



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 07/12/2019 | Report No: ESRSA00212



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Somalia	AFRICA	P171346	
Project Name	Shock Responsive Safety Net for Human Capital Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
«PRACTICEAREA»	Investment Project Financing	6/20/2019	8/8/2019
Borrower(s)	Implementing Agency(ies)		
Federal Republic of Somalia	Ministry of Labor and Social Affairs		

Proposed Development Objective(s)

The project development objective is to provide cash transfers to targeted poor and vulnerable households and establish the key building blocks of a national shock-responsive safety net system.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>65.00</b>

**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]**

The Shock Responsive Safety Net for Human Capital Project (SNHCP) would provide poor and vulnerable households nutrition linked cash transfers to meet their immediate consumption gaps and protect against famine and malnutrition risks expected as a result of the developing drought in 2019. With a view towards longer term development, the project would also support efforts by the Federal Government of Somalia (FGS) to strengthen institutional resilience and establish key delivery mechanisms of a national social safety net system. The SRSNP would be for a total of US\$ 65 million financed from the IDA’s pre-arrears grant, and would supports three components, to be implemented over a three year period. The components would be: (a) Nutrition-linked Unconditional Cash Transfer, (b) Delivery Systems and Institutional Capacity Building, and (c) Project management and Monitoring and



Evaluation (M&E). It would aim to reach 200,000 poor and vulnerable households (approximately 1.2 million people) in the 6 Federal Member States.

#### **D. Environmental and Social Overview**

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]  
The project will be implemented in areas of fragility due to endemic poverty, acute drought and protracted conflict and insecurity which may make direct access to beneficiaries challenging. Component 1 of the project will provide unconditional cash transfers in remote areas of rural Somalia. Specifically, the project is seeking to extend successful cash transfer programs already operating throughout Somalia through the provision of longer-term support which is shown to improve resilience of communities in the longer-term to periodic shocks such as those caused by drought.

Somalia operates under a complex system in which the way traditional clan and sub-clan dynamics interact with the formal machinery of state is still emerging against a backdrop of recent conflict, poverty and continuing instability. In addition, gender dynamics in Somalia can be restrictive for the target beneficiaries of the project.

Most livelihoods in rural Somalia rely on agriculture or pastoralism. Much of Somalia is arid or semi-arid making the agricultural output of the country marginal in many years. As rains have failed over the last 24 months, much of Somalia is drought affected exacerbating endemic poverty and threatening to undermine recent stability.

#### **D. 2. Borrower's Institutional Capacity**

The implementing agency for the project is the Ministry of Labour & Social Affairs (MoLSA). This is Bank's first project with the Ministry. The client therefore has limited capacity to apply Bank's ESF on the project.

MoLSA has created a joint program steering committee on social protection which is chaired by MoLSA and includes representatives of Ministry of Planning and Economic Development, Ministry of Humanitarian Affairs and Disaster Management, Ministry of Education, Ministry of Health and Ministry of Agriculture

As the client and regional governments lack the capacity to manage E&S risks on a project such as this, the project design relies heavily on high capacity implementing partners. However, the government will be the recipient of the IDA grant and will sign service contracts with WFP and UNICEF, both of whom have good capacity and existing procedures to implement the respective components and activities. The project will use WFP and UNICEF systems variously for beneficiary selection, development and management of applicant database, social accountability, monitoring, capacity building and grievance redress. The MoLSA, having worked with the UNICEF and WFP in similar interventions has adequate capacity to coordinate project activities. With the implementation of Component 3, MoLSA's capacity to implement and coordinate E&S risk will be strengthened.

