in these fields with a view to achieving ecologically rational, economically sound and socially acceptable development policies and programmes.

Article 6 on Land and Soil states that the Parties shall take effective measures to prevent land degradation, and to that effect shall develop long-term integrated strategies for the conservation and sustainable management of land resources, including soil, vegetation and related hydrological processes

ii. The Convention on the Protection and Use of Transboundary Watercourses and International Lakes (Water Convention) 1996:

The Convention is a unique legally binding instrument promoting the sustainable management of shared water resources, the implementation of the Sustainable Development Goals.

This convention states that parties are obliged to prevent, control and reduce transboundary impacts, i.e. adverse effects on the environment. These can be effects on human health and safety, flora, fauna, soil, air, water, climate, landscape and historical monuments and other physical structures, and the interaction among these factors. They also include harm to the cultural heritage or socio-economic conditions resulting from alterations to those factors.

iii. Convention on International Trade in Endangered Species of Wild Fauna and Flora.

This convention is an international agreement, signed by 184 parties in 1973, designed to ensure that international trade in animals and plants does not threaten their survival in the wild. Many marine species that are traded internationally are highly migratory—meaning they swim long distances, often crossing national boundaries. Their conservation can only be achieved if nations work collaboratively. That's where this agreement comes in. The agreement provides a legal framework to regulate the international trade of species, ensuring their sustainability and promoting cooperation among member countries.

iv. Convention on the Conservation of Migratory Species of Wild Animals.

Also known as Bonn Convention, it is an environmental treaty under the aegis of the United Nations Environment Programme. It provides a global platform for the conservation and sustainable use of migratory animals and their habitats. CMS is the only global and UN-based intergovernmental organisation established exclusively for the conservation and management of terrestrial, aquatic and avian migratory species throughout their range.

In article 2, the Parties acknowledge the importance of migratory species being conserved and of Range States agreeing to take action to this end whenever possible and appropriate, paying special attention to migratory species the conservation status of which is unfavourable, and taking individually or in co-operation appropriate and necessary steps to conserve such species and their habitat.

v. Regional Convention for the Conservation of the Red Sea and the Gulf of Aden Environment.

The objectives of this convention is to conserve the Red Sea and Gulf of Aden environment. Summary of provisions: Parties should undertake all appropriate measures to conserve the Red Sea and Gulf of Aden environment, including prevent, abate and combat marine pollution from all sources (art. III). They are to co-operate in the adoption of protocols for the implementation of this Convention, and with competent international and regional organisations with a view to adopting regional standards for the conservation of the Red Sea and Gulf of Aden environment. Specific provisions of the Convention deal with pollution from different sources, including from exploration and exploitation of the bed of the territorial sea, continental shelf and subsoil thereof (art. VII,) and with co-operation in case of pollution emergencies (art. IX). Other provisions provide for, inter alia, co-operation in scientific and technological activities, elaboration and adoption of procedures for civil liability and compensation, and assessment and management of the use of the environment.

vi. United Nations Framework Convention on Climate Change,

The ultimate objective of the Convention on Climate Change is to stabilize greenhouse gas concentrations "at a level that would prevent dangerous anthropogenic (human induced) interference with the climate system." It states that "such a level should be achieved within a time-frame sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened, and to enable economic development to proceed in a sustainable manner.

The Convention acknowledges the vulnerability of all countries to the effects of climate change and calls for special efforts to ease the consequences, especially in developing countries which lack the resources to do so on their own. In the early years of the Convention, adaptation received less attention than mitigation, as Parties wanted more certainty on impacts of and vulnerability to climate change. When IPCC's Third Assessment Report was released, adaptation gained traction, and Parties agreed on a process to address adverse effects and to establish funding arrangements for adaptation. Currently, work on adaptation takes place under different Convention bodies.

vii. The Convention on Biodiversity in 2009:

The Convention on Biological Diversity (CBD) is the international legal instrument for "the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources" that has been ratified by 196 nations.

The CBD's overall objective is to encourage actions which will lead to a sustainable future. It covers all possible domains that are directly or indirectly related to biodiversity and its role in sustainable development, ranging from science, politics and education to agriculture, business, culture, etc.

The conservation of biodiversity is a common concern of humankind. The Convention on Biological Diversity covers biodiversity at all levels: ecosystems, species and genetic resources. It also covers biotechnology, including through the Cartagena Protocol on Biosafety. In fact, it covers all possible domains that are directly or indirectly related to biodiversity and its role in development, ranging from science, politics and education to agriculture, business, culture and much more.

viii. Sendai Framework for Disaster Risk Reduction (2015 – 2030):

The Sendai Framework focuses on the adoption of measures which address the three dimensions of disaster risk (exposure to hazards, vulnerability and capacity, and hazard's characteristics) in order to prevent the creation of new risk, reduce existing risk and increase resilience. The Sendai Framework outlines seven global targets to guide and against which to assess progress.

The Sendai Framework Monitor is an online tool that captures self-reported (by member states) progress data against a set of 38 Sendai Framework indicators towards the seven Sendai Framework global targets. The indicators measure progress and determine global trends in the reduction of risk and losses.

The Sendai Framework for Disaster Risk Reduction 2015-2030 outlines seven clear targets and four priorities for action to prevent new and reduce existing disaster risks: (i) Understanding disaster risk; (ii) Strengthening disaster risk governance to manage disaster risk; (iii) Investing in disaster reduction for resilience and; (iv) Enhancing disaster preparedness for effective response, and to "Build Back Better" in recovery, rehabilitation and reconstruction.

It aims to achieve the substantial reduction of disaster risk and losses in lives, livelihoods and health and in the economic, physical, social, cultural and environmental assets of persons, businesses, communities and countries over the next 15 years.

ix. Cartagena Protocol on Biosafety in 2010;

It provides a comprehensive and holistic approach to the conservation of biological diversity, the sustainable use of natural resources and the fair and equitable sharing of benefits deriving from the use of genetic resources.

Article 1 states that "In accordance with the precautionary approach contained in Principle 15 of the Rio Declaration on Environment and Development, the objective of this Protocol is to contribute to ensuring an adequate level of protection in the field of the ,safe transfer, handling and use of living modified organisms resulting from modern biotechnology that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, and specifically focusing on transboundary movements".

Article 2: The Parties shall ensure that the development, handling, transport, use, transfer and release of any living modified organisms are undertaken in a manner that prevents or reduces the risks to biological diversity, taking also into account risks to human health

x. Stockholm Convention on Persistent Organic Pollutants in 2010;

Mindful of the precautionary approach as set forth in Principle 15 of the Rio Declaration on Environment and Development, the objective of this Convention is to protect human health and the environment from persistent organic pollutants.

The Stockholm Convention on Persistent Organic Pollutants is a global treaty to protect human health and the environment from harmful chemicals that remain intact in the environment for long periods, become widely distributed geographically, and accumulate in the fatty tissue of humans and wildlife. These chemicals, known as persistent organic pollutants (POPs), include PCBs, DDT, and dioxins. They can lead to serious health effects including certain cancers, birth defects, dysfunctional immune and reproductive systems, greater susceptibility to disease, and damages to the central and peripheral nervous systems. Given their long-range transport, no government acting alone can protect its citizens or its environment from POPs. In response to this global problem, the Stockholm Convention requires its parties to take measures to eliminate or reduce the release of POPs into the environment.

xi. African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala convention) 2009;

The main objectives of this convention are:

- a. Promote and strengthen regional and national measures to prevent or mitigate, prohibit and eliminate root causes of internal displacement as well as provide for durable solutions;
- b. Establish a legal framework for preventing internal displacement, and protecting and assisting internally displaced persons in Africa;
- c. Establish a legal framework for solidarity, cooperation, promotion of durable solutions and mutual support between the States Parties in order to combat displacement and address its consequences;

- d. Provide for the obligations and responsibilities of States Parties, with respect to the prevention of internal displacement and protection of, and assistance, to internally displaced persons;
 - e. Provide for the respective obligations, responsibilities and roles of armed groups, non-state actors and other relevant actors, including civil society organizations, with respect to the prevention of internal displacement and protection of, and assistance to, internally displaced persons;
- xii. Convention 144 on tripartite consultation will promote better industrial relations and improve stakeholder relations with government, employers, and trade unions;
- xiii. Convention 190 and six other International Labor Organization (ILO) conventions, to improve labor standards, and will promote gender equality at the workplace and will prohibit sexual and gender-based violence which is adversely affecting women and girls. The Convention will also assist unions in their campaigns for the introduction of a sexual offences bill in the federal parliament;
- xiv. Further, Conventions 187 and 155 on health and safety and protect workers' rights and will help to end unsafe working conditions and improve workers well-being; and
- xv. Conventions 97 on migration for employment, Convention 143 on migrant workers and Convention 181 on private employment agencies seek to address the abuse and exploitation faced by Somali migrant workers abroad. by providing legal protection.
- xvi. Forced Labour Convention, 1930

CHAPTER 4 – ENVIRONMENTAL AND SOCIAL BASELINE

112. This chapter provides a broad overview of the biophysical and social-economic baseline of Somaliland. It is not clear at the time of developing this ESMF as to the specific locations of the proposed project interventions, especially for component 1,2 and 3 which is a community driven development (CDD) components. However, all the sites will be in selected rural areas of Somaliland. Current environmental and socio- economic conditions will provide, in many cases, a basis for predicting impacts of the subprojects.

4.1. Environmental Baseline

Somalia's location and size

113. Somaliland is situated in the Horn of Africa. The territory of the Somaliland covers the same area as that of the former Somaliland Protectorate and is located between Latitude 8' to 11' 30' north of the equator and Longitude 42' 45 to 49' East; and consists of the land, islands, and territorial water above and below the surface, the airspace, and the continental shelf. Somaliland is 137,600 km² with a coastline of 850 kilometers long. Climactically, Somaliland is semi-arid.

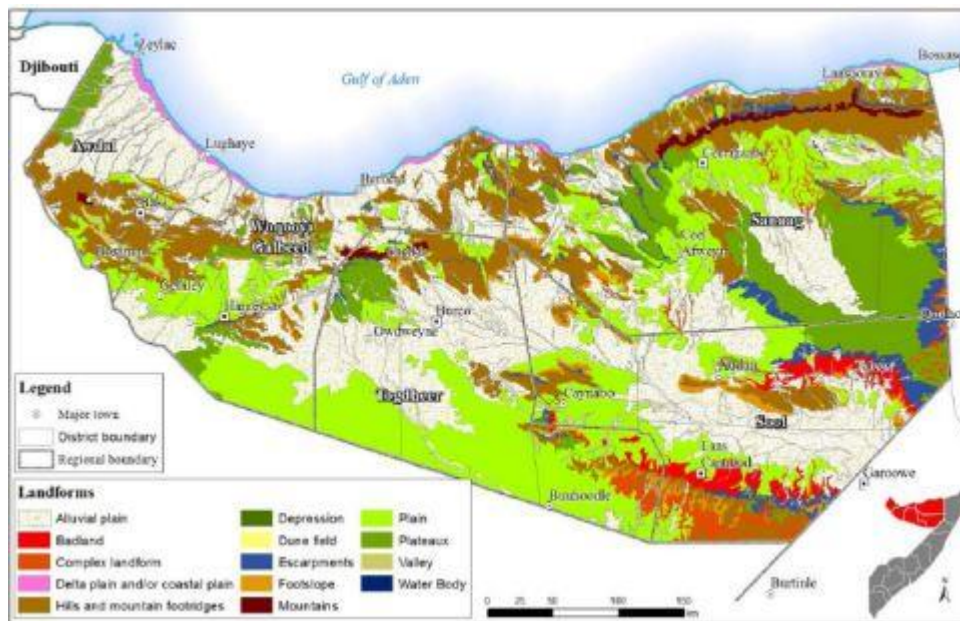


Figure 2: The map of Somaliland

Climate and Physical Environment

114. Somaliland is classified into three main climatic zones across the regions. These include; (a) desert zone mainly along the coastal belt, (b) very arid zone in the central and western areas and (c) semi-arid zone in the lower parts of Awdal and present-day Maroodijeex. The latter areas receive the best rainfall up to 500 to 600 mm per year, Togdheer, Sool and Sanaag regions come next with rainfall values of 100 to 400 mm per year. The coastal belt and a small pocket of the area south of Sool region are characterized by very low rainfall with values less than 100 mm per year. Somaliland is subject to four seasons each lasting three months. Winter (Jilaal) is a dry season occurring from December to mid-March. Spring (Gu') is the long rainy season, lasting from late March to mid-June. Summer (Xagaa) is the third season and occurs from late June to mid-September. Autumn or fall (Dayr) is

another rainy season but is much less bountiful than the spring season in many parts of the country, especially the west which is compensated by ‘Karan’ showers in winter.

115. The Plateau (Hawd) region lies to the south of Ogo. It is generally more heavily populated during the wet season when surface water is available. It is also an important area for grazing. There is generally warm and arid climate, though precipitation and the wind can be highly variable in places at certain times of the year (on account of proximity to the equator).

116. It is arid and hot most of the time, while precipitation is less than 50mm annually. Water Temperature is 21°C in January & 37°C in October. Two monsoon winds are experienced annually. Southwest monsoon blows June to September, while Northeast blows October to March.

117. The Seasonal rainfall is dominated by the north and south movement of the Inter-Tropical Convergence Zone (ITCZ), delineated into four seasons:

- i. **Jiilaal:** dry season is from December to March. The north-east monsoon is in dominance and conditions are generally dry and hot. The northern parts of the country experience some cool and dry air during this season while the central and southern parts experience very hot conditions.
- ii. **Gu:** rainy season is from April to June. Relatively wet and hot conditions prevail, with Gu considered as the major rainy season in the country. The southern regions receive more rains than the north. Occasionally the Gu season extends into June or July because of the Haggai rains, which are produced by the onset of moist onshore winds.
- iii. **Xagaa:** dry season is from July to September. The South-west monsoon dominates, bringing relatively cool conditions, with showers along the coast but dry inland.
- iv. **Deyr:** rainy season is from October to November. The rainfall received at this time is less than that of the Gu rainy season.

Water Resources and Access

118. Due to the scarcity of significant surface water resources, the country’s population to a large degree depends on ground water resources (especially berkads, hand-dug shallow wells, springs, and boreholes) for domestic water supply, livestock and small-scale irrigation. However, many of these water sources are unprotected and poorly managed and are prone to pollution, such as microbiological contamination, for instance, the hand-dug shallow wells, which are most water resources.

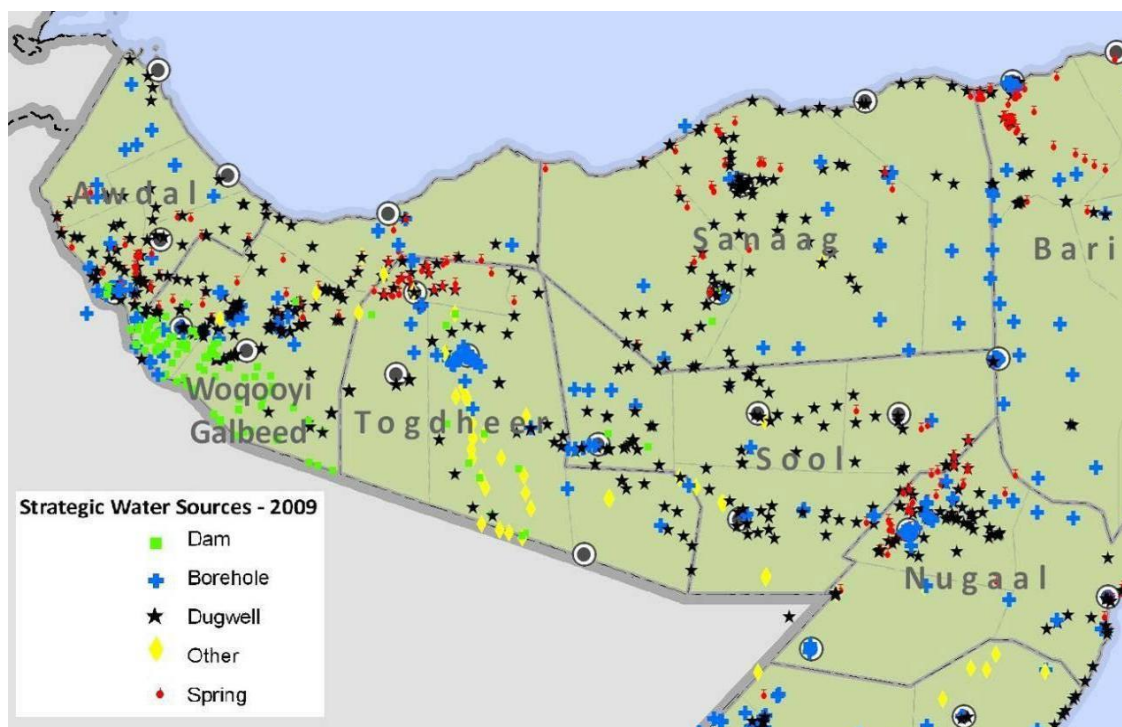
119. Due to the shortage of reliable water sources, water prices are one of the highest in Africa (up to \$10 per cubic meter), making it difficult for the poorest and vulnerable households to access safe water. Water scarcity has also led to high mortality rates amongst livestock and failed crop production, essential elements of household survival in Somaliland. Many households, usually women and girls, walk long distances to access water, increasing their exposure to risks of sexual and gender-based violence

120. According to FAO-SWALIM, 2012 a total of 1,037 water sources are found in Somaliland (see figure below). More than half of the water sources are shallow wells. Dams are restricted basically to the region west and south of Hargeisa, while springs are found in the mountainous regions, particularly in Awdal, between Hargeisa and Berbera and around Erigavo.

Table 4: Water resources in Somaliland

Region	Dams	Boreholes	Dug wells	Springs	Others	Total
Awdal	14	25	104	37		180
Sanaag	2	32	107	30	1	172

Sool	2	18	86	3		109
Togdheer	19	40	86	20	31	196
Woqooyi Galbeed	87	43	212	34	4	380
Grand Total	124	158	595	124	36	1037



Source: SWALIM (2012): Water and Land Information Management

121.

Figure 3: Water resources in Somaliland

Soil and Water Conservation

122. The conservation of water goes a long way to increase the resilience of the rural economy in drylands by restoring and conserving soil organic carbon (SOC) and harvesting rainwater. Opportunities exist to enhance rural communities' access to water across Somaliland's drylands by deploying low-cost, small-scale water harvesting and storage technologies. Stone bunds, terraces, and half-moons reduce runoff and erosion, promote infiltration, reduce evaporation losses, contribute towards restoring soil carbon sequestration capacity, and increase water storage in the soil. Water harvesting and storage in drylands can also be increased through sand dams, subsurface dams, and infiltration galleries. Increased water availability supported by improved vegetation biomass and soil management means better potential to support agricultural activities and food production, and thus increased resilience to climate change and other risks, as well as increasing soil carbon stocks. Increasing water catchment in the drylands has the potential to protect water from high evapotranspiration while supplying water for domestic, livestock and agricultural consumption.

Biodiversity and Protected Areas

123. Somaliland's fauna has been depleted due to hunting and culling to protect livestock. Some of the endangered species of mammals include: Somali Wild Ass (*Equus africanus somaliensis*), Hirola (*Beatragus hunter*) and Somali Wild Dog (*Lycaon pictus somalicus*); endangered plants include: *Acacia flagellaris*, *acacia densispina*, *acacia manubensis*, *Andenopodia rotundifolia*, *Albizia obbiadensis*; endangered birds: *Heteromirafrarcheri*, *Mirafraashi*, *Acrocephalusgriseldis*, and *Dorcatragusmegalotis*¹⁵ Some of the notable invasive species include: *Prosopis* spp. and the Indian House crow, *Corvus splendens*) have widespread effects on local fauna and flora and important to address, although *Prosopis* could be used to substitute endemic trees for charcoal production.

124. There are risks of losing the unique flora and fauna due to overexploitation, overgrazing and loss of the natural habitats. The local people overexploit the natural environment and biodiversity indiscriminately for their survival. They have engaged in activities such as deforestation and overgrazing.¹⁶

Ecosystems

125. The vegetation in Somaliland is predominantly dry deciduous bushland and thicket dominated by species of *Acacia* thorn trees, *commiphora*, aloes, baobab, and candelabra trees are native to the semiarid regions, with semi-desert grasslands and deciduous shrub land in the western parts neighboring Ethiopia. Trees that provide frankincense and myrrh are native to the region as well. Mangrove trees are found in the western part of Somaliland namely from Zeila to Lowyacada along the Red Sea coast. Kapok, and papaya grow along the rivers. Coconut, dune palm, pine, juniper, cactus, and flowering trees such as the flamboyant were imported and have become widespread in populated areas.

126. Along with its large livestock herd, Somalia has one of the most abundant and varied stocks of wildlife in Africa. Animal life includes elephants, lions, wildcats, giraffes, zebras, hyenas, hippopotamus, waterbucks, gazelles, and other mammals, although many of them are on the verge of extinction or are already extinct. A large variety of birds inhabits the different geographical zones, among these several species endemic to the Somali Region, e.g. Somali Pigeon (*Columba oliviae*), Somali Thrush (*Turdus ludoviciae*) and Warsangli Linnet (*Carduelis johannis*). For whole Somalia a total of 171 species of mammals, 655 species of birds, and over 3,000 species of plants have been reported.

127. Over the past two decades, land degradation, deforestation and desertification have rapidly accelerated; fauna and flora in Somaliland is affected by environmental degradation due to several factors such as: (i) clearing of vegetation and deforestation (average deforestation rate of 0.97% per annum); (ii) illegal charcoal production, trade and export; (iii) over-fishing and illegal fishing by foreign companies in coastal waters; (iv) indiscriminate shooting and hunting of wildlife; (v) uncontrolled over-grazing by livestock; (vi) Erosion and desertification. No official natural reserve or national park has been established in Somaliland so far.

¹⁵ <http://www.earthsendangered.com/search-regions3.asp?mp=&search=1&sgroup=allgroups&ID=307>

¹⁶ <http://apps.worldagroforestry.org/downloads/Publications/PDFS/WP16174.pdf>

Current and Projected Climate Change and Variability

128. The climate of the study area follows the general climatic pattern of Somaliland. The climate is influenced by the northerly movement of the Inter Tropical Convergence Zone (ITCZ), which is responsible for the bi-modal rainfall pattern which the country experiences annually. The general climate is hyper-arid, arid and semi-arid. Records collected for over 40 years for Hargeysa indicate that there is the probability of rains during five months of the year but the actual amounts vary considerably. The rainy season has two peaks. The first occurs during April to June and is the more important of the two rainy seasons. This is locally known as the “*Gu*” and is significant to the nomads and the agricultural communities. This rain is brought up by the south-west monsoon which blows during this period. Temperatures at this time of the year are somewhat above the yearly average of 21.7C⁰ with the highest temperature – around 40°C –occurring in the last half of June.

129. This rainy season is followed by a short period with less rainfall but with, more significantly, dry strong winds. These winds reach their highest velocities in July. And they have a very serious desiccating effect on vegetation and the annual crops in the agricultural areas. They are most uncomfortable for the human population as well.

130. *Deyr* (Autumn), the second rainy season is most significant, not only for the recovery of crops that had been damaged by the strong and dry summer (*Xagaa*) winds, but also for the short time crops such as maize and dwarf sorghum. This period sees the cessation of the strong winds of the preceding period. During winter (*Jilaal*) both the mean monthly temperature and rainfall drop, though this is associated with tremendous variations as mentioned earlier.

131. The very few records of evaporation report values vary between about 1000-3000 mm/yr. In general, evaporation is much higher than precipitation across the country, only temporarily rainfall can be higher than evapotranspiration sometimes during the rainy seasons (compare Annex).

132. Generally, all Somali climate, weather and vegetation etc. is comprehensively monitored by the modern scientific systems of FAO, especially FAOSWALIM and FSAU. The major parameters which are monitored are temperature, precipitation, air humidity, wind speed and direction and overall climate dynamics. A comprehensive overview is given by Mucheri (2007). Additionally vegetation parameters are monitored, especially the NDVI, based on National Oceanic and Atmospheric Administration (NOAA)remote sensing systems.

133. General predictions on the future climate at the Horn of Africa are made by the IPCC climate models, which forecast an increase of temperature for the Horn of Africa of about 3.4° C for the future and an increase of rainfall variation between 30 – 40%, with rather higher quantities, which, however, would rather increase the amounts of off-seasonal rainfalls while seasonal rains would decrease (IPCC 2008). Earlier models predicted increasing temperatures with reducing rains(IPCC2005).

Pastoralism

134. Pastoralism is the extensive production of livestock in rangeland environments. It takes many forms, but its principal defining features are livestock mobility and the communal management of natural resources. These are regulated by sophisticated governance systems within pastoral societies¹⁷. The primary policy challenge is how to protect and promote mobility and support the customary institutions which underpin pastoralism in a society which

¹⁷ WISP, 2008: Policies that Work for Pastoral Environments

is otherwise pastoral against others who are tending to sedentary and tending towards more individualized modes of organization and production.

Climate Change Impacts in the Water Sector

135. Majority of Somaliland's population are highly reliant on natural resource-based livelihood – a resource that is very susceptible to effects of climate change. Degradation of the country's natural resources as a result of sustained and unregulated exploitation over several decades, such as excessive charcoal production and overgrazing has further heightened the people of Somaliland's vulnerability to climate change impacts.

136. Climate change affected water sector in many ways. Seasonal variability affected supply and demand, and planning. It present operational challenges when planning for the water resources including during emergencies and disasters. High temperatures resulted increased loss of water through evapotranspiration. Increase in demographics will also increase demand which results into resource-based conflict which is already rampant in Somaliland.

137. Increase in extreme events, such as prolonged drought and heavy rains/floods will have significant impacts on infrastructure and endanger life and property through direct physical effects and potentially through water quality issues. Drought will result to reduced productivity and livelihoods and food insecurity. The effects of climate change are having serious consequences on the livelihood of Somaliland citizens since more than seventy percent of Somaliland's population is heavily dependent on climate-sensitive natural resources including animal husbandry and rain-fed agriculture.

Hydrology

138. Arid and Semi-Arid Lands (ASALs) are characterized by low and erratic rainfall, periodic droughts, irregular agricultural productivity, and high-water scarcity. The hydrology of ASALs influences water security, environmental sustainability and agricultural production and availability of aqua life and energy resources. The influences are pronounced in the tropical environments where land degradation threatens the livelihoods of poor communities, minority communities, and the vulnerable groups.

139. Water resources are generally scarce in Somaliland and there is no river with perennial flows in Somaliland. Groundwater is the main source of water for the majority of the people in Somaliland to meet their water needs, groundwater from dug wells, bore holes and springs are the primary sources of water for the population in the most of the country. Groundwater is harnessed by the rural and urban population to meet domestic and livestock water needs as well as for small scale irrigation.

4.2. Socio-economic Baseline

Demographics

140. The population of Somaliland in 2021 was estimated at 5 million according to the Ministry of National Planning and Development (Somaliland in Figures, 2011). About 55% of the people are nomadic pastoralists and 45% are urban and rural dwellers. Somaliland is predominantly a nomadic pastoral community and traditionally the major livelihood is livestock husbandry, which is the main source of food and income for 70% of the population including rural pastoral and urban communities. Crop production ranks second to livestock.

141. According to OXFARM, Youth make up approximately 70% of Somaliland's population, where they face youth unemployment rates hovering around 65%.¹⁸ Irregular migration of youth populations in search of resources of livelihoods, particularly from rural to urban areas may compound existing challenges linked to youth vulnerability and unemployment. A joint study by the World Bank and the United Nations on youth and attitudes to peace showed that for youth peace is not just about ending violence but includes strong and accountable institutions providing services and opportunities for all. According to Somaliland's National Development Programme, unemployment among youth stands at 75 per cent, which is much higher than the nation's average of 61.5 per cent in urban areas and 40.7 per cent in rural and nomadic areas. Unofficial estimates show that at least 65-70 per cent of Somaliland's people are under 30.

Economy and Poverty Levels

142. There are three main sources of revenue in Somaliland today: livestock, agriculture and remittance from the diaspora. Livestock is the backbone of the Somaliland region's economy. Sheep, goats, camel and cattle are shipped from the Berbera port and sent to Gulf countries, mainly Saudi Arabia. Around 10% of land area is estimated to be suitable for permanent agriculture (Somaliland country profile, 2021).

