

Federal Republic of Somalia



Ministry of Fisheries and Blue Economy

**SOMALI SUSTAINABLE FISHERIES DEVELOPMENT
PROJECT-[BADMAAL PROJECT]**

PROJECT ID: P178032

**ENVIRONMENTAL AND SOCIAL MANAGEMENT
PLAN (ESMP)**

**CONSTRUCTION OF FISH MARKET AT JAZEERA
SOUTHWEST STATE OF SOMALIA**

April 2026

**Project Management Unit (PMU)
Ministry of Fisheries and Blue Economy
Federal Republic of Somalia**

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ACRONYMS AND ABBREVIATIONS

AFRO	Regional Office for Africa
ARAP	Abbreviated Resettlement Action Plan
CBO	Community-based organization
CHS	Community Health and safety
CoC	Code of Conduct
CPF	Country Partnership Framework
CSO	Civil Society Organization
DG	Director General
E&S	Environment and Social
EHS	Environmental Health and Safety
EHSGs	Environmental Health and Safety Guidelines
EHSMP	Environmental Health and Safety Management Plan
EMF	Environmental Management Framework
EMRO	Regional Office for the Eastern Mediterranean
ESAMP	Environmental and Social Assessment and Management Plan
ESCP	Environment and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
EU	European Union
FCV	Fragility, Conflict & Violence
FGS	Federal Government of Somalia
FMS	Federal Member State
FRS	Federal Republic of Somalia
GBV	Gender-based Violence
GDP	Gross Development Product
GFF	Global Financing Facility
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
GIS	Geographic Information System
GRM	Grievance Redress Mechanism
GRC	Grievance Redress Committee
IA	Implementing Agency
IDA	International Development Association
IDPs	Internally displaced person
IP	Implementing Partner
IPF	Investment Project Financing
IPV	Intimate partner violence
IUU	Illegal, Unreported and Unregulated
IVAs	Independent Verification Agents
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MFBE	Ministry of Fisheries and Blue Economy
MoLSA	Ministry of Labour and Social Affairs

NGO	Non-governmental Organization
OHS	Occupation health and safety
OHSE	Occupation health and safety and Environmental
OP	Operational Policy
PAPs	Project affected persons
PDO	Project Development Objective
PPE	Personal Protective Equipment
PFM	Public Financial Management
PLWDs	People living with disabilities
PIU	Project Implementation Unit (FMS level)
PMU	Project Management Unit (FGS level)
POM	Project operational manual
PWDs	Persons living with disabilities
RAP	Resettlement Action Plan
RPF	Resettlement Planning Framework
SDG	Sustainable Development Goal
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEAH	Sexual Exploitation, Abuse, and Harassment
SMF	Security Management Framework
SMP	Security Management Plan
SEP	Stakeholder Engagement Plan
SOPs	Standard Operating Procedures
SSFDP	Somali Sustainable Fisheries Development Project
TA	Technical Assistance
ToR	Terms of Reference
TPM	Third Party Monitoring Agent
WB	World Bank
WBG	World Bank Group
WHO	World Health Organization
WM	Waste Management

EXECUTIVE SUMMARY

The proposed project aims to construct a fish market in Jazeera, equipped with fish processing facilities to enhance supply chain efficiency and strengthen governance in the fisheries sector. Jazeera located approximately 20 km southwest of Mogadishu in the Lower Shabelle region is a key coastal town known for its vibrant fishing activity and pristine beaches.

Environmental and Social Benefits: The subproject is expected to bring positive Environmental and Social Benefits. Environmentally, the project will enhance sustainable fisheries management, reduce post-harvest losses, and promote climate-resilient practices. It will also incorporate proper waste management systems, Wastewater generated from fish handling will be managed through septic systems, soakaways, and filtration units to minimize pollution and safeguard coastal ecosystems. Socially, the project will improve food safety and hygiene, create employment opportunities, and strengthen the livelihoods of local communities, particularly women and youth involved in the fisheries value chain. Overall, the initiative will contribute to inclusive, resilient, and environmentally responsible coastal development.

The activities associated with the construction of Jazeera fish market will likely generate site-specific risks and impacts. Most of these are related to typical risks and impacts in civil work. Risks include occupational health and safety of workers, both during the construction and operational phases; community health and safety risks; risks associated with labor rights and management, e.g child labor or forced labor; labor influx and associated risks, such as GBV/SEAH; and others.

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social risks and impacts of the Project associated with preconstruction, construction and operational activities are either avoided or mitigated. It aims to identify, characterize and manage the potential risks and impacts during the construction of modern fish market in Jazeera. The ESMP lists the project-specific risks and impacts, and mitigation measures, lays out institutional arrangements of the implementation and monitoring of the risk mitigation measures, and proposes monitoring indicators for measurement and monitoring of E&S performance. It further includes a description of the Project Grievance Redress Mechanism (GRM), which needs to be applied during the construction period, and reiterates stakeholder consultations that have been conducted in the lead up to the project design.

1.0 INTRODUCTION

1.1 Project background

The Badmaal Project supported by the World Bank, aims to promote sustainable fisheries management, improve the livelihoods of coastal communities, and develop the institutional capacity of the Ministry of Fisheries and Blue Economy of Somalia. The construction of a modern Fish Market at Jazeera is a key component of the project. This Environmental and Social Management Plan (ESMP) outlines the strategies, responsibilities, and actions needed to minimize the environmental and social risks and potential negative impacts of the construction activities and ensure compliance with the relevant Environmental and Social Standards (ESSs) of the World Bank and the national environmental and worker health and safety regulations.

The project aims to support improvement of fisheries' contribution to the national economy, food security and livelihoods of coastal communities. The project focuses on two key result areas:

- Increased capacity of government and communities to govern and manage fisheries,
- The development of infrastructure and associated value-chains and reduction of post-harvest losses.

1.2 Project development objective and components

Project Development Objective is to improve the capacity of targeted communities and authorities to benefit from and effectively manage selected fisheries.

Table 1: Project components and sub-components

Component	Subcomponent	Key activities
1. Increasing the Capacity of Dependent Communities to Benefit from Sustainable Marine Fisheries	<i>1.1 Climate-resilient fisheries infrastructure</i>	support the identification and investment planning of climate resilient, and gender informed small-scale fishing infrastructure at 10 sites based on needs analyses and in consultation with selected communities and stakeholders. This component will also support, at selected sites, constructing base infrastructure, including processing facilities and technologies to enable private sector investment in facilities (e.g., cold store) and equipment (e.g. ice plant).
	<i>1.2. Improving fishing, handling, processing, and marketing techniques to enhance quality and value-addition</i>	This sub-component will support screening, assessment, and formulation of climate resilient, and gender informed improvement plans for up to 6 small-scale fishing fish value chains at selected infrastructure sites (Comp 1.1), capacity building, training, and advice (technical and business) based on needs assessments, strengthening or establishing sector organizations, including for women (cooperatives, association), and promoting women into leadership roles through capacity building and mentoring, and support transition to climate and/or gender informed fishing and processing practices including safety at sea and labor conditions, new technologies and equipment with training, and provision of advisory services.
2. Strengthening Marine Fisheries Governance and Management	<i>2.1 Laying a foundation for effective, transparent, and equitable fisheries</i>	Aims to help Somalia achieve effective fisheries governance and provide technical assistance and operational support to the FMDC as well as legal and technical support to enable FMS to develop harmonized legal and regulatory frameworks for fisheries management. Building on this, ecosystem-based,

Component	Subcomponent	Key activities
	<i>resource governance and management</i>	climate-informed and gender-sensitive management plans will be developed for selected fisheries shared among FMS and the FGS.
	2.2 Developing a comprehensive Monitoring Control and Surveillance (MCS) system to fight IUU fishing in Somali waters	Investment in developing a comprehensive Monitoring Control and Surveillance (MCS) system to respond to IUU fishing in Somali waters, which includes support to develop and implement a National Plan of Action to fight IUU fishing and to upgrade Fisheries Monitoring Centers with equipment, services, technical assistance and training.
	2.3 Fisheries Statistics and Stock Assessment	This subcomponent will support development, deployment and institutionalize tools and systems to generate, analyse and disseminate information essential for effective fisheries management but tailored to Somalia's current level of capacity with the potential to become more sophisticated over time.
	2.4 Strategic studies on fisheries development and blue economy	The project will finance analytical and strategic studies for long term development of the fisheries sector in the changing fisheries environment and the broader blue economy in Somalia.
3. Project Management, Monitoring and Evaluation		Funds under this component will be used to provide equipment, technical assistance, training, and incremental operating costs to the Ministry of Fisheries and Blue Economy (MFBE) to strengthen its capacity to manage, implement, and monitor project activities.

1.3 Purpose of the ESMP

This ESMP lists the key elements of an Environmental and Social Management Plan (ESMP) capturing the Environmental and Social (E&S) risks and impacts and associated mitigation measures that need to be considered at minimum in the context of construction activities of Jazeera Fish market. The purpose of the management plan is to provide a consolidated summary of all the Environmental and Social (E&S) commitments relevant for the construction commissioning and operational phase of the project, including Occupational Health & Safety (OHS) and waste management. The measures focus on environmental aspects such as air emissions, environmental contamination and social aspects such as communication with local stakeholders and safety of workers and communities. This ESMP lists the project-specific risks and impacts and mitigation measures, lays out the institutional arrangements of the implementation and monitoring of the risk mitigation measures, and proposes monitoring indicators for measurement and monitoring of E&S performance.

The objective of this ESMP is therefore to provide management actions to mitigate negative risks and impacts in consistence with national or regional framework and relevant WB's ESSs & WBG General EHSs.

2 PROJECT DESCRIPTION

The Badmaal Project in Jazeera aims to strengthen the local fisheries sector by improving infrastructure, enhancing market access, and supporting effective fisheries management. The project includes the construction of fish market facilities to improve operational efficiency, promote hygiene standards, and contribute to sustainable fisheries development.

The project will include the development of fish market facilities to provide a structured space for fish handling, processing, and sales. Given the current lack of proper landing facilities, fishers manually transport their catch from boats, posing safety and efficiency challenges.

To enhance fish processing and storage, the project will establish chill room and processing facilities, ensuring a steady supply of high-quality fish, reducing post-harvest losses, and supporting trade. Additionally, an ice production plant will be built to meet the cooling and preservation needs of fishers and traders.

Water supply systems will be established through installation of freshwater and seawater storage tanks, elevated header tanks, and borehole systems with pumping infrastructure. Plumbing networks will distribute water to workstations, washing areas, and hygiene facilities. Sanitation infrastructure will include septic tanks, percolation fields, sewage catchpits, and soakaway systems designed to manage wastewater generated from both domestic and fish handling activities.

Specialized equipment installation will include cold storage (chill rooms), ice production units (solar ice plant), weighing equipment, and fish handling/processing tables designed to ensure hygienic operations.

By establishing these facilities, the Badmaal Project at Jazeera aims to increase food security, create employment opportunities, and promote sustainable fisheries management, ultimately strengthening the socio-economic well-being of coastal communities.

Location of the site.

Jazeera (Jaziira) is a coastal town in the Lower Shabelle region of Somalia, located approximately 20 km southwest of Mogadishu. It falls within the jurisdiction of the Somali federal government and is known for its pristine beaches and fishing activities. Bordered by the Indian Ocean to the east, Jazeera serves as a key location for tourism and local trade. Its proximity to Mogadishu makes it an important area for economic and recreational activities, attracting both locals and visitors.



Figure 1: Location Map of Proposed Jazeera Fish Market

The project site is characterized by mixed land uses, with nearby settlements, commercial enterprises, and institutional facilities. The area experiences a semi-arid climate, with seasonal variations in temperature and precipitation. The hydrology of the region is influenced by both groundwater and surface water sources, necessitating sustainable water resource management strategies.

The location was selected based on feasibility studies and urban planning considerations, ensuring minimal disruption to existing land uses while maximizing social and economic benefits. The surrounding infrastructure includes road networks, power supply lines, and health facilities that will support project implementation and operations.