For Component 1, WFP is the implementing partner of FGS. They have the existing partnerships (standard bank) and experience in the social, cultural, security and political economy analysis necessary to inform the design and implementation of this project. As noted, it is central to the viability of risk management on this project that the implementation of component 1, which carries the majority of the social risks, has been outsourced to a high capacity implementing partner with a proven track record for managing unconditional cash transfers in rural Somalia. The WFP have been managing unconditional cash transfers in Somalia as part of drought response for more than ten years. To



do so they have developed procedures for managing the security risks for the project implementers, risks posed by security forces to the community, and the secondary risks that operating in an insecure environment can have on the project’s efficacy (such as elite capture, or diversion of funds) laid out in their Safe Distribution Handbook. Moreover, WFP systems are at their very core intended to maximise the efficiency of targeting, avoid capture, avoid community conflict and ensure intended beneficiaries are reached. In addition, WFP have a well established, tested and effective system for managing gender-based violence when it occurs in the project area. As such, the project will rely on WFPs systems and practices, augmented where necessary. As such the social management plan developed for this project will largely catalogue existing WFP systems and any additional measures required to effectively manage identified risks.

The efficacy of WFP operations in Somalia at managing these risks have been demonstrated through intensive monitoring for the 10 plus years they have been employing cash transfers for drought relief. Large donors to WFP operations in somalia (such as UK’s Department of International Development (DFID) and United States Agency for International Development (USAID)) have established robust monitoring systems which have been continuously operating for a number of years. These systems have been analysed by the Bank and found to be strong and include measures acceptable for reporting cases of GBV where they occur. In addition to the existing robust systems for monitoring WFP operations in Somalia, for this project a Third-Party Monitoring (TPM) agency will be recruited by MoLSA to undertake quarterly monitoring and verification of the cash transfer component. The TPM will verify the targeting mechanism, beneficiary identity verification, compliance of the payment delivery agents, and to collect beneficiary feedback. Their role in the management of E&S risk is being considered.

For Component 2, UNICEF have the experience, expertise and networks to implement a technical assistance component in somailia. Collectively, as funds and programmes under the United Nations umbrella they have access to the security apparatus necessary to undertake operations in this complex operating environment and manage the low level of risk identified.

Component 3 would establish a Project Implementation Unit (PIU). Specifically, the PIU would be established at the federal level at MoLSA during the first year. Subsequently, separate antenna PIUs or Focal Points would be created in each of the member states. Focus would also be given to strengthening MoLSA’s coordination arrangements within other ministries and stakeholders at the federal level, and between the federal level and the member states at the local level. The federal PIU will be headed by a Project Manager/coordinator and will include an Operations Officer, Communication Officer, MIS Officer, GRM and social specialist, M&E Officer, Financial Management Officer and Procurement officer. The composition of the Focal Points at the member state level will be formed after consultation with State Governments and will be informed by the agreed implementation and governance structure of the national safety net program.

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

### A. Environmental and Social Risk Classification (ESRC)

Substantial

#### Environmental Risk Rating

Low



The project will have a minimal impact on the environment. Cash transfers have minimal adverse impact on the environment. While Component 3, project management support, will generate some e-waste through the purchase of computers for the FGS, the amount produced is likely to be minimal and the management of the waste a relatively simple matter in Somalia. As such, the project environmental risk is assessed as low.

**Social Risk Rating**

Substantial

Component 1 of the project will see unconditional cash transfers issued to women and children in rural Somalia. This carries risks of gender-based violence, exclusion, selection bias, elite capture, access to the site for project delivery and monitoring and the possibility of inward migration upsetting the delicate socio-political balance of the project area. Collectively, and given the use of a implementing partners with a strong track record and systems for managing these risks, they are considered to be moderate. However, the contextual risks (including security) of operating in a conflict zone with complex social dynamics, where community consultations, oversight and possible variable capacity of implementers to identify, understand and overcome social risks means the risk rating has been increased to substantial.

**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:**

The project shall ensure that any e-waste generated from project funding is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers. Details to guide this should be included in the Project Operations Manual.

The project will be implemented in areas of fragility due to endemic poverty, acute drought and protracted conflict and insecurity which makes direct access to beneficiaries challenging. Against this backdrop, the major social challenges identified are:

**Exclusion:** The security and other challenges associated with working in rural Somalia make effective stakeholder engagement and community participation very challenging. As such, the challenges of ensuring the project reaches vulnerable community members (such as minorities, people with disabilities or widows present in any cash transfer project are amplified.