143. More than 1 in 3 people in rural Somaliland and more than 1 in 4 people in urban Somaliland are living in poverty. Rural poverty is more prevalent and deeper than urban poverty. In rural Somaliland 24% of households live in extreme poverty —defined as consuming less than the cost of meeting basic food needs. Households in Somaliland face deprivations on many dimensions, particularly in rural areas, which points to the need for a comprehensive approach to addressing poverty. More than two-thirds of poor households in urban areas have a child who is not in school, or do not have access to an improved water source, or do not have access to external sources of information. However, households in rural Somaliland are three times more likely to be deprived in multiple dimensions at once. The acute nature of rural poverty in combination with the existence of deprivation on a greater number of dimensions makes rural poverty harder to address. Addressing poverty will require investments in education and improved health care in addition to investments to improve productive opportunities for poor households.

Minority Groups

144. Minority groups (occupational groups such as Midgan/Gabooye, Tumul, Yibir, Galgala) are estimated to represent up one-third of the population in Somaliland.¹⁹ However, they continue to be excluded from political participation, have limited access to justice, are denied multiple rights and are disproportionately affected by natural hazards and conflicts. For the most part, Somaliland's are artisanal specialists (for example, the Tumaal). Women from minorities and/or among IDPs are particularly affected by multiple violations of their rights, both as women and as members of minority groups. The marginalization and social segregation of vulnerable groups is one of the key driving forces of the protracted massive displacement of people and the difficulty to find durable solutions for them.

145. Minorities in Somaliland can be those who fall outside the three main clans of Gabooye, Tumul and Yibi that traditionally fulfilled a particular function considered taboo by the main Somali clans. This included leatherworking, pottery, metalworking, hunting and some traditional health practices. These communities are found all over Somaliland. Inter-marriage between young people from these communities

¹⁸ OXFARM, The Getting Somaliland's youth back to work through skills training, accessed at: <https://heca.oxfam.org/latest/stories/getting-somalilands-youth-back-work-through-skills-training>

¹⁹ While data on the population of minorities in Somaliland are limited and contested, in 2002, the UN Office for the Coordination of Humanitarian Affairs estimated that the minority groups combined comprised one-third of the population (UN OCHA 2002).

and those from the three clans is socially unacceptable – with at times tragic consequences whereby reprisal actions are taken when occasionally such marriages have taken place despite social disapproval and threats.

146. While all of these people are considered Somali and share languages and cultural characteristics with the country's majority clans, social and historical distinctions relegate some of the groups to subordinate and marginalized positions in the society

Gender Inequality

147. In Somaliland urban households are on average larger than rural households—a household in urban Somaliland has on average 6.7 members while the rural households have on average 6.1 members---but in both urban and rural areas poor households have more members on average. A poor household in urban Somaliland has 7.8 members compared to 6.3 members in a non-poor household (Ministry of Planning and National Development, 2022).

148. Gender is a critical determinant of poverty and access to services in Somaliland. Female headed households are quite prevalent in Somaliland, particularly in urban areas, and households headed by women in urban areas are significantly more likely to be poor than households headed by men. Although this is not the case in rural areas, other aspects of deprivation are particularly concerning in rural areas. For example, poor women in rural areas are very unlikely to face adequate health care during childbirth. Patterns of gender inequality are present in current school enrollment across rural and urban Somaliland, particularly for adolescent girls.

149. The participation and roles of women in politics and decision-making is minimal, and although this is improving, it limits female roles and perpetuates inequality. women's rights in Somaliland are ostensibly protected in their respective constitutions, implementation of these provisions continues to lag.

150. The linked to water insecurity. There is a vast literature on the role of women and girls in Somaliland, and the underlying factors contributing to the gender gaps.²⁰ These resources highlight the following gender gaps relevant to the proposed project: (a) Time spent to fetch water: In 2020, only a third of Somali households had water piped to their homes, with the rest depending on communal water taps (42 percent) and groundwater (16 percent). It is noted that 41 percent do not have access to a regular and stable improved water source for drinking.²¹ While this situation applies to both genders, women and girls are further impacted as they are usually the main providers of water to the households and spend a disproportionate percentage of their time collecting water averaging three to six hours per day.²²

151. The time that women and girls invest in water collection varies across states according to multiple factors - notably, source of water, season, water quality, climate shocks, and state of the borehole (in the case of groundwater)—but it is always time deducted from productive activities or education; (b) Decision making and leadership: Even though women and girls are the main providers of water to the household, they rarely have a voice in decision making regarding water governance. At the national level, gender

²⁰ FAO. 2021. National Gender Profile of Agricultural and Rural Livelihoods; <https://reliefweb.int/sites/reliefweb.int/files/resources/NATIONAL%20GENDER%20PROFILE%20Somaliland.pdf>. Also see: Croome and Husain. 2020. Climate crisis, gender inequalities and local response in Somaliland/Somaliland; <https://www.fmreview.org/sites/fmr/files/FMRdownloads/en/issue64/croome-hussein.pdf>

²¹ 2020 Joint Multi-Cluster Needs Assessment.

²² FAO (2021), pg 19.

inequality is also evident in women's low participation in leadership/decision-making roles;²³ (c) Agricultural productivity and income generation. Women play important roles in agriculture and livestock production, but their productivity is limited by lack of access to markets, inputs, extension, training as well as time taken for water collection and other domestic responsibilities.

152. Women make up 57% of the workforce in agriculture and pastoralism (both of which constitute nearly 70% of the local economy). They are significantly involved in trading and commerce, from micro-enterprises to large-scale businesses. While the women butcher and sell small ruminants (goat and sheep), they make up most of the fruit and vegetable vendors. Women are also engaged in the sale of local imported goods (e.g. rice, sugar, wheat, sorghum, etc.). Their employment options are limited by low levels of education; and (d) Health: Poverty, food insecurity, and environmental degradation have a disproportionate impact on rural women, not only due to their inferior socioeconomic, legal and political status, but also due to their critical roles as both producers and household managers and as a result of growing labor shortages due to male out-migration. Women are more malnourished than men and also less food secure. FAO surveys found that households dependent on women for food or income to buy food are over-represented in the category of households with poor food consumption, few income sources, and assets.²⁴

153. The project will make a positive impact on women transhumant nomads and smallholder farmers in terms of increasing access to more and better-quality water. The project aims to contribute to women's and girls' socioeconomic empowerment by reducing gender gaps in the agricultural and livestock sector where women play important roles but have limited access to extension, training, inputs, information, credit as well as little voice in decision making, and few opportunities for income generation given their heavy domestic responsibilities, particularly for water collection.

Labor and Employment

154. In the labor sector, 47 per cent of the population in Somaliland is unemployed. Among youth the rate is even higher with 54 per cent.²⁵ The main employment is in the livestock and agricultural sectors, where 72 per cent of employees worked in 2019; followed by 6 per cent in the industrial sector, and 21 per cent in the service industry.²⁶

155. In relation to child labor and trafficking, in Somali culture, girls and boys are expected to take part in household chores from around the age of five years, especially in rural areas. The distribution of such tasks is highly gendered and the burden skewed towards girls. The Project will strive to bridge this gap through sensitization and capacity building.

156. In addition, as ILO points out, the legal and judicial systems governing employment are still weak; and there are few private or public insurance institutions; nor are there labor inspection systems in place. It reminds that workers can be exposed to hazardous work without adequate protection, and child labor is a common practice in Somaliland.

²³ Gender inequality is alarmingly high in Somaliland at 0.776 out of a value of 1 (complete inequality), with Somaliland at one of the lowest positions globally on the Gender Inequality Index. Women suffer severe exclusion and inequality in all dimensions of the index—health, employment, and labor market participation (UNDP 2015).

²⁴ FAO (2021) pg. 20.

²⁵ Others Government of Somaliland, Ministry of Education, Culture and Higher Education, Education Sector Strategic Plan 2018-2020, p.13

²⁶ Statista, Somaliland: Distribution of Employment in by economic sector from 2009 – 2019, accessed at: <https://www.statista.com/statistics/863133/employment-by-economic-sector-in-Somaliland/>

Conflicts/Security

157. Land conflicts in the eastern regions of Somaliland have risen to be one of the key issues of instability due partly to a complex situation of land tenure and overlapping claims. The Constitution of Somaliland defines land as public property meaning formal legal frameworks now exist alongside customary land management. Due to insecure land tenure arrangements in IDP settlements, it is often difficult for IDPs to secure their land rights, with large numbers of IDPs evicted from both public and private land, making them more vulnerable.

158. Somaliland has two security zones in which each one has a homogenous security situation. Awdal, Marodijeh, Sahil, and Togdher have similar security levels whereas the eastern part of Somaliland is mainly south of Lasanod and east of Sanag regions. . In the East, occasional clashes occur between GoSL security forces and Puntland Troops.

159. The greatest threat of political violence in Somaliland is the ownership and administration of Saanag and Sool, along the disputed border between Puntland and Somaliland. Protests motivated by arrests or poor service delivery by the government is common in SL. Police sometimes mismanage and mishandle the protestors and the events can turn to be violent. Although protests can sometimes turn to be violent, they tend most of the time to be peaceful demonstrations.

160. This scenario has given birth to inclusivity concerns in in governance processes implying that all people including the poor, physically challenged persons, women, ethnic and religious minorities, minority communities and the indigenous peoples, and other disadvantaged groups, have their rights of participation in development activities curtailed. This project will make efforts have the right to participate meaningfully in governance processes restored through inclusivity and fair targeting and thus, influence decisions that affect this set of the society. FSRP has developed a SMP and will implement this Security Management Plan (SMP) to ensure that the project activities are implemented in a safe environment and also the activities do not trigger insecurity to the community, including their health and safety, and also in matters relating to GBV and SEA/SH; and that the project personnel are not exposed to potential security risks in the course of their work.

Vulnerability and Social Inclusion

161. Some minority and vulnerable and disadvantaged groups, such as the Midgan/Gaboye Tumul, Yibir and Galgala groups, exist.

162. Gender-Based Violence and Gender Dynamics. Differentiated social roles and responsibilities between men and women across livelihood systems have implications on the available mechanisms to cope and respond to external shocks such as drought. Sexual violence against women and girls in Somaliland, an abominable crime less prevalent in Somaliland pre-civil war history. Recent figures show 76% of all recorded cases happen among the IDPs whereas 14% occur in the hosting communities. In the face of crisis, such as insecurity, drought or famine, men and women adopt different coping strategies to increase household resilience. Preventing and combating sexual violence requires informed participatory not limited to education and awareness campaigns, safeguarding and robust reporting, effective law enforcement and judicial process which can furnish proportionate remedy and penalty.

163. Available economic opportunities, however, are still quite limited for both men and women and female-headed households remain among the most vulnerable populations. Unemployment rates remain particularly high for women, and especially female IDPs who often remain reliant on charity through social protection mechanisms and contributions from the diaspora in the form of remittances. Women who are engaged in income generating activities are often engaged in the informal sector and further bear the

double domestic burden of earning an income and taking care of the home. The consequences of this burden often fall to girls in the family, who are expected to contribute to the maintenance of the home, often at the expense of girls' education and skills development.

164. Women representation in politics and governance bodies has remained scarce. Political power and authority are perceived as masculine spaces, and the few women who are included in politics mostly act through their husbands or other male family. Analytical work on political economy in Somaliland has shown that political power is deeply rooted in access to resources. Women's economic empowerment should therefore play a fundamental role in their rise in politics and decision-making spheres. However, to date no analysis has explored the links between economic empowerment initiatives and political empowerment, nor has rigorous political economy analysis been coupled with a gender analysis.

165. The Provisional Constitution and the GoSL have made commitments on women's empowerment and gender mainstreaming. The Constitution provides for the protection of women, including the outlawing of female circumcision and protection from sexual abuse.

166. Most domestic violence and sexual violence cases are dealt with through the customary and Sharia legal systems. Anecdotal evidence indicates that some customary practices result in a double victimization of women and girls, denial of justice for many survivors, and impunity for perpetrators. The customary justice system is focused on clans. Justice is delivered for the clan rather than for the survivor of the sexual violence. Traditional approaches to dealing with rape seek resolution or compensation through negotiation between clan. Restitution is paid to the clan and not to the survivor. Once restitution is paid, the perpetrator of the sexual violence is free from further punishment and the case is considered finalized. In some cases, the woman or girl is forced to marry the perpetrator of the violence as a form of "restitution" ordered by customary courts. The customary system is widespread, and many families and clans choose it over other justice systems²⁷.

167. Under ESS1 the project will give special consideration to these vulnerable and disadvantaged groups. In addition to the three, other groups on economic and social vulnerabilities will also be considered including -

- i. Internally Displaced Persons;
- ii. Those who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities;
- iii. Nomadic pastoralist communities;
- iv. People Living with Disabilities;
- v. Widows and female heads of households; and
- vi. Youth.

168. The inclusion plan in the SEP outlines how the project will include these groups in consultations throughout the project lifecycle in order that they can input into the design, and not be excluded from project benefits.

169. Inclusive community consultations and management structures are critical to the achievement of the inclusion plan. The primary objectives will be to:

- i. Understand the operational structures in the respective communities;

²⁷UNDP 2018

- ii. Seek their input/feedback to avoid or minimize the potential adverse impacts associated with the planned interventions;
- iii. Identify culturally appropriate impact mitigation measures; and
- iv. Assess and adopt economic opportunities, which the PCU could promote to complement the measures required to mitigate the adverse impacts.

170. Although the selection of the areas for subprojects need to be based on technical considerations and need, given that there are likely to be many potential areas, equity and inclusivity will be considered in the subproject selection criteria as outlined in the PAD and the POM, especially as areas with IDPs or minority groups (0.5 groups) may otherwise be overlooked due to clannism and elite capture.

Stakeholders Engagement

171. Open and transparent engagement among Project stakeholders improves environmental and social sustainability, acceptance, and makes a significant contribution to successful achievement of the project development objective (PDO). FSRP SEP has been prepared to handle issues of stakeholder engagement.

Information Disclosure

172. Information to be disclosed to participants will include (i) the purpose and nature/type of the activities to be implemented, (ii) when the activity will be executed (day, and target hours), (iii) duration of proposed activity, (iv) intensity of the activity, and (v) potential risks and impacts of the activity to local communities, targets and non-targets including fauna and flora, ecosystems, and mitigation measures. Also, disclosure of information will include how stakeholders will participate by developing meeting schedules, venues, and procedure for receiving and addressing grievances. For the vulnerable groups' and the minority communities' information will be made available to the affected vulnerable groups and the minority communities in an appropriate form, language, and manner. Information will be disclosed through public consultation and made available in TV, radio, email, phone, brochures, leaflets, or booklets, using Somali language, Arabic, and English language. Summaries of the Stakeholders Engagement Plan will be made available in hard copies at national level, District and Village level where Village Development Committees will be located. Electronic versions will be available on the official website of MoAD, MoLFD, MoECC, and the World Bank External website.

FSRP Targeting Mechanism

173. Targeting is a process that spans the life of aid operation, not just the initial phases of identifying beneficiaries; finding the right balance between inclusion, and exclusion errors, opportunity costs, and project costs is a complex task. FSRP will establish basic principles to guide decision-making in a range of emergency situations, drawing on the decades of experience in Somaliland and its partners in targeting including FAO and ICRC and the WFP during emergency interventions (Targeting in Emergencies | World Food Programme, n.d.). Targeting, or identifying food insecure communities, vulnerable groups, poor communities, and the minority communities; and reaching households and individuals with assistance, will be the central element of all FSRP interventions to avoid discrimination.

Labor Issues

174. Environment and Social Standard 2 (ESS2) of the World Bank recognize the importance of employment creation and income generation in pursuit of poverty reduction and inclusive economic growth. The Project will promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy conditions.

Labor and Working Conditions

175. The main objective of Labor and Working Conditions (LWC) is to promote sound workers management relationships and enhance the development benefits of a project by treating workers in a project fairly and providing safe and healthy working conditions. The specific objectives are as follows: i) To promote safety and health at work, ii) To promote the fair treatment, non-discrimination, and equal opportunity of project workers, iii) To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with ESS 2) and migrant workers, contracted workers, community workers and primary supply workers as appropriate, iv) To prevent the use of all forms of forced labor and child labour, v) To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law, and vi) To provide project workers with accessible means to raise workplace concerns. The project has prepared Labor Management Procedures manual (LMP).

Gender Based Violence/Sexual Exploitation /Abuse Harassment (GBV/SEAH)

176. In recent years, for example, 2020 has been a year that witnessed an increase in incidents of gender-based violence against women and girls due to the restrictions imposed by the Government due to the COVID-19 pandemic in addition to the persistent communal conflicts, armed conflicts, and natural disasters including droughts and floods. Isolation, loss of livelihoods due to closure of business, disruptions in school calendars, and limitations of movement are associated with an increase in sexual violence, intimate partner violence and female genital mutilation among children, adolescent girls and women. The project has also prepared a GBV/SEAH Plan.

177. According to the “Expanding Access to Justice Program, Gender Assessment, 2019” report, sexual violence and GBV in the country are very high. Sexual violence against women has been used as a tool of war, a form of sexual hostage-taking as well as child marriage.

178. There are significant barriers to access to justice. Fear of reprisals or punishment deters survivors of GBV from reporting incidents. Survivors are often reluctant to pursue cases against the perpetrator due to the social stigma associated with rape and other forms of GBV. In Somaliland, survivors, lawyers, witnesses, journalists, and family members face death threats, harassment, and arrests for reporting GBV offences, if perpetrators are from the security forces.

179. Interventions for women and children should consider the well-being of the family. A positive engagement with the issues confronting men should be part of any attempt to address the needs of women and children. A SEAH Prevention and Response Plan is attached as an Annex 12 to this document.

Grievance Redress Mechanism

180. The implementation of the Project activities will involve interaction with the community hence it is important to promote broader stakeholder engagement to enhance transparency and accountability. The project will continue to strengthen and upgrade the grievance redress mechanism established for the FSRP

and will work through the appropriate institutional structures for Project management at national level and Village levels. A mechanism will be put in place to specify the way in which community workers can raise their grievances. Detailed mechanism is shown in FSRP GM Manual.

Social Organization, and Ethnic Groups

181. In clans and clannism determining one's origin, social standing and access to territory, property, and to a large extent, power at the societal, economic, and state levels. The traditional clan system, while evolving, remains a central and defining factor shaping political and socioeconomic realities. Clan affiliation is both a force that has influenced conflict and violence as well as a mechanism for protection and dispute resolution. Customary traditions and conventions help define rights and obligations among kin, clans, and subclans, with an emphasis on the preservation of social stability over individual rights in communities and families. At the local level, clan arbitration through the customary system (*xeer*) has helped regulate access to shared resources, such as grazing areas and water. In the absence of sound national institutions, resilient clan-based structures provide safety nets to the most vulnerable and have historically claimed responsibility for security and protection. While political developments, population movements, and conflict have weakened traditional authority structures, many expect that clan systems will continue to play an important socioeconomic and political role, even as more formalized governance institutions emerge.

Land Issues

182. Land conflicts in Somaliland have risen to be one of the key issues of instability at the community and inter-community levels. This is partly due to a complex situation of land tenure. The Provisional Constitution defines land as public property. The government has created means to transfer some land into private ownership by granting ownership for urban and agricultural land. Formal legal frameworks now exist alongside customary land management. Land disputes and grievances have been identified in the existing literature as a major issue of contestation. The land-related grievances are often due to existing inter-communal disputes over land for grazing or access to water, illegal seizing of land by powerful clans, people returning to claim their land abandoned during war, land inheritance disputes, and unregulated sale of land.

Cultural Heritage

183. Somaliland has rich cultural heritage due to its own cultural goods 'dhaqan', including the fundamentals of a segmentary society and the resulting social fabric. Traditions often originate in the proto-Somali cultural era or originate in the many interactions Somali populations had with other cultures, including those from the Arabian Peninsula, India, and sub-Saharan Africa. There are several cultural heritage sites spread over 11 administrative areas in Somaliland this includes Archaeological Sites, Historical Sites, Heritage sites and monuments. Deliberate efforts must be made to protect cultural heritage. Unfortunately, the country's legislation around these issues has not yet been developed and does not legally enforce the protection and preservation of cultural artefacts, cultural heritage, and distinct sub-national identities. Especially infrastructure development project therefore needs to support the protection of places of cultural and religious significance, including graveyards, religious buildings, and historical sites

CHAPTER 5 - POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS AND MITIGATION MEASURES

184. This section contains a preliminary summary of the risks and impacts that are likely to result from the Food Systems Resilience Project activities because of the interaction between the project components and the environmental and social aspects of the project-supported communities. It should be noted that the impacts identified here are preliminary in nature and the actual ones will be identified during environment and social screening and environmental and social assessments associated with individual subprojects.

5.1. Key Environmental and Social Benefits of the Project

185. The project will have several potential benefits including improved food security and safety through environmental and social compliance, improved average farm household incomes, community institutions will be strengthened, the project will boost social and child protection, community infrastructural development will be improved, increased employment for the youth, food safety and enhanced capacity building to all government ministries and departments working on the project.

186. Institutional capacity building will be undertaken at various levels including farmer institutions, staffs of stakeholder ministries, and stakeholder institutions including private sector players and enterprises in key value chains; and therefore, the project will risk missing out some key stakeholders if a correct stakeholder mapping and analysis are not done. If done well, it will enable key institutions to play sectoral leadership roles at various levels. Use of innovations is expected to drive development and application of climate resilient breeds and inputs, digitally enabled information and extension services, development of locally relevant and climate smart technologies, innovations and management practices (TIMPs), scaling up innovations through technology transfer and demonstrations at community level, new age conservation agriculture approaches, innovations in rangeland management and sustainable charcoal production, development of new fodder varieties, innovative intensification of livestock production systems, low cost innovations in post-harvest storage, and traceability systems in livestock and livestock products. For all beneficiaries to be involved the right targeting and inclusion approaches must be employed otherwise the project risks exclusion of key actors and beneficiaries.

187. The project will make investments at all levels to support inclusive farmer institutions and producer organizations, extension and advisory services, access to finance and markets through digital channels, and incubation support for women owned enterprises. The investments will integrate and build on existing or completed investments that support resilience building including but not limited to the Biyoole and Barwaaqo project investments into water infrastructure, Horn of Africa Groundwater project investments and others. These are key stakeholders where this project may draw lessons learnt to better its efficiency and contribution to the PDO. Therefore, wide consultation, participation, and inclusion of all stakeholders is a must.

188. Investments in building resilient food systems in Somalia, will be made through four primary pathways; i) rejuvenating Somalia's agri-livestock research institutions, seed systems, extension services, and develop community institutions that can anchor adaptation of climate smart agri-livestock practices, ii) strengthening the availability of water and improved rangelands management for resilient agriculture and livestock production, iii) strengthening the integration of the production systems to domestic and regional markets, with appropriate investments in food safety and value addition, and iv) establishing an enabling policy and institutional framework at sub-national, national and regional level capable of supporting food systems resilience for Somalia. To support these investment pathways, FSRP comprises of five technical components in addition to the Contingent Emergency Response Component (CERC). The project components, sub-components and resource allocation is outlined below.

189. On the environmental front, the project benefits include institutional strengthening, and environment and natural resource rehabilitation and conservation. Environmental and social impact assessments of new investments to ensure mitigation of risks and impacts hence compliance, professional training/capacity building in environmental planning and management, conservation and protection of protected areas and sensitive ecosystems,

improved soil and water resources conservation and access, capacity building on safe use of pesticides, improvement of existing irrigation facilities, cold storage infrastructure for dairy production.

5.2. Adverse Environmental and Social Risks and Impacts

190. Despite the various socio economic and environmental benefits mentioned above the program will also have some negative impacts likely to arise during the construction and operation phases of the proposed program components. The program subproject activities are expected to result in limited but manageable environmental and social risks and impacts.

191. As assessed in the parent project FSRP, the proposed activities in Somaliland will also generate variety of EHS risks and impacts could result. These include H&S risks and impacts during construction and rehabilitation of small scale irrigation schemes, storage, cold chain, processing, and marketing facilities; operational phase including risks that may result from inappropriate use, handling and disposal of agrochemicals including pesticides as well as agricultural research centers; overuse of water and water contamination by agrochemicals; degradation of soils; direct and indirect impacts on biodiversity and ecosystems; local environmental pollution, e.g., air, waste, noise. Project activities may also cause social risks related to the construction of infrastructure are possible, including, but not limited to issues with working conditions and managing workforce, child and forced labor, occupational health and safety, issues related to community health and safety, as well as acquisition and resettlement impacts.

192. All the FSRP3 components will not cause significant (or ranked high) environmental and social impacts and risks. However, the components that will have less negative, but manageable impacts will mainly include: (1) Component 1: (Re-)Building Resilient Agricultural Production Capacity, (2) Components 2: Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes (3) Component 3: Getting to Market

193. To identify and manage potential E&S risks, the government of Somaliland has prepared this Environmental and Social Management Framework (ESMF), including measures for managing potential risks and impacts associated with the application of pesticides. The ESMF will include among others screening, risk assessment (including cumulative and downstream impacts), general mitigation measures, guidance for site-specific instrument preparation, exclusion/eligibility criteria, a checklist to monitor implementation of mitigation measures etc. The negative social impacts will be managed through the project design and the development and implementation of social risk management instruments.

194. The anticipated E&S negative risks and impacts and proposed mitigation measures for the program components and subcomponent activities are detailed in the following subsequent sections. Table 5 provides a summary.

5.2.1. Risk Level

195. The overall project environment, social and GBV risk rating is Substantial. Assessment of risk for the Somalia Food Systems Resilience Project subprojects will be determined according to their E&S risk levels. The latest World Bank E&S directive for Investment Project Financing (IPF) of November 28, 2021, classified risks as: Substantial, Substantial, and Substantial. The classification of risk levels depends on the following considerations, among others:

- i. Type, location, sensitivity, and scale of the Project; type of infrastructure; volume of hazardous waste management and disposal.
- ii. The nature and magnitude of the potential E&S risks and impacts.
- iii. The technical and institutional capacity and commitment of the government to manage such risks and impacts in a manner consistent with the ESSs, including the country's policy, legal and institutional

framework; laws, regulations, rules, and procedures applicable to the project sector, including regional and local requirements; and

- iv. Other areas of risk that may be relevant to the delivery of E&S mitigation measures and outcomes, depending on the specific project context, including the nature of the mitigation and technology being proposed, considerations relating to domestic and/or regional stability, conflict, or security.

5.2.2. Environmental Risks & Impacts and Mitigation Measures

196. **Destruction of Biodiversity and Vegetation Cover:** One of the impacts of the proposed program component would be vegetation clearance/ deforestation associated with construction of the various infrastructures. All these activities may lead to loss of plant cover, invasion of alien species, depletion of vegetation and over all disturbances on the fauna and flora species. Specifically impacts include: (i) Loss of terrestrial habitat arising from habitat clearance, (ii) Loss of critical aquatic habitats due to water extraction, (iii) Accidental spills of hazardous and non-hazardous substances resulting in habitat loss and degradation, (iv) Habitat fragmentation and edge effects and related degradation of remnant habitat areas, (v) Habitat loss and degradation and species loss arising from invasive alien species encroachment, (vi) Impacts to terrestrial habitats from changes in surface water hydrology due to irrigation, and (vii) Impacts to habitats and plants from sediment-laden runoff. However, sub-projects and activities that have significant impact on biodiversity and vegetation cover are to be excluded.

197. **Mitigation Measures** include:

- Implement the project in a manner that will enhance or sustain biodiversity.
- Careful and suitable site selection for setting up of all subcomponent infrastructures.
- Locate borrow pits outside of important biodiversity areas.
- Do not undertake construction activities at night, including use of lights, to avoid disturbance to nocturnal fauna from increased noise and vibration.
- Avoid accidental machinery and vehicle collisions with wildlife. Vehicle operation shall be restricted to daylight hours to minimize the risk of vehicle collisions with wildlife.
- Signs shall be installed to identify wildlife crossing point to vehicle traffic.
- Avoid introduction of invasive species and pests.
- Non-invasive local plant species shall only be used for re-vegetation and biological mitigation measures to be used as parts of integrated watershed management program subcomponent.
- Avoid sensitive ecosystems and check no sensitive fauna and flora species are found within and around the construction area.
- Ensure proper demarcation of working area and avoid spillover effects to the neighboring areas.
- All rubbish and waste materials within the project area (including the project footprint, the working width, borrow pits, stockpiling areas and contractor facility area), quarry sites shall be cleared of all rubbish and waste material in accordance with the project's waste management principles.
- The physical landscape of the project area shall be restored by clearing the area of debris, filling holes with recycled material.
- Re-vegetate and plant trees as a way of replacement of the cleared vegetation/trees within the area after construction.
- Sensitize beneficiaries to co-exist with nature, i.e., bird species, other fauna, and flora.