Figure 2: Site Plan for Proposed Jazeera Fish Market

The designated project site measures 20m x 60m and is communally owned. The local community, through the Office of the Commissioner of the Jaziira Local Authority, has officially confirmed the donation of the land for the project's implementation. (see annex : land ownership letter)

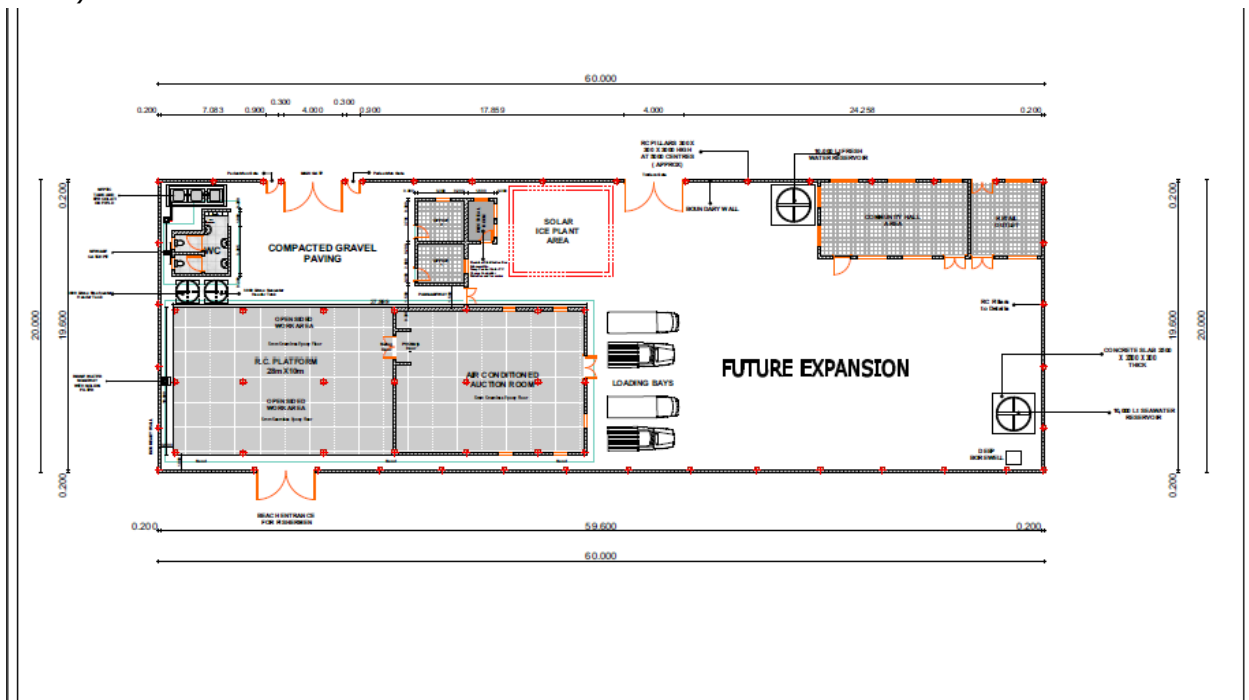


Figure 3: Jazeera Site Plan.

According to the table of "Building area per occupant" from the Building Design and Materials series (edited by the Architectural Institute of Japan), the required floor area per person is 7-12 m² in a workplace or factory and 2-3 m² at retail premises. The 8.0 m x 6.0 m sorting area, including the weighing area, yields an effective floor space of roughly 30 m².

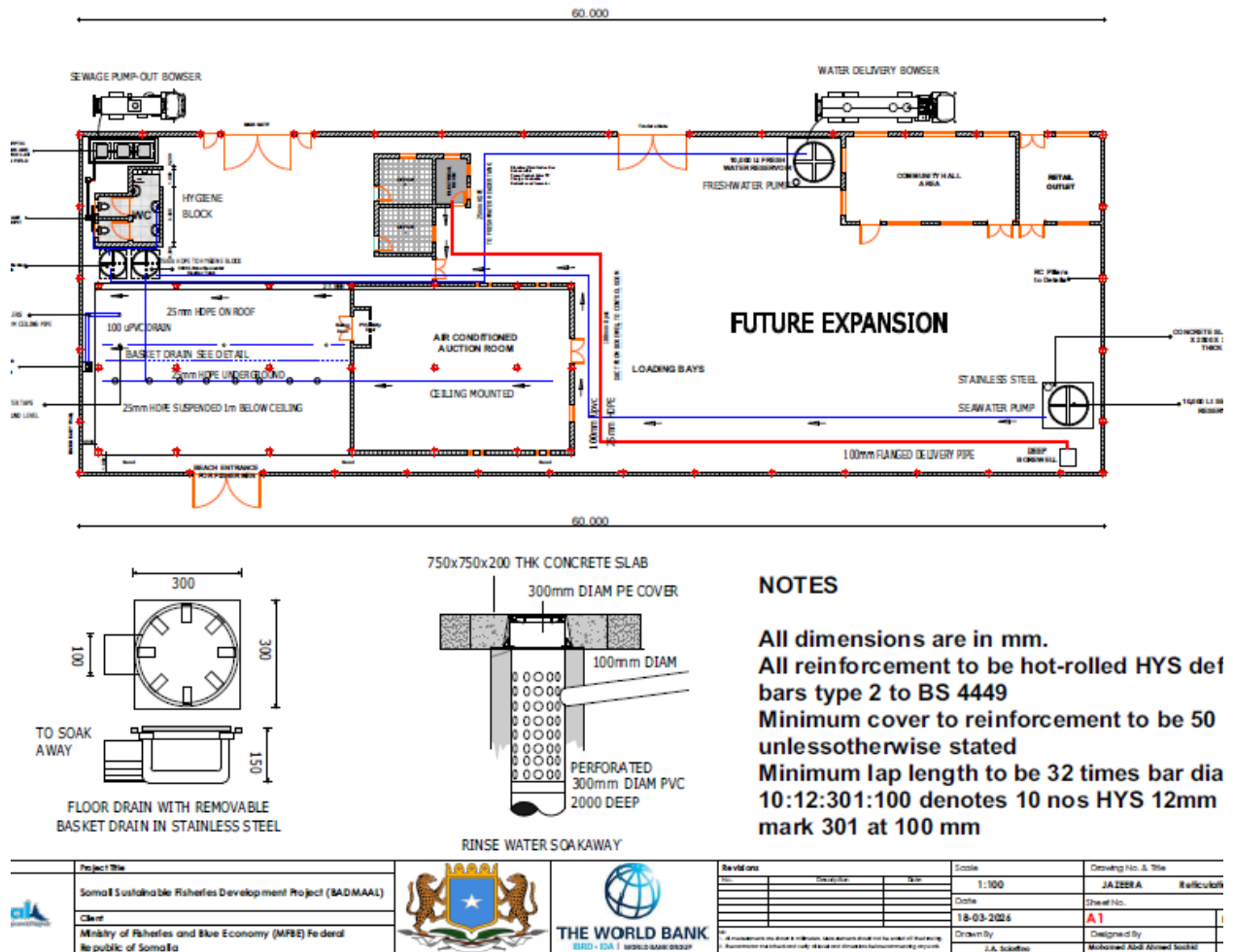


Figure 4; Jazeera Ground Floor Plan

2.1 Project Activities

To achieve the stated objectives, the project is structured to enhance the functionality of the fish market while simultaneously strengthening and establishing fisheries' support and management systems. The project is designed to enhance the functionality of the fish market while strengthening fisheries management systems in Jazeera. The scope of the project includes the construction of the following key facilities:

- i. Fish Handling and Work Area-Reinforced concrete platform for unloading, sorting, washing, and preparing fish for market distribution.
- ii. Auction Room-Designated facility for fish auctioning, price setting, and organized trade.

- iii. Chill Room (Cold Storage)-Temperature-controlled storage for preserving fish quality prior to sale or transport.
- iv. Open-Sided Work Areas-Covered but naturally ventilated working spaces for fish handling and processing activities, allowing airflow to reduce heat and odor accumulation.
- v. Weighing and Retail Area-Facilities for weighing fish and conducting direct sales to traders and consumers.
- vi. Loading Bays and Circulation Areas-Areas for vehicle access, loading/offloading, and internal movement within the facility.
- vii. Solar Ice Plant-Solar-powered ice production unit for fish preservation during handling and transport.
- viii. Water Supply System-Integrated freshwater and seawater system including borehole, storage tanks, and distribution network.
- ix. Sanitation and Wastewater Management System-Infrastructure including septic tanks, percolation fields, sewage catchpits, and soakaway systems with filtration to manage domestic and process wastewater.
- x. Hygiene and Sanitary Facilities-Dedicated male and female toilet blocks, handwashing stations to ensure worker hygiene and compliance with public health standards.
- xi. Administrative and Office Facilities-Office spaces for facility management, coordination, and record-keeping of fisheries operations.
- xii. Electrical and Energy System (Solar PV)-Solar photovoltaic system including panels, batteries, inverter, and distribution units to provide sustainable energy for facility operations
- xiii. Perimeter Wall and Access Control-Construction of boundary walls, main gates, pedestrian gates, and beach access gates to control entry, ensure security, and manage facility operations.

3 POLICY, LEGISLATIVE AND INSTITUTIONAL FRAMEWORKS

The Jazeera Fish Market subproject is guided by a combination of national legal frameworks and international standards, particularly the World Bank Environmental and Social Framework (ESF). The project will comply with all applicable Somali laws, regulations, and policies, as well as relevant Environmental and Social Standards (ESSs).

The Environmental and Social Management Plan (ESMP) draws from the Badmaal Environmental and Social Management Framework (ESMF) (Policy, Legislative and Institutional Frameworks section) to ensure that all legal, regulatory, and institutional requirements are addressed in the project's environmental and social risk management. The subproject will be implemented in line with national requirements and ESF principles to ensure that environmental and social risks are identified, avoided, minimized, mitigated, and monitored throughout the project lifecycle.

3.1 Somalia national laws, policies, and legislations

The Jazeera Fish Market subproject is governed by a combination of national legal frameworks and international standards, particularly the World Bank Environmental and Social Framework (ESF). The project will comply with all applicable Somali laws and regulations, as well as relevant Environmental and Social Standards (ESSs), to ensure that environmental and social risks are adequately managed throughout the project lifecycle.

- **Policy, Legal and Institutional Frameworks.** The project is required to comply with laws of Somalia relevant to the project, including the National Environment Policy and the newly developed Federal the Environmental Protection and Management Act became effective as of February 24, 2024. Development partners are supporting the country in the preparation of subsidiary Environmental and Social Impact Regulations that would give effect to the Act.
- **National Environment Policy-** The Somali Cabinet, on February 13, 2020, approved the National Environmental Policy, the overall goal of the policy is to improve and enhance the health and quality of life of the Somali people and to promote sustainable development through sound management of the natural resources of the country. The specific objectives of this policy are; Conservation of Natural Resources, Environmental Governance, and Multi-stakeholder Partnerships.
- **Somalia National Gender Policy (2016)** includes strategies to eradicate harmful traditional practices such as female genital mutilation/cutting (FGM/C) and child marriage and to improve services for the management of GBV/SEAH cases.
- **Legislation and Policies on The Civil Service.** The Provisional Constitution provides the legislative framework for labour issues. It provides that "all workers, particularly women, have a special right of protection from sexual abuse, segregation, and discrimination in the workplace. Every Labour law and practice shall comply with gender equality in the work place" (Article 24-5). Labour Code of Somalia (Law 1 Number 65, adopted in 1972) is the specific labour law governing all aspects of labour and working conditions, which covers the contract of employment, terms and conditions, remuneration, and OHS, trade unions and labour authorities. The provisions of the Labour Code apply to all employers and employees in all project areas. The Labour Code is applicable to all project workers. The Code is broadly consistent with the ESS2, while

there is a significant gap in the enforcement aspect of the legislation (see Section VIII on the institutional framework). The public service and institutions are governed by the Civil Service Law (Law Number 11).

- **Somalia Solid Waste Management Framework.** In Mogadishu, the local government or Benadir Administration collects transports and disposes waste materials from the city, the waste is disposed at Qashinweyne in Karana or Kaawo in Madina dumpsites. This is done in order to minimize harm to individual's health as well as the environment. In Somalia there is no distinction of the nature of waste; whether solid, liquid or any other form; waste will be considered as waste and dumped in the dumping sites
- **The Somali Labour Code (Law No. 36 of 2024)** provides the current legal framework for employment and labour relations, aligned with international standards. It requires written employment contracts specifying the nature and duration of work, working hours and location, remuneration, and termination procedures. The law regulates working hours (generally 8 hours per day and 48 hours per week) and mandates employers to ensure safe and healthy working conditions, including provision of adequate PPE, safe workplaces, clean drinking water, sanitation facilities, and measures to prevent occupational risks. These provisions are consistent with World Bank ESS2 on labour and working conditions.
- **Environmental Protection and Management Act, 2024:** The act guarantees the right to a clean, safe and healthy environment, provides requirements for waste management including hazardous wastes. The act requires the application of the polluter pay and precautionary principle in environment management. The demolition and construction project is required to adhere to all the relevant requirements prescribed by the act.

The project's approved Environmental and Social Management Framework (ESMF) lists applicable local laws and regulations including corrective measures to overcome gaps and responsibilities ([please see ESMF for more details](#))¹. Given that the project is financed by the World Bank, the environmental and social risks likely to be encountered during the sub-projects implementation will be managed using the World Bank's Environmental and Social Framework (ESF) and in particular the six of the following Environmental and Social Standards (ESSs) that apply to the project:

ESS1-Assessment and Management of Environmental and Social Risks and Impacts:

This standard is fundamental for all project activities, requiring, where necessary, Environmental and Social Management Plans (ESMPs) to manage potential risks. For the demolition and reconstruction of the MFBE headquarters, ESS1 necessitates an ESMP specifically addressing issues like dust, waste management, and community health and safety during demolition and construction.