**Mitigation:** In Somalia, community participation has been more robust in rural areas than in Urban and is used extensively by WFP on like projects. The WFP guidelines for community participation (adopted by the Somalia Food Security Cluster) in targeting uses a community driven process for identifying vulnerable people at risk of exclusion. To monitor the application and effectiveness of the targeting process the WFP carries out their own monitoring, of this system and where they are unable to carry out their own monitoring they use a monitoring contractor. Monitoring reports will be included in the SMP along with a detailed description of this process.

**Selection:** The project targets women and children at risk of malnutrition due to the drought. As such gender and other cultural dynamics will need to be managed to ensure transferred cash being captured by spouses, family, nominated caregivers, community leaders or armed groups but instead makes it to the intended beneficiaries.

**Mitigation:** WFP carries out periodic evaluations of intrahousehold dynamics including in Somalia seeking to better observe and understand this effect. After 10 years of administering cash transfer operations, WFP monitoring has not

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revealed an increase in intrahousehold abuse of the system including among spouses, family members or caregivers. However, this does remain of potential concern and hence WFP monthly monitoring screens for this effect. External capture has been observed both in terms of soliciting kickbacks and favoring one group of beneficiaries. To combat this, the WFP has developed a robust and multitiered monitoring system including hotline for anonymous reports. Where offenders are individuals, they are dismissed, or where the problem is systemic, contracts with implementing partners may be terminated and the matter is addressed with local authorities. Note WFP has not encountered this impact in their operations in Somalia.

As WFP has a requirement to monitor their operations, they do not work in areas controlled by armed groups in Somalia. Similarly, capture by armed groups has not been a problem observed in parts of Somalia with elevated levels of lawlessness. The small amount of the cash transfer (\$20 per month) is also seen as a mitigation measure for this effect.

Remoteness: The unconditional cash transfer system employed on this project has been used more in urban and peri-urban areas of Somalia than rural areas to date. While the methodology has been tried and tested in rural areas of Somalia, the cultural differences between rural areas creates a different set of challenges to urban environments which if not managed could complicate project implementation.

Mitigation: The unconditional cash transfer system was designed to operate in both rural and urban areas and has been tried and tested in rural areas in Somalia and has been found to work well. In practice, community cohesion is often stronger in rural areas than urban areas which adds to the effectiveness of the targeting and enrollment process. There are cultural differences between the rural areas and the WFP's use of local NGOs with operational knowledge of how to navigate these cultural differences is the principle mitigation measure along with the robust consultation process outlined below.

Systemic Weakness: As noted below, the borrower capacity for the preventing adverse social impacts on the project is limited, as is the borrower's capacity for redressing the impacts of social harm where it has occurred.

Mitigation: The project has two primary approaches to overcoming the low capacity of the borrower. The first is the use of WFP as the implementing agent for the cash transfer system. WFP has a proven track record for delivering unconditional cash transfers in rural Somalia. It is also worthy of note that the project will work with regional and district governments as well, where the capacity is significantly higher than in the FGS. In addition, Component 2 of the project will see UNICEF build the capacity of the FGS to manage a national safety net program.

Difficulty monitoring: Security concerns and the remoteness of the project target areas combine to provide a significant challenge for monitoring and supervising project implementation. This can include challenges for community and stakeholder engagement, grievance redress and other risk mitigation protocols.

Mitigation: Under WFP's rules in Somalia, except in extreme lifesaving circumstances, they can only operate in environments permissible enough to monitor the implementation of their risk management processes. So, for this project, WFP will use their already established capability for monitoring their operations. WFP have a multifaceted approach to monitoring involving WFP staff, a contracted company that provides staff for monitoring where WFP staff can't go and a complaints hotline. The Hotline is also used for proactive verification by making calls to beneficiaries to check how the project is operating. WFP is also monitored by other donors (notably USAID and DFID) plus the Bank will be hiring a third-party monitor to oversee this operation.