198. **Noise and Vibration:** Excavation activities, movement of vehicles and machinery are likely to cause noise emission and noise levels are expected to be much higher than the ambient noise level in and around the project

areas and construction sites. These in turn may create disturbances and impact people living nearby the project access roads as well as near construction sites.

199. **Mitigation Measures** include:

- Activities producing excessive noise levels shall be restricted to the daytime and working hours, and equipment producing high levels of noise shall be avoided or screened when working within proximity to any sensitive noise receptors in compliance with national standards or EHS guidelines standards for ambient noise, whichever are more stringent.
- Installing portable barriers and fencing off the construction site.
- Switching off equipment and vehicles when not in use to avoid noise emissions.

200. **Air Pollution:** There will be deterioration in air quality due to the generation of dust from construction activities and emissions from vehicle movement and could affect human health as these activities are likely to be undertaken in the vicinity of rural settlement areas. The potential environmental impacts related to air quality will be avoided or reduced by implementing the following:

201. **Mitigation and Management Measures:**

- Dust control and suppression measures including regular application of water on or near construction sites, settlement areas to reduce dust generation and practicing traffic speed limit.
- Regularly spray or sprinkle water on or near construction sites and settlement areas especially in windy and dry weather to reduce dust generation, when necessary.
- Avoid open burning of debris, cut vegetation (trees, undergrowth) or construction waste materials.
- Ensure regular maintenance of vehicles, machinery and equipment used at project site and
- Practicing traffic speed limit.

202. **Soil Erosion:** Excavation, levelling, vegetation clearance and related activities will be carried out during construction of infrastructures. Furthermore, construction of access roads could be carried out to transport materials and equipment. During these activities, soil disturbance and loss of vegetation cover will increase vulnerability of soil to erosion.

203. **Mitigation Measures** include:

- The project infrastructure design shall ensure that provision is made for suitable and adequate drainage facilities.
- Construction activities shall be concentrated as much as possible in the dry season to reduce the environmental damage and soil erosion.
- Safe disposal of cart away soil and minimize soil excavation; rehabilitation of areas where soil, excavation done.
- Excavated areas and temporary access roads not suitable for future maintenance activities shall be rehabilitated and reinstated after completion of the works.

204. **Water Pollution:** The major sources of construction-related impacts on water quality will be from erosion of disturbed areas construction sites, concrete mixing, material storage areas, vehicle maintenance areas, leaks and spills from fuel storage, spoil disposal areas, etc., as well as from wastewater discharge at the construction camps, and from contaminated water (oil, grease, cement, chemicals).

205. **Mitigation Measures** include:

- Adequate provision for treatment and disposal of sanitary and other liquid waste in such a way as will not result in any form of pollution of water resources.
- Take all reasonable precautions to prevent spillages and leakage.
- Do not wash vehicles into wetlands, lakes, streams or rivers, etc.

- Vehicle maintenance and servicing shall be done only on purpose-built impervious concrete platforms with oil and grease traps.
- Ensure adequate provision of toilets with temporary septic facilities and collection tanks camp sites.

206. **Rise of Groundwater Table and Water Logging:** one of the most frequent problems associated with irrigation development is the rise in the local water-table (waterlogging). Low irrigation efficiencies are one of the main causes of rise of water table. Waterlogging also implies increased health risks; especially it can be a breeding ground for mosquito. **Mitigation Measures** include implementing good irrigation water management practices, closely matching irrigation demands and supply can reduce seepage and increase irrigation efficiency thereby reducing the groundwater recharge. The provision of proper drainage will alleviate the problem locally but may create problems if the disposal water is of a poor quality. Apart from measures to improve irrigation water management, other options to reduce seepage are to line canals in highly permeable areas and to design the irrigation infrastructure to reduce wastage.

207. **Impacts of Agrochemical Pollution (Fertilizers and Pesticides):** Under irrigated agriculture, there will be an increase in the use of organic and chemical fertilizers. Especially, an increasing trend of nutrients such as nitrogen and phosphorus will lead to water quality deterioration through nutrient enrichment of surface water bodies (eutrophication) and nitrate contamination of ground water both limiting the direct use of water for different purposes and will become a risk to human and aquatic ecosystems. It is also expected that an increase in irrigated land will create a more humid and favorable environment that may result in an increase of agricultural pests and plant diseases. Increased pests and crop diseases will trigger increased use of pesticides. An increase in the use of pesticide has the potential to cause harm to users, to the public and to the environment. Specifically, use of pesticides will result in the following impacts:

- Air pollution due to inappropriate pesticides application, as some pesticides residues may be released, during application, into the air and become a health risk depending on toxicity level and quantity of the pesticides in the air as well as the quantity that a person breathes or gets exposed to and will have deleterious effects on human health.
- Loss of biodiversity due to pesticides use, as pesticide misuse is known to be common and can result in the following risks and impacts: (i) Destruction of crop pollinators leading to poor crop yields; (ii) Elimination of the natural enemies of crop pests and consequent loss of natural pest control that keeps the populations of crop pests very low; (iii) Development of pest resistance to pesticides, encouraging further increases in the use of chemical pesticides; (iv) Toxicity to fish and birds; (v) Unacceptable levels of pesticide residues in harvested produce and in the food chain and Change in the organoleptic properties of water (its odor, taste); (vi) Death of fish and other aquatic microorganisms; (vii) Modification of pH; (viii) Affect phytoplankton and other aquatic plants and can result in low oxygen levels; and (ix) Reduce fish habitat, food supply, dissolved oxygen, and fish productivity.
- Risks to human health: In addition to environmental risks, there is overwhelming evidence that some of the pesticides are potentially hazardous to human health.

Mitigation Measures include:

- Prepare and properly implement IPMPs (see Annex IX for preparation guideline).
- Use Integrated Pest Management (IPM) practices to control pests (found in the IPMP).
- Select pesticide application technique and operating procedures to avoid contamination of water bodies.
- Develop and implement procedure for notification of potentially affected farmers and adequately select and apply pesticides and monitor the weather when applying pesticides and avoid very hot or windy days.
- All empty pesticide containers must be collected from farmers and safely disposed in the proper place and never be reused.
- Follow label directions when using pesticides.

- Wear adequate personal protective equipment when applying pesticides or nearby application zones of pesticides.
- Ensure that all equipment is in good condition and properly calibrated to apply the correct dosage.
- Use only approved pesticides.
- Adequate disposal of obsolete pesticides.
- Compliance with prescribed doses of pesticides.
- Control of the periods of pesticide application.
- Promoting the use of organic manure and other conservation agriculture practices.
- Observance of recommendations for the use of fertilizers and pesticides bio control.
- Rational use of fertilizers and pesticides.
- Awareness creation and training on the use of agrochemical inputs. For the detail about pesticide use and management refer to the FSRP –IPMP.

208. **Overuse of Pesticides:** Majority of farm workers apply pesticides without protective gear, use empty containers of pesticides as utensils, agro-dealers sell pesticide products together with food items in same places, also ignore consideration of the right pesticides’ dosages, timeliness, and direction of the wind to avoid chemical drifting to non-targets. The project will refocus on safe use of chemicals to ensure efficiency in production while ensuring environmental sustainability.

209. **Mitigation Measures** include:

- Use PPE while farm workers apply pesticides.
- Sensitize agro-dealers to refrain from selling pesticide products together with food items in same places.
- Refocus on safe use of chemicals to ensure efficiency in production while ensuring environmental sustainability.

210. **Impacts of Low Flow Regime:** The Project will include rehabilitation of water infrastructures such as irrigation canals, shallow wells homestead level water storage (berkad) and water pans. Changes to the low flow regime due to irrigation water abstraction may have significant negative impacts on downstream users and the aquatic ecosystem.

211. **Proposed Mitigation Measures and issues to be considered are:**

- Minimum demands from both existing and potential future users need to be clearly identified and assessed in relation to current and future low flows.
- Undertake assessment of minimum environmental flow and water needs. Once minimum flow is determined, monitoring should be undertaken to ensure it is not exceeded on a regular basis.
- Integrating low flow release strategies into water site operation or management plans.

212. **Escalation of Greenhouse Gases (GHGs):** In Somaliland, CO₂ is emitted primarily through livestock, solid waste, trees, and wood products and over 95 % of the total agricultural sector greenhouse gas (GHG) emissions. It is a concern in the FSRP. The Project activities are expected to result in increased GHG emissions due to use of internal combustion machinery and equipment, and generation of methane from improper accumulation bio-solids/ landfilling of biodegradable wastes.

213. **Mitigation Measures** include:

- FSRP will focus on reducing the GHGs through appropriate mitigation measures.
- Minimize, for example opening of new land for agricultural activities, which is associated with increased CO₂ in the atmosphere.
- Control deforestation through sensitizing beneficiaries.

- Improved livestock production systems other than changes in total animal numbers.
- Use appropriate TIMPs to minimize soil degradation.
- Encourage forest and other vegetative regrowth for it takes CO₂ out of the atmosphere.

214. **Improper Waste Management:** Construction activities will produce considerable amount of waste which include excavated soil material, paper wrapping, polythene, vegetation stripping, packing materials, containers for various construction materials, plastics, metal scraps, oil spill from fuel storage tanks, waste oil, filters, lubricants and hydraulic fluids, food leftovers, sewage, etc. These wastes unless properly managed, could affect productive lands, the accumulation of solid waste on open lands, in water ways and drains which will be the source of pests and diseases and environmental pollution and clogging of drains, the creation of erosion, sedimentation, drainage problems and flooding.

215. **Mitigation Measures** include:

- Handle all waste in a way that protects the environment and complies with applicable standards and regulations.
- Proper waste segregation and store properly with no impacts to be generated from the storage area.
- Provide solid waste handling facilities such as separate waste bins for biodegradable and non -degradable wastes until waste generated is disposed at authorized dumping sites.
- Maximize the re-use of all excavated materials in the construction works.
- Disposal of surplus material (spoil) only at designated sites approved by the responsible local authority and only by approved methods.
- No spoil shall be disposed of in wetlands, near watercourses and other important habits.
- All wastes shall be properly disposed of in accordance with the national legislative requirements.
- The contractor should erect warning signs against littering and dumping sites within the construction site.
- Excavated topsoil shall be used as backfill by the contractor.
- Implement general waste management hierarchy avoid, minimize, re-use , recycle and dispose properly wastes).
- The contractor shall develop a waste management plan in line with the national policies, standards, and guidelines as well as international standards, including World Bank Group Environmental, Health, and Safety Guidelines.

216. **E-waste and Guidelines:** Electronic waste or E-waste describes discarded electrical or electronic devices or appliances that have ceased to be of any value to their owners. FSRP has a subcomponent on Disruptive Agriculture Technologies (DAT) that will procure technological equipment to the CIGs, VMGs, FPOs, SACCOs, and CDDCs. Therefore, e-waste will be generated though at a low level and hence there is the need for the e-waste Guidelines for handling and disposal of the same. The e-waste guidelines provide a framework for identification, collection, sorting, recycling, and disposing of electrical and electronic waste (e-waste).

217. **Charcoal Burning:** In Somaliland, ordinary people were thrust into extreme poverty. With many traditional livelihoods made impossible by poverty, Somaliland saw a surge in production of charcoal for export, particularly in the forested regions. This charcoal production led to a devastating impact on the environment, destroying forests that supported biodiversity and wildlife, and damaging water sources. At the same time, although domestic charcoal use is declining, production for local markets continues to cause deforestation, soil erosion, loss

of biodiversity and a rise in CO2 levels, while indoor air pollution from cooking and boiling water with charcoal still causes thousands of deaths each year, particularly among women.

218. **Mitigation Measures** include:

- Continued sensitization of the rural community to reduce use of charcoal for domestic cooking.
- Sensitize communities and the government to reduce charcoal export-share.
- Adopt clean energy for sustainable livelihoods.
- Help build capacity of law enforcers to reduce the effects of charcoal making and use and develop the right charcoal policy.
- Work with other like-minded organizations that are working against charcoal use.
- Promotion of fuel-efficient stoves that would reduce demand for charcoal.

5.2.3. Social Risks & Impacts and Mitigation Measures

219. The potential project social impacts and risks can be described as below:

220. **Gender Inequality:** Women have less access to resources, social and economic opportunities such as asset ownership, education, and employment, etc. (USAID, 2012). Gender inequality is exacerbated by the intersectionality with other axes including poverty, class, stratum, race, female genital mutilation, child marriage, maternal mortality rates, lack of access to fundamental tools for success, such as education, health care, credit, ethnicity, religion belief, physical disability, marriage status, age, sexual orientation, social identity and so on.

221. **Mitigation Measures** include:

- Sensitize all beneficiaries on gender equality.
- Project labor Management Procedures should be adopted to ensure gender-gap is narrowed.
- Avoid discrimination of any form.
- Encourage women to be members of the project CIGs and FPOs.

222. **Minority Groups/Exclusion from Project Benefits:** Minority groups exist (ethnic minorities or occupational groups such as Midgan/Gaboye, Tumul, Yibir, Galgala) that are estimated to represent up to 1/3 of the Somaliland population. They are generally excluded from political participation, have limited access to justice, are denied multiple rights and are disproportionately affected by natural hazards and conflicts. **Mitigation Measures** include:

- Adopt affirmative action for these ethnic minorities.
- Use the project SEP to engage them.
- Ensure inclusion to project benefits.

223. **Clan-based conflicts:** Clans and clannism determine one's origin, social standing and access to territory, property, and to a large extent, power at the societal, economic, and state levels.

224. **Mitigation Measures** include:

- Ensure inclusion and participation for all people.
- Adopt Project SEP for guidelines on community consultation and participation.

- Introduce the GM so that thorny issues are discovered early and addressed before escalation.

225. **Gender Based Violence/Sexual Exploitation /Abuse Harassment (GBV/SEAH):** Isolation, loss of livelihoods due to closure of business, disruptions in school calendars, and limitations of movement are associated with an increase in sexual violence, intimate partner violence and female genital mutilation among children, adolescent girls, and women. The project has also prepared a GBV/SEAH Plan.

226. **Mitigation Measures** include:

- Project to sensitize the community on the importance of avoiding GBV issues/cases.
- Contractor workers to sign code of conduct that stipulates how not to get involved in any of the GBV risks.
- The procurement office includes these E&S clauses in the contractors' bids.

227. **Child labor and Sexual Abuse:** In relation to child labor and trafficking, in Somali culture, girls and boys are expected to take part in household chores from around the age of five years, especially in rural areas. The distribution of such tasks is highly gendered and the burden skewed towards girls. The Project will strive to address and bridge this gap through sensitization and capacity building.

228. **Mitigation Measures** include:

- SFSRP has prepared an LMP, ESMF, that addresses these child risks.
- Project to sensitize the community on the importance of child protection.
- Contractor workers to sign code of conduct that stipulates how not to get involved in any of the risks.
- The procurement office to include these E&S clauses in the contractors' bids.

229. **Occupational Health and Safety (OHS) Measures weakened:** The likely OHS risks are associated with: (i) Accidents and risks of fire; (ii) Exposure to physical hazards; (iii) Exposure to chemical hazards; (iv) Exposure to biological agents (bacteria, fungi, viruses, parasites etc.). FSRP has prepared and will implement adequate occupational health and safety measures for workers (including emergency preparedness and response measures) in line with the ESMF/IPMF and World Bank Group EHS General guidelines.

230. **Mitigation Measures** include:

- Ensure installation of required safety facilities (chemical fume hood, fume cupboard, emergency eyewash stations; safety shower, etc.) as necessary recommended by Manufacturer Safety Data Sheet of all chemicals and materials used.
- Ensure contractor workers are capacity build.
- Each contractor's site introduces and maintains an Accident Incident Register.
- Procure First Aid Kit and firefighting equipment.
- Use appropriate personal protective equipment (such as safety goggles, respirator, safety boots and shoes, chemical-resistant gloves and apron, face masks as necessary and make first aid kits available.
- Provide appropriate warning signs for staff and public.
- Conduct awareness trainings including PPE usage for the safety of laboratory staff.
- Establish EHS standards and procedures according to WBG's EHSGs and ensure that the developed guidelines and standards are properly implemented.
- Capacity building for all actors.

231. **Incidents and Accidents:** Civil works envisioned in the project under components 1, 2 and 3 may pose risks in terms of incidents, and accidents occasioned by injuries or poor handling of pesticides, human safety issues a, etc. FSRP has developed an ESMP that will guide as well as OHS. Provide sufficient details regarding any

incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate.

232. **Mitigation Measures** include:

- Train all contractors on OHS
- Ensure contractor workers are capacity build.
- Each contractor's site introduces and maintains an Accident Incident Register.
- Procure First Aid Kit.
- Each contractor procures and issues PPEs to all workers.

233. **Community Health and Safety Compromised:** The project will develop and implement measures to assess and manage health and safety risks and impacts to the community arising from project activities, including, inter alia, risks to livestock, crop, fodder, and humans associated with inappropriate use of pesticides during spraying; risks of labor misconduct; related sexual exploitation and abuse; risks of security personnel (if any), etc. and include these measures in the ESMPs, IPMP, LMP, and GBV/P prepared in accordance with the ESMF, in a manner acceptable to the World Bank ESSs.

234. **Mitigation Measures** include:

- Sensitize contractors' workers to avoid risks of labor misconduct; related sexual exploitation and abuse. Sensitize all stakeholders to avoid risks of insecurity.
- Prepare and implement emergency preparedness and response plan in case of significant incident/accident and/or chemical spills or other health and safety related incidents.

235. **Spread of Communicable Diseases and Water Borne Diseases:** Impoundments, reservoirs and water harvesting ponds and pans can create a variety of health risks, in part because of ecological change. As a result, there would be an increase in the incidences of malaria and other water borne diseases, as the water infrastructures would serve as a breeding ground for mosquitoes and other water born disease. A communicable disease of particular concern in the Project operations is COVID-19, as could be associated with public gathering and not following local instructions of disease prevention and social distancing.

236. **Mitigation Measures** include:

- Regularly fluctuating water levels/Periodic reservoir fluctuation,
- Preventing or removing aquatic vegetation
- Design and operation of reservoirs/ ponds/ irrigation canals/ other water harvesting structures to decrease habitat for vector.
- Identify and manage COVID-19 related risks that include application of the World Bank's ESF Safeguards Interim Note, Construction Civil Works COVID, and as well compliance towards the government and other relevant international COVID 19 protocols/measures.

237. **Traffic and Road Safety:** Construction traffic is likely to increase total traffic flow and is likely to be greater in volume than normal flow, especially near to the main construction fronts. Construction vehicles may tend to move relatively quickly, and there is a danger of increased hazards to pedestrians, livestock, and other road users. Therefore, unless properly managed and regulated, will trigger increased risks to road accidents. To minimize traffic accidents, the contractor shall adopt the following

238. **Mitigation Measures:**

- Prepare a traffic management plan detailing traffic control procedures, train personnel on traffic management procedures, travel speed limits and related control measures.
- Make every reasonable effort to minimize road safety hazards and inconvenience to other road users, resulting from the passage of his haulage vehicles, and shall impose and enforce compliance with company speed limits.

- Drivers shall be trained at the start of the project, about road safety and due diligence to ensure safety of other road users.
- Limit maximum speed to 50 km/hr on access roads and 30km/hr in the work areas, installations, workshops, offices, camps, etc.
- Incidents or accidents that involve project vehicles must be immediately reported.
- Conduct sensitization programmer to obey the traffic management rule and keep everyone safe on site.
- Don't allow unauthorized person to drive Project vehicles'.
- No unauthorized passengers shall be carried on project vehicles.

239. **Vulnerability:** As the war has been fought along ethnic, or clan, lines, clan affiliation has played an important role in shaping people's vulnerability as has the impact of the conflict on social networks between and within clans. The project will ensure that vulnerability issues are identified for each of the target communities and due diligence done to mitigate the vulnerability in the right choice of investment.

240. **Mitigation Measures** include:

- FSRP has prepared this ESMF that will address common vulnerabilities under ESS1. Site-specific vulnerabilities will also be analyzed and mitigated in other instruments, such as ESIA's, ESMP's, and GBV/ SEAH plans.
- The project has also prepared a SEP that will guide stakeholder consultation to ensure inclusion for all.
- A social assessment will also be undertaken in the first 6 months of project effectiveness.

241. **Human Displacement:** The population of Somaliland in 2021 was estimated at 5 million according to the Ministry of National Planning and Development (Somaliland in Figures, 2011). About 55% of the people are nomadic pastoralists and 45% are urban and rural dwellers. The population is predominantly young with 75% of it estimated to be under the age of 30, and almost 50% under the age of 15. Somaliland has many internally displaced persons who continue to face serious risks of marginalization, forced eviction and exclusion.

242. **Mitigation Measures** include:

- Support livestock with feeds, hay, and fodder.
- Ensure inclusion for all in project benefits.
- Application of ESS5.

243. **Conflicts/Security:** The conflict is essentially one for control over power and resources, notably land as mentioned above, where clan identity has been manipulated overtime for political and economic ends. Over time the conflict has become increasingly influenced by both regional rivalries and international politics. This project will make efforts have the right to participate meaningfully in governance processes restored through inclusivity and fair targeting and thus, influence decisions that affect this set of the society. **Mitigation Measures** include:

- Community sensitization.
- Avoid all forms of discrimination.
- Ensure inclusion and participation for all people.
- Adopt Project SEP for guidelines on community consultation and participation.
- Introduce the GM so that thorny issues are discovered early and addressed before escalation.

244. **Impacts related to land Acquisition:** The expected impact during the implementation of component 1 is temporary or permanent expropriation of land for laboratory building, stores, camps and access roads etc. Since

exact amount of land that would be taken cannot be determined now, appropriate planning and implementation is essential. MOAD-FSRP PMU has developed a Resettlement Framework to guide the management of any upcoming land acquisition and restriction of access to natural resources in relation to FSRP activities.

245. **Mitigation Measures** include:

- To mitigate any potential negative social impacts related to land, MoAD through PCU should work closely with relevant stakeholders to ensure implementation of the following:
- Preparation of sub-project specific Resettlement Action Plans (RAPs)/ Abbreviated RAPs, as necessary, based on the Project's RPF, according to ESS5 requirements.
- Project affected people shall be consulted and be involved in decision-making at different stages of the program.
- Compensation for properties and land replacement shall be implemented as per pertinent land acquisition laws and WB ESS5.
- Compensation shall be paid prior to the start of the construction works.

246. **Drought:** Drought conditions, conflict and other climatic shocks are contributing to already pronounced rates of acute and protracted displacement. The Somaliland economy is largely natural resource-based with livestock and crop production sectors still accounting for the bulk of the GDP.

247. **Mitigation Measures** include:

- Avail water sources for both human and livestock.
- Support livestock with feeds, hay, and fodder.
- Capacity build the community to identify land for which eviction is not eminent.
- FSRP has prepared a SMP and will employ a Security Expert who will assist project beneficiaries avoid such risks.

248. **Cultural, Historical and Archaeological Importance sites:** The presence of heritage site can influence site selection, design, construction, and implementation. If is not properly sited, program construction activities might affect or damage cultural heritage, architectural, archaeological, cultural, and historical, ritual and burial sites.

249. **Mitigation Measures** include:

- Screen and identify known heritage sites in consultation with local communities and relevant institutions.
- Avoid locations where the project would displace, alter or render inaccessible important cultural heritage sites including historical sites/monuments, graves, churches and mosques etc..
- A chance finds procedure shall always be in place, even where sites are identified, in case anything unexpected is found. For the details about chance finds procedure refer to Annex XIII.

250. The following table provides summary E&S Risks and Impacts and proposed mitigation measures based on pre-construction, construction, and operation phases:

Table 1: Summary E&S Risks and Impacts and Proposed Mitigation Measures

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
Biophysical Environment					
Impact on Biodiversity and Vegetation Cover	1,2,3	√	√		<ul style="list-style-type: none"> • Implement the project in a manner that will enhance or sustain biodiversity. • Careful and suitable site selection for setting up of all subcomponent infrastructures. • Locate borrow pits outside of important biodiversity areas. • Do not undertake construction activities at night, including use of lights, to avoid disturbance to nocturnal fauna from increased noise and vibration. • Avoid accidental machinery and vehicle collisions with wildlife. Vehicle operation shall be restricted to daylight hours to minimize the risk of vehicle collisions with wildlife. • Signs shall be installed to identify wildlife crossing point to vehicle traffic. • Avoid introduction of invasive species and pests. • Non-invasive local plant species shall only be used for re-vegetation and biological mitigation measures to be used as parts of integrated watershed management program subcomponent. • Avoid sensitive ecosystems, and check no sensitive fauna and flora species are found within and around the construction area. • Ensure proper demarcation of working area and avoid spillover effects to the neighboring areas. • All rubbish and waste materials within the project area (including the project footprint, the working width, borrow pits, stockpiling areas and contractor facility area), quarry sites shall be cleared of all rubbish and waste material in accordance with the project’s waste management principles. • The physical landscape of the project area shall be restored by clearing the area of debris, filling holes with recycled material. • Re-vegetate and plant trees as a way of replacement of the cleared vegetation/trees within the area after construction. • Sensitize beneficiaries to co-exist with nature, i.e., bird species, other fauna and flora.
Noise and Vibration	1,2,3		√		<ul style="list-style-type: none"> • Activities producing excessive noise levels shall be restricted to the daytime and working hours, and equipment producing high levels of noise shall be avoided or screened when working within close proximity to any sensitive

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
					<p>noise receptors in compliance with national standards or EHS guidelines standards for ambient noise, whichever are more stringent.</p> <ul style="list-style-type: none"> • Installing portable barriers and fencing off the construction site. • Switching off equipment and vehicles when not in use to avoid noise emissions. • Monitor noise and vibration levels during construction on a weekly basis, and safeguard against standard thresholds.
Ai Pollution	1,2,3		√		<ul style="list-style-type: none"> • Dust control and suppression measures including regular application of water on or near construction sites, settlement areas to reduce dust generation and practicing traffic speed limit. • Regularly spray or sprinkle water on or near construction sites and settlement areas especially in windy and dry weather to reduce dust generation, when necessary. • Avoid open burning of debris, cut vegetation (trees, undergrowth) or construction waste materials. • Ensure regular maintenance of vehicles, machinery and equipment used at project site and • Practicing traffic speed limit. • Monitor levels of dust and gaseous emissions during construction on a weekly basis, and safeguard against standard thresholds.
Soil Erosion	1,2	√	√		<ul style="list-style-type: none"> • The project infrastructure design shall ensure that provision is made for suitable and adequate drainage facilities. • Construction activities shall be concentrated as much as possible in the dry season to reduce the environmental damage and soil erosion. • Safe disposal of cart away soil and minimize soil excavation; rehabilitation of areas where soil, excavation done. • Excavated areas and temporary access roads not suitable for future maintenance activities shall be rehabilitated and reinstated after completion of the works. • Monitor levels of key pollutants that could contaminate the soil during construction on a monthly basis, and safeguard against standard thresholds.
Water Pollution	2		√		<ul style="list-style-type: none"> • Adequate provision for treatment and disposal of sanitary and other liquid waste in such a way as will not result in any form of pollution of water resources.

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
					<ul style="list-style-type: none"> • Take all reasonable precautions to prevent spillages and leakage. • Do not wash vehicles into wetlands, lakes, streams or rivers, etc. • Vehicle maintenance and servicing shall be done only on purpose-built impervious concrete platforms with oil and grease traps. • Ensure adequate provision of toilets with temporary septic facilities and collection tanks camp sites. • Monitor levels of key water pollutants that could reach water sources during construction on a monthly basis, and safeguard against standard thresholds.
Risk of Groundwater Table and Water Logging	2		√		<ul style="list-style-type: none"> • implementing good irrigation water management practices, closely matching irrigation demands and supply can reduce seepage and increase irrigation efficiency thereby reducing the groundwater recharge. The provision of proper drainage will alleviate the problem locally but may create problems if the disposal water is of a poor quality. Apart from measures to improve irrigation water management, other options to reduce seepage are to line canals in highly permeable areas and to design the irrigation infrastructure to reduce wastage. • Monitor levels of key water pollutants that could reach water sources during construction on a monthly basis, and safeguard against standard thresholds.
Fertilizers and Pesticides	2		√	√	<ul style="list-style-type: none"> • Prepare and properly implement IPMPs. • Use Integrated Pest Management (IPM) practices to control pests (found in the IPMP). • Select pesticide application technique and operating procedures to avoid contamination of water bodies. • Develop and implement procedure for notification of potentially affected farmers and adequately select and apply pesticides and monitor the weather when applying pesticides and avoid very hot or windy days. • All empty pesticide containers must be collected from farmers and safely disposed in the proper place and never be reused. • Follow label directions when using pesticides. • Wear adequate personal protective equipment when applying pesticides or nearby application zones of pesticides. • Ensure that all equipment is in good condition and properly calibrated to apply the correct dosage. • Use only approved pesticides.