ESS2-Labour and Working Conditions: This standard ensures safe and fair labour practices, including working conditions, worker health and safety, and a separate grievance redress mechanism (GRM) for workers. The demolition and construction work of the Ministry of Fisheries and Blue Economy headquarters building require strict adherence to ESS2 to

¹ <https://mfbe.gov.so/wp-content/uploads/2024/09/BADMAAL-Environmental-and-Social-Management-Framework.pdf>

protect workers from hazards like heavy equipment use and potential exposure to dusts or other harmful substances.

ESS3-Resource Efficiency and Pollution Prevention and Management: ESS3 is relevant to managing pollution and ensuring resource efficiency. For the Ministry site, it applies to managing dust, noise, and waste during demolition and construction, ensuring minimal environmental impact, and applying best practices in resource usage during reconstruction.

ESS4-Community Health and Safety: Focused on protecting the health and safety of nearby communities, ESS4 is critical for the ministry HQ sub-project to mitigate potential risks from dust, debris, noise, hazardous material exposure, traffic accidents, and potential issues due to labor influx, including sexual exploitation, abuse, and harassment (SEAH). Measures include fencing, safety signage, controlled traffic access and safety measures, prevention of SEAH through awareness raising among the workers and use of workers' code of conduct, and respective communication with residents about safety precautions.

ESS8-Cultural Heritage: ESS8 seeks to protect tangible and intangible cultural heritage. ESS8 may be relevant to this sub-project if there is a chance find during excavation works.

ESS10-Stakeholder Engagement and Information Disclosure: ESS10 emphasizes the need for ongoing community engagement and information dissemination. For the ministry HQ sub-project, this involves informing stakeholders about construction timelines, risks and potential negative impacts, and benefits and establishing a grievance mechanism to address concerns.

3.2 Legal gap analysis

The activities as proposed in Somali Sustainable Fisheries Development Project, will need to comply with both existing Somali laws and regulations and World Bank Environment and Social Standards. This sub-section compares the national public sector environmental management rules, regulations, and standards to World Bank’s Standards. The main objective of this assessment is to strengthen the effective implementation of the ESMP at Federal and State levels in Somalia by identifying and addressing existing gaps, in line with the ESMPF. The table below summarizes a comparison focusing on the World Bank policies relevant to the project and gaps identified in existing Somali laws and regulations. All gap-filling measures proposed will be adopted for this Project.

Table 2: Legal gaps analysis

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
<i>ESS1 (“Assessment and Management of Environmental and Social Risks and Impacts”)</i>				
Environmental and social risks and impacts assessment instruments and protocols.	Range of instruments to satisfy the Bank include ESMFs, SEPs, LMPs, SEAH/SH RAPs, EIAs, regional or sectoral EIAs, ESMPs, etc.	Instruments for E&S assessment have not been delineated adequately at the FGS level. The environmental Protection and Management Act has been ratified at both the Lower and Upper houses of Parliament and has received Presidential Assent. However, the requisite EIA regulations that are to give effect to the Act are not yet established. In the meantime, EIA legislation is largely absent in the FMSs generally, except in one FMS (Puntland) and in the self-declared public of Somaliland.	EIAs not fully incorporated into Federal laws and are weakly captured at State level in only Puntland. Missing in all the other FMS.	ESMFs and the requisite ESF instruments highlighted in the mitigation plan for the project, and also clarified in the project’s ESCP, shall guide the Ministry of Fisheries, Somalia, in managing E&S risks for the project.

<p>Environmental and Social impact screening.</p>	<p>E&S screening and scoping procedures developed for projects involving sub-projects, as is likely to be the case in the Somali <i>Sustainable Fisheries Development</i> project, complete with Exclusion List.</p>	<p>There are no clear procedures for E&S screening and scoping of sub-projects under the statutes of Somalia. The government has developed draft ESIA/EA Regulations to give effect to the Environmental Protection and Management Act, but the procedures are largely unclear owing to institutional gaps, i.e., who signs off on screening process, lack of a register of EIA experts, etc.</p>	<p>E&S Screening procedures are absent in all the FMS save for Puntland.</p>	<p>ESMF and related ESF instruments to guide the Ministry of Fisheries, Somalia, in conducting screening and scoping for sub-projects.</p> <p>E&S assessment and management plans will be completed by contractors for sub-projects including E&S screening.</p>
<p>Public consultations.</p>	<p>The Bank requires the Borrower (in this case, Somalia) to initiate consultations with project-affected persons and other interested parties including CSOs.</p>	<p>Procedures for public consultations not explicitly stated in Somali legislation.</p>	<p>Procedures for public consultations not explicitly stated.</p>	<p>The project's approved SEP shall guide the Ministry of Fisheries, Somalia in the conduct of public consultations.</p> <p>Stakeholder consultations have been carried out at FGS level, and more consultations will be conducted at FMS level and by the contractors on the ESMPs once drafted.</p>

<p>Monitoring of environmental and social data.</p>	<p>Bank requires regular monitoring of E&S data to evaluate the success of the mitigation plan and to foster corrective measures at the earliest possible juncture.</p>	<p>There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of E&S data/</p>	<p>There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of E&S data.</p>	<p>ESMF, ESCP, and the sub-projects ESMPs to guide the Ministry of Fisheries in monitoring of E&S data.</p> <p>The E&S specialists at FMS and FGS levels will monitor the E&S performance of the contracting partners and review quarterly reports and submit these to the Bank.</p>
<p>Institutional arrangements.</p>	<p>Requirement by the Bank for specific description of institutional arrangement and implementation schedule for monitoring and mitigation measures.</p>	<p>The mandate of the MFBE as the project implementing partner.</p> <p>The Ministry of Environment and Climate Change, to be responsible for oversight of environmental matters.</p>	<p>MFBE has capacity for technical implementation of project interventions but will require extensive support in management of environmental and social risks.</p> <p>The Ministry of Environment and Climate Change is not at present directly responsible for coordinating institutional responses under this ESMF, and the institutional information is not available, and its remit is unknown, as is its technical capacities.</p>	<p>MFBE-based PMU to work with the respective ministries and agencies responsible for management of E&S matters as the focal points for administration of this ESMF.</p> <p>Contractors responsible for implementation of E&S risk management, overseen and supported by E&S specialists based at the MFBE FMS and FGS levels.</p>

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
ESS2 ("Labour and Working Conditions")				
<p>Management of different types of project workers.</p>	<p>The Bank puts emphasis on the identification and characterization of different types of workers (project workers, direct workers, contracted workers, community workers, primary supply workers) to manage different types of labor risks.</p>	<p>Labour Code of Somalia (Law Number 65, adopted in 1972) is the specific labor law governing all aspects of labor and working conditions, which covers the contract of employment, terms and condition, remuneration, and OHS, trade unions and labor authorities. The provisions of the Labour Code apply to all employers and employees in all project municipalities. The Labour Code is applicable to all project workers of the Somalia Sustainable Fisheries project.</p>	<p>The Labour Code is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.</p>	<p>ESMF and the Labour Management Procedures (LMP) to guide the borrower, including LMP prepared by project contractors.</p>

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
Labour standards.	Several provisions made under ESS2 to safeguard project workers, promote safety at work and ensure that they have a viable means of communicating grievances and receiving redress.	<p>Article 24(5) stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace.</p> <p>The Puntland Sexual Offences Act 2016 prohibits sexual harassment.</p> <p>Article 14 prohibits Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labor offences.</p> <p>Every labor law shall comply with gender equality.</p> <p>Provisional Constitution of the Federal Republic of Somalia Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.</p>	<p>The new labor code, amending the code from 1972, has not been passed yet.</p> <p>The implementation of the existing articles in practice may not be very strong.</p>	<p>The Project will fully comply with WB ESS 2. This is set out in the LMP.</p> <p>The Project will not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP.</p> <p>The PMU will have overall responsibility to monitor the implementation of the LMP and will hold all contractors liable to the implementation of the LMP including subproject Labour Management Plans as part of the contractors ESMPs. The Project will fully comply with WB ESS 2, including setting up the workplace GMs.</p> <p>The PMU will draw support from DOSH officers where they are in office.</p>

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
		<p>The Labour Code of 1972 stipulates that all contracts of employment must include: (a) the nature and duration of the contract; (b) the hours and place of work; (c) the remuneration payable to the worker; and (d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.</p>		
ESS3 ("Resource Efficiency and Pollution Prevention and Management")				
Pollution prevention and management.	This ESS requires the Borrower to undertake a health and safety risk assessment of potential for pollution generation at supported fisheries	There are no known national waste management standards or regulations to manage pollution. According to the World	There are no supporting legislative frameworks for pollution prevention and management of wastes.	ESMF to guide the Borrower on pollution prevention and management. EIA'S and ESMP will be prepared for all the Sub-

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
	facilities, which may affect communities, workers and the environment.	<p>Health Organization (WHO), the average annual level of particulate matter (PM2.5) in Somalia is around 3 times higher than the WHO recommended value (5µg/m³). This exposure to air pollution causes diseases and adverse health outcomes.</p> <p>There are also no known designated landfills for medical wastes by municipalities.</p> <p>No guidelines nationally known to support operation of incinerators.</p> <p>No known national statutes in support of periodic environmental audits.</p> <p>No national pollution standards known at the time of developing this ESMF.</p>		projects, implemented and monitored.
Management of hazardous wastes.	The bank requires the Somalia to undertake specific	There is no known national legislation or	There are no approved hazardous waste disposal	ESMF and the ESMP for sub-projects to guide the

	<p>measures to manage both hazardous and non-hazardous wastes.</p> <p>Specific emphasis is given in this ESS with respect to transportation and disposal, obtain chain of custody documentation to the final destination.</p> <p>Approved disposal sites are required for this ESS.</p>	<p>policies on management of hazardous wastes in Somalia.</p> <p>It is also worth noting that there are persistent reports claiming that Somalia has been used as a dumping ground for hazardous waste starting about the early 1990s and continuing through the civil war there.</p>	<p>sites in Somalia.</p>	<p>Borrower on the management of both hazardous and non-hazardous wastes.</p>
ESS4 ("Community Health and Safety")				
<p>Health of community members.</p>	<p>The ESS envisages that the project will put measures in place to anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances. Further, it provides for the avoidance or minimization of community exposure to project-related traffic and</p>	<p>The Somali Penal Code of 1962. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution.</p> <p>Articles 398-9 provide that 'carnal intercourse' and 'acts of lust omitted with violence' are punishable with 5-15 years and 1-5 years of imprisonment.</p> <p>Abduction for the</p>	<p>The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators for GBV/SEAH crimes.</p> <p>The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and GBV/SEAH.</p> <p>Furthermore, in practice it has been documented</p>	<p>The LMP, SEP and the SEAH/SHRPPlan developed for this project will guide the prevention and mitigation of harm to communities by the project including addressing stigma, discriminatory laws (such as the laws on adultery) and SEAH/SH.</p>

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
	road safety risks, diseases and hazardous materials.	<p>purpose of lust or marriage is prohibited under Art 401.</p> <p>Article 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Article 33 provides that when a superior officer orders the commission of an offence both the perpetrator and his superior will be liable.</p>	that women complaining about a rape may find themselves trapped by the Article 426 prohibition against adultery that makes no exception for the case of rape. In practice provisions under Art 39(i) offer little more than theoretical protection.	
Security personnel.	<p>ESS 4 postulates that when the Borrower retains security personnel to safeguard workers and property it will assess risks posed by these security arrangements to those within and outside the project site.</p> <p>The Borrower will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in</p>	<p>District police will likely provide security services in the implementation of the project. The civil servants in Somalia are governed by Provisional Constitutions and Civil Service Law (Law Number 11).</p> <p>However, there are no security protocols guiding their deployment, and there is possibility of violence meted out on civilians or workers or even the</p>	<p>There are no security guidelines for MFBE staff or contractors.</p> <p>While the security protocols guiding their deployment and use of force are broadly unknown, the project will coordinate with the law enforcement authorities in each municipality to manage associate risks.</p>	<p>The project to be guided by the ESMF and relevant provisions of ESS4 on the deployment of security personnel to support project activities.</p> <p>Further delineation of security operations to be provided in the Security Management Framework (SMF) of the Project, and through site-specific Security Management Plans</p>

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
	<p>proportion to the nature and extent of the threat.</p> <p>Borrowers must undertake Security Risk Assessments (SRA) and prepare Security Management Plans (SMP) to identify and mitigate risks to project workers and assets as well as community.</p>	<p>possibility of rent-seeking.</p>		<p>(SMPs)..</p>
<p>Universal access.</p>	<p>The ESS4 is emphatic on the right to access to services, especially on the concept of "universal access."</p>	<p>The service charter of the Ministry of Fisheries and Blue Economy is silent on the issue of "universal access."</p>	<p>The concept of universal access is not widely acknowledged in the FGS policies.</p>	<p>The Project will be guided by the provisions of ESS4 on unimpeded access for people of all ages and abilities in different situations and under various circumstances, as set out in GIIP.</p>
<p>ESS6 ("Biodiversity Conservation and Sustainable Management of Living Natural Resources")</p>				
<p>Ecosystem restoration.</p>	<p>In accordance with the mitigation hierarchy provided in ESS1 and with the requirements of this ESS, Borrower is required to ensure that biodiversity expertise is utilized to develop and implement a Biodiversity Management Plan.</p>	<p>Somalia has developed National Biodiversity Strategy and Action Plan (NBSAP), which calls for action to be taken to manage the 40+ identified biodiversity hotspots.</p>	<p>However, no draft management plan is provided in Somalia's NBSAP.</p>	<p>The project to be guided by the ESMF and relevant provisions of ESS6 on biodiversity restoration where the project interfaces with biodiversity and other environmentally sensitive areas.</p>

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
ESS10 ("Stakeholder engagement and information disclosure")				
<p>Meaningful engagement of stakeholders in the project activities from planning to implementation levels.</p>	<p>The World Bank anticipates that the project will establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. Further, the project will promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them. The project affected persons should be provided with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.</p>	<p>The Provisional Constitution of the Federal Republic of Somalia, Article 32 stipulates that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information.</p>	<p>The law on the right of access to information currently only exists as a draft.</p>	<p>The Project will implement stakeholder consultations throughout the lifetime of the project, as per the SEP. The contractors will develop sub-project SEPs in line with the project SEP, which will be reviewed and cleared by the MFBE and the World Bank.</p> <p>The PMU will ensure that a GM for the project is in place, in accordance with ESS10 as early as possible in project development to address concerns from project affected persons.</p> <p>The contractors will outline their workplace GMs in their subproject SEPs including confidential channels for GBV/SEAH reporting.</p>

4 BASELINE INFORMATION

4.1 Physical Environment

Topography: The Jazeera site is characterized by a relatively flat terrain with gentle undulations. The area lies within the coastal plains of Mogadishu, with an elevation that slightly varies due to natural and human-induced modifications. The topography influences drainage patterns, with water generally flowing towards the Indian Ocean. The region is prone to occasional flooding, especially during heavy rainfall periods, which necessitates proper drainage planning for the project.