Elite or Clan capture of project: With no formal safety net system, Somalis largely depend on informal, clan-based support in the face of increasingly frequent shocks. As such, there is a risk that local community dynamics will see attempts to capture the benefits of the project for a particular group.

Mitigation: WFP's system for targeting beneficiaries is independent of the clan structures and has strong mitigations against elite capture. FAO's Food Security Nutrition Analysis Unit undertake an assessment for food security and



nutrition which identified the target groups. This then underpins selection of the districts and existing data bases form a baseline for identifying target individuals within that district. Then the community consultation process is used to validate the data set and identify eligible groups missed. As noted previously, the community process is specifically designed to include minority groups and avoid capture.

Inward migration: As the project only operated in a small number of districts in each region in Somalia (the most drought affected) there remains a possibility, that people from neighboring districts will seek to migrate to the project areas to benefit from the project. This runs the risk of upsetting the clan balance in remote regions and exacerbating social and environmental fragility through associated population flows.

Mitigation: The primary mitigation measure for this effect is the WFP registration system which takes place before the project starts. As such, any inward migration due to the project would not see the migrant access the project. In addition, the small amount of the transfer (\$20 per month) plus the delicate clan balance is also perceived as a mitigation measure militating against harmful inward migration.

To manage these risks, the project:

- Makes use of highly capable implementing partners: WFP and UNICEF to supplement the capacity of the borrower to effectively manage the environmental and social risks (including security risks) associated with this project.
- Will prepare three primary instruments for the management of risks:
  - o A Social Management Plan (SMP) (including an Inclusion Plan). This will be the main instrument for managing the social and cultural dynamics of Component 1 of the project. It will outline the risk mitigation measures under which the project will operate.
  - o Stakeholder Engagement Plan (SEP) to outline the obligations of all parties for effective community consultation and grievance redress. This will cover components 1 and 2 of the project; and
  - o Labor Management Plan (LMP) to manage the risk of exploitation of and by workers on this project and ensure equity, diversity and transparency in recruitment of project staff and enshrine the requirements of ESS2 in project implementation. This will cover all components for the project.

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### **ESS10 Stakeholder Engagement and Information Disclosure**

Stakeholder Engagement Plan (SEP) has been prepared which includes: (i) stakeholder identification and analysis; (ii) planning for stakeholder engagement; (iii) consultations and disclosures; (iv) communication and sensitization campaigns; (v) participatory citizen engagements and, (vi) grievance redressal systems. Stakeholders consulted for the production of the SEP are Ministry of Finance, Ministry of Labour & Social Affairs, Ministry of Planning and Economic Development, United Nations World Food Programme, United Nations Children’s Fund, United Nations Food and Agricultural Organization and Development Partners including the European Union, ECHO, DfID, USAID and the governments of Australia, Italy, Sweden and Switzerland. The SEP will consult with female beneficiaries, female non-beneficiaries in the project area, alternate caregivers, beneficiary households, male community members, adjacent communities, and Vulnerable Members of the community (widows, disabled, single women) including minorities, local leaders and local government.

The Grievance Redress Mechanism currently in use for similar activities by WFP is being adopted for the project. The GRM methodology has been reviewed by the Bank and is considered appropriate for the project. As well as allowing



for registration of grievances at cash disbursement points, the GRM makes use of a WFP hotline where complaints are registered and a mechanism for follow up and redress is recorded and reported. Complaints are classified according to their risk level (high, medium, low and residual risk) and are captured in a WFP online case management software. In case of reports of conflict of interest, abuse of power or harassment by project staff, cases are escalated through the Risk Management and Compliance officer. Reports of sexual exploitation and sexual harassment will be referred to WFP PSEA focal points who have appropriate response pathways in place. The Hotline covers all WFP operations in Somalia and as such will resolve complaints about WFP staff, contractors, sub-contractors, and anyone else associated with their operations.