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
					<ul style="list-style-type: none"> • Adequate disposal of obsolete pesticides. • Compliance with prescribed doses of pesticides. • Control of the periods of pesticide application. • Promoting the use of organic manure and other conservation agriculture practices. • Observance of recommendations for the use of fertilizers and pesticides bio control. • Rational use of fertilizers and pesticides. • Awareness creation and training on the use of agrochemical inputs. For the detail about pesticide use and management refer to the FSRP –IPMP.
Overuse of Pesticides	2		√	√	<ul style="list-style-type: none"> • Use PPE while farm workers apply pesticides. • Sensitize agro-dealers to refrain from selling pesticide products together with food items in same places. • Refocus on safe use of chemicals to ensure efficiency in production while ensuring environmental sustainability. I
Low flow regime	2		√	√	<ul style="list-style-type: none"> • Minimum demands from both existing and potential future users need to be clearly identified and assessed in relation to current and future low flows. • Undertake assessment of minimum environmental flow and water needs. Once minimum flow is determined, monitoring should be undertaken to ensure it is not exceeded on a regular basis. • Integrating low flow release strategies into water site operation or management plans.
GHGs	1,2,3		√	√	<ul style="list-style-type: none"> • FSRP will focus on reducing the GHGs through appropriate mitigation measures. • Minimize, for example opening of new land for agricultural activities, which is associated with increased CO₂ in the atmosphere. • Control deforestation through sensitizing beneficiaries. • Improved livestock production systems other than changes in total animal numbers. • Use appropriate TIMPs to minimize soil degradation. • Encourage forest and other vegetative regrowth for it takes CO₂ out of the atmosphere.

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
Improper Waste disposal	1,2,3		√		<ul style="list-style-type: none"> • Handle all waste in a way that protects the environment and complies with applicable standards and regulations. • Proper waste segregation and store properly with no impacts to be generated from the storage area. • Provide solid waste handling facilities such as separate waste bins for biodegradable and non -degradable wastes until waste generated is disposed at authorized dumping sites. • Maximize the re-use of all excavated materials in the construction works. • Disposal of surplus material (spoil) only at designated sites approved by the responsible local authority and only by approved methods. • No spoil shall be disposed of in wetlands, near watercourses and other important habits. • All wastes shall be properly disposed of in accordance with the national legislative requirements. • The contactor should erect warning signs against littering and dumping sites within the construction site. • Excavated topsoil shall be used as backfill by the contractor. • Implement general waste management hierarchy avoid, minimize, re-use ,recycle and dispose properly wastes). • The contractor shall develop a waste management plan in line with the national policies, standards and guidelines as well as international standards, including World Bank Group Environmental, Health, and Safety Guidelines.
E-waste	1,2,3	√	√	√	<ul style="list-style-type: none"> • The e-waste guidelines provide a framework for identification, collection, sorting, recycling, and disposing of electrical and electronic waste (e-waste).
Charcoal burning	1,2		√	√	<ul style="list-style-type: none"> • Continued sensitization of the rural community to reduce use of charcoal for domestic cooking. • Sensitize communities and the government to reduce charcoal export-share. • Adopt clean energy for sustainable livelihoods. • Help build capacity of law enforcers to reduce the effects of charcoal making and use and develop the right charcoal policy. • Work with other like-minded organizations that are working against charcoal use. • Promotion of fuel-efficient stoves that would reduce demand for charcoal.

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
Socioeconomic Environment					
Gender inequality	1,2,3		√		<ul style="list-style-type: none"> • Sensitize all beneficiaries on gender equality. • Project labor Management Procedures should be adopted to ensure gender-gap is narrowed. • Avoid discrimination of any form. • Encourage women to be members of the project CIGs and FPOs.
Exclusion from project	1,2,3	√	√	√	<ul style="list-style-type: none"> • Adopt affirmative action for these ethnic minorities. • Use the project SEP to engage them. • Ensure inclusion to project benefits.
Clan-based conflicts	1,2,3	√	√	√	<ul style="list-style-type: none"> • Ensure inclusion and participation for all people. • Adopt Project SEP for guidelines on community consultation and participation. • Introduce the GM so that thorny issues are discovered early and addressed before escalation.
GBV/SEAH	1,2,3		√		<ul style="list-style-type: none"> • Project to sensitize the community on the importance of avoiding GBV issues/cases. • Contractor workers to sign code of conduct that stipulates how not to get involved in any of the GBV risks. • The procurement office includes these E&S clauses in the contractors' bids.
Child labor and sexual abuse	1,2,3		√		<ul style="list-style-type: none"> • SFSRP has prepared an LMP, ESMF, that addresses these child risks. • Project to sensitize the community on the importance of child protection. • Contractor workers to sign code of conduct that stipulates how not to get involved in any of the risks. • The procurement office to include these E&S clauses in the contractors' bids.
OHS	1,2,3		√	√	<ul style="list-style-type: none"> • Ensure installation of required safety facilities (chemical fume hood, fume cupboard, emergency eyewash stations; safety shower, etc.) as necessary recommended by Manufacturer Safety Data Sheet of all chemicals and materials used. • Ensure contractor workers are capacity build. • Each contractor's site introduces and maintains an Accident Incident Register. • Procure First Aid Kit and firefighting equipment.

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
					<ul style="list-style-type: none"> • Use appropriate personal protective equipment (such as safety goggles, respirator, safety boots and shoes, chemical-resistant gloves and apron, face masks as necessary and make first aid kits available. • Provide appropriate warning signs for staff and public. • Conduct awareness trainings including PPE usage for the safety of laboratory staff. • Establish EHS standards and procedures according to WBG's EHSGs, and ensure that the developed guidelines and standards are properly implemented. • Capacity building for all actors.
Incidents and accidents	1,2,3		√	√	<ul style="list-style-type: none"> • Train all contractors on OHS • Ensure contractor workers are capacity build. • Each contractor's site introduces and maintains an Accident Incident Register. • Procure First Aid Kit. • Each contractor procures and issues PPEs to all workers.
Community health and safety	1,2,3		√	√	<ul style="list-style-type: none"> • Sensitize contractors' workers to avoid risks of labor misconduct; related sexual exploitation and abuse. Sensitize all stakeholders to avoid risks of insecurity. • Prepare and implement emergency preparedness and response plan in case of significant incident/accident and/or chemical spills or other health and safety related incidents.
Communicable and water-borne diseases	1,2,3		√	√	<ul style="list-style-type: none"> • Regularly fluctuating water levels/Periodic reservoir fluctuation, • Preventing or removing aquatic vegetation • Design and operation of reservoirs/ ponds/ irrigation canals/ other water harvesting structures to decrease habitat for vector. • Identify and manage COVID-19 related risks that include application of the World Bank's ESF Safeguards Interim Note, Construction Civil Works COVID, and as well compliance towards the government and other relevant international COVID 19 protocols/measures.
Traffic	1,2,3		√	√	<ul style="list-style-type: none"> • Prepare a traffic management plan detailing traffic control procedures, train personnel on traffic management procedures, travel speed limits and related control measures.

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
					<ul style="list-style-type: none"> • Make every reasonable effort to minimize road safety hazards and inconvenience to other road users, resulting from the passage of his haulage vehicles, and shall impose and enforce compliance with company speed limits. • Drivers shall be trained at the start of the project, about road safety and due diligence to ensure safety of other road users. • Limit maximum speed to 50 km/hr on access roads and 30km/hr in the work areas, installations, workshops, offices, camps, etc.. • Incidents or accidents that involve project vehicles must be immediately reported. • Conduct sensitization programmer to obey the traffic management rule and keep everyone safe on site. • Don't allow unauthorized person to drive Project vehicles'. • No unauthorized passengers shall be carried on project vehicles.
Vulnerability	1,2,3	√	√	√	<ul style="list-style-type: none"> • FSRP has prepared this ESMF that will address common vulnerabilities under ESS1. Site-specific vulnerabilities will also be analyzed and mitigated in other instruments, such as ESIA's, ESMPs, and GBV/ SEAH plans. • The project has also prepared a SEP that will guide stakeholder consultation to ensure inclusion for all. • A social assessment will also be undertaken in the first 6 months of project effectiveness.
Forced eviction and displacement	1,2,3	√	√	√	<ul style="list-style-type: none"> • Support livestock with feeds, hay, and fodder. • Ensure inclusion for all in project benefits. • Application of ESS5.
Conflicts/ security	1,2,3		√		<ul style="list-style-type: none"> • Community sensitization. • Avoid all forms of discrimination. • Ensure inclusion and participation for all people. • Adopt Project SEP for guidelines on community consultation and participation. • Introduce the GM so that thorny issues are discovered early and addressed before escalation.

Impacts	Project Components	PP			Mitigation & Monitoring Measures
		PC	C	O	
Land acquisition			√	√	<ul style="list-style-type: none"> To mitigate any potential negative social impacts related to land, MoAD through PCU should work closely with relevant stakeholders to ensure implementation of the following: Preparation of sub-project specific Resettlement Action Plans (RAPs)/ Abbreviated RAPs, as necessary, based on the Project's RPF, according to ESS5 requirements. Project affected people shall be consulted and be involved in decision-making at different stages of the program. Compensation for properties and land replacement shall be implemented as per pertinent land acquisition laws and WB ESS5. Compensation shall be paid prior to the start of the construction works.
Drought	1,2		√	√	<ul style="list-style-type: none"> Avail water sources for both human and livestock. Support livestock with feeds, hay, and fodder. Capacity build the community to identify land for which eviction is not eminent. FSRP has prepared a SMP and will employ a Security Expert who will assist project beneficiaries avoid such risks.
Cultural, Historical and Archaeological Importance sites	1,2,3	√	√		<ul style="list-style-type: none"> Screen and identify known heritage sites in consultation with local communities and relevant institutions. Avoid locations where the project would displace, alter or render inaccessible important cultural heritage sites including historical sites/monuments, graves, churches and mosques etc.. A chance finds procedure shall always be in place, even where sites are identified, in case anything unexpected is found.
Conflict and Security Risks	1,2,3		√		<ul style="list-style-type: none"> Implementing access control system - secure and monitor entrance and outlet points of the workplace, proper badge and visitor card system Work closely with the national information network security agency and local security offices Conduct regular training on clashes and conflicts resolution within work environment security awareness programs for project staff

PP: Project Phases, PC: Pre-construction, C: Construction, O: Operation

5.3 Somaliland FSRP Exclusions List

251. Exclude the following types of activities as ineligible for financing under the project:

Table 6: Somaliland FSRP Exclusions

1. Activities proposed to be in Districts that are inaccessible due to high levels of insecurity
2. Activities proposed to be located in Districts that have large swathes of contested lands leading to significant challenges in complying with environmental and social safeguards
3. Activities proposed for Districts that have large investment projects similar to FSRP
4. Investments requiring taking land
5. Investments requiring support of financial intermediaries ESS9
6. Somaliland FSRP will not support large water structures such as Dams but water pans and sand weirs
7. Activities that have a high probability of causing serious adverse effects to human health and/or the environment
8. Activities that may affect lands or rights of vulnerable and marginalized groups, and minority communities
9. Activities that may cause long term, permanent and/or irreversible (e.g., loss of major natural habitat, sensitive ecosystems) impacts
10. Activities/ sub-projects rated high on biodiversity, that may cause long term, permanent and/or irreversible (e.g., loss of major natural habitat, sensitive ecosystems) impacts.
11. Activities/ sub-projects that are prone to natural disasters, such as floods, mudslides and forest fire.
12. Associated facilities which do not meet the requirements of the ESSs, to the extent that the beneficiaries have control or influence over such associated facilities
13. Activities that may have significant adverse social impacts and/ or may give rise to significant social or community conflicts
14. Activities that may involve involuntary resettlement or land acquisition (physical relocation of PAPs) ESS5
15. Investment in land for which credible means to confirm ownership or long-term occupancy is not available
16. Activities that may involve economic displacement of more than 200 PAPs
17. Activities that may affect or result in impacts on cultural heritage ESS8
18. Any activities that would curtail workers' fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor; (iii) prohibition of child labor, including without limitation the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities), persons under 18 from working at night, and that persons under 18 be found fit to work via medical examinations, all aligned with ESS2 provisions; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or social origin.
19. Any activities in areas that are considered to have high security risk
20. Any sub project that will be categorized as an associated facility shall be excluded.
21. Any other activity as may be set out in the project ESCP and PAD.
22. Any activity whose risk will be rated high or substantial after screening will be excluded.

5.4. Methodology for Preparation of ESIA/ESMP

252. In the project, the project implementing team will always anticipate and avoid risks and impacts; where avoidance is not possible, minimize or reduce to acceptable levels. Once risks and impacts have been minimized or reduced, mitigate (including improve or at least restore livelihoods). Where significant residual impacts remain,

compensate, or offset them, where technically and financially feasible. For Somaliland, the steps in ESIA formulation may include but not limited to:

A. Environmental and social screening (ESS)

253. This stage marks the beginning of the ESIA process, which should be initiated as early as possible along with the FSRP planning process after the FSRP is first conceived. During this stage, the **important functions** that need to be performed is shown below:

- Establish the likely study area by identifying broad boundaries for the project.
- Make a preliminary assessment of the significance of potential environmental impacts, and likely mitigating measures.
- Identify possible alternatives and the major potential environmental impacts associated with each, as well as the likely corresponding mitigation measures.
- Estimate the extent and scope of ESIA to be performed and offer an initial recommendation as to whether a full ESIA is required.
- Estimate the time frame of the ESIA study.
- Identify the expertise and human resources needed for the ESIA study.
- Prepare the terms of reference for the conduct of an initial environmental examination.

254. The value of conducting environmental and social screening at the early conception and planning phase of any sub project is to provide useful technical input to the subproject team for their planning and budgeting, thereby eliminating the possibility of costly remedial environmental and social work and delays caused by problems with adverse environmental and social damage.

B. Initial environmental and social examination (IESE)

255. The initial environmental and social examination is essentially a preliminary environmental impact evaluation to review the environmental integrity of a subproject by assessing the potential environmental and social impacts. Important functions of this stage are highlighted below:

- To ascertain the need for the nature of ESIA study
- To prepare the terms of reference
- To prepare the procedure to be followed
- To collect additional information and data
- To anticipate both positive and negative impacts

- To suggest measures to avoid, mitigate or compensate adverse impacts. To chalk out procedures for monitoring and evaluation during construction and post-construction stages

256. If the initial environmental and social examination results conclude that a full-scale ESIA is not required, then the mitigation measures and action plan should be prescribed for the sub project, and no further ESIA is required. This is usually the case for small subprojects where no significant adverse environmental and social impacts are anticipated.

C. **Environmental and social impact assessment (ESIA)**

257. The findings of the environmental and social screening study and initial environmental and social examination study form the basis for identifying the key issues that merit full analysis in the ESIA. Other issues that deserve only a brief discussion should also be mentioned and a supporting rationale offered. The important functions to be performed under the environmental and social impact assessment are shown below:

- To collect all possible information and data from various sources. To properly identify alternatives.
- To systematically analyze both environmental and social impacts of different alternatives.
- To design environmental and social mitigation measures.
- To develop an environmental and social management plan.
- To develop an effective monitoring program to evaluate the successfulness.
- implementation of mitigation measures during construction.
- To develop an effective post-construction evaluation program.

258. The end product of the environmental and social impact assessment is an ESIA report that provides decision makers with information regarding the important environmental and social issues, the impacts of various alternatives, proposed mitigation measures, and recommendations of the relative desirability of different alternatives.

CHAPTER 6 - INSTITUTIONAL / IMPLEMENTATION ARRANGEMENTS FOR ESMF

6.1. Introduction

259. The project will build on the engagement developed over the five years of implementing the WALP and Biyoole. The two projects have made significant progress in terms of peace and State building, as well as the capacity building of Somaliland institutions and the establishment of PCU.

260. Implementation arrangements will borrow heavily from both the Biyoole and Barwaaqo projects. The project will be managed by an established PCU in Somaliland. The Ministries of Agricultural Development (MoAD), in close collaboration with the Ministry of Livestock and Fisheries (MoLFD) and the Ministry of Environment and Climate Change (MoECC) will be the coordinating agencies with the MoAD being the lead ministry among other related ministries. Mobilization will help the community identify and address the shocks they face to their lives and livelihoods, for example, land degradation, access to inputs, and pest and disease and how they can work together as a community to address those shocks and work to solve those problems and develop more resilient livelihoods using the increased water availability. The process will form a Village Development Committee comprising traditional leaders and representatives from the stakeholder groups that will lead the formation of a village livelihood development plan that will prioritize the investments and management issues.

261. All the three ministries will also be responsible for M&E and for safeguards implementation with other relevant institutions providing backstopping support for the fiduciary aspects of this project. The role of districts and communities is critical in the management of rural resilience projects. This project will help districts and community management committees improve capacity by following these criteria. A project steering group is formed to monitor project implementation and provide support and direction as needed at the state level. In Somaliland, the project steering groups will be established to provide oversight and guidance. The Ministries of Planning will coordinate community participation and development to achieve stronger inter-agency collaboration. Strengthening institutional infrastructure and operations is essential: The project's budget will allow for the procurement of vehicles, office supplies and equipment, and the renovation and/or construction of dilapidated or non-existent office buildings to boost institutional capacity and support relevant government entities that lack adequate budgetary allocations. This factor is relevant to the project's institutional capacity building component. To allow PCU to become used to Systematic Tracking of Exchanges in Procurement (STEP) and other World Bank procedures, project employees will be trained to develop quality work plans, procurement plans, and other reports.

262. The Somaliland FSRP will be implemented by a designated project coordination unit (PCU), housed within the MoAD. The PCU will have strong representation from the Ministry of Livestock and Fisheries Development (MoLFD) and Ministry of Environment and Climate Change (MoECC), and will be strengthened through the recruitment of additional core staff and consultants who will be made responsible for Project management tasks including administration, M&E, communication, procurement, financial management (FM), and environmental and social safeguards, as well as GBV and sexual exploitation and abuse and sexual harassment (SEA/SH). Additionally, the project will contract dedicated subject matter specialists as required. The project will significantly benefit from implementation capacity developed under the Biyoole Project, that has performed moderately satisfactorily during the last couple of years.

263. The PCU will oversee and coordinate the implementation of the project and will guide and train the other staff members, as well as provide templates for reporting. It will employ:

- National environmental specialist – who will lead on the contractors ESMP or ESIA;
- Full time Social specialist – who will lead on the community engagement process as well as the MoU with the community, water sharing agreements and the summary social report and project GM;

- Full time GBV/gender specialist – who will be the main focal point for project and SEAH complaints; and
- Security specialist – who will oversee the security management system and review all site-specific security risk assessments and management plans.
- Line Ministry ESS focal persons shall remain at all levels but coordinated by the PCU ESS Focal persons. ESS Desk/Liaison Officers will coordinate project ESS activities at Ministries as well as being a link to district ESS activities.
- VDC Level – Accountability Committees, General GM Committee, and another Committee with a Female Lead Champion on GBV/SEAH to handle the sensitive area of GBV/SEAH.

6.2. Projec Implementation Unit

264. Project implementation and coordination will be anchored by the Project Implementation Unit (PCU). The PCU will be a high-capacity multi-thematic unit comprising representatives from MoAD, MoLFD and MoECC. The PCU will also have thematic specialists to support various project components including but not limited to crop production specialists, animal health specialists, financial inclusion specialist, a digital agriculture specialist, a private sector specialist, and a gender specialist. Additionally, the PCU will have dedicated personnel for environmental and social safeguards, finance, security, gender, procurement, and monitoring and evaluation. Detailed terms of reference will be developed for each of these positions. The PCU positions be filled primarily through secondment from stakeholder ministries. In case suitable staff are unavailable, the project will recruit staff externally. If needed, the project will engage leading technical agencies and research institutions to backstop implementation capacity and technical training. The focus of these partnerships will be to build long-term institutional capacity within the stakeholder ministries through co-implementation, training, and capacity building.

265. As part of the implementation arrangements, the project may also put in place technical advisory committees at the Somaliland level. The latter would include representatives from producer cooperatives and organizations, the chamber of commerce, banking associations, livestock associations, and other private sector associations. The purpose of these technical advisory committees will be to bring in sectoral insights, coordinate investments, and build stakeholder feedback into project design and implementation. For investments at the local level, the project will engage in intensive community consultations in the design, validation, and implementation of activities. The project will leverage the network of institutions mobilized under the project as well as pre-existing community forums to identify and prioritize investments. To the extent possible, PCUs will engage in multi-ministerial visits to assess the multi-sectoral needs of communities and develop local investment plans.

266. PCU will provide overall responsibility for safeguards due diligence, and compliance monitoring. The PCUs will be responsible for coordinating the identification, resolution and monitoring the status of all E&S issues through the E&S focal points.

6.3. Specific role of the Project E&S Staff

267. The E&S staff will specifically:

- i. Spearhead the development and updating of ESF instruments including this ESMF.
- ii. Review all ESIA, ESMP reports and documents prepared by E&S consultants to ensure compliance with the World Bank ESF/ESSs.
- iii. Ensure that the Somaliland Food Systems Resilience Project subproject design, specifications and budget adequately reflect the recommendations of the ESIA/ESMPs.

- 6.4. Coordinate application, follow up processing and obtain requisite clearances and approvals from the World Bank for the ESIA/ESMP submitted by the individual Somaliland Food Systems Resilience Project and subprojects contractors;
- 6.5. Prepare regular monthly/quarterly/semi-annual, annual progress reports with statutory requirements.
- 6.6. Develop, organize and deliver appropriate E&S safeguards related training courses for the PCU staff, contractors, government staff, community representatives and others involved in the project implementation.
- 6.7. Review and approve the Contractor’s ESMP using the ESMF as a guide.
- 6.8. Liaise with the Contractors and the PCUs on implementation of the ESMPs and ensure proper implementation of ESMP requirements through regular visits..
- 6.9. Liaise with various Government agencies on E&S, land, resettlement and other regulatory matters.
- 6.10. Continuously interact with relevant NGOs and community groups working in the sector and project locations.
- 6.11. Establish dialogue with the affected communities and ensure that the E&S concerns and suggestions are incorporated and implemented in the project.
- 6.12. Review the performance of the project in terms of E&S safeguards, through an assessment of the periodic internal monthly and quarterly E&S monitoring reports; provide summaries of same and initiate necessary follow-up actions; and
- 6.13. Provide support and assistance to the Government MDAs and the World Bank during Project Review Missions.

6.14. Roles and responsibilities of other Government Ministries, Departments and Agencies (MDA)

268. The Somaliland Government will implement the Project through the Ministry of Agricultural Development (MoAD), the Ministry of Livestock and Fisheries Development (MoLFD), and Ministry of Environment and Climate Change (MoECC). Implementation will be done in collaboration with the Ministry of Finance Development (MoFD) and other participating institutions on relevant activities. The Project will be anchored in the MoAD.

269. Various MDAs will be consulted and collaborated with on various matters including labor management, environmental, land, gender, security among others during the implementing of the Somalia Food Systems Resilience Project. Each agency will have a focal point for E&S issues who will ensure implementation of E&S requirements in conjunction with Environmental social/CDD and GBV/gender focal points. Some of their roles and responsibilities are enumerated in Table 7 below.

Table 2: Roles and responsibilities of other government MDAs in ESMF implementation

Ministries, Departments and agencies at FGS and FMS	Role in ESMF implementation
MoAD, MoLF & MoECC	Coordinate, logistics, and technical support to the implementing agencies
	Will host the project, Appoint the ESS Focal persons, support them and supervise them, ensure project activities/implementation security in liaison with the PCU Security Expert; Identify subprojects for support in liaison

Ministries, Departments and agencies at FGS and FMS	Role in ESMF implementation
	with PCU, Monitor community activities, review, and assist in budgeting. And on matters regarding land acquisition, land use and management issues
Ministry of Environment and Climate Change	-Provide policy, regulatory and enforcement guidance on environmental risks and impact mitigation measures. -Provide licensing on matters environmental and related field management
Ministries responsible for women, youth and People with Disabilities	Will be consulted on social impacts issues and mitigations measures regarding women, youth, children and PWD.
Ministries responsible for labor	Will be consulted on social impacts issues and mitigations measures regarding labor management.
Ministries responsible of Health	Will be consulted on social impacts issues and mitigations measures regarding Occupation Health and Safety.
Ministries and departments responsible for land	Will be consulted on environmental and social impacts issues and mitigation measures regarding land agreements, land acquisition, land use and management issues
	Will be consulted on environmental and social impacts issues and mitigation measures regarding land acquisition, land use and management issues

6.15. Roles of communities in E&S aspects for the CDD element

270. The implementation of FSRP will leverage the existing two-tier structures created for Biyoole and Barwaaqo at Somaliland, and community levels. The MoAD, in close working partnership with MoLFD and MoECC, represent the Somaliland level. The second tier will be at the community level, where beneficiaries will implement their community-led interventions.

271. A VDC will be formed at subproject locations to, among others, mobilize communities for development, lead in the development of the community investment plan, monitor implementation of the project activities, manage grievances and lead engagement of external actors including development partners and CSOs. The VDCs will have women and minority representation and will have a GM and SEAH focal points. They will be trained on the basics of the ESF/ESS and their role in relation to ESF implementation. They will help in the identification of E&S risks and impacts and appropriate mitigation measures they may know from local knowledge and/or from other projects and monitor implementation of the mitigation measures. The VDCs will be involved during the project screening and ESIA.

6.16. World Bank Roles and Responsibilities

272. The World Bank will:

- i. Provide guidance on the compliance with Bank ESF and ESSs;
- ii. Perform compliance monitoring of Somaliland Food Systems Resilience Project to ensure the ESF and standards are complied with and conduct regular project review missions.

- iii. Maintain an oversight role, review and approve Somaliland Food Systems Resilience Project’ ESMF, and environmental assessment instruments such as ESIA or ESMP of subprojects;
- iv. Conduct regular supervision missions to check on the performance of Somaliland Food Systems Resilience Project and assess its compliance to agreed grant covenants;
- v. Recommend measures for improving the performance of Somaliland Food Systems Resilience Project PCU/PCUs; and
- vi. Recommend appropriate training programs intended to improve the capacity of PCU/PCUs as necessary.

6.17. Budget for planning, and Implementation of the ESMF

273. To effectively plan and implement the various tools for the project E&S identification and mitigation measures suggested as part of the operationalization of the ESMF, resources will be required. An indicative budget has been provided in Table 7, to cover safeguards related expenses such as capacity building programs, sub project screening, coordination, and public consultation meetings, planning workshops, monitoring work, and environmental and social consultancy services. This estimated budget does not include the cost for mitigation and enhancement measures, which will be integrated into the construction cost. Likewise, all administrative costs for the operation of the PCU/line ministries Safeguards related personnel and related cost are included in the overall Project Budget

6.18. Lessons Learned from Previous Biyoole and Barwaqoo Projects

274. The project will significantly benefit from implementation capacity developed under the Biyoole Project, that has performed moderately satisfactorily during the last couple of years. Nevertheless, the following Table presents part of the institutional capacity challenges depicted in the implementation report of Barwaqoo, including how these challenges were addressed, which may convey some learning messages to this Project.

