



Additional Financing Appraisal Environmental and
Social Review Summary
Appraisal Stage
(AF ESRS Appraisal Stage)

Date Prepared/Updated: 10/27/2022 | Report No: ESRSAFA475



BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Somalia	EASTERN AND SOUTHERN AFRICA	Federal Republic of Somalia	Benadir Regional Administration, Kismayo Municipality/Jubbaland, Baidoa Municipality/South West State, Garowe Municipality/ Puntland, Ministry of Public Works
Project ID	Project Name		
P179775	Somalia Urban Resilience Project Phase II Second Additional Financing		
Parent Project ID (if any)	Parent Project Name		
P170922	Somalia Urban Resilience Project II		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	10/17/2022	12/5/2022

Public Disclosure

Proposed Development Objective

To strengthen public service delivery capacity of local governments and increase access to urban infrastructure and services in selected areas.

Financing (in USD Million)	Amount
Current Financing	112.00
Proposed Additional Financing	50.00
Total Proposed Financing	162.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes



C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

1. Somalia is on the brink of famine. Four consecutive rainy seasons have failed, a climatic event not seen in at least 40 years. The 2022 March-June rainy season was well below average and is likely the driest on record, devastating livelihoods and driving sharp increases in food, water, and nutrition insecurity. It is estimated that over 7 million people have been affected by severe water shortages across the country, triggering mass displacement. Since January 2021, drought-induced displacement has exceeded 1 million people. There is a good chance that certain areas in Somalia will experience famine by October if crop and livestock production failure is widespread, key commodity international prices continue to rise, and humanitarian assistance fails to reach the most vulnerable. Already on September 8, 2022, the Global Famine Review Committee projected famine in two areas in the Bay region, spanning the period between October 2022 and March 2023, unless humanitarian aid is immediately scaled up. In addition, the conflict in Ukraine has contributed to higher inflation and higher cost of imports, further worsening the food insecurity. Between January and June 2022, humanitarian assistance reached 4.1 million people and has prevented the worst outcomes. However, the level of assistance is outpaced by rapidly growing needs. The fifth consecutive failed rainy season in September could prolong drought conditions into 2023. The Government of Somalia declared the drought a national emergency on November 23, 2021, and issued an urgent appeal for international assistance.

2. The impact of drought and floods has been exacerbated by the COVID-19 pandemic. The pandemic is having significant indirect effects on security, driven by the regional economic downturn and supply chain disruptions. Border closures have hurt trade, livestock exports, and household incomes. The ongoing severe drought is affecting Somalia's economic recovery by reducing the country's limited domestic agricultural production, including livestock - the country's primary source of export earnings. More than an estimated three million livestock have died to starvation and disease since mid-2021. Furthermore, poor harvests and rising commodity prices, particularly for wheat and fuel following the invasion of Ukraine and the reduction of cross-border stable food imports due to the drought, are placing strains on household expenditures, especially for the poor. More than 40 percent of the population is projected to be food insecure between October and December 2022.

3. The government has limited fiscal space and policy options to respond to the drought. There is limited fiscal space to allocate resources to respond to multiple climatic shocks, the COVID-19 pandemic, the impacts of the war in Ukraine, and regular security incidents. As Somalia is in debt distress and participating in the Heavily Indebted Poor Countries initiative, there are no opportunities to borrow to increase fiscal space to respond to crises. In response to the drought crisis, the Federal Government of Somalia (FGS) submitted a request for financing under the Crisis Response Window (CRW) Early Response Facility (ERF) to the World Bank on July 5, 2022 to scale the ongoing response. To date, US\$ 1.15 billion has been raised by humanitarian partners for the wider humanitarian response, including FGS and by the World Bank. Yet, critical gaps remain across key sectors to prevent famine and provide life-saving assistance and sustain lives and livelihoods. All remaining available IDA resources for FY23 have been notionally programmed, leaving no additional resources for drought response or recovery, and making CRW ERF resources a critical last resort for much-needed additional support.

4. This project seeks approval of the Board of Executive Directors for a proposed additional grant from the IDA in the amount of SDRX million (US\$ 50.0 million equivalent) for the Somalia Urban Resilience Project Phase II (SURP-II, P170922). The proposed second Additional Financing (AF) worth US\$ 50 million is financed by the Crisis Response Window (CRW) Early Response Facility (ERF) for Somalia. The original grant of US\$112 million (SDR 82.15 million) was approved on December 19, 2019, and became effective on February 24, 2020. The first AF of US\$ 41.5 million



equivalent (US\$ 21.5 million from the Multi-Partner Fund and US\$ 20 million from IDA) was declared effective on July 14, 2022. Taken together, the SURP-II will have a total budget envelope of US\$ 203.5 million with a project closing date of December 31, 2026.

5. The proposed SURP-II second AF entails several key changes: (i) to restructure the project and add a new component – Component 4: Support for Urban Forced Displacement - and merge the ongoing support for drought-induced Internally Displaced Persons (IDPs) under the Contingency Emergency Response Component (CERC) with this component; (ii) to scale-up Component 4 by adding US\$ 45 million from the CRW ERF in the face of deteriorating drought and displacement; (iii) reduce the budget allocation for Component 2: Institutional Strengthening and Analytics from the existing US\$5 million to US\$ 1 million; (iv) increase the budget allocation for Component 3: Project Management and Capacity Building from the current US\$ 20.5 million to US\$ 29.5 million; and (v) retain the CERC now as Component 5 with a US\$ 0 allocation.

6. SURP-II's Project Development Objective (PDO) will remain the same: strengthen public service delivery capacity of local governments, increase access to climate-resilient urban infrastructure and services, and to provide immediate and effective response to an eligible crisis or emergency in selected areas.

7. SURP-II (the parent project and the first AF) comprises four components designed to strengthen urban resilience and municipal governance in key cities. SURP-II builds on the preceding and completed Somali Urban Investment Planning Project (P150374) and the Somalia Urban Resilience Project (P163857). It delivers prioritized basic urban infrastructure and reinforces the municipal government's urban governance capacities using the country's public financial management (PFM) systems. The parent project supports participatory decision-making processes to identify key urban investments that advance urban resilience in six strategically important cities across five Federal Member States (FMS) and the Benadir Regional Administration (BRA). These include the cities of Mogadishu (BRA), Garowe (Puntland), Baidoa (South West State), Kismayo (Jubbaland), Dhusamareb (Galmudug), and Beledweyene (Hirshabelle). The updated five components for the proposed Second AF are as follows:

-Component 1: Urban Infrastructure and Services supporting the preparation and implementation of all infrastructure investments.

-Component 2: Institutional Strengthening and Analytics including various technical assistance (TA) activities such as on informal settlements; climate-resilient operation and maintenance (O&M) of urban infrastructure; urban governance, including solid waste management; and hosting of mayors' forum. These activities help strengthen core municipal functions.