Geology and Soil: The soils in the project area are primarily sandy and loamy, typical of coastal regions. These soils have moderate to low fertility and are prone to erosion, especially in exposed areas. The sandy nature of the soil affects its water retention capacity, making irrigation and water management crucial for vegetation sustainability. During construction, appropriate soil stabilization measures will be necessary to prevent erosion and maintain soil integrity.

Climate and Metrology: Jazeera (Jaziira), like much of southern Somalia, experiences a hot semi-arid climate (BSH) with the following key characteristics:

- **High Temperatures:** Temperatures remain warm throughout the year, typically ranging between 25°C and 35°C (77°F – 95°F).
- **Seasonal Rainfall:** The area has two main rainy seasons—Gu (April to June) and Deyr (October to December)—with annual precipitation averaging 300–500 mm.
- **Dry Periods:** Extended dry seasons occur during Jilaal (January to March) and Hagua (July to September), bringing hot and dry conditions.
- **Coastal Influence:** Proximity to the Indian Ocean moderates temperatures slightly, with sea breezes helping to reduce extreme heat.
- **Humidity Levels:** The coastal location results in moderate to high humidity, especially during the warmer months.
- **Overall,** Jazeera has a warm and dry climate with periodic rainfall, making it suitable for fishing, small-scale agriculture, and tourism.

Biological Environment: The Jazeera site has a relatively sparse natural vegetation cover, dominated by coastal shrubs, scattered acacia trees, and grass patches. The area has undergone significant anthropogenic activities, including settlements and small-scale agriculture, which have altered the natural ecosystem. Wildlife presence is minimal, with occasional sightings of small mammals, birds, and reptiles. There are no designated conservation areas within the immediate vicinity of the project site. However, the proximity to the coastline necessitates measures to protect marine and coastal biodiversity.

4.2 Socio-economic Environment

Population and Demography: The population around the Jazeera site consists of both permanent residents and transient populations, including traders, construction workers, and informal settlers. The dominant age group falls within the 15–45 years bracket, indicating a youthful and economically active population. Household sizes vary, with an average of 5–7 persons per household. The influx of people seeking employment opportunities could increase demand for services, including housing, water, and health facilities.

Economic Activities: Somalia's economy has experienced steady growth in recent years, with GDP increasing from 2.4% in 2022 to 2.8% in 2023, according to the African Development Bank's Somalia Economic Outlook 2024. This growth has been driven primarily by the

recovery of the agricultural sector following prolonged drought, alongside expansion in services, household consumption, and investment. Despite these positive trends, the economy remains heavily dependent on agriculture and livestock, with unprocessed livestock products accounting for 76% of total exports in 2022.

Jazeera's Economic Landscape: Jazeera's economy is largely dependent on fishing, small-scale farming, tourism, and trade, supported by its coastal location and proximity to Mogadishu.

Fishing: Local fishermen supply seafood to nearby markets, contributing to livelihoods. However, the sector faces challenges such as outdated fishing techniques and inadequate storage facilities, limiting its full potential.

Small-Scale Agriculture and Livestock: Farming and livestock keeping provide food and income, although reliance on rain-fed agriculture and limited market access pose constraints.

Tourism: Jazeera's pristine beaches and natural beauty have attracted growing tourism, supporting local businesses such as hotels, restaurants, and transport services. Despite its potential, infrastructure gaps and security concerns hinder sector growth.

Gender-based Violence (GBV): Somalia is a patriarchal society with firmly entrenched gender roles that often subjugate women and girls. GBV is pervasive, particularly female genital mutilation/cutting (FGM/C), early marriage and psychological abuse. GBV is rampant in Jazeera and the most affected are young girls and women from IDP camps who are vulnerable to rape and other forms of sexual abuse. After decades of war and conflict in the country, women, girls and children have been displaced. They remain vulnerable to gender-based violence due to high insecurity in the camps, limited access to justice and lack of protection from the clans. In Jazeera many gender-based violence cases go unreported, and perpetrators go unpunished.

Infrastructural Facilities

Road Network: The Jazeera site is accessible via a network of roads, including paved and unpaved routes. The primary access roads are in good condition but may require periodic maintenance, especially during the rainy season. Road expansion and improvement may be necessary to accommodate increased traffic due to construction activities.

Water Supply: Water supply in the area primarily relies on boreholes, wells, and water trucking services. The availability and quality of water vary, with some communities facing periodic shortages. The project will need a sustainable water management plan to ensure minimal strain on local water resources.

Electricity and Energy: Electricity supply is provided by private utility companies, with some households and businesses using generators and solar panels as alternative sources. The demand for electricity is expected to increase with the development of new infrastructure. Energy efficiency measures will be integrated into the project to reduce environmental impact.

Waste Management: Solid waste management in the project area is largely informal, with waste disposal methods including open dumping and burning. There is a need for improved waste management systems to handle construction and operational waste. The project will incorporate waste minimization, and proper disposal strategies to reduce environmental pollution.

Social Services and Community Well-Being

Health Facilities: The project area is served by several health centers, clinics, and pharmacies. However, access to advanced medical care remains limited, requiring residents to travel to central Mogadishu for specialized services. The influx of construction workers may increase demand for healthcare services, necessitating measures such as on-site first aid and emergency response planning.

Education and Skills Development: The Jazeera area has several primary and secondary schools, with some vocational training centers providing skills development opportunities. The project could enhance local capacity by offering technical training programs and employing skilled and semi-skilled workers from the local population.

Security and Safety: Mogadishu has faced security challenges in the past, necessitating robust safety measures for project implementation. The presence of law enforcement agencies and community policing initiatives contributes to maintaining stability in the area. The project will adhere to strict security protocols to safeguard workers, equipment, and community members.

Cultural and Heritage Considerations: The Jazeera site does not have officially recognized cultural heritage sites within its immediate vicinity. However, any potential cultural artifacts discovered during excavation will be reported and managed in accordance with national heritage protection guidelines. The project will also respect local customs and traditions through community engagement initiatives.

5 ANTICIPATED ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

Construction of a Modern Fish Market at Jazeera is a significant project that will involve various environmental and social risks and potential impacts. They must be carefully identified, evaluated, and mitigated to ensure the sustainability and safety of the project for both the community and the environment. Below are the anticipated environmental and social risks and potential negative impacts:

5.1 Environmental Risks and Potential Negative Impacts

- **Air Pollution and Dust:** Construction will produce dust and particulate matter, potentially affecting air quality and public health. Mitigation includes dust control measures and PPE for workers.
- **Noise and excessive vibration:** Heavy machinery will generate noise, disturbing nearby communities. Mitigation includes limiting working hours (8.00 a.m-5.00 p.m) and using noise-reducing equipment.
- **Waste generation and Management:** Construction and demolition will produce significant waste, including hazardous materials. A waste management plan is essential to ensure proper disposal and recycling.
- **Contamination of soil and water by hazardous Waste:** Construction activities could lead to runoff and contamination of local water sources. Erosion control and safe handling of materials can minimize risks.
- **Impact on biodiversity and aquatic life:** The surface run off from the construction site drains into the sea and this may affect aquatic life. Implementation of ESMP and minimizing land disturbance are key mitigation strategies.

5.2 Social Risks

- **Traffic incidents, accidents and disruptions**
- **OHS risks to workers-** Increased occupational accidents and incidents, including injuries and illnesses caused by eminent construction and mechanized processing hazards (e.g. handling of construction equipment; stepping on or using sharp objects; spills and leakage of hazardous materials as a result increased labour etc.)
- **Risks to community Health and safety** such as traffic incidents and accidents, spread of communicable diseases, etc.
- **Occupational Health and Safety:** Workers may face health and safety risks. Ensuring proper training, availability and use of Personal Protective Equipment (PPE) and monitoring of compliance, access to medical inputs and facilities, and emergency protocols will address these concerns.
- **Community Disruption:** Construction may disrupt daily life, causing social tensions. Clear communication, compensation, and grievance mechanisms can help manage these impacts.
- **Impacts on Vulnerable Groups:** Vulnerable groups, such as women and children, may be disproportionately affected. Gender-sensitive policies and inclusive consultation processes are essential.
- **Security related incidents:** Threats and attacks from Al-Shabaab and clan conflicts.
- **Labour, particularly child/forced labour related potential risks.**
- **Increased incidences of communicable diseases** like tuberculosis, malaria, diarrhea, Covid19, HIV/AIDS etc. due to an influx of workers at construction sites.

6 ENVIRONMENT AND SOCIAL MANAGEMENT PLAN

The table below lays out the specific adverse risks and impacts anticipated for the demolition, construction of a Modern Fish Market at Jazeera and the respective mitigation measures required to reduce or eliminate the risks and impacts.

Note 1: The cost of the implementation of the environment and social management plan is estimated at 3% of the average cost of the works and will be included in the overall project cost.

Table 3: Environment and Social Management Plan

a) Positive Impacts of the project	Proposed Enhancement measures	Monitoring Indicators	Responsibility	
			Implementation	Supervision Monitoring
<p>1. Improved Infrastructure and Services: The project will enhance local infrastructure, providing better electricity, water supply, and sanitation facilities.</p> <p>2. Economic Growth and Livelihood Improvement: Increased commercial activities will boost trade and improve livelihoods for local residents.</p> <p>3. Tourism and Hospitality Growth: The project may enhance tourism in Jazeera, attracting more visitors and boosting businesses</p>	<ul style="list-style-type: none"> - Embrace the concept of green building in the design of the building for enhanced energy efficiencies, sustainable water usage and provide for waste management facilities -Consider installing solar power system for use in the building -Consider procuring of energy efficient office appliances - Engage licensed waste collectors to collect the waste from the site area for appropriate disposal, - Encourage waste segregation at the site 	<ul style="list-style-type: none"> -Market design -Contract for waste management company -Energy rating for market operations 	Contractor	PMU E&S Specialists

such as hotels and restaurants.				
<p>4. Increased Revenue for Local Government:</p> <p>Property development will contribute to local taxation and municipal revenue, supporting further community development.</p>				

b) Anticipated Environmental Risks and Negative Impacts	Proposed Mitigation Measures	Monitoring Indicators and Frequency	Phases (Design (DS), Construction (CN), and Operation (OP))	Responsibility (Contractor, PIU², PMU E&S³, Specialist, WB⁴)
Risk of poor implementation of the respective mitigation measures against the negative impacts identified in this ESMP	<p>Enhance capacity of all implementers on E&S risk assessment and mitigation measures through training sessions</p> <p>Provide capacity-building opportunities to the E&S teams working on the subprojects on understanding and implementing assessment and management requirements of the WB's ESF and WB Group's General Environmental Health and Safety Guidelines (WBG EHSs).</p> <p>- Provide H&S training to the construction workforce (including subcontractors, temporary workers,</p>	<p># of awareness sessions provided to workers</p> <p># of training sessions provided to project team</p> <p>Frequency: Throughout the project life</p>	CN	<p>Contractor</p> <p>Monitoring: PMU</p>