Table 3: Lessons Learned from Barwaqoo/ Biyoole Projects – Institutional Capacity

	Lessons Learned	Solution	Application to the FSRP
1.	At the later stage of the project mobilization and establishment, there was a need to increase the collaboration between the state ministries of the same sector for better coordination, monitoring, and exchange of knowledge and experiences.	The project initiated and implemented specific sectoral meetings and workshops which were held in the participating implementing entities but led by the line ministries. This has increased the collaboration between the state ministries within the project implementation and follow-up with the activities by the sectors. It would, therefore, be necessary to include sectoral meetings in Barwaaqo.	consultation was held on 13 th - 15 th June 2023 as part of project scoping and subsequent separate preparatory meetings with all the respective ministry representatives, local public administrations, as well as other government stakeholders and development partners. This allowed the government stakeholders to better understand the project and enhance their collaboration
2.	Building the capacity of the community, such as Community Animal Health Workers, collaboration, coordination between departments.	Improved livestock services at the field level and access to livestock treatment and response.	The FSRP will support: (a) crop and livestock producers’ capacity for collective action; (b) build their capacity to adopt climate-smart agriculture (CSA) technologies and management practices; and (c) recover from climate shock-related asset

	Lessons Learned	Solution	Application to the FSRP
			losses and establish a strong community-based extension system. The project will build producers' capacity for collective action by supporting the mobilization of farmers, agro-pastoralists, and pastoralists into common interest groups (CIGs).
3.	Active participation and collaboration between project implementing entities and beneficiaries enable community organizations to form strategic alliances with state institutions, increasing community ownership over the interventions, and effectiveness of the planning process.	Maintaining the support and momentum of planned activities, the Village Development Committee engaged early enough, comprehensively, and continued with the involvement of local authorities from different sectors. This is key to the success of the interventions.	The implementation of FSRP will leverage the existing two-tier structures created for Biyoole and Barwaaqo at Somaliland, and community levels. The MoAD, in close working partnership with MoLFD and MoECC, represent the Somaliland level. The second tier will be at the community level, where beneficiaries will implement their community-led interventions. The Somaliland community engagement operational guidelines will be developed to guide the processes and procedures for engaging and working with the target communities in line with the Barwaaqo guidelines.
4.	Gender involvement and empowerment are fundamental added values to the project and have become better mainstreamed at all levels—from the implementing entity level to the beneficiaries. The Biyoole project benefited from having crosscutting and sectoral integration with gender.	Strengthen women's participation in the project activities and decision making at all levels of the project.	Project recognizes that gender mainstreaming and social inclusion are key to achieving its objectives of this project. The Project has designed a strategy for gender mainstreaming and social inclusion of youth and VMGs whose objectives are; i) social awareness and capacity building of all stakeholders—implementing agents, SPs, beneficiary communities (men, women, youth, and VMGs); ii) ensure participation of women, VMGs and youth in decision making, as well as in micro-projects and subprojects; iii) design and implement special program targeting vulnerable women, VMGs and youth to address their basic and persistent constraints to access resources.
5.	Proper engagement among stakeholders and communities.	Capacity building of public and private sector institutions, including policy formulation and review planning.	The project consultative stakeholder meetings were carried out across all the

	Lessons Learned	Solution	Application to the FSRP
			stakeholder Ministeries In June and July diverse dates. The meeting was attended by the key stakeholders including representatives of the MoAD, MoLAFD, MOECC , private sector players, women groups, representative of the vulnerable groups including disadvantaged among others.
6.	Capacity building for the GM and ESMP to reach World Bank standard operating procedures on social and environmental management.	The team has already commenced mobilizing communities with the safeguarding regulations, procedures, and implementation at the site levels.	Training in ESMP and complaint handling for GM will be carried out for all staff and contractors, including drivers, as anyone may be approached with a complaint.

CHAPTER 7 - PUBLIC AND STAKEHOLDER CONSULTATION AND INFORMATION DISCLOSURE

7.1. Introduction

275. Public consultations, when properly organized, have generally been recognized to have improved the quality of policy-making, positively influenced the direction of country programs, strengthened national ownership of key reforms, and contributed to the promotion of public-sector transparency and accountability. CSOs can provide essential local knowledge that is vital to the policy process and that gives voice to the opinions and experiences of the poor.

276. As guided by ESS10 on Stakeholder Engagement and Information Disclosure, the government/implementing agencies are required to provide stakeholders with timely, relevant, understandable, and accessible information. Consultations should be conducted in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. A stand-alone Stakeholder Engagement Plan (SEP) is developed for this project.

277. The project team held several meetings leading up to the development of the various instruments including this ESMF, the SEP, IPMP, RPF, SMP, Gender/GBV/SEAH/P, and LMP. The engagements and consultations on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant government Ministries and implementing agencies as summarized below (the minutes are attached in Annexes VII & VIII). Public consultations was organized at national level on 10th August 2023 to ensure that the contents of the frameworks are disclosed for both ownership and gap_filling. The invitees were all stakeholders as proposed in the 'stakeholder list shared with this report'. These stakeholders include different government institutions, international and UN agencies, local NGOs and CSOs and women and minority organizations.

7.2. Consultation Process

278. The engagements and consultations on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant government Ministries and implementing agencies.

279. The FSRP project identification mission between the Bank and Somaliland took place between 21st June and 27th July 2022. During this mission representatives in the MoAD, MOLAFD and MoECC were taken through the concept note for the project and a presentations on the areas of development focus and elaboration of components of the proposed project. In these presentations by Government Ministries, the discussion focused on:

- A brief outline of the achievements in the particular reform area;
- Reform priorities going forward; and
- Challenges to be addressed by the reform priority.

280. The subsequent consultation was held on 13th - 15th June 2023 as part of project scoping and subsequent separate preparatory meetings with all the respective ministry representatives, local public administrations, as well as other government stakeholders and development partners. This was an important stage to allow stakeholders to understand better the scope, impact and risks of the Project, and potential opportunities; to make available Project-related information as early as possible. The objectives of the preparation mission were to conduct a series of discussions with sector authorities and other key stakeholders to (i) determine key elements of the project design, including costing of activities for all components; (ii) develop an initial results framework; (iii) assess safeguards and fiduciary capacity of the assigned implementation unit; (iv) discuss project readiness requirements related to

Environmental and Social Standards; and (v) initiate assessments on utility performance, gender and citizen engagement, and a positive feedback was received from all stakeholders during the meetings.

281. Due to timeline of the project brief consultative stakeholder meetings were carried out across all the stakeholder Ministries In June and July diverse dates. The meeting was attended by the key stakeholders including representatives of the MoAD, MoLAFD, MOECC , private sector players, women groups, representative of the vulnerable groups including disadvantaged among others. The aim was to provide input to the broad content areas of E&S, social and environmental risks and how to mitigate them, legal and policy environment, stakeholders' engagement mechanisms, and handing of project related grievances. The list of participants part of the photos of the participants is attached as annex I and annex II respectively.

282. The stakeholder engagement is a continuous activity throughout the project cycle. The project plans to put more effort in ensuring diverse representation of stakeholders from all categories of the project affected persons and beneficiaries with emphasis given to the vulnerable and the marginalized in the community like women, youth, elderly and minority clan members and the IDPs. To this end, the project will engage in wide community mobilization leveraging on the existing systems and channels from other project in the agricultural and livestock sectors. Communities in rural areas, IDP camps, nomadic communities and the women driven enterprises among others will be given priority in ensuring that engagements are done in accessible environment that will not affect their economic activities.

283. Representatives from these groups will also be approached to help simplify the project components and activities and make the engagement more robust. As part of accessibility, the project will translate project activities into local languages in every localized engagements and have people from the community who can pass the information in a more refined and simplified manner.

284. A summary of key issues highlighted in the stakeholder consultation meetings include:

- i. Consultations with stakeholders highlighted the project is very important to address challenges caused by the climate change consequences and support the farmers, pastoralists, and other stakeholders in the value chain to improve their livelihood. This can contribute to solving the drought and other natural disasters that repeatedly affect pastoralists.
- ii. Livestock and agriculture represents a major source of income to the people and improving the process will positively impact the livelihood of the pastoralists.
- iii. The stakeholders showed concern on project sustainability as there are a lot of projects similar to this one that failed in a short of time due to lack of proper sustainability strategy.
- iv. The stakeholders suggested meaningful and continues community engagement through community mobilization and awareness raising for a successful implementation of the project and a positive impact.
- v. They have also insisted to make sure involvement and inclusivity of women and other vulnerable groups and women shall be provided at least 30% when implementing the project
- vi. There is a need to enhance the collaboration of implementing agencies through a monthly or quarterly coordination meetings
- vii. Some of the stakeholders suggested establishing a hotline or complaint mechanism which is very quick and easily accessible to the public to address their grievances.

285. Detailed findings from stakeholder consultation can be found in Annexes VII & VIII.

7.3. Disclosure of Safeguards Instruments

286. The FSRP ESS instruments: ESMF, IPMP, RPF, LMP, GBV/SHE/Plan, GM, SMP, ESCP, and SEP have been prepared in consultation with the relevant stakeholders in Somaliland and will be disclosed on the government website not later than effectiveness date. A more robust and wider public consultation will be conducted during

preparation of ESIA/ESMPs. A summary of the safeguard's instruments will be translated into Somali language and disclosed. The World Bank will post the approved document on its website. Project specific ESMPs/ESIAs will be disclosed before implementation.

287. The FSRP ESMF and respective plans shall be publicly disclosed in-country on the MoAD Website on and at on the World Bank External Website. Subsequently, the specific implementation plans will also be prepared, reviewed, and approved by the World Bank Task Team and then disclosed appropriately where the target communities and stakeholders will adequately access this information.

288. These frameworks provide a mechanism for: (i) identifying and assessing potential adverse environmental and social impacts and risks, based on the types of activities envisioned; and (ii) proposing screening methods and processes of assessing and designing appropriate mitigation measures for the identified activities. The screening will utilize the Environmental and Social Screening Form/checklist (Annex I); and an Environmental and Social Project Report will outline simple environmental mitigation measures in its simplified Environmental and social Management Plan/ESMP) for small scale activities and a full ESIA (Environmental and Social Impact Assessment) report for activities whose impact is deemed long lasting or whose magnitude is relatively large.

CHAPTER 8 - ENVIRONMENTAL AND SOCIAL SAFEGUARDS CAPACITY BUILDING AND TRAINING PLAN

8.1. Introduction

289. Once the Somaliland E&S safeguards specialists are on board, a capacity assessment and implementation plan will be developed, possibly by an independent consultant. The plan will include timing of capacity assessment and plan development related to starting of various subprojects (which would require necessary capacity (training) prior to starting. Considering the limitation in E&S expertise in Somaliland, particularly at ministerial level, it is likely that capacity will have to be developed from scratch.

8.2. ESS Training/Capacity Building

290. The general initial training and capacity building plan (Table) will include general ESF training and project implementation facilitated by World Bank consultants, and the senior social specialist and other government specialists and consultants from other World Bank funded projects. Specialist training and capacity building support may also need to be carried out by independent capacity building specialists, firms and consortiums and agencies including contractors and social accountability committees and GM. Most of the training will be conducted after completion of capacity assessment and plan development.

291. Effective implementation of the FSRP ESMF and its Social Plans (RPF, SEP, LMP, SMP, GBV Action Plan, GM) will require adequate capacity in institutions, target communities and other stakeholders, especially with regards to observation of compliance as certain activities will be implemented and subsequently followed up with an elaborate and inclusive monitoring and evaluation (M&E). There is a need for targeted capacity building and training on ESS implementation and monitoring at the Ministerial, District, and community levels (VDCs), to include the private sector. In the initial preparatory stages, the environmental and social Standard specialists in the PCU will assist in sensitization and awareness creation with implementers, stakeholders, and communities to further enhance learning, formulation, and eventual implementation. The simple Project Implementation Manual (PIM) will describe in detail ESS-related aspects such as capacity building at all levels, later undertaking the project social assessment analysis, and compliance monitoring, among others.

292. Capacity building of ESS for compliance will continue throughout the project life cycle as indicated below in the two capacity building tables (Table 1 & Table 2). The approach should be that all instrument messages are packaged in modules piecemeal as operations advance.

Table 9: Capacity building Indicative Cost on project ESS (USD)

S/No.	Activities	Year 1	Year 2	Year 3	Year 4	Year 5	Total
1	Setting up ESS implementation structures at all levels/ Sensitizations.						
	a) Government level	4,000	2,000	1,000	4,000	1,000	12,000
	c) District level	250	125	65	250	65	755
	d) Village level	12,000	6,000	3,000	12,000	3,000	36,000
2	Boards and Committees						
	Steering & Technical Committees	4,000	2,000	1,000	4,000	1,000	12,000
	District level Technical Committees	250	125	65		250	567
3	GM Committees (Generals/ GBVs /SEA Committees)	10,250	10,250	10,250	10,250	10,250	51,250
4	ESS Instruments Sensitization Workshops/Meetings (Somaliland level, District & VDCs)	50,000	50,000				100,000
5	Project Sensitization Launch meetings	10,000					10,000
6	ToTs/ToF's trainings						
	a) District level	15,000	15,000	5,000	3,500	2,000	40,500
	b) Village level	6,500	6,500	6,500	6,500	6,500	32,500
8	Proposals vetting	2,000	4000	5,000	3,000	2,000	16,000
9	Capacity building on projects screenings	3,000	2,000	3,000			8,000
10	Actual screening of prioritized projects/ Screening checklist	500	2,000	2,000	1,000	1,000	6,500
11	Capacity building on implementation of LMPs, SMPs, RAPs, IPMPs, GBVP, VMGMF	10,000	20,000	10,000	10,000	5,000	55,000
12	GM establishment & Training	10,000	10,000	10,000	10,000	10,000	50,000
	GM operationalization	20,000	5,000	5,000	5,000	5,000	30,000
	Sub total USD						460,505
13	Other training						
	a) Capacity building on Proposal development, ESIA process, ESS M&E, GM, GBV/SEA/SH, LMPs, SMPs, EH, OHS, Security management, quality assurance on value chains, e.g., Milk products, meat products		50,000	100,000	50,000	50,000	250,000

							710,505
	Grand total						
	NB/ The other training will happen in the 1st 18 months and will be mounted at least every year.						

Budget for Other Key ESS Activities

293. Table 10 below reflects on a budget to implement other ESS activities.

Table 10: 5 Year Project Period: ESS TA Engagement Plan for capacity Building

TA Engagement Plan Costs in USD							
S/ No	Activities	Year 1	Year 2	Year 3	Year 4	Year 5	Total Cost
1	Social Assessment	100,000					100,000
2	Gender Analysis	100,000					100,000
3	Project Environmental Assessment						
	a) Baseline	100,000					100,000
	b) Midline			75,000			75,000
	c) Endline					100,000	100,000
4	Staff Performance Appraisal/Quality Assurance		20,000		20,000		40,000
5	ESS Staff allowances						
	a) Environmental Specialist						
	b) Social Specialist						
	c) GBV/SEAH Specialist						
	d) Security expert						
	e) Security surveillance part-time firm						
	f) ESS Specialized training experts on a need basis, e.g., global Gap.						

Certifications, Registration of FPOs						
Grand total						515,000

CHAPTER 9 - ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK PROCEDURES

9.1. Procedures for ESMF implementation

294. The following steps summarize procedures for ESS Instruments implementation.

295. Step 1: Determination of subproject locations: Identification of subproject locations will be initially done through technical considerations for water points and combined with susceptibility to drought and essential water needs and equity considerations (in line with the inclusion plan in the SEP), this will also include analysis of alternatives to select the feasible project option including environmental considerations to avoid significant impacts since the earliest phases. This will be based on the Web Automation Testing (WET) tool combined with data and studies on drought need and then ensuring that subprojects include different clans and minority groups and avoid elite capture.

296. Step 2: Subproject identification will be carried out through an inclusive community consultation process involving women, persons with disabilities, and marginalized groups including minorities (in line with the inclusion plan), with the aim of promoting resilient and sustainable community livelihoods for all. Local authorities in the beneficiary districts will ensure that the activities fall with integrated land use plans and rationale use of resources. The Somaliland PCU will facilitate smooth communication between the project affected communities and themselves during subproject identification and implementation.

297. Step 3: Screening/scoping: The ESMF requires that all Somaliland Food Systems Resilience Project subprojects shall be scoped/screened for E&S impacts. The Somaliland PCU E&S staff will initiate the scoping/screening process by completing the form contained in Annex I. The aim of the screening/scoping form is to assist in identifying potential environmental and social impacts based on field investigations in the project area. The completed scoping/screening report will be submitted to the Somaliland E&S team for internal checking and approval. The Somaliland E&S team will review the Scoping/Screening Report and will accept the document – with conditions relating to implementation; accept the documents with required and/or recommended amendments; or reject the document with comments as to what is required to submit an acceptable Scoping/Screening Report so that the preferred option is selected. Following the approval of the subproject E&S screening/scoping report, the subproject will be fed into one of the following processes based on its approved categorization of high, substantial, moderate, and low risk.

298. If the outcome of the E&S screening/scoping categorizes the subproject as low risk activities, no further actions to carry E&S will be needed. However, for moderate risk categorized subprojects, an ESIA/ESMP shall be prepared, contractors will be required to derive their C-ESMPs from specific ESMPs and ESHS, labor, GBV/SEAH clauses/ conditions shall be included in subprojects procurement and contract documents.

299. Step 4: The PCU will consult with the World Bank and if the activity is considered to be a substantial risk to decide on the type of E&S assessments to be undertaken. Moderate risk subprojects will use ESMP templates provided in the annex (including the social summary report, evidence of consultations and community land agreements, and site-specific security management plan/evacuation plan). High risk projects are excluded from financing, if overall program is substantial. Substantial risk projects will require an ESIA that will entail a systematic investigation of all risks and impact areas as identified in the screening report. ESIA shall be developed following both ESF requirements and local standards, and when these differ, the most stringent standard should apply. Proportionate to risk level, E&S studies will be prepared. i.e., High risk project may require the preparation of a full-ESIA, while lower risk project would require less in-depth studies. However, robust assessment in case of

substantial risk may still be required. In certain cases, for Moderate risk projects a ESMP may suffice. See Annexes II and III for a content template for ESIA and ESMP, respectively.

300. For subprojects involving land acquisition, ESS5 requires the development of resettlement plans (RAP) proportionate to the scale and magnitude of the land acquisition impacts, regardless of the number of affected parties and livelihood restoration plans (LRPs) if livelihoods are affected as a result of the subprojects including impacts on downstream users. Following review by the Somaliland E&S specialists on the project, the ESIA/ESMP, RAP, LRP, Biodiversity Management Plan (BMP), Cultural Heritage Management Plan (CHMP), IPMP and SMP will be sent to the World Bank for review and clearance before project activities are initiated as well as ensuring all instruments are disclosed not only in the World Bank External website but also in-country.

301. Step 5: Implementation and Supervision: Once the ESF documents have been cleared, the ESMP and security management requirements will be included in the contractors' contracts. E&S specialists and the supervisory engineer will be required to orient and closely monitor the implementation of the ESMPs and sign off on the ESMP completion reports before payments are made. Internal monitoring to ensure the compliance of Somaliland Food Systems Resilience Project. Components 1, 2 and 3 subproject implementation activities for the mitigation measures set out in its ESMP, RAP and LRP will be carried out by the E&S risk management staff of the Somaliland PCU, in line with risk assessment procedures and monitoring protocols, as well as the Somaliland E&S teams who are responsible for environmental and social management and the supervisory engineer at the construction sites. The VDC will also help monitor the contractor and raise any concerns with the Somaliland E&S specialists.

302. Step 6: E&S Risk Management and Monitoring Reports: During the course of ESMF implementation, the Somaliland PCU as well as the E&S teams will prepare and submit regular quarterly, biannual and annual E&S monitoring and performance reports for all subprojects carried under components 1, 2, and 3 including the identification and mitigation measures for unanticipated environmental and social risks and a summary of the grievances received and resolved. The environmental and social risk management (SRM) monitoring reports will be submitted internally to the World Bank for review.

303. Step 7: Annual Reviews: ESMF implementation will also be supported by conducting annual E&S performance audits that will be carried out by a third party (i.e. Registered and licensed independent consultancy firm). The third-party annual E&S performance audits will be conducted on Somaliland Food Systems Resilience Project to evaluate the overall implementation of the ESMF.

9.2. Structures for Implementation of the ESMF and other ESF instruments

304. The Somaliland FSRP will be implemented by: (i) the PCU established Ministry of Agricultural Development under FSRP, in close coordination and collaboration with the Ministry of Livestock and Fisheries Development and Ministry of Environment and Climate Change. The unit will be staffed with specialists with OHS, social/CDD, and GBV/gender skills. These specialists will ensure the ESF/ESS is implemented as required. Key ESS Staff include Environmental Specialist, Social Specialist, and Gender/GBV/SEAH Specialist – ToRs are in the ESMF. To enhance intergovernmental coordination, Project Steering Committee will be established, including the relevant Ministers (Agriculture of Agriculture Development; Livestock and Fisheries Development; Ministry of Environment and Climate Change; and any other institutions. Below the Project Steering Committee will be a Technical Advisory Committee. At every level of FSRP implementation, an ESS Focal staff/champion will be recruited. The ESS (Environment/Social; and GBV/SEAH/Gender Officers) will be recruited. At the District level, the Project will utilize its technical support and M&E teams who will support the Village Development Committees (VDCs). The VDCs will be elected from the farmer organizations (existing or established FPOs and CIGs by the FSRP). The FPOs will later be expected to grow into Value-Chain Cooperatives. At the district level, it is prudent to have an ESS coordinating office with a Desk Officer on safeguards being facilitated logistically for both

coordination and M&E for ESS compliance and reporting. At the VDCs/CIGs/FPOs level, each of these entities will have their committees and subcommittee for ensuring ESS compliance, including handling the general aspects of grievances and conflict resolution mechanisms and the GBV complaints/cases. To handle GBV/SEAH responsibilities, the committees will receive specialized training on GBV/SEAH expertise. The GBV/SEAH/Gender experts may be the first contact persons to log in complaints and secretariat of the respective ESS implementation Committees at all levels. A GM Manual for FSRP will be formulated before project appraisal and consequently disclosed.

9.3. Stakeholder Engagement (SEP) and Information Disclosure for ESS

305. As guided by ESS10 on Stakeholder Engagement and Information Disclosure, the government/implementing agencies are required to provide stakeholders with timely, relevant, understandable, and accessible information. Consultations should be conducted in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. A stand-alone Stakeholder Engagement Plan (SEP) will be developed for this project. The key stakeholders for this project include communities where subprojects will be implemented (including disadvantaged and vulnerable and minority groups), downstream or neighboring communities who may be affected by the project, government institutions and individuals who will benefit from capacity strengthening, contractors who will be contracted for civil works. The stakeholders will be analyzed to understand their interest and influence on the project and consequently involve them starting with Somaliland-FSRP ESS instruments disclosure in the stakeholder consultations. This disclosure will be in-country and in the World Bank External website and subsequently on all the ESS documentation at all stages of the project implementation. Appropriate tools and methods will be used, such as community meetings, stakeholder workshops (including by virtual means); audio-visual messages on project information (radio, TV in different local languages), printed materials on project information, social media (Twitter, Facebook, Instagram, WhatsApp), emails, websites, and press releases among others. During preparation of this ESMF, stakeholders will be consulted within the confines of Covid-19 protocols and their views taken on board. Later they will be engaged in the general project implementation and M&E for ESS compliance Stakeholder engagement will be monitored and reported back to the stakeholder groups, and they will also be involved in monitoring stakeholder engagement.

CHAPTER 10 – MONITORING, EVALUATION AND REPORTING

306. Adequate institutional arrangements, systems and resources will be put in place to monitor ESMF implementation. The goals of monitoring will be to measure the success rate of the activities, determine whether interventions have addressed negative impacts, and whether further interventions are required, or monitoring is to be extended in some areas. The goal of inspection activities is to ensure that sub-component activities comply with the plans and procedures laid out in the ESMF. The main monitoring responsibilities and inspection activities will be with the PCU, which will administer the overall project-related environmental and social monitoring and implementation as laid out in this ESMF, as well as the SEP and general GM. The PCU coordinator will be overall responsible for the implementation of the E&S mitigation measures, as well as for monitoring and inspections for compliance.

307. The ESMF lays out expectations for the Technical Leads who will be responsible for their own site/activity specific screening, impact assessments, development of site/activity specific ESMPs, monitoring of impacts, and administration of mitigation measures in line with their respective sub-component activities.

308. These activities may follow the internal processes of Technical Leads, where applicable. They further commit to integrating stakeholder inputs into their regular monitoring and reporting activities. The PCU and PCU E&S Specialists will assess the compliance of Technical Leads’ activities against the ESMF and their subsequent ESMPs and will report any non-compliance to the PCU team and project coordinator. Indicators are identified in both documents and use as a baseline for assessing progress on implementation. The PCU will also independently conduct its own monitoring, verification, and inspection of the activities of Technical Leads to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts.

309. The PCU will promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Reporting will provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Equally important is that any such incidents/accidents should be promptly reported by the contractor to the National PCU. See Annex 4 for detailed incident and accident reporting procedure.

310. Types of incidents that are applicable to the scope of this project are illustrated in the following table, according to the WB’s Environment and Social Incident Reporting Tool (ESIRT).

Table 4: Types of incidents to be reported

Incident type	Details
Fatality	Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).
Lost Time Injury	Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

Incident type	Details
Acts of Violence/Protest	Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.
Disease Outbreaks	The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.
Displacement Without Due Process	The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.
Child Labor	An incident of child labor occurs: (i) when a child under the age of 18 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.
Forced Labor	An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.
Unexpected impacts on heritage resources	An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas that was not foreseen or predicted as part of the project design or the environmental or social assessment.
Unexpected impacts on biodiversity resources	An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.
Environmental pollution incident	Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24hrs or have resulted in harm to the environment.

Incident type	Details
Other	Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

311. Following an incident, the Project will address the causes and prevent recurrence of the incident. Details of the action(s) to be taken, along with the responsible implementing organization and the timeline for completion, should be set out in the Corrective Action Plan. Under certain circumstances, action from the Bank may also be warranted following an incident through the application of Bank remedies (such as suspension of disbursement).

312. Annex 4 provides examples of incident reporting forms as well as Project actions that may be appropriate to address the causes of some incidents. It should be noted that the actions should be unique to the circumstances of the project and the causes of the incident and are likely to be more specific and robust than those listed above.

313. The PCU will ensure contractors and supervising firms provide monthly reports on Environmental, Social, Health and Safety (ESHS) performance to their relevant PCU in accordance with the metrics specified in the respective bidding documents and contracts and eventually submit such reports to the World Bank.

314. The World Bank will equally supervise and assess the E&S performance through review of the quarterly monitoring reports. The GM will further help track complaints and effectiveness of interventions, including those with E&S impacts. Project M&E efforts would be supplemented by World Bank-procured third-party monitoring (TPM) arrangements in areas being implemented through third-party implementing agencies. TPM frequency will be quarterly in the early project phase and, based on contextual improvements, semi-annual at most after the 18th month of implementation. TPM arrangements may cover the following aspects (among others): implementation progress or completion status; physical verification of infrastructure; compliance with the ESF, and the effectiveness of the project's GM responding to complaints; and fiduciary compliance. The contracted agency will be a private or public firm, a civil society organization (CSO), an international NGO, or a UN organization, required to have strong knowledge of the country's context, a country footprint, experience, ability to establish and enforce effective security systems, ability to develop effective working relationships with government and other implementing entities, relevant technical and sectoral knowledge, ability to integrate technology into monitoring procedures (where relevant), and ability to mobilize rapidly. Contracts will include provisions that require the contracted TPM entity to strengthen the government's capacity to conduct such tasks at a later stage.

CHAPTER 11 - PROJECT GRIEVANCE MECHANISM

315. GM structures and processes will be established for this project drawing lessons from other World Bank financed projects (Barwaaqo and Biyoole). Grievance focal points and grievance redress committees will be present at Ministerial, and community levels. The FSRP GM will be implemented in the following categories: General project GM; Contractors' GM, and Specialized GM on GBV/SEAH cases. At Somaliland, these are likely to be the GBV/gender specialists, to ensure confidentiality in line with SEAH complaints protocols, in addition to E&S specialists who oversee the more comprehensive complaints. Social/CDD specialists and environment specialists will support resolution with guidance from the Project Coordinator and Managers who will review complaints at least every 2 months in conjunction with the Grievance Redress Committee (GRC). Training in complaints handling will be carried out for all staff and contractors including drivers, as anyone may be approached with a complaint. The GM aims to strengthen accountability and ensure transparency to beneficiaries, and to provide channels and structures for project stakeholders to provide feedback and/or raise grievances related to project supported activities. The GM is designed in a culturally appropriate way and can respond to all questions, concerns, and complaints of project-affected parties.

316. All contractors and suppliers will be expected to have an internal GM for their workers and sensitize them on the Project GM. The contractors will have a focal person to receive complaints regarding the construction and their workers. GMs specific to the workers will be detailed in Labor Management Procedures (LMP). GBV/SEAH cases will be reported through the general Project GM. However, additional channels will be identified and integrated into the GM (details to be provided in the SEAH Prevention and Response Plan). The availability of these GMs does not prevent recourse to judicial and other administrative resolution mechanisms. The World Bank Grievance Redress Service is also available for all WB financed activities.