-Component 3: Project Management and Capacity Building providing the overall project management costs, including monitoring and evaluation (M&E), as well as the capacity building of the Project Coordination Unit (PCU), Project Implementation Units (PIUs), and relevant municipal staff.

-Component 4: Support for Urban Forced Displacement to provide urgent support for the newly arriving drought-induced IDPs and the host communities to alleviate the increased pressure on the already limited urban services and mitigate social tension. The ongoing drought response activities under the CERC worth US\$ 20 million financed by the first AF will be incorporated into this new component.

-Component 5: Contingent Emergency Response allowing for rapid reallocation of uncommitted project funds in the event of a natural or man-made crisis in the future, during the implementation of the project, to address eligible emergency needs under the conditions established in its Operations Manual.



8. SURP-II implementation status. The project is more than 31 months into implementation and underwent its latest implementation support mission in June 2022. It is making gradual but steady progress towards achieving its development objective. PDO achievement is rated Satisfactory, and implementation progress is rated Moderately Satisfactory. Despite the complex operating environment, the project is successfully being implemented across vast and diverse areas that cover the entire country except Somaliland. The project has been performing relatively well with trained and functional municipal Project Implementation Units (PIUs) and a federal level Project Coordination Unit (PCU) at the Ministry of Public Works (MoPW), as well as established Federal Government of Somalia (FGS)/Federal Member State (FMS) Inter-ministerial Project Steering Committees. The US\$20 million CERC was activated on July 19, 2022. The CERC is providing drought response activities in terms of housing, land, and property (HLP) and basic service provision (water, sanitation and hygiene [WASH] and health) in the three cities of Mogadishu, Baidoa, and Garowe that are already receiving a large inflow of IDPs triggered by the ongoing drought. The FGS has engaged the International Organization for Migration (IOM) as an implementing partner through an output agreement, while IOM will outsource elements of the response to its Danwadaag Consortium that comprises international and local non-governmental organizations (NGOs). The FGS and IOM signed the output agreement in September 2022.

9. As of September 28, 2022, total project disbursements stand at US\$ 19.72 million, representing approximately 13 percent of the total grant of US\$ 153.5 million. Initial delays in disbursements from the FGS to the FMS, which took over six months in some cases along with delays in the completion of the engineering designs, led to a slow start. Disbursement has picked up since the SURP-II budget has now been transferred from the Ministry of Interior (which is in charge of all public sub-national fiscal transfers) to the direct client of the federal MoPW, and construction commenced since August 2021 in two of the six target cities of Baidoa and Garowe. In these two cities, the first package of investments will be completed by the end of 2022. A third city of Kismayo has also started civil works in February 2022 after a nine-month delay, while the PIU is working closely with the contractor to fast-track implementation. The civil works in Mogadishu will also start soon. There is also the issue that the Somalia has difficulties in attracting internationally reputable and competent contractors due to high risks. Future delays in implementation are possible due to deteriorating security. For the ongoing drought response activities under the CERC, the project focuses on quick disbursing activities and leverages the standing capacity of implementing partners led by the IOM to facilitate rapid implementation. The disbursement is likely to accelerate as the output agreement was recently signed between the FGS and the IOM.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

1. Project locations: The project locations of the proposed second AF are the same as those supported by the CERC financed under the first AF: Mogadishu (Zones 4 and 5 in Districts of Khada and Daynille), Baidoa (Barwaqo North extension IDP site and ADC IDP site) and Garowe (Armale IDP site) (For more details on these targeted sites, see the CERC-ESMF which will be renamed as “the ESMF for Component 4: Urban Forced Displacement”). Under the proposed second AF, additional sites/zones may be supported in these three municipalities (for example, all 10 Zones in the same district in Mogadishu; the far north areas of the Barwaqo North Extension, the southern side of ADC, and two other areas called Holwadaag and Berdale to the West and East of Baidoa; and for Garowe, the originally identified Armale IDP site may be shifted to another IDP site near Jillab), depending on the new IDP arrivals and their needs.



(i) Mogadishu is the capital of the federal government and an important financial and trade hub, and endowed with the most extensive urban infrastructure in the country. Mogadishu hosts the largest number of IDPs, estimated at over 850,000, and is expected to receive the largest new arrivals triggered by the drought. Since September 2021, Mogadishu has accommodated more than 158,000 drought induced IDPs. Yet, land in Mogadishu is highly contested and the Government has not been able to secure a large plot of land for IDPs' settlement. Consequently, all the IDPs are squatting on vacant private land without any formal lease agreement with the private landowners, rendering them highly vulnerable to repeated forced evictions. The majority of the IDPs are concentrated in the two districts of Khada and Daynille.

(ii) Baidoa is a strategic town in south-central Somalia and the interim capital of South West State (SWS) of Somalia. It is situated approximately 250km west of Mogadishu. Baidoa, also home to vibrant markets and large internally displaced persons (IDP) populations, emerged as an important hub for trade and place for refuge for people displaced due to multiple causes. Baidoa is projected to face famine conditions (IPC 5) between October and December 2022 without a significant increase in humanitarian assistance. It is expected to receive more than 350,000 IDPs due to the drought on top of the existing 475,000 IDPs currently residing in Baidoa, adding considerable pressure on the existing land and services. The South West State government, in collaboration with the Baidoa municipality, secured land for IDPs called the Barwaqo site and its extension area 8 km north of Baidoa City. Another resettlement site called the Isha/ADC south of the city is also being secured by the government.

(iii) Garowe, the state capital of Puntland, is situated in the north-east of Somalia. Garowe serves as the trading center for livestock for the local market. While Garowe has only received minimal drought induced IDPs, food insecurity and health incidents among the more than 55,000 existing IDPs are high. Puntland State government, in collaboration with the Garowe Municipality, secured resettlement sites for IDPs in and around the city. Currently, there are no services provided at the site.

2. Salient physical characteristics of project areas: The physical environment in the three municipalities targeted under the proposed second AF is broadly characterized by a strong existing anthropogenic imprint typical for intra-urban areas, including ageing and poorly maintained transport infrastructure, residences, shops, workshops, drainage systems and highly altered biodiversity and land cover. On the social aspect, the stresses of urbanization are particularly pronounced in these municipalities. The massive number of IDPs due to the FCV context, flooding and drought in Somalia are settled in precarious conditions in urban and peri-urban areas. Clusters of formal and informal IDP camps, de facto slums, are spread throughout these cities. The growing population in the cities places considerable stress on municipal service delivery capacity, increasing social tensions between host communities and the displaced.

3. Project locations with differentiated activities: The project activities to be supported under the proposed second AF will continue to focus on small-scale emergency activities with limited E&S risks and impacts, while excluding activities with potentially significant E&S risks and impacts. More specifically, the proposed second AF will support a "Minimum Response Package" (MRP) that includes multi-purpose cash assistance, water trucking, hygiene kits (such as soaps and toilet paper), WASH (boreholes, latrines), health, nutrition services (child malnutrition monitoring and treatment), and plastic sheet for emergency shelters and Camp Coordination and Management (CCCM) (registration, service delivery monitoring) for the drought-induced IDPs flowing into the cities of Mogadishu and Baidoa. In Garowe, the



proposed second AF will provide health services that serve the drought-induced IDPs which could not be provided under the CERC of the first AF due to budget constraints.