² PIU- Project Implementation Unit

³ PMU E&S- Project Management Unit Environment and Social

⁴ WB- World Bank

b) Anticipated Environmental Risks and Negative Impacts	Proposed Mitigation Measures	Monitoring Indicators and Frequency	Phases (Design (DS), Construction (CN), and Operation (OP))	Responsibility (Contractor, PIU², PMU E&S³ Specialist, WB⁴)
	and drivers). Raise awareness of workers regarding the implementation of the ESMP tailored to the project scope, through toolbox talks and other platforms			
Risk of excessive noise and vibration	<ul style="list-style-type: none"> - Notify the public of any activities that may be perceived as noisy and intrusive prior to starting. - Establish a GRM for the public to contact the engineers-in-charge (i.e., provide telephone number, email, etc.) and the procedures to handle complaints. - Provide hearing protection gears for use by workers when exposed to noise levels above 85 dB(A). - Ensure that noise and excessive vibration from construction activities are within permissible levels as per the provisions of WBG EHSs: this includes among others adhering to permissible noise and vibration level - Use modern construction equipment, which produces less noise; and - Use of noise shielding screens and the operation of such machinery restricted to when actually required 	<ul style="list-style-type: none"> -complaints received over noise -complaints registered via GRM -Hearing protection and aids provided to workers <p>Monitoring Frequency: Monthly</p>	CN	<ul style="list-style-type: none"> - Env. specialist of the contractor to implement - PMU Env. specialist to monitor
Risk of air pollution by dust generated during construction, and emissions from	<ul style="list-style-type: none"> - Construction sites, diversions and materials handling sites to be water- 	<ul style="list-style-type: none"> - Visual observations of dust emissions 	CN	<ul style="list-style-type: none"> - Env. specialist of the contractor to implement

b) Anticipated Environmental Risks and Negative Impacts	Proposed Mitigation Measures	Monitoring Indicators and Frequency	Phases (Design (DS), Construction (CN), and Operation (OP))	Responsibility (Contractor, PIU², PMU E&S³ Specialist, WB⁴)
construction equipment and vehicles	<ul style="list-style-type: none"> sprayed on dry and windy days to contain dust; - Construction equipment and trucks shall be regularly maintained in good operating condition to reduce exhaust emissions - Haulage trucks to be covered or the aggregates sprayed with water before loading; - Encouraging reduction in engine idling during on- and off-loading activities - Cordon off construction sites to minimize dust migration to nearby facilities by wind; - Restrict access to construction and allow only authorized personnel - Staff working in dust generating activities e.g. site preparation, excavation, concrete mixing, stone dressing shall be provided with Personal Protective Equipment (PPE) - The use of PPE shall be monitored and enforced; and - Prohibit open burning of solid wastes 	<ul style="list-style-type: none"> - Complaints from community about dust - Visual observation on use of PPE -Vehicle and machinery servicing schedule and reports <p>Monitoring Frequency: Monthly</p>		<ul style="list-style-type: none"> - PMU E&S specialist to monitor - PMU to coordinate implementation
Soil and water pollution	<ul style="list-style-type: none"> - Sewage systems and wastewater treatment plants must be designed to prevent them from the intrusion of saline water to ensure the systems are properly functional and its effluent 	<ul style="list-style-type: none"> - Incidents on soil erosion and water pollution reported 	CN and OP	<ul style="list-style-type: none"> - Env. specialist of the contractor to implement - PMU Env. specialist to monitor

b) Anticipated Environmental Risks and Negative Impacts	Proposed Mitigation Measures	Monitoring Indicators and Frequency	Phases (Design (DS), Construction (CN), and Operation (OP))	Responsibility (Contractor, PIU², PMU E&S³ Specialist, WB⁴)
	<ul style="list-style-type: none"> always meets national regulations before discharging into water bodies. - Open stockpiles of onsite construction materials should be covered with tarpaulin or similar fabric during rainy season. - Prevention of the washing away of construction materials, soil, silt or debris into any drainage system. - All machinery and equipment be regularly maintained and serviced to avoid leak oils; - Maintenance and servicing of heavy vehicles, machinery and equipment must be carried out in a designated area (protected service bays); - Implementation of erosion and sediment control measures such as silt fences, where applicable and where resources permit - Pre-treatment for wastewater from the office building before re-use or release into the environment 	<ul style="list-style-type: none"> - Incidents of oil leakages and actions taken to address it - Monitoring Frequency: Monthly 		<ul style="list-style-type: none"> - PMU to coordinate implementation
Risks related to Waste generation and Management	<ul style="list-style-type: none"> - Contractors selected under this project will be required to develop and implement a Waste Management Plan, which will include area specific waste management, capturing waste volumes and categories expected from the projects 	<ul style="list-style-type: none"> - Records of quantities of wastes generated - Records of quantities of different types of waste disposed off, along the disposal site 	CN and OP	<ul style="list-style-type: none"> - Env. specialist of the contractor to implement - PMU Env. specialist to monitor - PMU to coordinate implementation

b) Anticipated Environmental Risks and Negative Impacts	Proposed Mitigation Measures	Monitoring Indicators and Frequency	Phases (Design (DS), Construction (CN), and Operation (OP))	Responsibility (Contractor, PIU², PMU E&S³ Specialist, WB⁴)
	<ul style="list-style-type: none"> - The contractors will be responsible for instituting and implementing a simple waste tracking system that allows for the identification of current waste streams while determining how much waste is being generated from each main source of waste - Practice waste minimization segregation and proper disposal according to internationally accepted guidelines and (where possible) municipal bylaws - Reuse construction waste for landscaping and backfilling - The contractors will be responsible for keeping documentation showing details of interventions put in place for tracking, measuring and optimizing wastes and recycling processes as appropriate; - The effluent being discharged from the building to the sewer line shall conform to the international limits for effluent discharge into public systems; - Ensure that sewerage discharge pipes are not blocked or damaged; and - Put in place mechanism for wastewater management and disposal 	<ul style="list-style-type: none"> - Monitoring Frequency: Monthly - GRM incidents reported on waste disposal - Monitoring Frequency: Monthly 		<ul style="list-style-type: none"> - Facility management MFBE
<p>Poor management and disposal of material generated from demolition activities,</p>	<p>Contractor to prepare and implement a Waste Management Plan for site</p>	<p>Records of amount of solid waste re-used,</p>	<p>CN</p>	<ul style="list-style-type: none"> - Contractor

b) Anticipated Environmental Risks and Negative Impacts	Proposed Mitigation Measures	Monitoring Indicators and Frequency	Phases (Design (DS), Construction (CN), and Operation (OP))	Responsibility (Contractor, PIU², PMU E&S³ Specialist, WB⁴)
including rubble / waste management	<p>Reuse and recycling of the waste generated shall be prioritized</p> <p>Ensure disposal of generated solid waste at designated and authorized disposal site in consistence with the local and international requirements, (see WBG's General EHS Guidelines), such as:</p> <p>Institute good housekeeping and operating practices - including inventory of different materials and waste</p> <p>Control to reduce the amount of waste</p> <p>Institute procurement measures that recognize opportunities to return usable materials</p> <p>Implement stringent waste segregation to prevent mixing hazardous and non-hazardous wastes</p> <p>Identify, separate and adequately store potentially recyclable materials</p> <p>Provide on-site or off-site transportation of waste to prevent or minimize spills, releases and exposure to employees and public</p> <p>Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GRM</p> <p>Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, the existing</p>	<p>recycled, disposed, where and when</p> <p>Records of waste tracing sheets from the premises to the disposal sites</p> <p>Related grievances filed</p> <p>Waste management plans</p> <p>Report on implementation of the waste management</p> <p>Monitoring Frequency: Monthly</p>		

b) Anticipated Environmental Risks and Negative Impacts	Proposed Mitigation Measures	Monitoring Indicators and Frequency	Phases (Design (DS), Construction (CN), and Operation (OP))	Responsibility (Contractor, PIU², PMU E&S³ Specialist, WB⁴)
	waste management system in the area, local routes, and general aesthetic value of the area			
Risks of contamination of soil and water by hazardous waste	<ul style="list-style-type: none"> - Empty paint cans stored in closed drums or isolated area from soil and water at CONTRACTOR store, then handling as recycled metal scrap. - Store fuel and oil away from subproject site and heat at a well-ventilated area and provide suitable fire extinguishers - Store any chemicals and hazardous waste at designated areas, insulated from the ground - Carry a spill prevention kit - Ensure trained personnel handle hazardous chemicals and wastes. 	<ul style="list-style-type: none"> - Availability of material safety data sheets in areas where chemicals are used or stored - Availability of eye wash stations - Training records on handling of hazardous chemicals - Availability of spill prevention kit - Monitoring Frequency: Monthly 	CN and OP	<ul style="list-style-type: none"> - Env. specialist of the contractor to implement - PMU Env. specialist to monitor - PMU to coordinate implementation - Facility management and responsible FMS and FGS Ministries
Increased surface or stormwater runoff generation	<ul style="list-style-type: none"> - No surface water shall be directed into the sewer system to avoid overloading the sewerage system; - Storm water drainage to be provided to mitigate risk of soil erosion - Harvest rainwater from roof for non-portable uses e.g. cleaning and watering plants. 	<ul style="list-style-type: none"> - Flooding incidents arounds the projects facilities - Erosion caused by storm water observed 	OP	Facility management FMS and FGS Ministry responsible for fisheries and environment
Impact on biodiversity and aquatic life	<ul style="list-style-type: none"> - Implement soil erosion control measures 	<ul style="list-style-type: none"> -Incidents of pollution <p>Monitoring Frequency: Monthly</p>	DM, CN and OP	<ul style="list-style-type: none"> - Env. specialist of the contractor to implement

b) Anticipated Environmental Risks and Negative Impacts	Proposed Mitigation Measures	Monitoring Indicators and Frequency	Phases (Design (DS), Construction (CN), and Operation (OP))	Responsibility (Contractor, PIU², PMU E&S³ Specialist, WB⁴)
	<ul style="list-style-type: none"> - Wastewater to be treated before release into the environment and meet international standards - Proper waste management through implementation of the above-described relevant mitigation measures 			<ul style="list-style-type: none"> - PMU Env. specialist to monitor - PMU to coordinate implementation - Facility management and responsible FGS MFBE
Risk of excessive water consumption	<ul style="list-style-type: none"> - Manage water consumption, including through <ul style="list-style-type: none"> - On site water recycling - Rainwater harvesting - Conduct regular inspections to identify and fix leaks in pipes, hoses and tanks. 	<p>Availability of water recycling</p> <p>Availability of inspection records</p> <p>Monitoring Frequency: Monthly</p>	CN and OP	<ul style="list-style-type: none"> - Contractor - Facility management and FGS MFBE

Social Impact Management

Social risk and Impact	Proposed Mitigation Measures	Monitoring Indicators	Phases (PC, CN, OP, DC)	Responsibility (Contractor, PIU ⁵ , PMU E&S ⁶ Specialist, WB ⁷)	Cost
<p>OHS risks to workers- Increased occupational accidents and incidents, including injuries and illnesses caused by eminent construction and mechanized processing hazards (e.g. handling of construction equipment; stepping on or using sharp objects; spills and leakage of hazardous materials, etc.)</p>	<ul style="list-style-type: none"> - Prior to construction, ensure EHS risk assessment is conducted, all hazards are identified, management controls are documented in the C-ESMP or Occupational Health and Safety Management Plan - Take all safety precautions to address hazards for workers and visitors and the nearby community including safety/warning signage, safety barrier around the construction site and safe driving practices; - Regular supervision of construction projects to ensure that safety conditions are met while any deviation from safety regulations is immediately reclaimed following the best practices regarding safety at work; - Toolbox meetings, safety awareness and refresher trainings - Provision of first aid kits at work sites - Trained first aiders present on sites all time 	<ul style="list-style-type: none"> - Number and severity of safety incidents and accidents - Evacuation procedures in place and known to the workers - Safety signages in Somali language - Records on PPE provided - Monitoring Frequency: Monthly 	<p>CN and OP</p>	<ul style="list-style-type: none"> - Env. specialist of the contractor to implement - Env. specialist to monitor - PMU to coordinate implementation - Facility management and responsible FGS MFBE 	

⁵ PIU- Project Implementation Unit

⁶ PMU E&E- Project Management Unit Environment and Social

⁷ WB- World Bank

Social risk and Impact	Proposed Mitigation Measures	Monitoring Indicators	Phases (PC, CN, OP, DC)	Responsibility (Contractor, PIU ⁵ , PMU E&S ⁶ Specialist, WB ⁷)	Cost
	<ul style="list-style-type: none"> - Develop evacuation procedures to handle emergency situations; - Controlled entry and exit from the construction sites; - Post in prominent places informative signage and notices in Somali language to inform of safety hazards and controls; - Provision of appropriate Personal Protective Equipment (PPE) and monitoring and enforcement of its use; - Hire qualified personnel in all SSFDP-financed sub-projects; and regular training on OHS and Code of Conduct. - Adhere to provisions of the WBG's EHSs and labour management procedures 				
Risks to community health and safety	<ul style="list-style-type: none"> - All waste storage and disposal sites are adequately cordoned off from the public - Access to construction sites by the public must be restricted - Grievances by the community shall be recorded and resolved as per the SSFDP project GRM - Raise awareness on the risk of HIV/AIDS and other sexually 	<ul style="list-style-type: none"> - Records of incidents and accidents affecting the community - Grievances related to community health and safety - Monitoring Frequency: Monthly 	CN/OP/DC	<ul style="list-style-type: none"> - Env. specialist of the contractor to implement - PMU Env. specialist to monitor - PMU to coordinate implementation - Facility management and 	