317. The following actions will be used for managing complaints for this project (Details are the FSRP –GM Manual):

- a. Complaints should be sent to the GM focal point at the workplace by email, text, phone, and letter or in person. The complaints should be collated onto complaints form and logged into the register and reported using the format provided in the GM Manual. The email address and phone number (of the contact person) will be made available to the workers at signing the contract/recruitment.
- b. Complaints should be reviewed by the PCU weekly upon receipt. The grievance committee at the workplace comprised of the in-charge who will be the chair, GM focal point will act as the secretary, and departmental heads as members (multidisciplinary membership is recommended). The team will review the complaints and provide guidance on the course of action and ensure follow-up on previous complaints. Any preliminary investigation should take place within 5 working days of the committee meeting. Feedback will be given to the complainant within 7 working days since logging-in.
- c. For informal complaints, i.e., those raised through social media, print media, or not formally lodged, the committee should be deliberate upon them to decide whether to investigate based on the substance and potential impact/reputational risk.
- d. If the complaint is referred to the main project GM and government's legal complaints structures, the World Bank should be notified.
- e. Complaints regarding SEAH should be kept confidential, the name of the complainant should not be recorded, only the age and gender of the complainant, and whether a project worker was involved and should be sent directly to the FSRP PCU who should immediately inform the World Bank.
- f. No disciplinary or legal action will be taken against anyone raising a complaint in good faith.
- g. A monthly report of complaints resolution should be provided to the FSRP PCU and the World Bank.

318. The World Bank's Grievance Redress Service (GRS) is a grievance mechanism managed by the World Bank. It provides a fast and accessible complaint mechanism for individuals and communities who believe that a World Bank-financed project causes harm to their community. The GRS is an additional tool that supplements project-level grievance redress mechanisms. If issues cannot be resolved at the project level, grievances can be brought directly to World Bank Management through the GRS.

319. The GRS screens complaints and supports World Bank teams and complainants to identify a timely solution to issues raised in complaints. In terms of the support it provides, the GRS offers various services to teams, ranging from support in reviewing project documents and identifying issues of compliance with Bank policies, facilitating dialogue between the project teams and communities, to advising on possible solutions and best practices. visit GRS website to register a complaint.

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ANNEXES

Annex 1. Environmental and Social Screening Checklist

(This form will be updated prior to starting project implementation. This includes updating as needed to reflect potential issues/impacts/risks).

Subproject:

Location: From focus group discuss or key informant interview with people with different interests and needs regarding the proposed investment e.g. women, youth, people with disabilities, minority groups, livestock keepers, crop farmers, seasonal users e.g. nomadic pastoralists.

The purpose of the checklist is to flag possible environmental and social risks and impacts to determine what E&S instruments to develop and so the issues can be further explored and included in the summary safeguard report and contractors ESMP etc. It should be done as part of ground-truthing based on visual observation and key informant interviews with people with different interests and needs regarding the proposed subprojects e.g., elders, local government officials, women, youth, people with disabilities, minority groups, livestock keepers, crop farmers, seasonal users e.g. pastoralists. Those people consulted should be mentioned at the end of the checklist.

Will the Project?	Yes	No	Explanation
1. Affect downstream water flows			
2. Require clearing of trees, pasture/browse?			
3. Land ownership is clear (Private, Government, Community)?			
4. Is on or near private land?			
5. Require demolition of existing structures ?			
6. Require large volumes of construction materials (e.g., gravel, stone, water, timber, firewood)?			
7. Use water during or after construction, which will reduce the local availability of ground water and surface water?			
8. Affect the quantity or quality of surface waters (e.g., rivers, streams, wetlands), or ground water (e.g. wells, reservoirs)?			
9. Be located within or nearby environmentally sensitive areas (e.g., intact natural forests, mangroves, wetlands) or threatened species?			
10. Lead to soil degradation, soil erosion in the area?			
11. Create waste that could adversely affect local soils, vegetation, rivers and streams or ground water?			
12. Create pools of water that provide breeding grounds for disease vectors (for example malaria or bilharzia)?			
13. Involve significant excavations, demolition, and movement of earth, flooding, or other environmental changes?			
14. Be located in or near an area where there is an important historical, archaeological or cultural heritage site?			

Will the Project?	Yes	No	Explanation
15. Is an area where minority groups (0.5 groups) or IDPs reside or use the water point?			
16. Displace people or structures or restrict people's access to crops, pasture, fisheries, forests or cultural resources, whether on a permanent or temporary basis?			
17. Result in human health or safety risks during construction or later?			
18. Involve inward migration of people from outside the area for use of services or other purposes?			
19. Is an area where there has been insecurity incidents in the past 12 months?			
20. Have activities that will cause disputes over land or access to water?			
21. Is an area where there has been conflict over water or land in the past?			
22. Require sharing or regulation of use between different groups or communities?			
23. Result in a significant change/loss in livelihood of individuals?			
24. Adversely affect the livelihoods and /or the rights of women?			
25. Cause physical resettlement or extensive economic displacement, or loss of livelihoods?			
26. Cause increased settlement or degradation of surrounding areas?			
27. Disposal of bush clearance residue may cause spreading of invasive species?			
28. Introduce a non-native animal or plant species?			
29. Maintenance and management responsibilities have not been defined and accepted by users/local government?			
30. Any limitations for the livestock movement crossing gabions and rehabilitated rangelands			
31. Boundaries of the water sources are clearly demarcated to avoid creation of adjacent settlements			
32. Water source fenced/protected to avoid risks and contamination			
33. Will result in Transmission diseases from region to region or boundaries			
34. Result in transmission of zoonotic disease			
35. Will require use and application of inorganic fertilizers/pesticide/herbicide or fumigation?			
36. Potential risk due to natural disaster hazards (such as flooding, drought, landslide, earthquake, etc.)			
37. Water scarcity / complex hydrological conditions			

Will the Project?	Yes	No	Explanation
38. Efficient use of resources			
39. Potential for significant cumulative impacts and availability of geolocalization tools to be used also for monitoring.			
40. Potential significant biodiversity impacts			
41. Potential exposure to community health and safety risks due to water pan safety risks			
42. Potential for high-risk activities including OHS			

Based on the above checklist, and subproject exclusion criteria, what are conclusions and recommendations on:

Note the exclusion criteria:

1. Activities proposed to be located in Districts that are inaccessible due to high levels of insecurity
2. Activities proposed to be located in Districts that have large swathes of contested lands leading to significant challenges in complying with environmental and social safeguards
3. Activities proposed for Districts that have large investment projects similar to S-FSRP
4. Investments requiring land take
5. Investments requiring support of financial intermediaries ESS9
6. Somalia FSRP will not support large water structures such as Dams but water pans and sand weirs
7. Activities that have a high probability of causing serious adverse effects to human health and/or the environment
8. Activities that may affect lands or rights of vulnerable and marginalized groups, and minority communities
9. Activities that may cause long term, permanent and/or irreversible (e.g., loss of major natural habitat, sensitive ecosystems) impacts
10. Activities/ sub-projects rated high on biodiversity, that may cause long term, permanent and/or irreversible (e.g., loss of major natural habitat, sensitive ecosystems) impacts.
11. Activities/ sub-projects that are prone to natural disasters, such as floods, mudslides and forest fire.
12. Associated facilities which do not meet the requirements of the ESSs, to the extent that the beneficiaries have control or influence over such associated facilities
13. Activities that may have significant adverse social impacts and/ or may give rise to significant social or community conflicts
14. Activities that may involve involuntary resettlement or land acquisition (physical relocation of PAPs) ESS5
15. Investment in land for which credible means to confirm ownership or long-term occupancy is not available
16. Activities that may involve economic displacement of more than 200 PAPs
17. Activities that may affect or result in impacts on cultural heritage ESS8
18. Any activities that would curtail workers' fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor; (iii) prohibition of child labor, including without limitation the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities), persons under 18 from working at night, and that persons under 18 be found fit to work via medical examinations, all aligned with ESS2 provisions; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or social origin.
19. Any activities in areas that are considered to have high security risk
20. Any sub project that will be categorized as an associated facility shall be excluded.
21. Any other activity as may be set out in the project ESCP and PAD.

22. Any activity whose risk will be rated high or substantial after screening will be excluded.

Proposed project is eligible for financing under the project criteria

.....

Proposed Environmental and Social Risk Ratings (High, Substantial, Moderate or Low). Provide Justifications.

.....

Proposed E&S Management Plans/ Instruments (i.e. ESMP, ESIA, Summary safeguards report (for social issues), Voluntary land donation/agreement form, MOU on use of water and maintenance.....

.....

Who was consulted in the completion of the checklist: Provide list?

Prepared by			
Name and role:		Name and role:	
Date	Signature	Date	Signature
Reviewed and approved by			
Environment Specialist Name:		Social Specialist Name:	
Date	Signature	Date	Signature

Annex II - ESIA Content Template

- A. Executive Summary:** Concisely discusses significant findings and recommended actions
- B. Introduction:** This section gives overview of the project conception and the necessity of carrying-out an ESIA.
- C. Legal and Institutional Framework**
1. Analyzes the legal and institutional framework
 2. Compares the client's existing environmental and social framework and the WB ESSs and identifies the gaps between them
- D. Project Description**
1. Concisely describes the proposed project and its geographic, environmental, social,
 2. and temporal context,
 3. Includes a map of sufficient detail, showing the project site and the area that may be affected by the project's direct, indirect, and cumulative impacts
- E. Baseline Data**
1. Sets out in detail the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures. This should include a discussion of the accuracy, reliability, and sources of the data as well as information about dates surrounding project identification, planning and implementation.
 2. Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions.
 3. Assesses the scope of the area to be studied and describes relevant physical, biological, and socioeconomic conditions
- F. Environmental and Social Risks and Impacts**
- Takes into account all relevant environmental and social risks and impacts of the project
- G. Mitigation Measures**
1. Identifies mitigation measures and significant residual negative impacts
 2. Identifies differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable.
 3. Assesses the feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of proposed mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the proposed mitigation measures.
- H. Analysis of Alternatives**
1. Systematically compares feasible alternatives to the proposed project site, technology, design, and operation including the "without project" situation terms of their potential environmental and social impacts.
 2. For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible

I. Design Measures:

- Sets out the basis for selecting the particular project design proposed

J. Annexes

1. List of the individuals or organizations that prepared or contributed to the environmental and social assessment
2. Reference
3. Record of meetings, consultations and surveys with stakeholders
4. Tables presenting the relevant data referred to or summarized in the main text
List of associated reports or plans.

Annex III – ESMP Content Template

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. The content of the ESMP will include the following:

(a) Mitigation: The plan will include compensatory measures, if applicable. Specifically, the ESMP:

1. Identifies and summarizes all anticipated adverse environmental and social impacts;
2. Describes with technical detail each mitigation measure;
3. Estimates any potential environmental and social impacts of these measures; and
4. Takes into account, and is consistent with, other mitigation plans required for the project (e.g. for involuntary resettlement, indigenous peoples, or cultural heritage).

(b) Monitoring: The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides:

1. A specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and
2. Monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

(c) Capacity Development and Training:

1. The ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level.
2. Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures
3. The ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures

(d) Implementation Schedule and Cost Estimates:

For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides

1. An implementation schedule for measures that must be carried out as part of the project
2. The capital and recurrent cost estimates and sources of funds for implementing the ESMP,

Annex IV - Incident and Accident Reporting Procedure

Incident reporting will follow the process indicated in Figure 7.

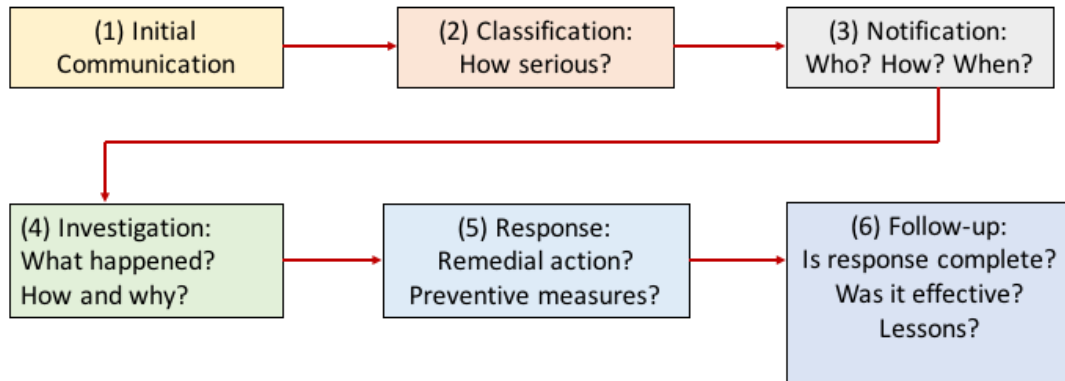


Figure 2: Incident reporting process

Incidents should be categorized into ‘indicative’, ‘serious’ and ‘severe’. Indicative incidents are minor, small or localized that negatively impact a small geographical area or a small number of people and do not result in irreparable harm to people or the environment. A ‘significant’ incident is one that causes significant harm to the environment, workers, communities, or natural resources and is complex or costly to reverse (see the World Bank incident classification guide). A ‘severe’ incident causes great harm to individuals, or the environment, or presents significant reputational risks to the World Bank.

Severe incidents (an incident *that caused significant adverse effect on the environment which affected communities, the public or workers*, e.g., fatality, GBV/SEAH, forced or child labour) will be reported within 24 hours to the PCU and PCU and within 48 hours to the World Bank.

Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the implementer has to handle the case appropriately, and refer the case to the GBV/SEAH referral system, defined in the GBV/SEAH Action Plan. Contractors and primary suppliers who do not adhere to the GBV/SEAH provisions will be debarred for 2 years.

The following is Incident’s Form for all incident types except SEA/SH and discrimination/ violence on the basis of sexual orientation and gender identity. Following this form is the proposed set of actions relevant to incident type.

Incident Form

Part A: To be completed by TTL

A1: Project Details		
Project ID:	Project Name:	ADM TTL Name:
ADM Environment Spec. Name:	ADM Social Development Spec. Name:	# Prior ESIRT Notifications:
PIU Name:	PIU Rep.:	Date of Form Completed:
Country of Incident:	City of Incident:	Incident Location:
Financing/Lending Instrument:		
A2: Project Background (Summary)		
A3: Project Implementation Arrangements (Summary)		
<p>Form of Construction Contract (tick those that apply): N/A <input type="checkbox"/>; Works <input type="checkbox"/>; Underground Works <input type="checkbox"/>; Works Design and Build <input type="checkbox"/>; Works Design, Build and Operate <input type="checkbox"/>; Works EPC/Turnkey <input type="checkbox"/>; Works Output and Performance Based <input type="checkbox"/>; Small works <input type="checkbox"/>; Plant <input type="checkbox"/>; Goods <input type="checkbox"/>; Consulting Services <input type="checkbox"/>; Non-Consulting Services <input type="checkbox"/>; Other <input type="checkbox"/> International Competitive Procurement <input type="checkbox"/>; National Competitive Procurement <input type="checkbox"/>; Prior Review <input type="checkbox"/>; Post Review <input type="checkbox"/></p>		

Part B: To be completed by Borrower within 24 hours

B1: Incident Details			
Date of Incident:	Time:	Date Reported to PIU:	Date Reported to WB:
Reported to PIU by:	Reported to WB by:	Notification Type: Email/'phone call/media notice/other	
Full Name of Main Contractor:		Full Name of Subcontractor:	

B2: Type of incident (please check all that apply) ¹
Fatality <input type="checkbox"/> Lost Time Injury <input type="checkbox"/> Displacement Without Due Process <input type="checkbox"/> Child Labor <input type="checkbox"/> Acts of Violence/Protest <input type="checkbox"/> Disease Outbreaks <input type="checkbox"/> Forced Labor <input type="checkbox"/> Unexpected impacts on heritage resources <input type="checkbox"/> Unexpected impacts on biodiversity resources <input type="checkbox"/> Environmental pollution incident <input type="checkbox"/> Dam failure <input type="checkbox"/> Other <input type="checkbox"/>

See Annex for definitions

B3: Description/Narrative of Incident
<p><i>Please replace text in italics with brief description, noting for example:</i></p> <ol style="list-style-type: none"> <i>I. What is the incident?</i> <i>II. What were the conditions or circumstances under which the incident occurred (if known)?</i> <i>III. Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?</i> <i>IV. Is the incident still ongoing or is it contained?</i> <i>V. Have any relevant authorities been informed?</i>

B4: Actions taken to contain the incident			
Short Description of Action	Responsible Party	Expected Date	Status

For incidents involving a contractor:
 Have the works been suspended (*for example, under Contract GCC8.9 of Works*)? Yes ; No ;
 Trading name of Contractor (if different from B1):
 Please attach a copy of the instruction suspending the works.

B5: What support has been provided to affected people

Part C: To be completed by Borrower (following investigation)

C1: Investigation Findings
<p><i>Please replace text in italics with findings, noting for example:</i></p> <ul style="list-style-type: none"> <i>I. where and when the incident took place</i> <i>II. who was involved, and how many people/households were affected</i> <i>III. what happened and what conditions and actions influenced the incident</i> <i>IV. what were the expected working procedures and were they followed</i> <i>V. did the organization or arrangement of the work influence the incident</i> <i>VI. were there adequate training/competent persons for the job, and was necessary and suitable equipment available</i> <i>VII. what were the underlying causes; where there any absent risk control measures or any system failures</i>

C2: Corrective Actions from the investigation to be implemented (to be fully described in Corrective Action Plan)		
Action	Responsible Party	Expected Date

Incident	Potential actions to address incident
Excavations left open	<ul style="list-style-type: none"> • Review Method Statement for excavations and require short-term excavations to be in-filled at end of day • Reduce steepness of excavation slopes • Install barriers/improve barrier design • Provide warning signs and illumination at night • Provide security or audible alarms
Reversing vehicle	<ul style="list-style-type: none"> • Ensure reversing alarms and flashing beacons are fitted and working • Install reversing cameras to cover vehicle blind spots • Provide banks person for all vehicle movements on worksites • Enforce 'no mobile phone use' while in vehicles or walking on site • Provide pedestrian walkways segregated from vehicle routes by barriers
Improper use of equipment / safety features not fitted	<ul style="list-style-type: none"> • Review and update health and safety manual to ensure all hazards and risk assessments have been undertaken for the activities occurring on site • Provide individual task training and toolbox talks prior to use of equipment • Instigate recorded equipment inspections prior to use • Improve signage (appropriate language or images) at workstations • Review Personal Protective Equipment requirements at workstation
Repeated observations of poor or inconsiderate behavior and breaches of safety protocols	<ul style="list-style-type: none"> • Senior management review of Health and Safety manual to ensure roles and responsibilities are clear • Ensure clear senior and middle management leadership of safety, including: setting examples in complying with safety requirements, holding regular staff safety meetings, ensuring health and safety issues are discussed at site meeting, encouraging use of reporting of unsafe actions • Review and refresh training program • Incentivise safety reporting and compliance

Incident	Potential actions to address incident
Displacement without due process or compensation	<ul style="list-style-type: none"> • Identify evicted people and provide compensation and support for identification of new housing/other facilities as relevant, in line with resettlement requirements, including appropriate consultation • Review resettlement process with responsible implementing parties • Require written confirmation of receipt of payment prior to authorising start of works in new areas
Poaching of endangered species	<ul style="list-style-type: none"> • Report concerns to law enforcement and collaborate with any investigation to halt the poaching • Provide anti-poaching training for project workers and the community • Include sanctions for inappropriate worker behavior and incentives for appropriate behavior • Develop an alternative livelihoods program for communities around protected areas
Hydrocarbon or chemical pollution of water course	<ul style="list-style-type: none"> • Improve work process or procedures as necessary • Training for project staff on spills and associated procedures • Increase on-site monitoring • Provide equipment at key locations for quick clean up and remediation of pollution, and train employees in use of equipment
Individual reports a SEA/SH incident directly to Bank staff	<ul style="list-style-type: none"> • Notify the appropriate GM to trigger the project response • Ensure the survivor was provided information about local, quality GBV service providers • Ensure the survivor is receiving the required services
GM not being used	<ul style="list-style-type: none"> • Review GM and address issues (upgrade, improve access, better organize response process) • Publicize GM in community/ies • Train PIU staff on GM management and monitoring • Assign responsibility to qualified PIU staff, with reporting requirement
A worker of the age of 17 performing hazardous tasks on construction sites	<ul style="list-style-type: none"> • Implement HR checks of identification documents and record keeping for all personnel, including sub-contractor personnel • Issue site passes to legitimate workers and use to restrict access at entrance to work sites
Encroachment of works onto area of archaeological importance	<ul style="list-style-type: none"> • Install fencing between works area and protected area • Provide signs on fence line and include briefing in toolbox talk prior to resuming works in area • Remove extraneous material from protected area and remediate

Incident	Potential actions to address incident
Speeding construction vehicles	<ul style="list-style-type: none"><li data-bbox="574 264 1468 338">• Establish dedicated haul routes with: repeated warning signs, speed humps, pinch points at key risk areas<li data-bbox="574 348 1468 422">• Remove incentives to speed from conditions of driver employment, such as payments linked to the number of trips completed each day<li data-bbox="574 432 1468 495">• Install GPS in site vehicles to track speed, monitor data, and invoke penalties and incentives system to moderate driving behaviour

Annex V - ESS ToT Attendance List

Annex VI – Stakeholder Consultation Attendance List

- Mr. Mohamed Abdillahi – The DG of MOECC, Somaliland,
- Mr. Ahmed Kilas – FSRP PCU coordinator
- Mr. Abdirizak Shafi – MOAD.
- Mr. Abdisamad Yusuf – Social safeguarding specialist - MOECC
- Dr. Ayanle Shu’ayb – environment safeguarding specialist - MOECC
- Mr. Khadr Abdi - MOLAFD
- Mr. Abdisamad Hassan – Agriculture development organization – Project manager
- Mr. Eid Mohamed – Ministry of employment, social and family affairs
- Ms. Nasra Saed – Taakulo organisation – Management team
- Ms. Nimco Eid – World vision international – FSL manager
- Ms. Amran Mohamed - Adam academy Minority groups
- Mr. Ahmed Mohamed – Somaliland national disability forum – Project Manager
- Mr. Abdiladif Ahmed – Candlelight organisation – Project officer
- Mr. Mukhtar Aydiid – Pharo-foundation – Agriculture dept manager
- Mr. Khadar Mawliid – MOAD – Staff
- Mr. Ismail Ahmed – MOWRO construction co. – Engineer
- Mr. Abdillahi Ahmed – Ministry of national planning – Planning dept director
- Mr. Omar Abdillahi – MOECC – Advisor
- Mr. Mohamed Yasin - MOECC – Director of urban dept
- Mr. Ali Ismail – FOA – SWALIM Focal person
- Ms. Tufaah Suleiman – PENHA – HR dept
- Mr. Nimcan Mohamed – MOAD – water and land dept director
- Ms. Yasmin Yusuf – MOLAFD – Staff
- Ms. Fardus Yusuf – MOAD – staff
- Mr. Khalid Muhumed – Ministry of national planning – MEAL
- Ms. Hikma Mohamed – Hanaqad local organisation – Manager
- Ms. Ayan Mohamed – Hanaqad local organisation – project coordinator



Food Systems Resilience Project (FSRP)

FSRP ESF STAKEHOLDERS CONSULTATION MEETING Date: 10/08/2023
 MANSOUR HOTEL, HARGEISA

Workshop Participants Sheet (Attendance Sheet)						
NO	Name	Institution	Position	Telephone/Email	District/Village	Signature
1	Abdiisak Shafi Mohamed	MOAD	MOAD Staff	4086455		
2	Abdisamad Yusuf	MOECC	SafeGuard Social Staff	4420829		
3	Ayanle Shusob Jama	MOECC	env. Safeguard	44178457		
4	Khadar cabdi Adan	MOLFD	FSRP Focal Point (MOLFD)	063-4409461		
5	Abdisamad Hassan	ADO	Project Manager	4232627		
6	Fid Mohamed Sagal	MESAF	Planning Officer	4151730		
7	Nasra Saeed Elmi	TAAKULO	Management	4412917		
8	Nimou Eid Adan	KVI	Acting FSL Manager	4420077		
9	Amrhan Mohamed	Minority - ADAM ACADEG	ADAM ACADEG STAFF	4410811		
10	Ahmed Mohamed Allala	SNDF	Project Manager	4232148		
11	Abdi Ledif Ahmed Seki	Candle Light	Project Officer	4201014		
12	Mukhtaar Caydiid	Pharo Foundation	Agriulture Manager	4089125		
13	Chaclar mawlid Isaaq	MOAD	MOAD Staff	4139054		

14	Ismail Ahmad Asten	MOWRID	Engineer	63-4420121	Is Amir
15	Abdillahi Ahmed	MOPAD	P. Director	063-4413528	Ahmed
16	Qunw Al-Muliy Ali	MOECC	Advisor	063-4004489	Qunw
17	Mohamed Hassan Hassan	MOECC	Director Urban	063-4429233	Mohamed
18	Ali Kaman L	FAO SWALIM	Local person	0634427226	Ali
19	Tufayx Suleiman	PENHA	H.R	063 4545 929	Tufayx
20	Nimran Mohamed Asten	MOAD	Water, land	063. 4297726	Nimran
21	Jasmin Yusuf Ali	MOEF	Cooperator	063-4448854	Jasmin
22	Fadus Yusuf Ali	MOAD	Procurement	063-4069427	Fadus
23	Khalid Mohamed	MOONPD	MEAL	063-4170589	Khalid
24	Xikma Mahmud	Hamrad	manager	063 4411370	Xikma
25	Ahmed Mahmud	Hamrad and	coordinator	063 44 63132	Ahmed
26	Mohamed H. Dule	MOECC	D. G.	663-4700005	Mohamed
27	Ahmed Kilas	project coordinator	World Bank	0633 16 16 96	Ahmed
28					
29					
30					

Annex VII - National Stakeholder Consultation Meeting Held on the 10th August 2023

Key themes to cover	Responses
<p>Perception about the project</p>	<p>The general perception of the project is very good, the project will improve and enhance agricultural production of Somaliland, also the project will create a lot of jobs, opportunities and livelihood benefits specially vulnerable community like the pastoralists and women, this will definitely contribute the economy of the country. In addition to that, the project has come to address challenges caused by the climate change consequences and support the farmers, livestock keepers and other stakeholder in the value chain to improve the livelihood. solution for the drought and other natural disasters that repeatedly affect pastorals.</p> <p>The sustainability of the project remains ambiguous, there are a lot projects similar to this those failed in a short of time due to lack of proper sustainability strategy. Political conflicts and clan interests also are one of the prospective challenges if not addressed properly. Also, land ownership is a big challenge in Somaliland. As we know land ownership goes to the private, therefore a lot of challenges will happen when the project needed land acquisition.</p> <p>These challenges and prospective risks will be avoided or mitigated to create a responsive steering committee those are mandated to address the grievances, concerns and demand of the public. Establishment Independent monitoring and evaluation team, holding a regular meeting between stakeholders, putting in place communication channels.</p>
<p>Exclusion during project design and implementation</p>	<p>Minority, other vulnerable groups like women, IDP, disability community are among the most marginalized segments of the society. These group doesn't have the opportunities of education, employment and other benefits of the projects, therefore they are one of the deprived segment of the society. Now In Somaliland the skill and education of this segment is very good and rich however they are excluded mostly mostly benefits of the projects.</p> <p>Therefore, during the implementation and project design this group needs to include every stage of the project to gain the benefit of the project with their fellow citizens. Also during stakeholder meetings this group shall be respected their participation and involve them any project that may affect their stake or give them benefit.</p>
<p>Stakeholder engagement</p>	<p>Community outreach activities specially to mobilize widely the community through posters, or other relevant IEC material will be very important. The project can arrange information sessions about the project. women and other vulnerable community shall be allocated enough and appropriate time to share them the information.</p>
<p>Labor-related risks</p>	<p>Possible bias of employment may occur, also rights of the labor or their safety may be denied or over-looked. Somaliland has a Labor law that states every ones rights, equal employment and fairness of the staffing. Therefore the project shall refer that law and ensure the safety and rights of the staff.</p>

Key themes to cover	Responses
Socio-cultural Beliefs	<p>social beliefs are very important to consider, for instance frankincense and myrrh farmers believe that women can't inherit totally, only it's male dominant business. Women can get the benefits of the farms but when it comes inheritance women are excluded, therefore when implementing this projects and referring one of the requirements of the project which is direct beneficiaries shall be women 30% this will not work in that sector, therefore this needs to include women in another way and respect the social beliefs of that sector.</p> <p>Also heritage and religious sites shall be respected and consulted the relevant community if needed to do something.</p>
Security issues and conflicts	<p>For the last 6 months Sool region has been under political conflict, there are armed groups those cross the border between Somalia and Somaliland. Many armed conflicts happened between Somaliland national military and armed groups. This may cause potential risk to implement the project in Sool region and other surrounded areas. Also there are potential political conflicts in Togdheer region and in general Somaliland. The project shall consider to avoid the sensitive areas.</p>
Gender-Based Violence (GBV)	<p>SGBV and GBV cases are reported across Somaliland regions specially eastern regions, there is no legal framework for those cases but Somaliland courts refer the criminal law when this case happens. The project shall follow its own guidelines and refer those cases into concerned institutions or the formal justice institutions.</p>
Occupational Health and Safety	<p>Potential Staff neglect, specially their safety, health and lack of break time is expected to come out throughout the lifecycle of the project. Also The expected waste from the use of pesticide need to have a proper way to manage. The farmers and other business people have been using the pesticides and it causes a negative impact to the environment and society. Waste management is important to make sure the project does not turn out to be a problem especially now that the project will cover most parts.</p> <p>Also, some groups underlined that contractors might sometimes be reluctant to make sure adequate safety tools are in place, and sometimes workers might also not be willing to wear safety gear. Participants suggested to enhance awareness of both contractors, workers and communities on the importance of using safety measures to mitigate potential risk.</p>
Grievance mechanisms	<p>Majority of the groups highlighted the importance to address the negative feedbacks of the project specially the grievances as early as possible to avoid prolonged conflicts. Some of them raised to establish a hotline or complain mechanism which is very quick and easily accessible to the public. The GM should be accessible to all and confidential.</p>
Recommendations	<ul style="list-style-type: none"> - Meaningful and continues community engagement dialogues - Organize occasional workshops and training - Community mobilization and awareness raising - Policies and relevant legal frameworks shall refer specially social safeguarding measurements

Key themes to cover	Responses
	<ul style="list-style-type: none"> - Women shall be respected and shall be provided at least 30 % when implementing the project or conducting community engagement - Inclusivity is another important issue to be respected, every relevant or concerned sector of the population shall be included during the set-up of the project. - Collaboration shall be respected specially the implementing agencies need to enhance their collaboration of the project thorough Monthly or quarterly coordination meetings . - Free hotline telephone to complain issue needed to establish
Interviewer's comments	<ul style="list-style-type: none"> - the majority of the participants contributed and provide their idea towards respective themes. Some of the participants have enough experience and knowledge for the ESMF and SEP instruments.