D. 2. Borrower's Institutional Capacity

1. Output Agreement between the FGS and IOM: Drought response activities supported by the first AF and the proposed second AF will be implemented under a different modality to ensure timely implementation, though still under the overarching umbrella of the SURP-II institutional arrangements. The Output Agreement signed between the FGS and IOM for the CERC under the first AF will be revised to incorporate the proposed second AF. The implementation of activities will be led by IOM in partnership with the CSO partners in the Danwadaag Consortium, which comprise the Norwegian Refugee Council (NRC), Concern Worldwide (CWW) and Gargaar Relief and Development Organization (GREDO). In addition, IOM plans to contract the Building Resilient Communities in Somalia (BRCiS), an NGO consortium created in late 2013 which includes relevant national and international NGOs to support health and nutrition activities and the WFP to advise on beneficiary targeting, registration, and monitoring of its cash programming. The field level presence and technical experience of IOM and their partners will maximize rapid implementation and benefits of the drought response activities. The ESCP includes borrower commitments relevant to drought response activities under Component 4, so that the activities are managed in a manner consistent with the ESF, which will cascade to IOM and all implementing partners and contractors/subcontractors/service providers.

2. Municipal-level Project Implementation Units (PIUs): Under the parent project, PIUs have been set up at the municipality level in Mogadishu, Baidoa, Garowe, Kismayo, Beledweine and Dusamareb. These PIUs are staffed with a Project Coordinator, Finance Specialist, Procurement Specialist, Environment and Social Safeguard Specialist, Community Engagement Officer(s), Engineer, and Monitoring and Evaluation Specialist. All positions have been competitively recruited. The PIUs have day-to-day project management responsibility, coordinating project implementation, ensuring the timely fund transfer to contractors, implementing relevant E&S instruments including continuous community engagement and grievance redress, monitoring and evaluation. These staff are being provided with thematic capacity building and on-the-job support by Bank staff and engineering and supervision consultants, including on environmental and social risk management. For Component 4, the Baidoa, Garowe and Mogadishu PIUs will have overall responsibility for the E&S due diligence and compliance monitoring of the proposed activities. These three PIUs include well-trained local E&S Safeguards Specialists who will be responsible for daily monitoring of E&S safeguards compliance supported by Community Engagement Officers. These E&S Specialists have been supporting the project since the start of SURP II under the ESF in a satisfactory manner (the E&S performance in ISRs for SURP II to date are rated "Moderately Satisfactory (MS)" or higher.). Based on the IOM and its Implementing Partners' (IPs) reporting, they will prepare regular progress reports for the Bank, develop, organize and deliver appropriate E&S safeguards training for IOM, IPs, contractors, local government/community representatives and other stakeholders involved in the project implementation.

3. Federal-level Project Coordination Unit (PCU): Under the parent project, a PCU has been established at the federal level in the Federal Ministry of Public Works (MoPW). The PCU is responsible for providing oversight of the project and technical and coordination support and guidance across municipalities, liaising with the Ministry of Finance/MoPW and supporting project monitoring and reporting. The PCU consists of a Project Coordinator, a Procurement Specialist, a Financial Management Specialist, an Environmental and Social Safeguards Specialist, a GBV/Gender Specialist and other technical specialists as deemed relevant. For Component 4, the PCU's roles and responsibilities will include provision of E&S capacity building support to the PIUs as needed, quality assurance of E&S instruments and spot checks on E&S safeguards implementation and monitoring. The PCU is staffed with an experienced E&S Specialist who has been supporting the SURP Phase 1 (under WB safeguards OP/BP) as well as SURP



II (under the ESF) since 2018 in a successful manner, leading and mentoring the E&S Specialist in each PIU team. The PCU is also staffed with a GBV Specialist to provide such support. The PCU is also responsible for compilation of E&S reporting and preparation of the Quarterly E&S progress report to the World Bank.

4. IOM and IPs’ E&S staffing and capacity enhancement plan: As humanitarian relief agencies to address emergency situations, the IOM and its IPs have differentiated operational guidelines, practices and timelines on E&S risk management from the WB. Most of them have limited experience in implementing a project in Somalia under the World Bank’s ESF. Considering this, the ESMF for Component 4 has been prepared which is consistent with the ESF but proportionate to the E&S risks and impacts in emergency operations, together with an E&S staffing and capacity enhancement plan for IOM and IPs. As per the ESMF for Component 4, IOM will engage E&S specialists/consultants with relevant expertise, which include overall E&S risk management, stakeholder engagement, field mission and monitoring, GBV and security risk management. All IPs will nominate one focal point for E&S matters, who in particular will prepare, implement and report on the respective E&S instruments. These E&S focal points will further work closely with their counterparts in the respective PIUs. These staffing plans are currently being implemented as of October 2022, which will be continuously reviewed on its adequacy and effectiveness. IOM and IPs will ensure that the above listed E&S staff and focal points are familiar with the WB’s ESSs and can ensure compliance with all E&S instruments. In collaboration with PCU/PIUs and World Bank, relevant capacity building activities will be organized for such E&S staff and focal points before the proposed activities are implemented.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

High

Environmental Risk Rating

Substantial

The environmental risk rating of the parent project, the first AF and the proposed second AF is “Substantial”. Because of the nature and relatively moderate scale of the civil works in urban environment, the potentially adverse environmental impacts from the project will remain minor, temporary, and confined to the area immediately surrounding the construction of drought induced IDPs sites. As experienced under the parent project, the environmental risks and impacts anticipated under the proposed Second AF will include dust generation, possible gaseous emissions, noise pollution, soil erosion, land contamination, surface water sedimentation and groundwater pollution, poor management of solid medical and non-medical wastes and liquid effluents arising out of poor environmental health and safety (EHS) practices during site operation, probable deleterious impacts on living natural resources and habitats in the areas contiguous to the proposed project sites, traffic interruptions, pollution from construction wastes (such as spoil-material dumped on open land), site hazards, structural safety risks during construction works, occupational health and safety risks, including possible transmission of infectious diseases among workers and other stakeholders, especially COVID-19 as well as other communicable diseases endemic to the project intervention areas. These short-term risks and impacts shall be mitigated with the adoption of standard operating procedures and good construction management practices, including Good International Industry Practice, the World Bank’s Environmental, Health and Safety General and sector-specific Guidelines (for Health Care Facilities) and the Bank’s Good Practice Notes on COVID-19 mitigations. The paucity of robust legislative and institutional legislation at both the state and federal levels in Somalia and the low capacity of local contractors in managing environmental risks are among the key risk factors to the project implementation with the ESF. While the 2012 Somali Constitution is yet to be finalized and the federal system is still being negotiated, the Somali national laws on environmental and social

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risk management and governance are still being developed. The Government has limited institutional capacity and resources to address the basic service delivery and infrastructure challenges in urban areas, including E&S risk management. For Component 4, the institutional capacity of IOM and its IPs to manage E&S risks and impacts are also considered to be limited (measures to fill the capacity gaps are provided in the above section of "Borrowers Institutional Capacity").