Social risk and Impact	Proposed Mitigation Measures	Monitoring Indicators	Phases (PC, CN, OP, DC)	Responsibility (Contractor, PIU ⁵ , PMU E&S ⁶ Specialist, WB ⁷)	Cost
	and otherwise communicable diseases - Implement the traffic management plan			responsible FGS MFBE	
Risk of Chance Finds	- Implement the Chance Find procedures (see Annex 3)	- Reports on chance finds	DM and CN	- Contractor and PMU	
Labour: OHS related potential risks	<ul style="list-style-type: none"> - Abide by OHS requirements as set out in Labour Code (Articles 101-104), ESS2 (including WBG EHSs) including: - Develop and implement an approved Contractor ESMP (C-ESMP), including OHS Management Plan. - Select legitimate and reliable contractor through screening of OHS records. - Address adequately OHS risks with non-compliance remedies in procurement documents. - Require the contractor to engage qualified ESHS staffing and apply adequate PPE and safety measures onsite. - Implement workplace OHS awareness and training. - Conduct routine monitoring and reporting. - Adherence to SSFDP labour management procedures 	<ul style="list-style-type: none"> - Formulated OHS plans - Records of grievances raised and status of resolution - Monitoring of C-ESMP implementation - Staff qualification records - ESHS staff recruited - Monitoring reports 	CN/OP/DC	<ul style="list-style-type: none"> - Social specialist of the contractor to implement - PMU Social specialist to monitor - PMU to coordinate implementation - Facility management and responsible FGS MFBE during operations 	Included in the project cost

Social risk and Impact	Proposed Mitigation Measures	Monitoring Indicators	Phases (PC, CN, OP, DC)	Responsibility (Contractor, PIU ⁵ , PMU E&S ⁶ Specialist, WB ⁷)	Cost
Labour: child/forced labour related potential risks	<ul style="list-style-type: none"> - Include minimum age (18 years) in procurement documents. - Raise awareness on child protection with contractors and in the communities. - Maintain labour registry of all contracted workers with age verification. - Develop remedial procedures to deal with child labor incidents - Include the prohibition of forced labour in procurement documents and CoC for suppliers, contractors and sub-contractors e.g. suppliers of construction materials such as gravel and sand which may originated from quarries using forced labour - Raise awareness on prohibition of use of forced labour 	<ul style="list-style-type: none"> - Records of labour registry of all contracted workers with age verification. - Spot checks reports - Records of awareness sessions - Remedial procedures on management of incidents related to child/forced labour - Grievances related to child/forced labor 	CN/OP/DC	<ul style="list-style-type: none"> - Social specialist of the contractor to implement - PMU Social specialist to monitor - PMU to coordinate implementation - Facility management and responsible FGS MFBE during operations 	Included in the project cost
Exclusion, elite capture and selection bias	<ul style="list-style-type: none"> - Awareness raising of all project implementers, contractors and primary suppliers on the requirements and implementation of the inclusion plan. - Promote inclusion of disadvantaged and vulnerable 	<ul style="list-style-type: none"> - Inclusion plan and implementation monitoring - Number of representatives of disadvantaged and vulnerable groups, PWDs and women recruited for the project 	CN/OP/DC	<ul style="list-style-type: none"> - Social specialist of the contractor to implement - PMU Social specialist to monitor - PMU to coordinate implementation 	Included in the project cost

Social risk and Impact	Proposed Mitigation Measures	Monitoring Indicators	Phases (PC, CN, OP, DC)	Responsibility (Contractor, PIU ⁵ , PMU E&S ⁶ Specialist, WB ⁷)	Cost
	<p>groups in consultations and access to project benefits.</p> <ul style="list-style-type: none"> - Promote diversity in recruitment including all disadvantaged and vulnerable groups, PWDs and women. There may be a need to put quotas for gender and PWDs. 			<ul style="list-style-type: none"> - Facility management and responsible FGS MFBE 	
Security related incidents: Threats and attacks from Al-Shabaab and clan conflicts	<ul style="list-style-type: none"> - Implementation of the Security Management Plan (SMP) 	<ul style="list-style-type: none"> -Monitoring reports on implementation of SMP -Number of security incidents and management 	CN/OP/DC	<ul style="list-style-type: none"> - Social specialist of the contractor to implement - PMU Social specialist to monitor - PMU to coordinate implementation - Facility management and responsible FMS and FGS Ministries during operations 	Included in the project cost
Increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors by project workers	<ul style="list-style-type: none"> - Implement the SSFDP Sexual Exploitation, Abuse and Harassment Action plan - Disseminate policies and protocols to all staff. - Train staff in GBV/SEAH on counselling, referral mechanisms, and rights issues. 	<ul style="list-style-type: none"> -Grievances related to GBV/SEA and SH -Incidents related to GBV/SEA and SH reported - CoCs with clear guidance on GBV/SEAH. 	CN/OP/DC	<ul style="list-style-type: none"> - Social specialist of the contractor to implement - PMU Social specialist to monitor 	Included in the project cost

Social risk and Impact	Proposed Mitigation Measures	Monitoring Indicators	Phases (PC, CN, OP, DC)	Responsibility (Contractor, PIU ⁵ , PMU E&S ⁶ Specialist, WB ⁷)	Cost
	<ul style="list-style-type: none"> - Enforce total adherence to code of conduct - Communication and implementation of GRM with specific inclusion of anonymous reporting 			<ul style="list-style-type: none"> - PMU to coordinate implementation - Facility management and responsible MFBE during operations 	
<p>Socio-cultural barriers - exclusion of disadvantaged groups.</p>	<ul style="list-style-type: none"> - The contractors' E&S assessment and management plan and community outreach plan will identify and address socio-cultural barriers through appropriate awareness raising and engagement with opinion influencers. - The inclusion plan (see Annex 6 of ESMF) will promote services for all groups in the project sites. - The SEP and GRM have been developed in order to address these risks. In addition, plans may be developed to target specific groups with information including PWDs, women and minority groups given their influence in society. - Measures will be put in place to encourage participation and inclusion of disadvantaged and vulnerable individuals and groups. 	<ul style="list-style-type: none"> -Record of measures put in place to include the disadvantaged group -Inclusion plan and implementation monitoring reports 	CN/OP/DC	<ul style="list-style-type: none"> - Social specialist of the contractor to implement - PMU Social specialist to monitor - PMU to coordinate implementation - Facility management and responsible FMS and FGS MFBE during operations 	Included in the project cost

Social risk and Impact	Proposed Mitigation Measures	Monitoring Indicators	Phases (PC, CN, OP, DC)	Responsibility (Contractor, PIU⁵, PMU E&S⁶ Specialist, WB⁷)	Cost
Increased incidences of communicable diseases like tuberculosis, malaria, diarrhea, Covid19, HIV/AIDS etc. due to an influx of workers at construction sites	<ul style="list-style-type: none"> - Provide proper sanitation and waste disposal facilities based on a site-specific Waste Management Plan (WMP) - Carry out training/awareness campaigns for the prevention of communicable diseases - Empty/drain all areas that may hold standing water - Ensure use of PPE and, where possible, social distancing to reduce risk of disease transmission 	<ul style="list-style-type: none"> - Adequacy of sanitation facilities provided - Number of awareness sessions conducted - Records on provision of PPE provided and used 	CN/OP/DC	<ul style="list-style-type: none"> - Social specialist of the contractor to implement - PMU Social specialist to monitor - PMU to coordinate implementation - Facility management and responsible and FGS MFBE during operations 	Included in the project cost
Challenges in access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring	Implementation and monitoring of GRM Implementation of the Project SEP.	% of complaints filed have been addressed No. of site-specific incident logs	DS, DM and CN	- PMU	Included in the PMU Stakeholder engagement and GRM costs

7 INSTITUTIONAL IMPLEMENTATION ARRANGEMENTS AND RESPONSIBILITIES

7.1 Government Institutions

The Ministry of Fisheries and Blue Economy

The MFBE through the PMU is responsible for the overall implementation of the project. The PMU will be contracting a construction company directly to implement construction works. The construction company will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP.

Below is the list of Government institutions involved in the road rehabilitation works implementation, with their respective roles and interests.

Table 3 Institutional partners' responsibilities

<p>Project Management Unit - PMU</p>	<p>The application of mitigation measures required under this ESMP is the responsibility of the PMU. However, since actual construction works will be carried out by the private entity/contractor, the PMU will ensure that implementation of the ESMP is incorporated in the Request for Proposals (RfPs) and the costs are integrated in the Bill of Quantities (BoQs), and subsequently in the legal agreement between the construction company and the PMU. The PMU is responsible for instructing, observing and monitoring its contractors against the ESMP provisions. The PMU should make sure that corrective actions are applied by the contractors, when necessary. Within the PMU, the Environmental Safeguards Specialist and the Social Development Specialist will be responsible for the monitoring of the implementation of the ESMP, including reporting duties.</p> <p>The PMU can undertake monitoring itself if deemed necessary. The PMU will request for any violations to be corrected by the Constructor and monitor the actions and undertakings in correcting violations. The PMU has further deployed a Third-Party Monitor (TPM), which monitors E&S mitigation measures across the project components (If necessary).</p>
<p>Project Implementation Unit - PIU</p>	<p>The PIU's Environmental & Social Safeguards focal persons will monitor the implementation of risk mitigation measures by the construction company. The monitoring will be supported by PMU/PIU Engineers. Environmental and social monitoring reports will be prepared by the PIU's and submitted to the PIU every month throughout the project duration.</p>
<p>Supervision Consultant E&S Safeguard Specialists:</p>	<p>The Supervision Firm shall deploy qualified, site-specific Environmental and Social (E&S) Safeguard Specialists to monitor and ensure that all construction activities are implemented in full compliance with the approved contract-specific Environmental and Social instruments, including the Contractor's ESMP (C-ESMP), and the World Bank Environmental and Social Standards (ESSs). The Specialists will oversee adherence to occupational health and safety (OHS) requirements, social safeguards, and site-specific mitigation measures, and shall provide regular E&S inspection reports to the PMU E&S team.</p>

7.2 Contractor

The contractor is responsible for complying with requirements for all field activities covered by this ESMP, the contractor is also responsible to ensure that all its sub-contractors follow the ESMP and other ESF instruments that apply to this sub project. The contractor will have contractual clauses specifying compliance with the mitigation measures listed in the ESMP and in the WBG's EHS Guidelines, in addition to national requirements and to indicate measures taken in cases of non-compliance. The contractor is also responsible for the actions of any subcontractors they may engage. Sub-contractors also have to comply with all E&S Standards as laid out in this ESMP. Contractor's responsibilities include:

- Ensuring that all operations comply with the ESSs and mitigation measures laid out in this ESMP, for which the contractor is responsible and will develop a Construction ESMP (C-ESMP).
- Ensuring that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- Complying with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported to PMU within 24 hours of occurrence.
- Monitoring the C-ESMP implementation, against the monitoring indicators laid out in the ESMP Table.
- Organizing and participating in Community Consultative Meetings with an approach to adaptive sub-project management as necessary.
- Identifying additional significant matters pertaining to environmental and social compliance.
- Liaise with PMU on the need for corrective action in the event of unexpected environmental or social issues emerging during operations.
- Communicating with all staff regarding E&S compliance requirements and other matters of importance.
- Identifying additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Preparing reports on all aspects of E&S compliance.
- Maintaining lists of all workers, including their age and gender.
- Maintaining and adequately operating a workers' GRM.
- Prepare and implement an OHS Plan and provide related and frequent training to all workers.
- Ensure signing of the code of conduct by every worker, covering issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.
- Implementing the Security Management Plan (SMP).
- The contractor is obliged to implement this ESMP, operationalized through the C-ESMP with all risk mitigation measures assigned to it.

E&S Risk Management or Environmental Health and Safety (EHS) Specialist: The contractor will deploy an E&S or EHS Specialist to ensure operationalization of this ESMP and adequate implementation of the C-ESMP, including monitoring, supervision and reporting on mitigation measures. The key tasks of the Specialist are to;

- Ensure PPE for workers is available and workers are trained in its use and comply with it
- Provide OHS training to all workers, based on the OHS Plan
- Ensure health and safety of all workers at the construction site
- If necessary, stop the works to ensure safety

- Maintain records of accidents and incidents and ensure appropriate reporting of incidents to the PMU/PIU.
- Ensure waste management procedures are followed closely
- Ensure availability of water and sanitation facilities for all workers at site and at the campsite
- Conduct toolbox talks for workers
- Train all workers in the CoC and ensure that CoC is signed by every worker
- Liaise closely with the supervision consultant and PMU on training workers on GBV issues, as well as community awareness on GBV
- Maintain workers' lists indicating age and gender
- Liaise closely with the PMU/PIU on the implementation of Project GRM
- Maintain records of workers' GRM

7.3 Reporting on ESMP Compliance

The PMU will prepare periodic monitoring reports, including inputs from the contractor and on the status of implementation of this ESMP. The reports will be submitted to the World Bank for their review and feedback as part of the PMU’s general Quarterly report to the Bank. Details of these reports and their content are given in the Table below.