Annex VIII - Key Stakeholder Comments, Suggestions and Concerns

Stakeholder Comments, Observations, Fears, and Suggestions

o.	Comments, observations, fears, and Suggestions (<i>put it the way asked...don't change anything</i>)	Name of the participant commenting / Institution	Response given by a Government Rep. (<i>State Name and Institution /Ministry</i>)	Government Officers (<i>Must respond to all questions</i>)
	<p>This project is very important and mainly focusing the most important of life however a lot of projects wasted their time looking for international experts for the assessment side, my argument is don't waste your time and resources on the project finding experts for assessment purposes, majority of the related assessment of this project has been prepared and ready in Somaliland. for instance FOA conducted a lot of assessments about the food system and handover those documents to related institutions especially the MOAD and other relevant organizations, therefore, I will suggest to use and refer those baselines instead of wasting the time to find or create new fresh assessments that can cause a lot delays and confusion.</p>	<p>ALI ISMAIL, FOA, SWALIM project focal person</p>	<p>Mohamed Abdillahi, MOECC Director General (We will consider those baselines and refer them, thanks Mr.Ali, as a Ministry we have a lot of baselines related to this project and also other implementing agencies so we will consider and share together when needed)</p>	<p>Shaafi MOAD, we have also a lot of written assessments and policies towards agriculture, therefore we will refer to those documents if the project is needed.</p> <ul style="list-style-type: none"> Ministry of National Planning participants also stated that this project is aligned with the national NDP3 plan.
	<ul style="list-style-type: none"> This Project is very important to our country, it was also very important that MOECC arranged this consultation meeting of ESF and invited us, we are recommending that every project shall respect and conduct ESF before project implementation. As an organization, we adopted and always conduct consultation engagement meetings before we implement the projects. In addition to that, We are recommending establishing a formal seed system together Also we have an assessment document related to seed system and we are ready to share with you if needed 	<p>ABDISAMAD HASSEN, ADO (Agriculture development organization) – Project manager</p>		
	<p>I know the challenges that the project will face. for instance, the land is owned</p>	<p>Khaalid Director –</p>	<p>Mohamed Abdillahi, MOECC Director General,</p>	<p>Abdirizaq Shafi (MOAD), and other governmental</p>

	<p>privately, it's very challenging to find public land anywhere in Somaliland. Therefore, the land issue will lead to a delay in the implementation of the project. How will you solve this problem? what is your plan?</p>	<p>General of Agriculture development organization (ADO)</p>	<p>Mr. Dualle acknowledged that problem, we are aware of our land ownership problems, and we know that a lot of projects failed due to land ownership challenges but we will try to conduct a meaningful consultation meeting, especially with concerned stakeholders before the project implementation for mitigation measures.</p>	<p>representatives also acknowledged those issues but they mentioned that as a government institution, they will try to solve any obstacle that may raise or come out during the project implementation through consultative and legal ways.</p>
	<p>Plans are beautiful, we do good and beautiful plans but when it comes to the execution always it becomes very hard to implement.</p> <ul style="list-style-type: none"> Also there is a lack of investment in the production sectors (agriculture), business people are out of that sector, and only substantial farms exist. For instance, in Asia agricultural institutions encourage business people to invest in Agricultural areas. 	<p>Abdillahi Ahmed, Ministry of planning and national development Director of Planning</p>		
	<ul style="list-style-type: none"> MOECC announced that they made a number of rangeland including grassland reservations across Somaliland regions 4 years and none of them succeeded what is the Problem Mr. Director General? Can you share with us the status of that investment? 	<p>Abdillahi Ahmed, Ministry of Planning and national development – planning depart director</p>	<p>Mohamed Abdillahi, MOECC Director “Of course pursuing the national policy we have planned 51 rangeland and grassland reserves across Somaliland.</p> <p>we have done and reserved 6 rangelands, while we invested 3 grasslands. The purpose of this reservation is to prepare livestock fodder during the dry season. However, we always struggle with the local people to maintain those grazing reserves, specifically the Maroodjiheeh and Togdheer regions. Although we managed the last two years and limit their challenges however there is still something to work on regarding rangeland/grassland reservations and since it's mandatory and aligned with our national policy we will do every step to ensure MOECC policy of creating sustainable range/grassland areas.</p>	<p>Subsequently one of the MOECC staff also stressed that the Ministry with community consultation and following the national policy about range/grassland reserves now completed a number of measurements and plans to safeguard those national reserves.</p>
`	<p>Geographically, Somaliland land is mostly a rangeland, however, there are a number of areas that are suitable for</p>	<p>Ali Abdillahi – FOA, SWALIM</p>	<p>Mohamed Abdillahi, MOECC General Director stated that the</p>	

	<p>agriculture, as an FOA we mapped those areas and we have the details of that assessment. My recommendation is to consider the land's suitability and refer to existing literature or map out.</p> <p>We shall also consider collaborative issues specifically the implementing agencies</p>	Project focal person	Somaliland government is now ready to implement and benefit World Bank projects, some of them are now ongoing while others are in the pipeline. We are ready to listen and consider any meaningful recommendation like this one.	
	I am really concerned about the quality of the seeds that we use in Somaliland, NGOs distribute poor seeds to the farmers which can cause big problems in the long run. I am asking the MOAD if there is any policy or guideline for this issue.	Tufaax – PENHA organization, Management level.	Abdirisq Shafi, MOAD staff, “The ministry doesn't have the capacity to buy or collect the suitable and good seeds, therefore INGOs always bring the seed to the country, also the business people bring the seeds for business purposes however we created a relevant legal framework that forces all the business and other agencies to test the quality of the seeds through MOAD sponsored lab. Also, he stated that MOAD drafted a seed policy framework.	
	The Project is very important in terms of its scope and mandates, however, I will suggest you, do not waste time and resources looking for foreign consultants, almost every piece of literature, local experts, and knowledge available in our country, use and localize every step for the smooth implementation of the project.	NIMO EID – World Vision International FSL Manager		
	Our Projects cause a lot of dependency syndrome problems, we always work cash programs, and unconditional cash programs halted the productivity of the people. I would like to suggest governmental officials who are available in this consultation to establish alternative and other guidelines for this direct cash program. I feel this will kill our society in the long run therefore we need governmental intervention and national policies to manage this issue.	NASRA SAED– TAAKULO Organisation, Management ,	Abdillahi, Ministry of Planning and national development, Director of Planning states that we feel the disasters of that issue. About two months ago, the president nominated a task force to advise him on this issue of direct cash programs, the task force still preparing its recommendation and policy guidelines to manage this, hopefully, we will see change in the upcoming months.	Mohamed Abdirahman, from MOECC, also acknowledged the problems of that unconditional direct cash program, he pointed out this program is one of the most disgusting programs in Somaliland. Some people call it humanitarian but this program created dependency and caused productivity problems. People only wait for the cash and sit chewing with Qat whole the day. He stated that hopefully, useful policy will come out.
	It seems that mostly the projects are not aligned with our priorities, I hope this project will follow our national demands although it was mentioned that the program is aligned with our national development plan III. Also, we shall consider the sustainability of the project.	kHAALID – Agricultural development organization (ADO) – Director General	Ministry of Planning participants stated that this program is absolutely aligned with our national development plan III (NDP3)	MOECC DG underlined that due to our financial system compatibility, all World Bank projects are framed with our national Budget and plans therefore this project is not stand alone project but aligned with our national system and policies.

	<p>Decentralization remained very weak in Somaliland, it was needed to decentralize every activity and policy to the local governments however still everything is in the hands of the Central government. For the success of this project, we need to consider including the local governments</p>	<p>Mohamed Abdirahman – MOECC director of urban waste management</p>		
	<p>A lot of challenges will come out by the time this project reach the implementation stage, we have experienced those issue whenever we try to implement a project. Always there are local people who mislead the public therefore try to do meaningful consultations and avoid exaggerations, false promises, and undermining influential individuals.</p>	<p>NASRA, World Vision International FSL Manager</p>		
	<p>Minority and Vulnerable groups are always out of project staff, mostly every project in Somaliland excluded the minority groups, is there any plan in this project towards Minority groups?</p>	<p>Amran Mohamed, Adam Academy, staff – Minority</p>	<p>Abdisamad Yusuf, Social safeguard specialist – MOECC “This project will address all concerns towards the minority and Vulnerable groups, some components in this program state that it’s mandatory to include the vulnerable groups when conducting the community engagement activities and benefits of the projects if they are relevant“</p>	

Annex IX - Integrated Pest Management (IPM) Procedural Guideline

Integrated Past Management Guideline emphasizes the importance of IPM and stresses that the use of pesticides should be only a last resort.

Food Systems Resilience Project does not permit the procurement of pesticides, and the local government does not purchase pesticides for use of Somalia Food Systems Resilience Project and subprojects. However, if individual farmers purchase pesticides, to ensure that World Bank standards are followed, the following supplementary procedures will be undertaken:

If and when a farmer/pastoralist on a Food Systems Resilience Project subproject considers the purchase of pesticides, the PCU will:

- a) Advise the crop or livestock farmer according to this IPM Guideline and in the event that the farmer decides to use pesticides, assess the nature and degree of risks involved and advise the farmer on the necessary steps.
- b) Ensure that such pesticides are limited to those that comply with the World Bank Environment, Health, and Safety Standards.
- c) Ensure that such pesticides do not contain ingredients restricted under applicable international conventions.
- d) Ensure that such pesticides do not include those that have impacts on non-target species.
- e) In the event that in future Somalia Food Systems Resilience Project should change to permit procurement of pesticides by the Project or by any associated agency, PCU will ensure that *a risk hazard assessment and emergency response plan* is developed and implemented for the subproject concerned.

Guidelines on the Implementation of Integrated Pest Management (IPM) for Food Systems Resilience Project (Both Crop and Livestock Subsectors):

Principles of IPM Implementation

1. The emphasis of the IPM programme is on the reduction of or wherever possible, the elimination of the use of pesticides to avoid the misuse of pesticides and to prevent or at least to delay the breakdown of the agro-ecosystem and livestock through good crop and livestock management decisions. This condition will enable the prevention of unnecessary stockpiling of pesticides and their inevitable consequences of accumulating obsolete pesticides.
2. The basis of good crop management decisions is a better understanding of the crop ecosystem including that of pests, their natural enemies, and the surrounding environment.
3. Traditional and indigenous crop and livestock protection methods that encourage the building up of natural enemies, such as crop rotation, intercropping, host plant/livestock resistance, appropriate planting time and planting density, use of local botanicals, vaccinations and other livestock external pests and disease prevention, control and treatment practices are highly encouraged.

4. Pesticides should be used only as a last resort.
5. Where pesticide use is unavoidable, it is desirable to select pesticides which are both effective at controlling pests and cause minimal damage to the environment.
6. The pesticide should be used according to Good Agricultural Practices (GAP) Good International Industry Practices (GIIP) only when necessary for the right crop or livestock at recommended dose and at the right time.
7. The farmer and /or pastoralist should use pesticide safety gear whenever they apply pesticides.
8. Farmers should get training on safe use, handling, and proper storage of pesticides.
9. Creating awareness among the general public about the potential risks associated with pesticide use is highly essential.

Contents of an IPM Plan

To ensure that the above principles are followed, each sub project on a crop or livestock investment should have an IPM Plan (based on the size of the investment, scale of production, and volumes or numbers involved).

The IPM Plan may form part of the subproject investment document/proposal.

The IPM Plan shall, at a minimum, contain the following components and activities:

1. *Technical Assistance:* Crop Production, livestock production, and Protection Experts contacts from both the Ministry of Agriculture and Irrigation, and the Ministry of Livestock, Forestry, and Range; and other sector development agencies (FAO, International Red Cross and Red Crescent Movement –[ICRC]) for technical assistance;
2. *Training and Awareness-Creation:* The project arranges an IPM Training, Safe Use of Pesticides, and Awareness-Creation workshop(s) for the Project Beneficiaries and incorporating the above-mentioned principles.
3. *Pest-Resistant Varieties and animal breeds:* The Project will provide advice to the Project beneficiaries on pest-resistant crop varieties and livestock-resistant breeds based on expertise, innovations, and knowledge.
4. *Supervision:* will be done on weekly basis, to ensure that investments are being operated as intended, to monitor the presence or absence of pests, and provide advice on mitigation options. The management will be in accordance with the IPM components favoring traditional and indigenous pest management practices, and conservation of natural enemies.
5. *Technical Information:* Project should ensure that information is made available to the Project beneficiaries regarding the management of pests expected in the location concerned. If the need for pesticides arises, the project will provide advice on the recommended pesticides and their usage, within the list of allowable pesticides.

6. *Safety and Storage of Pesticides:* The project will develop and implement arrangements for safe use, handling, transportation, and storage of pesticides, and the proper use, maintenance, disposal of waste mixers, and storage of pesticide spraying equipment. Storage should follow the instructions provided. Pesticides shall be kept separately, away from humans and animals in a closed, dry, and secure place. Any surplus or unwanted pesticides will be reported to PCU for due diligence disposal.
7. *Regular Monitoring:* conduct monthly visits to the project investments, to monitor as follows:

Expert Responsible	Indicators Monitored
Crop Production and Protection	Compliance with IPM good practice guidelines /GIIP/WB EHS Guidelines
Natural Resources	Environmental impacts including human health, soil, sensitive ecosystems, none-target flora, and water pollution
Livestock	Hazards to animals, bees, and aquatic life, and other non-target fauna, etc.

8. *Reporting:* act, if required, to rectify any shortcomings arising from the use of pesticides.

Annex X - Sexual Exploitation Abuse/Sexual Harassment Prevention and Response Action Plan

PROJECT: SOMALILAND FOOD SYSTEMS RESILIENCE PROJECT (P178566)

Level of Risk Identified through Risk Assessment: Substantial

Project Description

320. The Project Development Objective (PDO) for FSRP will be *‘to increase the resilience of food systems and the Somaliland’s preparedness for food insecurity in project target areas’*. Progress toward the PDO will be measured using five PDO indicators and intermediate indicators. All relevant indicators will be disaggregated by gender (men and women) and age (youth and adult).

321. **FSRP will support investments across 5 Is-Infrastructure, Institutional Capacity, Innovation, Inclusion, and Integration to comprehensively address food systems resilience.**

322. The Food Systems Resilience Program (FSRP) is part of a regional initiative by the World Bank to provide a comprehensive framework to intervene at both the national and regional levels. This Multi-phase Programmatic Approach (MPA) aims to tackle the underlying structural challenges of food insecurity and reduce beneficiaries' vulnerability to unpredictable climate, crisis, and conflict events. It seeks to achieve this by rejuvenating Somaliland's agri-livestock research institutions, seed systems, and extension services and developing community institutions that can anchor adaptation of climate smart agri-livestock practices; strengthening the availability of water and improved rangelands management for resilient agriculture and livestock production; strengthen animal health services, strengthening the integration of the production systems to domestic and regional markets, with appropriate investments in food safety and value addition, and establishing an enabling policy and institutional framework capable of supporting food systems resilience for Somaliland at national and regional levels.

323. FSRP will support investments across the '5Is'- Infrastructure, Institutional Capacity, Innovation, Inclusion, and Integration to address food systems resilience comprehensively. **Infrastructure investments** will support the revival of flagship agriculture and livestock research institutions, automated weather stations and early warning systems, small scale irrigation infrastructure, produce testing and certification facilities for export-oriented commodities, value addition and processing infrastructure, post-harvest storage, and cold chains. These infrastructure investments are envisaged as foundational to the agenda of food systems resilience.

324. **Institutional Capacity** building will be undertaken at various levels, including farmer institutions, staff of implementing ministries, and stakeholders, including private sector players and enterprises in key value chains. This will enable key institutions to play sectoral leadership roles at various levels. The use of innovations is expected to drive the development and application of climate resilient breeds and inputs, digitally enabled information and extension services, development of locally relevant and climate smart technologies, innovations and management practices (TIMPs), scaling up innovations through technology transfer and demonstrations at community level, new age conservation agriculture approaches, innovations in rangeland management and sustainable charcoal production, development of new fodder varieties, innovative intensification of livestock production systems, low cost innovations in post-harvest storage, and traceability systems in livestock and livestock products.

325. The Project will make investments at all levels to support inclusive farmer institutions and producer organizations, extension and advisory services, access to finance and markets through digital channels, and incubation support for women owned enterprises. The investments will integrate and build on existing or completed investments that support resilience building, including but not limited to the Biyoole and Barwaaqo (Water for Resilience Project) investments into water infrastructure and multi-use water points, Horn of Africa (HoA) Groundwater project investments, Livestock sector investments being undertaken in the De-risking, Inclusion and Value Enhancement of Pastoral Economies in the Horn of Africa (DRIVE) project, and enterprise support investments in the Capacity Advancement, Livelihoods, and Entrepreneurship Digital Uplift Project (SCALED-UP) project.

326. Investments in building resilient food systems in Somaliland will be made through four primary pathways; i) rejuvenating Somaliland’s agri-livestock research institutions, seed systems, extension services, and develop community institutions that can anchor adaptation of climate smart agri-livestock practices, ii) strengthening the availability of water and improved rangeland management for resilient agriculture and livestock production, iii) strengthening the integration of the production systems to domestic and regional markets, with appropriate investments in food safety and value addition, and iv) establishing an enabling policy and institutional framework at sub-national, national and regional level capable of supporting food systems resilience for Somaliland. To support these investment pathways, FSRP comprises five technical components in addition to the Contingent Emergency Response Component (CERC). The project components, sub-components, and resource allocation is outlined below:

327. The project has four components:

Component 1: (Re-)Building Resilient Agricultural Production Capacity: This component is focused on strengthening the foundation for resilient production capacity and productivity in agriculture and livestock sector by rejuvenating Somaliland’s Agri-livestock research institutions and seed systems and building capacity for improved extension and advisory service delivery to small-holders at scale.

Component 2: Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes: This component aims to enhance water availability for crop and livestock value chains and support rangeland rejuvenation and management. It will be implemented in coordination with ongoing World Bank-financed projects that share these objectives. For example, the Project will complement activities carried out under other projects in water infrastructure development²⁸ mainly through its investments in energy efficient water pumping, and promotion of climate-smart crop and livestock farming practices around farmer fields near already established water points.

Component 3: Getting to Market: This component will strengthen the agriculture and livestock sector’s market orientation, helping it cater to both domestic and regional markets. It will do this by supporting existing and new farmer producer organizations (FPOs)²⁹ and agrifood enterprises, the development and upgrading of market infrastructure and export-oriented testing and certification capacity, and rural producers’ access to savings and credit services.

Component 4: Promoting a Greater Focus on Food Systems Resilience in National and Regional Policymaking: component will build food systems resilience at the national and regional levels by focusing on building the capacity of public institutions and identifying relevant policy reform opportunities within the implementing three ministries. In the crops, livestock, and environment sectors it will: (a) build the capacity of government institutions; and (b) carry out comprehensive assessments of agrifood policies for Somaliland.

Component 5: Contingent Emergency Response Component: The component will finance eligible expenditures in the event of an emergency precipitated by a disaster. The activation of CERC, by request of the government, will allow funds to be disbursed rapidly to reduce damage to productive infrastructure, ensure business continuity, and speed up recovery. An immediate response mechanism operation manual (IRM-OM) will be developed by the government stipulating the fiduciary, safeguards, monitoring, and reporting requirements relating to CERC as well as other coordination and implementation arrangements. In the event of CERC activation, funds from other project components may be reallocated to finance immediate response activities as needed.

²⁸ [Mainly Biyoole, Barwaaqo, and Horn of Africa Groundwater projects.](#)

²⁹ [FPO refer to both farmer and livestock producer organizations](#)

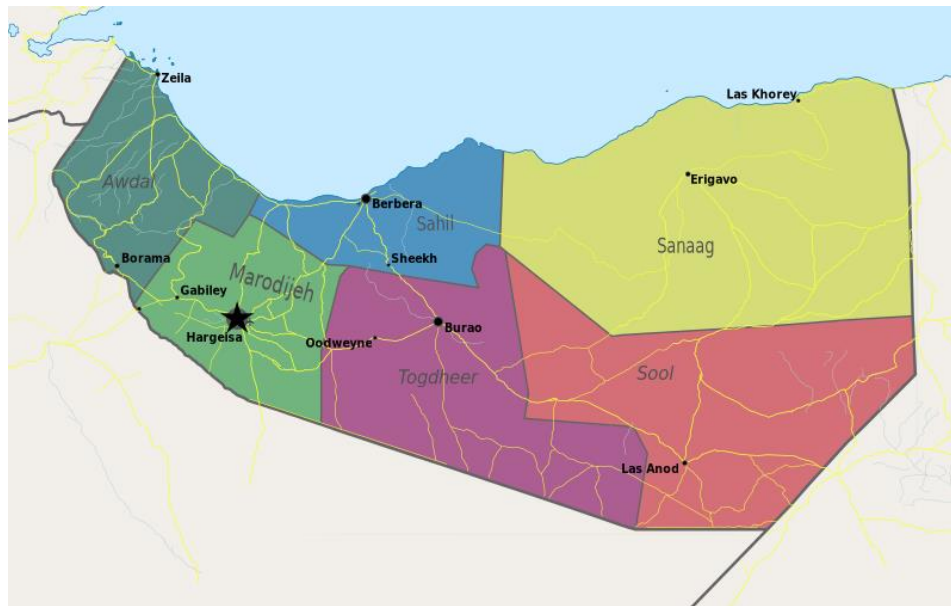
Component 6: Project Management: This component will ensure effective implementation and coordination of the project at all levels.

Project Beneficiaries

328. The project will directly benefit an estimated 65,000 small farmers, agro-pastoralists, and nomadic pastoralists, of which at least 30 percent will be female.

1.5 The Project Area

329. In terms of geographic coverage, the project activities within a sector will be implemented up to 8 districts of Somaliland to avoid resources dissipation and diluted impact: Within each sector, the project will be implemented in up to 8 selected districts, to be identified based on several “exclusion” and “inclusion” criteria. Excluded from consideration will be districts that: (i) are inaccessible due to high levels of insecurity; (ii) have large areas of contested lands leading to significant challenges in complying with environmental and social safeguards, and (iii) have large investment projects similar to FSRP. Districts to be targeted by FSRP will be selected on the basis of the following “inclusion” criteria: (i) the potential for impact within priority value chains in terms of farmer and pastoralist coverage, potential productivity gap to be bridged, and maturity of specific value chain within the district; (ii) implementation readiness in terms of systems, existing institutions, and infrastructure;³⁰ (iii) level of community vulnerability and marginalization (including high share of rural population under IFC3+); (iv) the existence of ongoing, complementary investments; (v) potential for investments to have national and regional spillover effects, notably in the control of transboundary animal disease and population displacement, and the development and resilience of regionally-significant value chains.



Somaliland Map

³⁰ The project may choose to adopt a phased implementation approach wherein districts with low implementation readiness will be entered into after initial systemic capacity building.

Definition of Terms

The Inter-Agency Standing Committee (IASC) defines **gender-based violence** as “an umbrella term for any harmful act that is perpetrated against a person’s will, and that is based on socially ascribed (gender) differences between males and females. GBV broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families and in the community at large. These include sexual violence, domestic or intimate partner violence, trafficking, forced and/or early marriage, and other traditional practices that cause harm.

The United Nations defines “**sexual exploitation**” as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. **Sexual abuse** on the other hand is “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” SEA is therefore a form of gender-based violence and generally refers to acts perpetrated against beneficiaries of a project by staff, contractors, consultants, workers and Partners.

Sexual harassment is defined as any unwelcome sexual advance, request for sexual favours, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. It occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

Contextual GBV Risks

Gender-based violence (GBV)³¹ continues to be a concern in Somaliland due to multiple displacements, droughts, flooding, armed conflicts and the COVID-19 pandemic³². The women and girls have experienced alarming economic stress and poverty levels, thus the risks of increased vulnerability to GBV³³.

A recent spike in Intimate Partner Violence (IPV), rape, sexual exploitation, sexual harassment and abuse have multiplied GBV risks for women and girls, with a worsening impact on women and girls living with disabilities³⁴. GBV affects both men, women and children, but it disproportionately affects women and girls and exists in every country and environment where the Bank operates.

Available evidence indicates GBV is common in the lives of women and girls across every age and stage of life in Somaliland, with some forms of GBV endemic. Sexual violence and Intimate partner violence, the most prevalent types of GBV globally, are commonplace in Somali women's and girls' lives. Other forms of GBV in Somaliland include early and forced child marriage³⁵.

In recent years, for example, 2020 has been a year that witnessed an increase in incidents of gender-based violence against women and girls due to the restrictions imposed by the Government due to the COVID-19 pandemic in

³¹ GBV includes a range of violations, including i) intimate partner violence; ii) non-partner sexual abuse; iii) harmful practices; iv) human trafficking and v) child sexual abuse. It is expected that the country and regional integration profiles will highlight the most prevalent forms of GBV within each country and provide considerations for how to address these risks most effectively. <http://www.worldbank.org/content/dam/Worldbank/document/Gender/Arango%20et%20al%202014.%20Interventions%20to%20Prevent%20or%20Reduce%20VAWG%20-%20A%20Systematic%20Review%20of%20Reviews.pdf>

³² UNFPA (2022) Advocacy brief: Overview of Gender-Based Violence in Somalia

³³ UNFPA (2022) GBViE brief: Amidst the worst drought crisis experienced in a decade in Somalia

³⁴ Ibid

³⁵ International Alert/CISP (2015) The Complexity of Sexual and Gender-Based Violence: Insights from Mogadishu and SouthCentral Somalia, International Alert, Nairobi.

addition to the persistent communal conflicts, armed conflicts, and natural disasters including droughts and floods. Isolation, loss of livelihoods due to closure of business, disruptions in school calendars, and limitations of movement are associated with an increase in sexual violence, intimate partner violence and female genital mutilation among children, adolescent girls and women.

According to the “Expanding Access to Justice Program, Gender Assessment, 2019” report, sexual violence and GBV in the country are very high. Sexual violence against women has been used as a tool of war, a form of sexual hostage-taking as well as child marriage.