SEP will also draw upon on the experience and expertise of the contracted UN agencies that have a sound understanding of the local context and have existing implementing systems. The client will maintain, and disclose, a documented record of all stakeholder engagement activities. SEP includes mechanisms for setting out a Grievance Redressal Mechanism (GRM) which would help the beneficiaries/ affected individuals to express their concerns and grievances and provide the borrower to address them effectively.

## **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**

ESS2 Labor and Working Conditions Project applies to direct project workers, contracted workers including WFP contracted NGOs, primary supply workers, security workers as well as government and community workers. To ensure recruitment and management of labour on the project is in accordance with ESS2, and LMP will be prepared by the borrower. The LMP will ensure that both the PIU and the contracted primary suppliers promote safety and health at work. This will include fair treatment, nondiscrimination and equal opportunity for recruitment of project workers; protection of project workers, including vulnerable workers such as women, persons with disabilities, the elderly and youth as appropriate; prevent the use of all forms of forced labor and child labor and to provide project workers with accessible means to raise workplace concerns.

The client will prepare labor management procedures which details plan for enlisting project workers and suppliers. Grievances will be handled using a separate GRM mechanism other than SCOPE with a separate GRM officer hired by WFP on a full-time basis. The LMP will detail a grievance redress mechanism for project workers and in particular those working under WFP contracted NGOs and those under payment merchants, including security officers. Additional details on the engagements and operations of the security guards under Standard Chartered will be included in the LMP and the POM. The project LMP will also assess the mechanisms within the WFP cash transfer system (SCOPE) to manage grievances and where gaps are identified, measures will be implemented to close those gaps.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**





The project will ensure that any e-waste generated from project funding is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers. Details to guide this will be included in the Project Operations Manual.

#### ESS4 Community Health and Safety

**Gender Based Violence:** Closely associated to selection risks noted above, the targeting of women and children as beneficiaries necessitates the management of gender-based violence risks. The exchange of sexual favors for registration or transfer of funds, or the spousal abuse to receive cash are key risks for the project.

**Mitigation:** The project implementing teams will develop and implement measures and actions to assess and manage the risks of gender-based violence due to the receipt of cash transfers by women and children (within households or at payment points) and sexual exploitation and abuse risks such as sexual favors for registration or release of funds. A GBV action plan will be drafted and included in the SMP to include measures for minimizing gender-based violence, most notably sexual abuse and exploitation including outreach to local communities. This will include a code of conduct for partners making payments and their hired security.

**Security:** Conflict and insecurity remain persistent challenges in Somalia and have, in the past, impeded delivery of drought relief services. Ensuring security for project operations (including the handling of cash) amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the drought, will remain a significant challenge. Delivery points cash transfers may be targeted by opportunistic armed actors including Al-Shabaab. This general insecurity may impact both the project workers and beneficiaries. In addition, the presence of security services in the project area can pose a threat to the community through violence, exploitation and abuse.

**Mitigation:** By design, the project will only operate in relatively permissive parts of the country, with security of operations and access to site for monitoring and supervision key criteria in the selection of districts for support. Further, the choice of WFP and UNICEF as key implementing partners provides the project access to the UNs system and local capacity for identifying and managing security threats to operations. UNDSS provides overarching security for all UN agencies. In addition, WFP has security officers in all of the regions who oversee the security of the WFP operations. These systems are tried and tested on projects such as this. They work in all districts except those controlled by armed groups and as such have established systems for managing the security of their operations. Moreover, the WFP service agreement with project service providers contain a contractual obligation for the service provider and any contracted security to uphold humanitarian principles such as “do no harm” and to protect beneficiaries (from violence, exploitation and abuse). They also contain an obligation to ensure the security of their own personnel or workers by implementing appropriate risk prevention and mitigation strategies to reduce the likelihood of a harmful event occurring and to mitigate the impact of a security event if it were to occur. The WFP have developed a Safe Distribution Guidelines which outline their requirements and provide training to contracted entities in their use.