Table 4: ESMP Monitoring and Compliance Reports

No .	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
1	ESHS Monitoring Report to Engineering and Supervision Consultant	Compliance status of the subproject with the E&S mitigation and monitoring measures. The report shall cover: <ul style="list-style-type: none"> • Environmental incidents. • Health and safety incidents. • Identification of child and forced labor. • Health and safety supervision • Usage of PPEs by workers • Highlights of inspections • Training conducted, and workers participated • workers’ and community grievances submitted and their response status. 	Monthly	Contractor
2	ESMP Monitoring Report to WB	Compliance status of overall subproject with ESMP requirements	Quarterly	PMU
3	Incident Reports	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to prevent and address future recurrence of a similar event	Initial Notification report for severe incidents within 24 hours. Detailed Investigation Report within ten days	PMU (contractor/PI U to PMU)

7.4 Capacity Building and Training

The implementation of this ESMP and the C-ESMP is highly dependent on the capacity and awareness of the contractors' staff, the surrounding community and the stakeholders concerned. Training workshops are required to increase the awareness of all individuals concerned with the subproject and to train and follow up with the workers who are specifically involved in the site operation.

On-site workers should receive appropriate training to undertake the duties of implementing the necessary mitigation measures. The training workshops shall be undertaken prior to commencement of construction activities. The recipients of the training are all construction workers. The training courses are to be included in the budget of the contractor. The training for the workers should cover at least the following issues:

- Occupational and public health and safety.
- E&S mitigation measures need to be applied.
- GBV/SEA/SH prevention
- Prevention, addressing, and reporting of accidents and preparation and implementation of emergency plans
- Roll-out of GRM among workers and communities
- Appropriate segregation, transportation, and final disposal of solid waste.

This will be achieved by small workshops conducted in the induction phase for the workers. The induction training will include familiarization with the workers' GRM, Project GRM, CoC, GBV/SEA/SH, HIV/AIDS prevention, and other toolbox talks as mentioned above in the ESMP. During the construction phase, refresher trainings will be held. While some training will be provided by the contractor,

Next to the training of workers, communities at the site will receive awareness raising sessions on the following topics:

- Community grievance redress mechanism (GRM)
- GBV and SEA/SH prevention and response plan

Next to the training of workers, communities at the site will receive awareness raising sessions on the following topics:

- heighten awareness of environmental and social risks and impacts and mitigation measures including trainings on (not exhaustive):
- Communicable diseases/HIV-AIDS/STI/GBV awareness and prevention
- Community grievance redress mechanism

In addition, continuous E&S training has to be provided to the contractor staff as well as to the PIUs, in all E&S aspects of the Project.

8 IMPLEMENTATION BUDGET

Table 4: Estimated Implementation Budget

	Required Resources	Costs in USD
PMU – Monitoring of ESMP		
1.	Human Resources: 1 Environmental, 1 Social Safeguards Specialist	PMU staff costs
2.	1 GBV Specialist (GBV training and GRM)	PMU staff costs
3.	1 Security Specialist/Advisor	PMU staff costs
5.	1 GRM Operator (GRM awareness)	PMU staff costs
6.	Logistics / Travel	PMU travel budget
Grievance Redress Mechanism hotline		
7.	Hotline and other mechanisms	PMU GRM budget
8.	GBV/SEAH reporting mechanisms	PMU staff costs
Implementation of Risk Mitigation Measures Contractor		
9.	Human Resources 1 EHS Specialist	contractor
10.	Cost of PPE	contractor
11.	Cost of all OHS measures and other Training	contractor
13.	Construction Waste Disposal	contractor
14.	Safety Signages	contractor
15.	Community engagement	contractor
16.	Latrines	contractor

9 STAKEHOLDER CONSULTATION

The preparation of the ESMP and of the project selection and design was highly dependent on stakeholder consultations, conducted as per the Somali Sustainable Fisheries Development Project (SSFDP) Stakeholder Engagement Plan (SEP).

Stakeholder engagement, one of the basic principles of environmental and social risk management, is one of the most important tools for the implementation of the ESMP and C-ESMP. It provides a better understanding of the conditions in the subproject area and the concerns of stakeholders. It is also essential to ensure the effectiveness of the mitigation measures developed under the ESMP. The preparation of the ESMP and of the project selection and design was highly dependent on stakeholder consultations, conducted as per the Badmaal Stakeholder Engagement Plan (SEP) by considering the following basic objectives:

- Identification of stakeholders directly or indirectly affected by the subproject or interested in it
- Identification and planning of stakeholder engagement activities that will start at the preparation and planning stages of the subproject and continue during the construction and operation phases
- Determining the frequency of stakeholder engagement activities, information sharing and degree of participation, content of consultation activities
- Establishing a Grievance Redress Mechanism (GRM) that will provide an open communication channel for stakeholders at every stage of the subproject
- Addressing concerns and expectations communicated by stakeholders in the SEP, ESMP and subproject decision-making and planning stages.

The list of stakeholders determined within the scope of the SEP, which can be updated as the subproject progresses, is presented in this report.

Table 5: Project stakeholders consulted

Stakeholder Groups	Project Stakeholders
Public institutions and organizations	<ul style="list-style-type: none"> • Ministry of Fisheries, Director General (DG), and senior officials who provide strategic direction and oversight. • PMU staff Environmental and Social (E&S) Specialist
Local administrations and institutions	District police officer
Interest groups; local businesses, and others	Fishermen, Fishing Association members, Youth Groups, Women Groups.

9.1 Stakeholder Engagement Activities

9.1.1 Engagement with Fishing community at Jazeera

As part of the stakeholder engagement process, community consultations were conducted on 28 January 2025 to ensure transparency, inclusivity, and local ownership of the proposed fish market development in Jazeera. These consultations aimed to gather input, concerns, and recommendations from key stakeholders, particularly those directly reliant on the fisheries sector.

Participants included representatives from the Ministry of Fisheries and Blue Economy, fishing cooperatives, residents, environmental and social specialists, civil society organizations, and project developers and contractors.

Two structured consultation meetings were held in January 2025 to present the project scope, discuss potential impacts, and receive feedback. Key discussion points included:

- Community expectations and priorities related to fisheries infrastructure.
- Potential environmental risks and proposed mitigation measures.
- Anticipated socio-economic benefits, including employment, value addition, and improved market access.
- Measures to minimize environmental disruption and support sustainable fishing practices.

The fishing community and cooperatives played a central role in the discussions, reflecting their critical importance to the local economy and food security. Participants expressed strong appreciation for the initiative and welcomed the project, noting its potential to enhance livelihoods, improve working conditions, and support the long-term sustainability of the fisheries sector.

Additionally, following the initial design review, the project design was refined and reduced through structured stakeholder and community engagement in line with the Stakeholder Engagement Plan (SEP) and World Bank ESS10. Consultations with local communities, relevant authorities, and key stakeholders ensured that the revised design was well understood, socially acceptable, and responsive to local needs. The design was subsequently presented, discussed, and validated by stakeholders and the community, strengthening transparency, enhancing ownership, and minimizing potential environmental and social risks.



Figure 6: Consultations in Jazeera with Local Government and Communities



Figure 7: Jazeera fish market design validation session

10 GRIEVANCE REDRESS MECHANISM (GRM)

One of the main requirements of the ESMP is to implement an effective mechanism to record and share environmental and social issues. The basic principles of effective communication methods with the Grievance Redress Mechanism (GRM) in question, as part of stakeholder engagement, are as follows:

- Accurate recording and protection of all information obtained during the implementation of the C-ESMP
- Sharing information about the progress and monitoring of the subproject with stakeholders and all interest groups, evaluating the information for the preparation of periodic reports.
- Appoint a member of staff responsible for public relations, handling of internal and external complaints, recording oral complaints and filling in relevant forms.
- Sharing information on the functioning of the GRM with affected communities as part of stakeholder engagement activities.

The project's grievance mechanism and the rights of affected communities to receive information about the Project and to convey their complaints / thoughts form the core of stakeholder engagement process and GRM. PIU will ensure the establishment of a local grievance mechanism, by the Construction Contractor, to deal with complaints in a timely and effective manner.

The GRM shall enable stakeholders to communicate directly with PIU, but a separate system will be established for the project in which the stakeholders can receive their responses locally and communicate their complaints. This local grievance system will be established within the body of project PIU, implemented and followed by both Project PIU and Contractors during construction, operation and decommissioning/closure phases, which will be more easily accessible for stakeholders and will encourage them to voice their complaints.

Recording and follow up of grievances (including environmental issues) will be the primary responsibilities of the PIU. The PIU will have personnel assigned for the grievance management process both on site and at Headquarters. PIU Social Specialist will be primarily responsible for grievance management as well as Contractors' social staff. Project PIU will regulate the contractual agreements with Contractor to ensure that they have a Social specialist on site who will be responsible for recording and follow up of grievances on site office. These assigned staff will follow the GRM established to record and resolve all complaints from the stakeholders and follow up corrective actions taken. Contact information will be provided via the Project website, through public information meetings, consultation meetings and Project brochures to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for stakeholders to vocalize their grievances formally include:

- Face to face (Stakeholders can voice their grievance to assigned personnel of Contractor and/or at site office)
- Complaint registers form (Stakeholders can fill the forms that will be distributed to them in advance to voice their grievances)
- Telephone (Stakeholders can call) to request to speak to contact person
- Email (Grievances can be sent)

Grievances related to BADMAAL subprojects in Mogadishu will be submitted through grievance redress channel details that are shown below. Anonymous grievances will be allowed to be raised and addressed.

Email address:	grm.badmaal@gmail.com
Free hotline number (s):	2498

The Environment and Social Management Framework (ESMF)⁸ for the SSFDP subprojects and the Labor Management Procedures (LMP)⁹ provide a detailed description of the GRM for the Project stakeholders and workers.

■ **Procedure**

The following is the outline of the grievance process to be followed (the structure is illustrated in Figure 2):

- Receive, register and acknowledge complaint (see Annex 4) for a Grievance Registration Form Template.
- Screen and establish the basis of grievance (e.g. nuisance complaint may be rejected but the reason for the rejection should be clearly explained to the complainant);
- A Grievance Redress Committee (GRC) hears and resolves the complaint.
- Implement the case resolution or the unsatisfied complainant can seek redress at a formal court of justice.
- Elevation of the case to a formal court if complainant is not satisfied with the GRC resolution; and
- Document the experience for future reference.

To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, GBV and SEA/SH grievances shall be handled at a designated focal point to ensure the safety of survivors and enable survivor-centered care. The sexual exploitation and abuse and sexual harassment prevention and response plan (SEA/SH PRP)¹⁰ for the SSFDP subprojects provides details for managing associated risks.