Social Risk Rating

High

Given the significant security risks associated with terrorism and violent conflicts, the social risk rating of the parent project and the proposed second AF will remain "High". As experienced under the parent project, other key social risks anticipated under the proposed second AF will include: (i) risks associated with labor and working conditions, such as OHS risks, child labor, labor influx and labor dispute; (ii) exclusion of disadvantaged and vulnerable groups from project benefits and stakeholder engagement activities; and (iii) increased tension/competition in the community over limited project-related resources. These risks will be mitigated through implementation of environmental and social instruments; inclusion of disadvantaged and vulnerable groups in project activities/benefits including project-related job opportunities; effective stakeholder engagement (such as inclusive and transparent consultation process and functional GRM); and measures to minimize security risks. The FCV environment in the country places systemic constraints on the ability of the Bank task team to more robustly supervise E&S risk management. While the Bank's supervision and oversight of civil works will be supported through a third-party monitoring agent, the Bank's limited direct oversight over the E&S risk management on the ground is one of the contributing factors for the proposed overall E&S risk rating.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

High

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating for the project will remain High. GBV in Somalia is both a significant contextual and project-related challenge. While no project-related GBV incident has been reported under the project, incidence of GBV is increasing due to the impact of severe prolonged drought conditions which has eroded livelihoods and resulted in multiple displacement around the country. Such emergency circumstances have been known to heighten the vulnerabilities of women and girls, increasing risks to their exploitation and abuse. Other factors identified that increase incidents of GBV include travelling long distance in search of water and basic amenities; limited access to protective shelter, safe water and sanitation facilities; poor lighting in settlements; and lack of essential health services, which increases women and girls' risks of sexual exploitation and abuse and other forms of GBV. In addition, project workers and in particular female workers can be at risk of sexual harassment by colleagues, supervisors and other stakeholders. Considering these, the proposed second AF will continue to apply a robust and comprehensive risk management plan as elaborated in ESS4 section below.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

1. Project types supported under the proposed second AF: The project activities to be supported under the proposed second AF will continue to focus on small-scale emergency activities with limited E&S risks and impacts, which include multi-purpose cash assistance, water trucking, hygiene kits, WASH (boreholes, latrines), health, nutrition services,

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and plastic sheet for emergency shelters and Camp Coordination and Management (CCCM) (registration, service delivery monitoring) for the drought-induced IDPs flowing into the target cities. These activities will be completed within 12 months. Among these activities, the multi-purpose cash assistance, water trucking, hygiene kits, nutrition services and CCCM are the new types of activities supported under the proposed second AF, which aim to address worsening humanitarian situations of the growing IDP inflows. The injection of cash to families at the outset of the emergency will enable the project to rapidly scale-up while supporting families to meet their most immediate needs.

2. Anticipated E&S benefits. The proposed activities under the second AF will expand the broad and life-saving benefits to IDPs in Baidoa, Garowe and Mogadishu supported under the first AF, including (i) enhanced WASH and health services for new arrived IDPs; (ii) land development of IDP sites and access roads; (iii) provision of legal advice and support to IDPs to avoid forced evictions and ensure more secure title situations; (iv) improved food security through multi-purpose cash assistance; and (v) strengthened camp coordination and management through registration of new arrivals and improved service delivery to IDPs. Especially, while the proposed activities are based on solid planning processes and long-term perspectives of integrating IDPs into the urban environment, they will outweigh its limited and short-term E&S risks and adverse impacts. In addition, the activities will be making use of local labor and will therefore create temporary job opportunities for IDPs and host communities.

3. Anticipated E&S risks and impacts of the proposed second AF will be similar to those in the parent project and the first AF, as presented in the above E&S risk rating section and the following sections on each ESS. The E&S Standards (ESSs) relevant to the proposed second AF remain the same as the parent project and the first AF (i.e., ESSs 1, 2, 3, 4, 5, 6, 8 and 10). Also, the General WBG Environmental, Health, and Safety Guidelines (EHSG), the EHSG for Health Care Facilities and the recently issued WB ESF Life Safety Tip Sheet (2021) will continue to be applied to individual subprojects, as relevant.

4. The disadvantaged and vulnerable groups relevant to the proposed second AF include IDPs, returned refugees, female-headed households, orphans, persons with disabilities, elderly, illiterate community members, minority clans and other poor households. Female workers and female community members are also considered a distinct vulnerable group given the GBV risks. The project will ensure that such groups will be included in the project benefits and stakeholder engagement activities.

5. E&S instruments: The E&S frameworks prepared for the parent project (ESMF, SEF, RPF and LMP) and the ESCP were updated and disclosed in April 2022 before the appraisal of the first AF. While the CERC activities financed under the first AF cover relevant but different sectors (WASH, health and HLP) from the parent project (which is focused on urban infrastructure), an ESMF specific to CERC activities (CERC-ESMF) was prepared separately to address E&S risks and impacts of such activities. As per World Bank Guidance on CERC (October 2017), the CERC-ESMF was designed to be as concise and action-oriented as possible, covering all relevant ESSs and building upon the existing E&S framework instruments for SURP II. The CERC-ESMF was cleared by the Bank and disclosed in June 2022. As per the ESCP, the CERC-ESMF is applicable to all CERC activities, which cascades to IOM and all IPs and their contractors/subcontractors and service providers. For the proposed second AF, the CERC-ESMF will be renamed as “the ESMF for Component 4: Urban Forced Displacement”, updated to incorporate the proposed second AF and disclosed before appraisal of the proposed second AF (focusing on the new aspects of the project, such as (i) new types of activities; (ii) additional sites/zones in three municipalities; (iii) newly added IPs; and (iv) the outcome of stakeholder consultations conducted to date). The ESCP will be also updated to incorporate the proposed second AF



(focusing on the changes in component names and other minor edits) and disclosed before appraisal. The ESMF for Component 4 also includes guidelines on site-specific E&S instruments and their timelines. While the Output Agreement between the FGS and the IOM was just signed in September 2022, site-specific E&S instruments are currently under preparation.