A GBV action plan will be drafted and included in the SMP to include measures for minimizing gender-based violence, in particular risks of sexual abuse and exploitation and sexual harassment. The plan will further include provisions related to reporting and response, including procedures for reporting through GBV-sensitive GRM systems and codes of conduct, outlining expectations for behavior and sanctions for breach for all contractors hired under the project, including partners making payments and their hired security actors. The plan will be implemented throughout the life of the project.



**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

n/a

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

n/a

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

n/a

**ESS8 Cultural Heritage**

n/a

**ESS9 Financial Intermediaries**

n/a

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

No

**OP 7.60 Projects in Disputed Areas**

No

**III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
<b>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</b>	
<p>MANAGEMENT : The borrower will prepare and implement three primary instruments for the management of risks on this project:</p> <p>(i) A Social Management Plan (SMP) (including an Inclusion Plan and GBV management action plan). This will be the main instrument for managing the social and cultural dynamics of Component 1 of the project. It will outline the risk mitigation measures under which the project will operate</p> <p>(ii) Stakeholder Engagement Plan (SEP) to outline the obligations of all parties for e</p>	08/2019
<b>ESS 10 Stakeholder Engagement and Information Disclosure</b>	

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Develop and implement a Stakeholder Engagement Plan (SEP), to ensure engagement with the Project-affected communities and other stakeholders throughout Project implementation.	09/2019
Establish, maintain and operate a grievance mechanism to ensure reception and timely response to any complaints made about the Project (including those from members of the communities, local businesses and other stakeholders), as described in the SEP	09/2019
<b>ESS 2 Labor and Working Conditions</b>	
The Labor Management Procedures (LMP) shall be prepared through prior to 1 September 2019. The Project will establish and operate a grievance mechanism for workers as described in the LMP. Prepare and implement appropriate occupational health	09/2019
Prepare and implement appropriate occupational health and safety measures (OHS), including any emergency preparedness and response measures necessary, as part of the development and implementation process in accordance with the guidelines contained i	09/2019
<b>PROJECT WORKERS TRAINING:</b>	
Project workers will receive training on humanitarian protection policies on discriminated and marginalized groups, gender-based violence, operational health and safety, emergency response procedures and personal security.	09/2019
<b>ESS 3 Resource Efficiency and Pollution Prevention and Management</b>	
The project will ensure that any e-waste generated from project funding is segregated from other forms of waste and is taken to licensed refurbishes, collection centers or recyclers. Where applicable, procurement procedures will integrate the degree	09/2019
<b>ESS 4 Community Health and Safety</b>	
A GBV action plan will be drafted and included in the SMP to include measures for minimizing gender-based violence, in particular risks of sexual abuse and exploitation and sexual harassment. The SMP will also contain security management protocols.	09/2019
: As the project is adopting WFP and UNICEF systems and procedures for Component 1 and 2 respectively, the existing and applicable emergency preparedness and response mechanisms will be adopted	09/2019



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Under Component 1, implementing partners (Standard Bank subsidiary Amal Bank and locally recruited NGOs) will be responsible for their own security. The LMP will include provision for a Code of Conduct governing all security personnel hired to protect	09/2019
Under Component 1, WFP systems include mechanisms for community engagement and training as required for the project to be undertaken by local NGOs hired for the purpose. There is no community training anticipated under component 2.	09/2019
<b>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	
<b>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>	
<b>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</b>	
<b>ESS 8 Cultural Heritage</b>	
<b>ESS 9 Financial Intermediaries</b>	

**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:**

N/A

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**



Borrower: Federal Republic of Somalia

**Implementing Agency(ies)**

Implementing Agency: Ministry of Labor and Social Affairs

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s):	Afrah Alawi Al-Ahmadi
Practice Manager (ENR/Social)	Iain G. Shuker Cleared on 12-Jul-2019 at 23:02:50 EDT