There are significant barriers to access to justice. Fear of reprisals or punishment deters survivors of GBV from reporting incidents. Survivors are often reluctant to pursue cases against the perpetrator due to the social stigma associated with rape and other forms of GBV. In Somaliland, survivors, lawyers, witnesses, journalists, and family members face death threats, harassment, and arrests for reporting GBV offences, if perpetrators are from the security forces.

Interventions for women and children should consider the well-being of the family. A positive engagement with the issues confronting men should be part of any attempt to address the needs of women and children.

Gender-based violence including sexual violence has been normalized in Somaliland due to sustained exposure to elevated levels of violence over the past decades, compounded by the lack of national and community-level communication, discussion and dialogue about sexual violence and other forms of GBV³⁶. This combination of high levels of exposure and low levels of public and private discourse has created an enabling environment for violence against women and girls to continue and curbs national and community-level awareness, commitment, and action to do something about it.

The current Covid-19 pandemic, locust invasion, drought and flooding have affected productivity and increased displacement within the country. Children and women are bearing the brunt of the consequences of these emergencies³⁷. Unsafe environments, eroded protection mechanisms and social cohesion, and a lack of safe livelihoods options all increase the incidence of opportunistic sexual violence perpetrated in and around displaced settings when women and girls are collecting water, firewood and other resources, and when in public spaces and accessing public facilities³⁸.

The Somaliland legal system is a mixture of systems, which comprises statutory law, customary law (Xeer) and Sharia law. Although Sharia law is not applied in statutory courts, it is integrated into customary law which is also not adhered to strictly. While formal laws define crimes and punishment, their application is continuously negotiated through the customary power dynamics and their upholders. In practice, the primacy of Xeer is accepted and is the most accessible, used and preferred system for dispute resolution. The state also perpetuates the Xeer supremacy when its officers – police, prosecutors and judges – refer cases back to clan elders, who still remain the most powerful force behind justice and access to it.

Project GBV risks have the potential to create or exacerbate risks of varying forms of GBV, including SEA and SH. The World Bank's GBV risks rating for Food Systems Resilience Project has been classified as **Substantial**. Key risks that may emerge as a result of the project include:

- i. Potential abuse of power and sexual exploitation in labour practices, especially during recruitment, can distort power relations and lead to opportunities for abuse. For example, labour-intensive work schemes and/or cash for work programs (in general) can expose women to sexual exploitation, harassment, or

³⁶ International Alert/CISP (2015)

³⁷ Saferworld UK (2020) Gender and COVID-19: responding to violence against women and children in Somalia

³⁸ Ministry of Planning, Investment and Economic Development (2017); Refugees International (2017) On the Edge of Disaster: Somalis forced to flee drought and near famine conditions, RI, Washington DC; Human Rights Watch (2014a) Here, Rape is Normal, HRW, New York.

violence; when moving about communities and engaging with male leaders and/or community or Project beneficiaries.

- ii. Unequal gender norms and harmful beliefs run the risk of creating hostile environments for female workers, in **instances where** unethical project workers personnel may take advantage of their positions and sexually exploit other personnel or the community while accessing the cash for work and water infrastructure. In cases where female workers have less time for traditional gender-related work such as childcare, this can also lead to a potential increase in IPV.
- iii. Potential amplification of community and household tensions because of women's increased presence in decision-making spaces and access to assets. Change or exacerbation of gender inequitable household dynamics can increase the risk of violence and harm for women, girls and other vulnerable groups directly or indirectly participating in the project. An injection of assets, cash or other commodities within a household or community can significantly increase tensions if traditional decision-making or gender roles are shifted. For example, the provision of equal pay to male and female cash for work participants may also lead to increased forms of violence towards the female recipients. Additionally, because women and girls typically have less access to capital/assets and less agency in economic decision-making, influxes of cash or assets risk increasing either male control over household income/women and girls' decision making or female dependency on male counterparts.
- iv. Exclusion from spaces of voice, agency and decision-making for women and girls can lead to decisions that further harm or marginalize women and girls. In agriculture and water, this can lead to water structure, or livelihood activity, prioritization that does not take women and girls' safety or needs into account, thereby increasing their risk to GBV – i.e., via the water structures or locations prioritized, via requirements that are not correctly met or assessed. Mandating a quota of a minimum of 30% female leadership of Village Development Committees can both 1) alleviate some of this marginalization while also 2) lead to elite capture and the potential to silence less powerful women by more community elite ones, and 3) expose women to leadership positions in order to resist violence and/or abuse as push back.
- v. Women and girls can face high risks related to limitations on their mobility and presence in agriculture, livelihoods, and income-generating spaces. For example, travelling long distances to reach infrastructural work sites or sell items will increase targeting, exploitation, and harm from non-partner individuals, including armed groups / forces / individuals, and other individuals associated with products' supply and value chains
- vi. The use of local labor (mostly men) to support ploughing for women involved in agricultural production has been noted to increase fear of being sexually assaulted, and the potential perpetrators may go unidentified due to a lack of background checks. Exposure to GBV can in turn heighten food insecurity, especially for agriculture and livestock, which can affect a survivor's capacity to work, limiting their ability to produce or secure food for themselves and their families.
- vii. Misinformation or lack of information throughout the project's components can lead to harm and violence towards the communities, especially those with less agency and power. For example, gender-related factors can influence productivity. Additionally, in Somali society, patriarchal norms often lead women and girls – of all groups – often have limited access to trustworthy information and available services, at times left out of community discussions or have their needs and priorities silenced, which negatively influence their productivity. Information and education dissemination activities must engage and reach out to all within society; corresponding monitoring, and safeguards, such as grievance mechanisms, can mitigate some of these risks.

- viii. Women's ownership and land utilization may also pose risks of GBV, exploitation and further disenfranchisement. As more women are widowed due to conflict and more women and children move home or to third locations to resettle and rebuild, land ownership and utilization become contentious. If women are unable to negotiate on the use of land with traditional leaders, they are forced to illegally occupy other private or public land or remain dependent on other individuals, increasing the risk of exploitation and abuse. Women who are successful at negotiating land use may face an increased risk of targeting or pressure to share the fruits of that land as compensation for their access to it. This may therefore limit the accessibility of land by women hence the invested land will mainly be led or owned by men.
- ix. Community conflict resolution approaches can lead to more harm, including against survivors who report GBV/SEAH experiences. Community or local governance resolution processes might reinforce gender inequality pushing for resolutions that widen inequalities, are not survivor-centered and may lead to impunity and more harm to a survivor (through marriage to a perpetrator, re-victimization or other consequences).

GENDER, GBV, and Referral Systems

Gender issues are not solely about women and girls but also men and boys depending on the nature of a society, economic situation, and social access to services. This means that women/girls and men/boys have equal conditions for realizing their full potential and for contributing to and benefiting from economic, social, cultural, and political development. Gender equality doesn't mean women and men should be the same, but they should have the same rights, responsibilities, roles, and opportunities, namely women should not only enjoy equal opportunities, procedures, rules, and laws, but the equality of results or substance.

Gender is a critical determinant of poverty and access to services in Somaliland. Female headed households are quite prevalent in Somaliland, particularly in urban areas, and households headed by women in urban areas are significantly more likely to be poor than households headed by men. Although this is not the case in rural areas, other aspects of deprivation are particularly concerning in rural areas. For example, poor women in rural areas are very unlikely to face adequate health care during childbirth. Patterns of gender inequality are present in current school enrollment across rural and urban Somaliland, particularly for adolescent girls.

The participation and roles of women in politics and decision-making is minimal, and although this is improving, it limits female roles and perpetuates inequality. women's rights in Somaliland are ostensibly protected in their respective constitutions, implementation of these provisions continues to lag.

The linked to water insecurity. There is a vast literature on the role of women and girls in Somaliland, and the underlying factors contributing to the gender gaps.³⁹ These resources highlight the following gender gaps relevant to the proposed project: (a) Time spent to fetch water: In 2020, only a third of Somali households had water piped to their homes, with the rest depending on communal water taps (42 percent) and groundwater (16 percent). It is noted that 41 percent do not have access to a regular and stable improved water source for drinking.⁴⁰ While this situation applies to both genders, women and girls are further impacted as they are usually the main providers of water to the households and spend a disproportionate percentage of their time collecting water averaging three to six hours per day.⁴¹

³⁹ <https://reliefweb.int/sites/reliefweb.int/files/resources/NATIONAL%20GENDER%20PROFILE%20Somaliland.pdf>. Also see: Croome and Husain. 2020. *Climate crisis, gender inequalities and local response in Somaliland/Somaliland*; <https://www.fmreview.org/sites/fmr/files/FMRdownloads/en/issue64/croome-hussein.pdf>

⁴⁰ 2020 Joint Multi-Cluster Needs Assessment.

⁴¹ FAO (2021), pg 19.

The time that women and girls invest in water collection varies across states according to multiple factors - notably, source of water, season, water quality, climate shocks, and state of the borehole (in the case of groundwater)—but it is always time deducted from productive activities or education; (b) Decision making and leadership: Even though women and girls are the main providers of water to the household, they rarely have a voice in decision making regarding water governance. At the national level, gender inequality is also evident in women’s low participation in leadership/decision-making roles;⁴²(c) Agricultural productivity and income generation. Women play important roles in agriculture and livestock production, but their productivity is limited by lack of access to markets, inputs, extension, training as well as time taken for water collection and other domestic responsibilities.

Women make up 57% of the workforce in agriculture and pastoralism (both of which constitute nearly 70% of the local economy). They are significantly involved in trading and commerce, from micro-enterprises to large-scale businesses. While the women butcher and sell small ruminants (goat and sheep), they make up most of the fruit and vegetable vendors. Women are also engaged in the sale of local imported goods (e.g. rice, sugar, wheat, sorghum, etc.). Their employment options are limited by low levels of education; and (d) Health: Poverty, food insecurity, and environmental degradation have a disproportionate impact on rural women, not only due to their inferior socioeconomic, legal and political status, but also due to their critical roles as both producers and household managers and as a result of growing labor shortages due to male out-migration. Women are more malnourished than men and also less food secure. FAO surveys found that households dependent on women for food or income to buy food are over-represented in the category of households with poor food consumption, few income sources, and assets.⁴³

The project will make a positive impact on women transhumant nomads and smallholder farmers in terms of increasing access to more and better-quality water. The project aims to contribute to women’s and girls’ socioeconomic empowerment by reducing gender gaps in the agricultural and livestock sector where women play important roles but have limited access to extension, training, inputs, information, credit as well as little voice in decision making, and few opportunities for income generation given their heavy domestic responsibilities, particularly for water collection.

According to the World Development Report, gender equality matters not only in its own right, but it is also a form of “smart economics” as it enhances economic efficiency (World Bank, 2011). FSRP investment initiatives may have differential effects on men and women due to gender differences arising from the different gender roles and responsibilities; but the project management will be expected to minimize this differential through strategies and mechanisms that bridge the gap (sensitization, capacity building, excursions, exhibitions, discussions, and reviews). Information on gender dynamics and use/application is critical for sustainable development.

Existing Risk Management Systems/Gaps

a) Code of Conduct (CoC)

The parent project has established a draft code of conduct that specifies behavioural conduct, responsibility, and penalties for all workers and contractors. The PCU teams are expected to reinforce it through training and possible signing. The recruited project workers will be required to sign the code of conduct which clearly outline prohibited behaviours, including SEAH, which is unacceptable in the project sites. The CoC sensitization for the project workers will be incorporated into GBV risk management training by the GBV advisor and GBV focal points at the state level.

⁴² [Gender inequality is alarmingly high in Somaliland at 0.776 out of a value of 1 \(complete inequality\), with Somaliland at one of the lowest positions globally on the Gender Inequality Index. Women suffer severe exclusion and inequality in all dimensions of the index—health, employment, and labor market participation \(UNDP 2015\).](#)

⁴³ [FAO \(2021\) pg. 20.](#)

The contractors will ensure all construction workers are informed of the CoC and have understood and signed the document to ensure SEAH free environment in and around the construction sites, and other project areas including offices. Regular sessions on the CoC for workers will be conducted to serve as compliance and part of risk management.

It is mandatory for all contractors and the implementing agencies to ensure all construction workers and project workers sign the CoC that is translated and explained to workers in languages that they understand, considering the different dialects across selected States. However, there is a need to reinforce the CoC, particularly training on SEAH provisions to project workers by the GBV Advisor to be hired at the Ministry of Agriculture Development together with Ministry of Livestock and Fisheries and Ministry of Environment and Climate Change in Somaliland.

b) Referral pathways

Help-seeking referral pathways for survivors of GBV exist and have been established in all the Ministries. However, limited availability of specialized services such as rape treatment for rape survivors, psycho-social support and higher levels of mental health care for traumatized women and girls are major gaps in GBV service provision in Somaliland. This is compounded by the limited number of specialized services providers. In some project sites, there are no GBV service providers, but the community, through the identified VDC, has devised a way of referring individuals in need of health services to the nearest health facility in the district. The project will continue to advocate with other GBV service providers on the areas where gaps are identified and provide an appropriate action. There is a need to regularly update the GBV referral pathways in collaboration with different ministries and relevant agencies providing GBV services, provide relevant training for the project workers, and inform communities on where to seek services whenever appropriate.

The project will also leverage other World Bank-funded projects like Barwaaqo, which have established female health workers (FHWs) in different locations. The VDCs will be linked up with FHWs to support community-based referrals of GBV sensitive cases, especially in areas with no health facilities or clinics.

(a) Other Mitigation Measures

The project will adopt a robust approach to address potential GBV risks. Relevant mitigation measures to address these risks are as follows.

i. **Capacity building:** This action plan will focus on building capacity and sensitization of PCU and the Contractors, Community, and other project stakeholders on the importance of GBV/SEAH-related issues. The Training will include an explanation of GBV/SEAH, expectations for behaviour and conduct, sanctions for violations, roles and responsibilities of actors involved, GBV incident report mechanisms, accountability, and referral procedures. The PCU, particularly the GBV Advisor with the supervision of the World Bank, will review training and communications materials, make suggestions if there are gaps, and assess the need for follow-up activities.

ii. **Contractor responsibilities:** The capacity of contractors to manage the GBV/SEAH risks is an integral part of the action plan. Consequently, SEAH requirements and expectations will be incorporated into contractors' and sub-contractors bidding documents. The contractor's SEAH Accountability and Response Framework will be evaluated as part of the bid's evaluation. Define GBV/SEAH requirements and expectations included in the contractual obligations and finalize the code of conduct that addresses SEAH in the project locations. The PCU will review C-ESMP to verify that appropriate mitigation actions are included and evaluate the contractor's SEAH Accountability and Response Framework in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV/SEAH prevention and response requirements.

iii. **Stakeholders Engagement and Consultations:** Stakeholder consultation with the Farmers, Range management, pastoralist, community animal health workers, project workers and community Project beneficiaries from the project sites, including the adjoining areas will be conducted regularly to inform them properly about the potential GBV/SEAH risks, project activities including the channels available to seek grievance redressal through project-related grievance mechanisms. The GBV focal points will use the community engagement guidelines

developed under the parent project for providing information, education, and communication to the stakeholders, particularly on GBV response services (such as hotline numbers and where to seek assistance when needed). PCU gender/GBV Advisors and PCU will re-examine the GBV risks and take appropriate follow-up actions to manage those risks. GBV service providers, including national organizations, International and relevant government agencies working to respond to GBV, will participate in the consultation. Such consultation will also help to build linkages with each other and prepare the project to respond better to the GBV cases. The project will also conduct regular focus group discussions to understand the risks and limiting factors that female staff and community Project beneficiaries have and may experience in their working environment.

iv. **GBV risk assessment:** The GBV focal points will conduct regular safety mapping/ audits at the project sites and with the community to identify areas where community Project beneficiaries feel unsafe and develop remedial actions where necessary.

v. **Accountability and Response Framework to deal with the GBV/SEAH cases:** The framework will detail how the project will handle allegations of SEAH, procedures to report SEAH allegations internally, a referral pathway to refer survivors to appropriate service providers and procedures of confidential requirements dealing with the cases will be strengthened. A Standard operating procedure and response protocol to ensure timely and safe reporting of SEAH incidents is under development. The GBV focal points will ensure beneficiaries and communities are informed of the availability of varying reporting channels for allegations related to GBV/SEAH. This will be made explicit in all community awareness sessions and be part of the publicly disclosed information.

vi. **Monitoring and Evaluation:** Conduct periodic monitoring and evaluation of the implementation plan including reporting on the indicator progress.

Annex XI – Biodiversity Management Plan

Introduction: The WB ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. Similarly, the Environmental and Biodiversity Policies of Somalia also recognize the need to conserve, develop and utilize the country's biodiversity resources.

In response to these requirements, the Biodiversity Management Plan (BMP) has been prepared as part of the ESMF to address the impacts on biodiversity that are anticipated to occur as a result of the construction and operation phases of the proposed program subproject activities.

The purpose of the BMP is to provide a clear set of actions and responsibilities for the control of impacts affecting biodiversity. The scope of this BMP covers construction, operational phases and mitigation measures are presented to ensure that ecological processes are maintained and are not disrupted through the development of the program. The BMP will be updated as and when new information about the specific locations of the subprojects and its activities become available throughout the various phases of the program implementation and construction. Contractors will also develop their own Biodiversity Management Plan (C_BMP)

Identification of Potential Impacts to Biodiversity: These impacts will include but not limited to:

1. Loss of terrestrial habitat arising from habitat clearance
2. Loss of critical aquatic habitats due to water extraction
3. Accidental spills of hazardous and non- hazardous substances resulting in habitat loss and degradation
4. Habitat fragmentation and edge effects and related degradation of remnant habitat areas.
5. Habitat loss and degradation and species loss arising from invasive alien species encroachment
6. Impacts to terrestrial habitats from changes in surface water hydrology due to irrigation
7. Impacts to habitats and plants from sediment-laden runoff

Mitigation Measures: The steps of mitigation hierarchy which constitute a framework for managing biodiversity shall be followed so that adverse potential program-related impacts are avoided, minimized and restored or rehabilitated where feasible. The mitigation hierarchies include:

Avoidance: this is the first step in the mitigation hierarchy; Examples of avoidance measures include the spatial or temporal relocation or removal of infrastructure, to completely avoid impacting key components of biodiversity (i.e. particularly priority species, habitats or ecosystem services). Some of the recommended avoidance measures include:

1. Realignment of infrastructures (access roads, canals and other infrastructures to avoid impacts to avoid impacts (the loss and degradation of habitats of high conservation importance), during the pre-construction phases
2. Borrow pits required for excavating gravel must be located outside of important biodiversity areas
3. Do not undertake construction activities at night to avoid disturbance to nocturnal fauna from increased noise and vibration.

4. Undertake pre-clearance checks of trees to support roosting bats and other fauna species
5. Night working and the use of artificial lighting shall not be permitted to avoid adverse impacts to priority nocturnal fauna
6. Project vehicles shall not be used at night within the project area to avoid adverse impacts to priority nocturnal fauna
7. Avoid accidental machinery and vehicle collisions with wildlife: Vehicle operation shall be restricted to daylight hours to minimize the risk of vehicle collisions with wildlife
8. Avoid spills of hydrocarbon, oil, chemicals and other hazardous materials (e.g. paint, solvents etc.)
9. Avoid introduction of invasive species and pests
10. Non-invasive local plant species shall only be used for re-vegetation and biological mitigation measures to be used as parts of integrated watershed management program subcomponent

Minimization: this is the second component of the mitigation hierarchy. Proposed Minimization Measures under this mitigation hierarchy include:

1. Areas scheduled for habitat and land clearance shall be demarcated and activities outside the designated areas shall be strictly forbidden
2. Environmentally sensitive areas shall be clearly marked and mapped as ‘No Go Areas’
3. Herbicide and fire shall not be permitted as a means to clear vegetation to ensure a minimal impact footprint during habitat clearance and to reduce the risk of mortality and injury to wildlife.
4. Reduced speed limits shall be signposted to minimize the risk of accidental injury and mortality to fauna
5. Vehicle traffic shall be slowed at wildlife crossing point. This reduction in speed limit shall be signposted
6. Signs shall be installed to identify wildlife crossing point to vehicle traffic.

Rehabilitation /Restoration/: this third step in the mitigation hierarchy should be applied to rehabilitate or restore biodiversity that are impacted by project activities that cannot be completely avoided and / or minimized. An example includes rehabilitating degraded habitats due to quarry or restoring cleared habitats to reduce residual project-related impacts. Rehabilitation /Restoration of areas that have been adversely impacted by project activities shall include:

1. All rubbish and waste materials within the project area (including the project footprint, the working width, borrow pits, stockpiling areas and contractor facility area), quarry sites shall be cleared of all rubbish and waste material in accordance with the project’s waste management principles.
2. The physical landscape of the project area shall be restored by clearing the area of debris, filling holes with recycled material

Offset: Biodiversity offsets are measures taken to compensate for any residual significant, adverse impacts that cannot be avoided, minimized and / or rehabilitated or restored, to achieve no net loss or a net gain of biodiversity. Biodiversity offsets are measurable positive conservation outcomes on priority biodiversity features that are attributed to project activities, and whose magnitude outweighs that of the residual adverse

biodiversity impacts arising from the project development. Offsets require investments in conservation management protection where the results of these investments can be quantified.

BMP Roles and Responsibilities: In order to be effective, Biodiversity Management Plan (BMP) must be fully integrated with the overall project management effort at all levels. On this basis, the responsibility of addressing expected impacts on Biodiversity lies within implementing entities at national level (MoAD, MoLFD and MoECC) as well as relevant ministries, where project activities are taking place.

Monitoring: On daily and monthly monitoring undertaken during construction phases, the contractor and responsible entity shall prepare monthly reports related to biodiversity matters. The reports will summarize the data collected through the monitoring, identifying any occasions when the action levels were triggered and the remedial action that was taken. The reports will also include the findings of the visual observations and will include a record of the activities resulting in the biodiversity impact. The reports will also summarize any complaints received from the local communities, setting out the complaint, whether it was substantiated, and any actions taken to alleviate the impact.

Annex XII – Cultural Heritage Management Plan

Introduction: The WB ESS8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present, and shall be protected from adverse impacts of project activities and support its preservation. Provisional constitution of Somaliland promotes the art and modest culture of the society by protecting cultural heritage sites and structures. In response to these national and the WB requirements, this Cultural Heritage Management Plan has been prepared as part of the ESMF.

Identification of Potential Impacts: Activities associated with the construction and operation of the proposed program activities may result in both direct and indirect physical impacts on known above ground and unknown subsurface cultural heritage sites. In addition, construction activities may restrict local stakeholder access to locally significant cultural heritage sites such as modern, historic, and/or prehistoric graves. The adverse impacts could arise from the following major activities but not limited to:

1. Vegetation removal
2. Leveling and excavation
3. Cut and fill operations
4. Trenching
5. Road construction
6. Use and movement of heavy vehicles
7. Drilling of wells

The Project activities can also have the potential to cause indirect impacts to cultural heritage, including:

- Loss or limitation of community access to cultural heritage sites
- Project-related influx of people
- Changes in livelihood practices resulting from impacts to ecosystem

Mitigation Measures: The most effective way to manage or mitigate potential impacts to cultural heritage sites is by avoidance through project redesign. Where avoidance is not possible, impacts will be managed through:

- A stakeholder engagement program;
- Pre-construction cultural heritage surveys;
- Pre-construction cultural heritage mitigations;
- implementation of a chance finds procedure ;
- Provision of cultural heritage training to project staff;
- Post-assessment archaeological field excavations; and
- Post-assessment site relocation excavations.

A stakeholder engagement program: A stakeholder engagement program shall be conducted in order to minimize the restricting of access to cultural heritage sites during the construction and operation phases. This program will include:

- Identify periods and frequency of site use in order to provide input into designing a construction schedule that will minimize access restrictions during the construction phase;
- Identify which cultural heritage sites are currently utilized or viewed as significant by local stakeholders in order to make recommendations for avoidance of these sites during the construction and operation phases of the planned interventions; and
- Where avoidance is deemed to be unfeasible, establish compensation measures including, but not limited to, site relocation to mitigate impacts to significant cultural heritage sites.

Contractor Pre-construction Cultural Heritage Surveys: Unless agreed prior to undertaking work scope all Contractors shall conduct a preliminary desktop assessment of the entirety of their work sites to determine if cultural heritage sites may be located within them. This assessment shall consider, as a minimum:

- Previously identified cultural heritage properties and sites; and,
- Through engagement with the former land users / owners of that area, an identification of other potential cultural items.

Based on the results of the preliminary desktop assessment, Contractor's Archaeologist shall develop a work plan for a pre-construction cultural heritage survey of the site.

Pre-construction Cultural Heritage Mitigations: One of the preferred management approaches for cultural heritage resources is avoidance. Cultural heritage resources can be avoided through a number of techniques, including:

- Redesigning or relocating of project components to avoid resources at risk;
- Reduction in horizontal or vertical extent of work areas to minimize impacts by avoiding portions of resources;
- Engineering controls during construction to avoid and/or minimize impacts, such as the use of mats, temporarily burying sites, or directional drilling underneath resources; and
- Chance Finds: Cultural heritage resources that are discovered as Chance Finds during construction activities will be managed compliant with (Annex XIII).

Cultural Heritage Resource Management Planning: For cultural heritage resources classified as high and very high significance, contractor will need to develop specific management plan(s) for these resources that details how Contractor will manage it.

Post-Assessment Archaeological Excavations: Archaeological data recovery excavations shall be performed at prehistoric cairn sites that cannot be avoided. In order to fall under the category of prehistoric cairn, a cairn cannot be ascribed to any stakeholders. This will be determined through the stakeholder engagement programmer. Archaeological excavations of such sites will consist of:

- Data recovery excavations resulting in the complete excavation and removal of the entire site; or
- Smaller scale, site sampling excavations designed to obtain sufficient data to characterize site type, use, and period of occupation.

Cultural Heritage Management and Monitoring Plan: The objective of the Cultural Heritage Management and Monitoring Plan is to track and provide assurance that the plan is being implemented appropriately and effectively (Table A).

Table A: Summary of Cultural Heritage Management and Monitoring Plan

Source of Impact	Potential Impact	Mitigation and Management (Design Feature/Specific Measure)	Monitoring Frequency	Responsibility
On-ground works and movement of people and vehicles within the direct disturbance areas	Damage to, or destruction of, cultural heritage sites. Disconnection of communities from cultural heritage sites.	Conduct Cultural Heritage Survey in all areas designated for disturbance during construction	Before Construction	Relevant Ministries at all levels, contractors
		Prepare a site-specific cultural heritage management plan for each potential disturbance area	Before Construction	Contractor
		Consult with community representatives	As required	Relevant Ministries at all levels
		Implement cultural awareness before activities commence.	Before Construction	Ministries at all levels, contractors Bureau
		Identify on site plans and create buffer zones, where necessary, to allow for the management of cultural heritage locations.	Before Construction	Contractor
		Implement the Cultural Heritage Chance Find Procedure	As required	Contractor

Organizations, Roles, and Responsibilities: Like any other plans, implementation of this Plan and other plans to be prepared for specific project activities requires coordinated efforts between MoAD, together with other ministries MoLFD and MoECC. Contractor's site-specific management plan(s) shall describe the resources allocated to and responsible for the execution of each task and requirement contained therein and shall describe how roles and responsibilities are communicated to relevant personnel.

The Contractor shall:

1. Provide cultural heritage awareness training to staff;
2. Provide specific cultural heritage training for those non-cultural heritage specialist;
3. Utilize cultural heritage monitors to observe construction activities;
4. Identify and report potential chance finds to relevant institutions; and
5. Regularly communicate planned construction activities to allow for cultural heritage monitoring activities.

Reporting and Notification

1. Contractors shall complete site clearance forms for each cultural heritage site identified in Cultural Heritage Survey or during Contractor's Pre-construction Surveys;

2. Contractor's Archaeologist and/or trained personnel will determine the nature and significance of individual sites;
3. Contractors will develop maps illustrating archaeological findings in areas to be affected;
4. Contractor shall also report the results of contractor pre-construction surveys and integrate the results into its Site-Specific Management Plan(s), including Cultural heritage assessments.

Contractor's monthly Cultural Heritage report shall include:

1. Incidents of disturbance to known cultural heritage sites
2. All cultural heritage sites identified, distinguishing between known and chance finds
3. All Chance Finds etc.

Annex XIII – Cultural heritage- Chance Find Procedure

Annex XV - Terms of Reference (TA Capacity Building - Template)
Consultancy to undertake Environmental and Social Studies and Provision of E&S Technical Support to Government