6. The E&S performance of the parent project: The E&S performance of the parent project is rated Moderately Satisfactory in the most recent Implementation Status and Results Report (ISR) (June 2022). Since the parent project became effective in February 2020, Baidoa, Kismayo, Garowe and Mogadishu municipalities have selected and prepared their priority investments. All required subproject-specific E&S instruments have been prepared and disclosed in Baidoa in August 2020, in Kismayo in March 2021, in Garowe in June 2021 and in Mogadishu in September 2022. The civil works for these priority investments are currently progressing. While the priority investments in the new municipalities of Beledweyne and Dusamareb are currently under consideration, no E&S instruments for these municipalities have been prepared yet. The implementation of the ESCP of the project continues to be broadly on track, despite the difficult fragility, conflict and violence (FCV) circumstances in Somalia, including limited state capability, generally significant levels of physical insecurity, climate change and their intensifying socio-economic impacts. The E&S performance is steadily improving, while some weaknesses and delays have been identified, such as: (i) inconsistent use of PPE and COVID-19 protocols at project sites and minor diversion from E&S requirements by the contractor (such as access to drinking water and sanitation facilities), (ii) continued systemic challenges with waste management, (iii) weakness in preparing the E&S instruments for subprojects in a timely manner, and (iv) inability of the project teams to augment climate resilience into their sub-projects. To address these identified issues, the project is taking a variety of measures, which include (i) taking non-compliance remedies with the contractor (such as clearance of construction wastes dumped randomly at site); (ii) ongoing training and sensitization activities for contractors and their workers (including daily toolbox talks, thematic trainings, signing on code of conduct) to abide by the E&S instruments; (iii) monthly check-ins with each PIU, PCU and the engineering and supervising consultant to proactively identify, facilitate trouble shooting and provide cross-learning opportunities between PIUs; and (iv) deployment of a Third-Party Monitoring Agent (TPMA) to review the civil works progress, quality, and environmental and social (E&S) compliance. The project is also preparing the introduction of the Geo-Enabling Initiative for Monitoring Services (GEMS) to streamline and visualize information management. A few grievances have been received and addressed in some municipalities to date, which include those related to damaged utility lines underground, construction-induced air pollution, information sharing with affected communities, and working conditions of project workers. In September 2022, potential incidents were reported in Baidoa, which relate to labor and working conditions for project workers, including timely wage payment and age verification for project workers. These incidents are currently under review, for which outcome and corrective actions will be reflected in the forthcoming ISR in November 2022. The lessons learned under the parent project will be also considered in the implementation of the proposed Second AF.

ESS10 Stakeholder Engagement and Information Disclosure

1. Stakeholder identification: As identified in the ESMF for Component 4 (see Section 7 Stakeholder Engagement), key stakeholders in the proposed activities include the following:

(i) Project affected parties: Beneficiary IDPs who will benefit from project activities; and other community members (IDPs or non-IDPs) who will be subject to potential E&S risks induced by such activities;



(ii) Other interested parties: Community/Clan leaders/members, religious leaders, landowners, municipalities of Garowe and Baidoa, BRA/Mogadishu, federal and state ministries, Project implementing institutions (IOM and its IPs), other UN/bilateral donors, international/national NGOs, private sector (water and power utilities), contractors (such as construction companies) and service providers (such as health care professionals, lawyers and paralegals) engaged in project activities; and

(iii) Disadvantaged/vulnerable groups: IDPs in general, but in particular those with disabilities, female-headed households, widows, elderly, orphans, illiterate persons, minority clans, persons living with severe illness. The proposed second AF will continue to take differentiated measures to include such vulnerable groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, simply written materials or graphics or provision of free municipal transport.

2. Stakeholder engagement program: During the preparation phase of activities supported under the proposed Second AF, the project team of IOM and IPs will conduct inclusive stakeholder engagement in all project sites, building on their existing stakeholder engagement programs. As highlighted in the ESMF for Component 4, the lessons learned under SURP II on community engagement will be taken into account, which include: (i) the concept of “Inclusive stakeholder engagement” is not common for the communities in the country. Stakeholder engagement activities arranged by the project can be used as entry points to broaden stakeholder mapping and outreach; (ii) the need for awareness-raising and authorities’ buy-in on WB standards; (iii) better management of community expectations; (iv) continuous feedback to the community on key decisions; and (v) management and consideration of “consultation fatigue” where a series of consultations without timely start of projects create frustration and resentment of the communities. All stakeholder engagements will follow the guidelines provided by the World Health Organization (WHO), the Ministry of Health of the Federal Republic of Somalia (FRS) and the WB to mitigate the risk of COVID-19 transmission during stakeholder engagement activities.

3. Consultations conducted for Component 4: Inclusive consultations with stakeholders were held on July 6 and September 8, 2022 in Baidoa, including local IDPs (leaders and representatives of women, youth and elderly), host communities, local NGOs and government officials. Stakeholders emphasized the urgent needs for the support to IDPs (such as food security, livelihood support, access to water, health and other basic services) and discussed ways to manage potential E&S risks and impacts (such as pollution, competition over limited resources, inclusion and safety of women). Consultations in Mogadishu and Garowe are currently under preparation in close coordination with the local government.

4. Grievance redress mechanism (GRM): The parent project has a three-tier grievance system covering the district, municipal and federal levels. The project GRM will include representatives of project-affected parties and local communities as part of grievance redress committees. The grievance log will be maintained and its functionality will be closely monitored by the respective PIU and the engineering and supervision consultant. Information about the mechanism will be disseminated among local communities and allow anonymous complaints to be raised and addressed. While IOM and its IPs have been implementing activities in the respective areas already, they do have in-house GRMs in place. IOM and its IPs have been applying an ‘Accountability to Affected Persons (AAP)’ mechanism. The AAP is based on (i) participation, (ii) complaints and feedback mechanism (CFM), and (iii) information sharing and transparency. AAP contains GRM, but also the involvement of the community in the design and implementation of activities and feeding back information and learning to the communities. Also, the IPs supporting CCCM have a robust system of for gathering complaints and feedback from the assisted IDP populations. While the GRM established



under the parent project will continue to be available for stakeholders in Component 4, the project will allow the use of IPs' GRMs, as long as the IP GRM is in compliance with key GRM features as required in ESS10. For this purpose, the ESMF for Component 4 includes a GRM checklist (Annex 3) to be applied for each IP GRM to assess the compliance level of the IP GRM prior to commencement of works. In case of gaps in the IP GRM, measures to fill these gaps will be taken.

5. Treatment of GBV cases in GRM: To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the grievance mechanism shall have a different and sensitive approach to GBV cases. As in the case of the GRM under the parent project, the GRCs to be established (or utilized if already exist) for Component 4 activities will have a female member trained in dealing with GBV grievances. This member will be supported by GBV specialists/focal points engaged by IOM and other IPs. The female community engagement officers in the PIUs in Garowe, Baidoa and Mogadishu will also provide support, who are also experienced in dealing with GBV issues. The PCU has a GBV specialist who will also closely work with GBV specialists/focal points of IOM and other IPs. Where a case is reported, actions taken will ensure confidentiality, safety and survivor-centered care for survivors. Any survivors reporting through the GRM, should be offered immediate referral to appropriate service providers based on their preference and with informed consent, such as medical and psychological support, emergency accommodation, and any other necessary services. In the parent project, appropriate GBV service providers mapping has been conducted and working relationships established. In some of the cities, in the case of rape, the victims are required to go through the general hospital. For both activities under the parent project and the proposed second AF, this process will be carried with assistance from GBV service providers. The GBV service providers are expected to refer project related survivors of GBV to the project GRM according to their wishes. Data on GBV cases should not be collected through the grievance mechanism unless operators have been trained on the empathetic, non-judgmental and confidential collection of these complaints. Project workers will also have the right to lodge complaints related to SEA/SH through the GRM, with any supervisor at any level, with the IP in the case of a sub-contractor, or directly with the PCU (GBV Specialist). Only the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, can be collected and reported with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered. The preference of the survivor will be recorded and the case will be considered closed. Recorded GBV/SEA/SH cases should be reported to the World Bank project team within 24 hours.

Public Disclosure

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

1. Labor use for Component 4: As indicated in the ESMF for Component 4 (which includes a section on Labor Management Procedures (Section 6)), the labor use in the proposed activities for Component 4 is similar to the parent project, which includes 'direct workers' (e.g., PIU and PCU staff), skilled and unskilled 'contracted workers' (e.g., engaged by construction companies), 'primary supply workers' (e.g., engaged for provision of construction materials) and government civil servants (e.g., federal, state and municipal officials, including police officers), who will remain subject to the terms and conditions of their existing public sector employment. Key additional types of project workers under Component 4 include the following (While the exact number of project workers will be



determined during project implementation, the indicative number of project workers in each category under the first AF are provided below):

- Contracted workers: (i) the permanent and program staff of IOM (approx. 40 workers) and its IPs (approx. 100 workers), who will fully or partially support the Component 4 activities; (ii) workers engaged by their contractors and service providers (the number of workers are unknown at this stage) (e.g. construction companies for minor civil works for Component 4, health care professionals, lawyers and paralegals to support HLP, operators for multi-purpose cash assistance); and (iii) IDP community members (approx. 200 jobs for 12 months), who will be engaged by IOM and some IPs to support relevant project activities under 'cash for work' program (who will be paid approx. US\$20 per day).
- Community workers: Local IDP community members (approx. 1,800 workers for Garowe and 1,500 workers for Baidoa) will support other IDP families who will receive building materials and labor cost from IOM in setting up transitional shelters with 'owner driven transitional shelter approach'.
- Primary supply workers: Workers engaged by primary suppliers who provide goods and materials essential for project activities on an ongoing basis (the number of workers are unknown at this stage) (e.g., construction materials for component 4, building materials for shelters, materials for WASH, medical supplies).

2. Potential labor risks and mitigation measures: Similarly to the parent project and the first AF, potential risks related to labor and working conditions include (1) OHS risks (such as moving equipment and heavy machines, noise, vibration, welding, chemical hazard, working environment temperature, working at height, safety and hygiene at worksite including transmission of COVID19 and other communicable diseases endemic to the area, OHS risks associated with health care workers at HCFs and mobile clinics, in particular with medical wastes and cross-infection); (2) child labor; (3) labor influx; (4) labor disputes over terms and conditions of employment; (5) GBV/SEA/SH risks; (6) discrimination and exclusion of vulnerable/disadvantaged groups; and (7) security risks (workers exposure to attacks). The proposed second AF will continue to address these labor risks as follows in line with the LMP Section of the ESMF for Component 4:

(1) OHS risks: pursuant to the relevant provisions of the national Labour Code, ESS2 (including EHSs) and the LMP section in the ESMF for Component 4, the IOM, the IPs and their contractors are required to manage all construction sites and O&M activities (such as maintenance of WASH facilities, health care waste management) in such a way that the workers and the community are properly protected against possible OHS risks. Key elements of OHS measures specified in the ESMF for Component 4 include (a) identification of potential hazards to workers; (b) provision of preventive and protective measures; (c) training of workers and maintenance of training records; (d) documentation and reporting of occupational accidents and incidents; (e) emergency preparedness; and (f) remedies for occupational injuries and fatalities.

(2) Child labor: To prevent engagement of under-aged labor, all contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance. The IOM, the IPs and their contractors are required to maintain labor registry of all contracted workers with age verification. Verification of the age shall be undertaken prior to the engagement of labor and documented.

(3) Labor influx: With the limited scale of work under the proposed second AF and the availability of labor supply in the project municipalities, a large scale of labor influx is not expected. Nevertheless, to minimize the labor influx, the proposed second AF will require the IOM, the IPs and their contractors to preferentially recruit unskilled labor from



the local communities and nearby areas . Relevant trainings will be provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values.

(4) Labor disputes over terms and conditions of employment: To avoid labor disputes, fair terms and conditions will be applied for project workers in the proposed second AF consistent with national Labour Code. The proposed second AF will also have grievance mechanisms for project workers in place to promptly address their workplace grievances.

(5) GBV/SEA/SH risks: Sexual harassment and other forms of abusive behavior by project workers or community members will have the potential to compromise the safety and wellbeing of vulnerable groups of workers and the local communities. This will include potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers supported under the project. Beneficiary IDPs in IDP camps will also face increased GBV/SEA/SH risks when receiving project services from workers. To address such risks, the project will (i) conduct awareness raising for project workers and the community; (ii) enforce signing of code of conduct by all project workers; (iii) train GRC GBV focal point on handling related complaints and also on GBV service providers referral mechanism; and (iv) require the IOM, IPs and their contractors to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers.

(6) Discrimination and exclusion of vulnerable/disadvantaged groups: The employment of project workers under the proposed second AF will continue to be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship. To address the risk of exclusion of vulnerable groups (such as women, elderly and persons with disabilities) from employment opportunities, the proposed second AF will encourage the IOM, the IPs and their contractors to employ such groups as part of their unskilled workforce. They will be also required to comply with the national Labour Code on gender equality in the work place, which will include provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate for men and women workers. Provisions will be also put in place to enable safety in the workplace to address potential sexual exploitation or harassment.

(7) Security risks: Considering significant security risks in some IDP sites in the project municipalities, the project will continue to take appropriate and proportionate security measures to minimize the potential risk to the workers through the preparation and implementation of SMPs (see also ESS4 section below). Internal security risks associated with the deployment of security personnel on project workers and the community will continue to be mitigated in accordance with ESS2, ESS4 and the WB Good Practice Note on “Assessing and Managing the Risks and Impacts of the Use of Security Personnel.”

3. Risk management tools and monitoring and reporting: Relevant mitigation measures proposed in the LMP section of the ESMF for Component 4 will be incorporated into procurement documents. The contractor will report to the IOM and the IPs on the status of implementation of ESHS measures on a monthly basis. The IOM and the IPs will closely monitor the contractor/subcontractor on labor and OHS performance and report to the PIUs/PCU on a quarterly basis, which will be included in the E&S progress report to the WB. As per the ESCP, any incident or accident related to the project which is likely to have a significant adverse effect on the environment, the affected communities, the public or workers will be notified to the WB with 48 hours.



ESS3 Resource Efficiency and Pollution Prevention and Management

1. The Standard is relevant. Because of the nature and relatively moderate scale of the works under the proposed Second AF, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction sites as well as site operation. These risks related to ESS3 include the normal impacts of civil works (dust vortexes, possible gaseous emissions, noise pollution due to the activity of heavy construction equipment, land contamination, soil erosion and diminution in soil quality to exudates from construction work/accidental spillage, surface water sedimentation and groundwater pollution by operating sanitation services, pollution from construction and operational phase wastes, medical wastes and water use, including by project workers as well as various waste effluents from site users/drought-induced IDPs and lack of resource-efficiency measures).

2. To address these short-term impacts, the ESMF for Component 4 includes standard operating procedures and good construction management practices, including those proposed in WBG's General Environmental and Health Safety Guidelines (EHSGs) and the EHSG for Health Care Facilities (HCFs). The mitigation measures include: all vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be bundled in order to contain spillage. All waste containers, litter, overburden and any other waste generated during project activities shall be collected and disposed of at designated disposal sites in line with any existing applicable government waste management regulations. All drainage and effluent from storage areas, workshops and work sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations. Used oil from the maintenance of heavy vehicles and other construction machinery shall be collected and disposed of appropriately at designated sites or be re-used, recycled or sold for re-use locally. Entry of storm water runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution. Construction waste shall not be left in stockpiles along the infrastructure such as road, but removed and reused or disposed of on a daily basis. If disposal sites for clean spoil are necessary, they shall be located in areas of low land use value and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low-lying areas and should be compacted and planted with species indigenous to the locality. Resource efficiency measures will be also taken, such as use of recyclable building materials for temporary shelters, provision of fuel-efficient stoves, and efficient use of water. Measures will also be taken to include climate resilience interventions to be incorporated into the project activities as far as possible, including observance of plot ratios for greening works and re-vegetation of public spaces using indigenous vegetation.

ESS4 Community Health and Safety

1. This Standard is relevant. Because of the nature and relatively moderate scale of the works under the parent project and the proposed Second AF, the community health and safety impacts will continue to be minor, temporary, and confined to the area immediately surrounding the construction. Anticipated risks and impacts include (i) possible exposure to COVID-19 and other communicable diseases due to exposure and possible interactions in the sub-project sites between the project workers and associated stakeholders; and (ii) community health and safety risks associated with civil works, such as traffic safety, life and fire safety, hazardous materials, use of potable water of poor quality. Other possible ESS4 risks include exposure to the consequences of improper waste management actions, safety risks associated with fencing/access restrictions and lack of emergency preparedness. To address these short-term impacts, the ESMF for Component 4 includes standard operating procedures and good construction management



practices, include those proposed in WB EHSs (General and Health Care Facilities) and the recently issued WB ESF Life Safety Tip Sheet (2021).

2. Management of security risks: While security risks in some IDP sites to be supported under the proposed Second AF are considered significant, the project will take appropriate and proportionate security measures to minimize the potential risk to workers. As elaborated in the ESMF for Component 4, key security measures will include security protection by public security personnel (such as by district police); restrictions on work hours where security risks are higher (such as proscribing night time work); and measures to maintain low profile of the site and workers (such as the minimum use of sign boards and other visibility and branding features). While security measures to be arranged by public security personnel to address external security risks (such as terrorism and armed insurgency) will be determined by relevant security authorities in each municipality, the project will address internal security risks associated with the deployment of such security personnel on the community and project workers in line with ESS4 (Community Health and Safety) and the WB Good Practice Note titled “Assessing and Managing the Risks and Impacts of the Use of Security Personnel” (such as the awareness raising and training of security officers on the principles of proportionality in the use of force and GBV risks.). While the IOM and its IPs are already operating under the current security environments with their respective security risk management systems, the consistency with the relevant requirements of security risk management under the ESF will be confirmed and additional measures will be applied, where necessary.

3. Management of SEA/SH risks: Considering the project’s high risks regarding Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), the proposed Second AF will continue to apply a robust and comprehensive risk management plan to address potential project-induced GBV/SEA/SH risks, including both measures to prevent or mitigate risks and ensure safety of beneficiaries as well as measures to enable safe, ethical survivor centered care should incidents occur. Also, These measures include: (a) integrating codes of conduct with GBV/SEA/SH-related protection for project workers, consultants and contractors; (b) community consultations, sensitization and capacity building activities to raise awareness of potential risks of GBV/SEA/SH and mitigation measures to be adopted; (c) management of GBV and SEA/SH risks in the recruitment/retention of female workers; (d) mapping of and collaboration with potential service providers in project-affected areas; (e) development of an SEA/SH prevention and response action plan; (f) hiring of a GBV service provider to support the implementation of the SEA/SH action plan; and (g) strengthening of the grievance mechanism with procedures and channels to enable safe, confidential, and ethical reporting of GBV/SEA/SH incidents. GBV risks will be monitored throughout project implementation through regular reassessment, particularly as specific project locations are determined, and through regular monitoring activities to ensure all parties are meeting their responsibilities. The proposed Second AF will continue to receive ongoing technical support from the project’s PCU GBV specialist.

4. Additional SEA/SH mitigation measures by IOM and IPs: While the IOM and all IPs will implement the above measures in their respective activities in collaboration with the PCU’s GBV specialist, they have their own programs in place to address SEA/SH risks, as follows: IOM will recruit an additional GBV Specialist consultant for the implementation of the project activities. IOM will identify and seek to address GBV through deliberative dialogue sessions that will be facilitated during community-based planning to ensure that the safety, dignity, well-being and equitable access to services, especially women and girls, is prioritized, integrated and coordinated across all partners. This will create safe spaces for: (a) mitigating risks: by mitigating the risk of GBV in activity planning and doing no harm; (b) supporting survivors: by facilitating access to survivor-centered, multi-sectoral services; and (c) addressing



the root causes: by contributing towards progressively transforming the conditions that perpetuate GBV. GREDO will implement early identification and referrals of GBV cases through trained Community health workers. It will further mainstream support to GBV survivors and other GBV referral responders while also conducting community sensitization and awareness on GBV prevention, SEA and SH. NRC will, through community paralegals and monitors deployed in the target locations identify GBV cases and refer them to appropriate service providers. NRC is also a lead implementing partner of the Protection Return Monitoring Network and can make referrals for emergency protection assistance. CWW health and mobile clinics will provide counselling and referral services of case identified at CWW-supported health facilities. Community health workers and health facility midwives will raise awareness around GBV matters and sensitize community members on early referrals to the respective facilities. The project-related risks are further mitigated by IOM, which has mechanisms and protocols in place to prevent, mitigate and respond to SEA/SH risks as well as leverage the GBV service providers engaged by IOM and IPs in some of the project areas.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

1. Legal and Institutional framework on land and resettlement: This standard is relevant. While the Constitution is yet to be finalized, Somali national laws are still being developed, including land related matters such as resettlement. While the different levels of government (at the federal, state and municipal levels) have developed some legislation and practice that address land issues, such legal and regulatory frameworks are nascent. In 2019, the federal government developed a national policy to address the crisis around forced migration, which aims to promote the protection of refugees-returnees against forced displacement. However, the implementation of the policy is still to be seen. Considering this, the parent project primarily applies the Bank's ESS5, taking precedence over any applicable national, state and municipal laws and regulations for land acquisition and resettlement for the project. The absence of functioning local authority also causes delays in managing resettlement issues, in particular RAP compensation. These underlying gaps are being addressed through the establishment of the municipal level PIU, federal level PCU, the supervision consultant and the third party monitor.

2. Management of resettlement impact: Under the parent project, the resettlement impacts of each subproject will continue to be moderate due to the limited size and nature of the individual physical works. The physical displacement will continue to be avoided and minimized through project selection and design processes. No physical displacement has occurred in the parent project. The economic displacement will continue to largely relate to temporary livelihood impact on mobile vendors or roadside businesses during the construction (approximately for one month at a given project road section), which will be also minimized and compensated. Subproject-specific RAPs will continue to be prepared and compensation/assistance measures implemented before the start of civil work of each subproject.

3. Exclusion of activities with economic and physical displacement under Component 4: As specified in the list of excluded activities in the ESMF for Component 4, the project will not support any activities that will cause economic or physical displacement. All project activities will be conducted on the land secured by the government, which will be subject to prior screening to confirm the consistency with the SURP II Resettlement Policy Framework (RPF, updated in April 2022).

4. Legal support to land tenure security and mitigation of forced eviction. The proposed activities for HLP include legal support to IDPs (who are informally settling on private land outside IDP sites provided by the government) to



promote land tenure security and mitigate forced evictions. Most of the evictions of IDPs in Somalia are driven by insecure tenure, inadequate legal and policy frameworks, and weak rule of law. The three most cited reasons for evictions in Somalia are the desire of owners to develop their properties, irregular and arbitrary increase of rental fees, and the inability of tenants to fulfil rental obligations. To address such evictions, the proposed activities include eviction monitoring & response program. Monitoring is done through a local network of community leaders, informal settlement leaders, monitors, paralegals and community volunteers. When an eviction event is identified, a diversion or mitigation response is activated. Government focal points are notified and either they or a qualified IP staff establish contact with the landowner or representative(s) attempt to resolve the dispute so that the eviction threat is dropped and the occupants' tenure is temporarily assured (diversion) or, if eviction is unavoidable, to negotiate sufficient time to safely relocate the land occupants to a new site. With that extra time, relevant IPs attempt to find a new site or accommodations for dignified relocation (mitigation). Once the eviction threat is diverted or mitigated, government focal points and IP staff negotiate with landowners to provide a written commitment to secure the tenure of occupants for several years as a means to prevent future arbitrary evictions. While the WB ESS5 does not apply to disputes between private parties in land titling and related contexts (ESS5 para 7), the following measures are specified in the ESMF for Component 4 to address potential risks in these activities: (i) facilitate legal agreements between the local authorities, camp management and land owners; (ii) ensure the participation and witnessing of legal agreements by traditional and formal authorities; (iii) get agreement from all residents and users of the land and relevant departments on the use of land; (iv) ascertaining land ownership and claims and ensure all resettlement issues are resolved prior to the start of relevant support; (v) ensure that the affected parties have access to functional GRM; (vi) where possible ensure that the lease agreement is notarized by the public notary; (vii) ensure both landowners and affected communities are aware of their HLP rights and responsibilities under signed lease agreements; (viii) ensure that there are functional well-trained community fora with capacity on dispute resolution to resolve any land disputes and emerging cases; and (ix) in cases, where the land disputes arise (e.g., landowners issue eviction threats or breach of lease agreement), the IP will work with local authorities and community dispute resolution committees to resolve the cases.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This Standard is relevant. A large inflow of IDPs in targeted sites are one of the key contextual risks relevant to ESS6, which can have adverse impact on water supply, waste water and waste disposal in and around the targeted sites. However, given the strong existing anthropogenic imprint typical for intra-urban areas in the three municipalities, the potential impact (whether singular or cumulative) of small-scale civil work for humanitarian emergency response on sensitive areas supported under the Component 4 will continue to be limited. While a few civil works in key municipalities may affect some areas with inherent environmental sensitivity relevant to ESS6 (including modified, natural and/or critical habitats), the subproject screening process in the ESMF for Component 4 excludes such sensitive areas and prohibits the use of living natural resources. The ESMF for Component 4 also includes specific measures to avoid or minimize negative impact on such areas. While the project also supports emergency WASH services and minor drainage networks at IDP sites, the ESMF for Component 4 includes proportionate mitigation measures to address potentially adverse impacts on water body and ground-water resources. So far in the preparation and implementation of the first AF for CERC activities, no significant impact on areas with environmental sensitivity has been identified. No environmentally sensitive areas were identified during the WB's task team mission to some of the target IDP sites in Baidoa and Garowe. This will be confirmed upon identification of actual subprojects locations and addressed accordingly through site-specific ESMPs.



ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

ESS7 is not currently relevant to the project, as the people in the project area are not considered as Indigenous Peoples as defined under ESS7.

ESS8 Cultural Heritage

While no chance find has occurred under the project, there remains the potential for chance find of cultural or archeological significance during construction and the existence of some historic or cultural buildings that could potentially be impacted from the construction. To address such potential risks, the ESMF for Component 4 includes provisions related to management of tangible cultural heritage as well as intangible cultural heritage (such as disruption to religious/cultural festivity in the community by civil work). Subproject-specific ESMPs will address these issues through the inclusion of chance find procedures and site-specific mitigation measures.

ESS9 Financial Intermediaries

ESS9 is not currently relevant, as the project does not involve any financial intermediaries.

B.3 Other Relevant Project Risks

The project paper provides a broad range of other key risks relevant to the proposed AF, including political, governance, macroeconomic and fiduciary risks.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

OP 7.60 Projects in Disputed Areas

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

Use of Borrower Framework will not be considered.

IV. CONTACT POINTS

World Bank

Public Disclosure



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Borrower/Client/Recipient

Borrower: Federal Republic of Somalia

Implementing Agency(ies)

Implementing Agency: Benadir Regional Administration

Implementing Agency: Kismayo Municipality/Jubbaland

Implementing Agency: Baidoa Municipality/South West State

Implementing Agency: Garowe Municipality/ Puntland

Implementing Agency: Ministry of Public Works

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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