⁸ <https://mfbe.gov.so/wp-content/uploads/2024/09/BADMAAL-Environmental-and-Social-Management-Framework.pdf>

⁹ <https://mfbe.gov.so/wp-content/uploads/2024/03/P178032-Stakeholder-Engagement-Plan-Somalia-Sustainable-Fisheries-Development-Project.pdf>

¹⁰ <https://mfbe.gov.so/wp-content/uploads/2024/10/Somalia-fisheries-project-SEAH-PRP-August-2024.pdf>

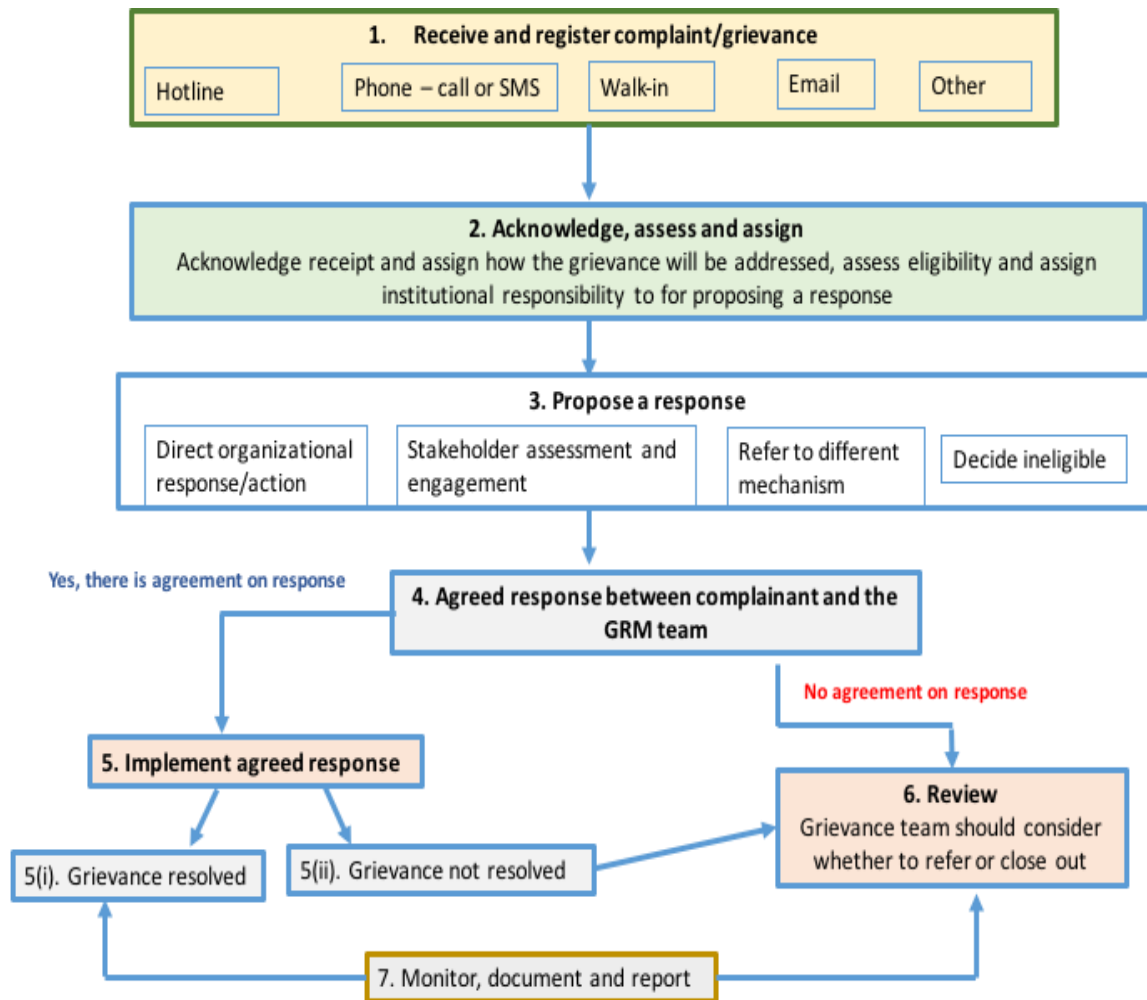


Figure 5: GRM Flowchart

■ **Disclosure Program**

Multiple channels will be used for information disclosure for subproject activities. These include: (i) disclosure of all relevant documents in the MFBE websites and through the WB website. Translated copies of the E&S risk management instruments summary will be also made available; (ii) publication of posters and public notification in the site accessible to local communities, relevant organizations and other stakeholders; and (iii) stakeholder workshops. Printed copies of the E&S risk management instruments will be made accessible for the general public at PMU office.

Annex 1. Environment & Social Screening for Jazeera Fish Market construction.
 Environmental and Social Screening for the Somali Sustainable Fisheries Development Project

Environmental and Social Screening for the Somali Sustainable Fisheries Development Project	
SECTION A: General Sub-Project Information	
Date of screening	15 th January 2025
Activity/Sub-project title	Construction of Fish Market in Jazeera
Activity/Sub-project component	Component 1: Increasing the Capacity of Dependent Communities to Benefit from Sustainable Marine Fisheries
Proposed activity duration	6 months
ES Screening Team Leader and Contact Details	Marian Abdulle- Social Development Specialist- marian.ssfdp@gmail.com
ES Screening Team Member	
Name of Executing Agent	N/A
Site/Activity location (include GPS coordinates)	Jazeera
New/Rehabilitation project	Jazeera (Jaziira) is a coastal town in the Lower Shabelle region of Somalia, located approximately 20 km southwest of Mogadishu
Objective of the screening process	<ul style="list-style-type: none"> i. To assess the suitability of the proposed site for Construction of Modern Fish market at Jazeera ii. To determine the potential E&S risks and impacts and proposed mitigation measures for the proposed sub-project. iii. To determine the risk classification and E&S instrument to be prepared and implemented. iv. Ensure the mitigation measures identified in the matrix are translated to detailed mitigation measures in the environmental and social management plans for the sub-project. v. Ensure the completed E&S screening outcome is integrated
E&S Framework and Overall Project Risk Classification	Moderate Risk
Project Description.	This sub project is for the construction of the proposed Modern Fish market at Jazeera.

Briefly describe the project activities	
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Potential Environmental/Social Risks Impacts of Activities					
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Risk Category	Yes	No	UNK	If these risks ('yes') are present, refer to:	Remarks
<i>(Please check each line appropriately. At this stage, questions are answered without considering the magnitude of impact – only yes, no or I don't know are applicable answers)</i>					

ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
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Is an Environmental and/or Social Assessment required where the project is undertaken?		✓		World Bank Environment and Social Standards	
Is there a risk of a lack of monitoring of project activities?		✓		ESMP and C-ESMP	
Are there existing land uses on or around the location e.g. industry, commerce, recreation, which could be affected by the proposed project activities?		✓		ESMP	
Are there any plans for future land uses on or around the location which could be affected by the proposed project activities during the operational phase		✓		ESMP	
Is there a risk that the activity will cause population influx from neighboring areas?		✓		LMP	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?		✓		Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM) for the project	

ESS 2: Labor and Working Conditions					
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Is the project likely to provide local employment opportunities, including employment opportunities for women?	✓			Labor Management Procedures	
Does the activity has the potential to cause labor risks / ESS2 non-compliance risks (child and forced labor)?	✓			Labor Management Procedures (LMP); GRM	

Does the activity include a construction component?	✓			LMP, C-ESMP Occupational Health and Safety Management Plan (OHSMP)	
Will the project potentially involve an influx of workers to the project location?		✓		Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for project Workers?		✓		LMP	
Will there be any potential risk of OHS accidents during the construction, and operation phase of the project which could affect human health and the environment?	✓			OHSMP: risks of OHS accidents including but not limited slip and falls, confined spaces and struck by objects.	
Is there a risk of delayed payment of workers?	✓			LMP, GRM implementation	
Is there a risk that workers are underpaid?		✓		LMP implementation	
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the construction or operation of the project use natural resources such as land, water, sand, materials or energy, especially any resources which are non-renewable or in short supply?		✓		C-ESMP; ESMP	
Will the project involve use, storage, transport, handling or production of substances or materials that could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?		✓		ESMF, GRM, OHSMP, SEP	
Will the activity result in the production of solid waste (directly by the project or by the workforce) during construction, operation, or decommissioning?	✓			ESMP to address its management	
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceuticals, industrial chemicals, ozone depleting substances)		✓			
Will the activity result in generation of dust and noise?	✓			C-ESMP	

Will the activity result in soil erosion?		✓		C-ESMP	
Will the activity produce effluents (waste water)?	✓			C-ESMP	
Are there nearby portable water sources that need to be protected?		✓		ESMP	
Will the activity result in siltation and/or contamination of the water body?		✓		C-ESMP	
Will the activity result in increased levels of vibration from construction machinery?		✓		C-ESMP	
Will the project release pollutants or any other hazardous, toxic, or noxious substance to the air? (e.g. significant greenhouse gas emissions, dust emissions)		✓		C-ESMP OHSMP	
Will the activity disturb any fauna and flora?		✓		C-ESMP	
Will the activity result in irrigation water with high Total Dissolved Solids (TDS) with more than 1,500 ppm?		✓		C-ESMP Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g., discharges, leaking, leaching, boreholes, etc.)		✓		C-ESMP;	
Will the project require use of chemicals? (e.g., fertilizers, pesticides, paints, etc.)	✓			Operational ESMP, Emergency Response Plans	Paints
				ESMP	
Is there any risk of accidental spill or leakage of material?		✓		ESMP	
ESS 4: Community Health and Safety					
Will the project interfere with the normal health and safety of the public?		✓		ESMP, C-ESMP	
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?		✓		GRM	
Is there a risk of communal drinking water pollution through hazardous waste?		✓		ESMP, (OHSMP and WMP)	
Is there a risk of increased GBV cases due to labor influx?		✓		GRM, LMP	

			SEAH PRP	
Is there a risk of spread of communal diseases due to labor influx?		✓	LMP, GRM, C-ESMP	
Is there a security risk to the community triggered by project activities?		✓	LMP	
Will the project interfere with the normal health and safety of the worker, employee or public?		✓	ESMP, OHSP	
Does the activity have the potential to upset community dynamics during the construction and operation phase?		✓	SEP; GRM	
Will the activity expose community members to physical hazards on the project site?		✓	C-ESMP; OHSMP	
Will the activity pose traffic and road safety concerns?		✓	C-ESMP	
Is there a possibility that the activity contaminates open wells?		✓	ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants		✓	Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement				
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)		✓	ESMP, GRM, RPF	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?		✓	ESMP, GRM, RPF	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?		✓	SEP, LMP, RPF	
Will the activity lead to disputes over land ownership?		✓	ESMP, GRM, RPF	
Will the activity lead to blocked access to the site by people in the area?		✓	ESMP, GRM and RPF	
Will the activity require acquisition of land or physical buildings or infrastructure?		✓	RPF	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				

Will the project be located within, or near environmentally sensitive areas or areas of high ecological value?	✓		ESMF	
Will the project require the conversion of land use of significant areas of land?	✓		ESMF	
Can the project cause disruption of wildlife migratory routes	✓		ESMP	
Will the project affect fragile, protected, or endangered ecosystems or species? (e.g., natural forests, wetlands, estuarine, coral reefs, mangroves, endemic species, endangered species etc.).	✓		ESMP	
Can the project impact ecosystems upon which communities rely for food, water, fibers, or other basic needs, including cultural and spiritual needs?	✓		ESMP	
Are the needs of the project likely to exceed the capacity of existing water supply, sanitation systems, transport, or other infrastructure	✓		ESMMP	
Will the project involve extraction, diversion or containment of surface or groundwater?	✓		ESMP	
Will the activity impact sensitive areas?	✓		ESMP	
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?	✓		ESMP	
Is there a risk that the activity causes loss of precious ecological assets?	✓		ESMP	
ESS 8: Cultural Heritage				
Will the project be located in or close to a site of natural or cultural value?	✓		ESMF and ESMP	
Is the project site known to have the potential for the presence of cultural and natural heritage remains?	✓			
ESS 10: Stakeholder Engagement and Information Disclosure				
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?	✓		Stakeholder Engagement Plan (SEP)	

Is there a historical exclusion of disabled persons in the area?	✓		Stakeholder Engagement Plan (SEP)	
Is there a lack of community consultations by the government generally?	✓		Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regards to the activity?	✓		Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?	✓		SEP; GRM	

SUMMARY OF THE E&S SCREENING PROCESS

E&S Screening	Results and Recommendation		
<p>Screening Results:</p> <p>Summary of Critical Risks and Impacts Identified</p>	<p>Risk/Impact</p> <p>Environment Risks</p> <ul style="list-style-type: none"> the activity result in generation of dust and noise during construction there is activity that result in the production of solid waste <p>Social Risks</p> <ul style="list-style-type: none"> there is a risk that exclusion of beneficiaries leads to grievances 	<p>Individual Risk/ Impact Rating</p>	<p>Mitigation</p> <ul style="list-style-type: none"> use dust suppression techniques such as water spraying and dust control products during construction activities. <p>Social Risk mitigation:</p> <ul style="list-style-type: none"> engage in participatory planning processes that include stakeholders from all affected groups, ensuring their voices are heard.
<p>Is Additional Environmental and social Assessment Necessary?</p>	<p>E&S Screening Result/Out come</p> <p>Moderate Risk/Minor Impact: Some potential negative impacts identified, requiring an Environmental and Social Management Plan (ESMP)</p> <p>Monitoring Recommendations: Suggestions for ongoing monitoring and</p>		<p>Summary of Screening Result Justification</p> <p>The screening process identified some potential negative impacts of moderate risk with minor overall effects, necessitating the development of an Environmental and Social</p>

	reporting to ensure effective mitigation during project implementation.	Management Plan (ESMP) to manage these risks effectively. The ESMP will outline and oversee the implementation of necessary mitigation measures. To ensure these measures are working as intended and to address any emerging issues, ongoing monitoring and reporting are recommended. Establishing a robust monitoring framework will enable the project team to track progress, evaluate the effectiveness of mitigation strategies, and make any needed adjustments to the ESMP, thereby promoting both environmental and social sustainability throughout the project lifecycle.
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Annex 2: Code of Conduct for Workers:

The following Code of Conduct (COC) must be read and understood by all workers engaged

I acknowledge that adhering to the provisions as detailed in this Code of Conduct (CoC) and following any of the Project's Environmental, Social or Health (ESH) or Occupation Health and Safety (OHS) provisions is mandatory.

The Client considers that failure to follow the CoC, EHS or OHS standards - constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment.

I agree that while working on the Project I will:

Attend and actively participate in any induction or training required for OHS or sexual exploitation and abuse (SEA) or sexual harassment (SH), as requested by my employer.

Not drink alcohol or use narcotics or other substances which can impair faculties and potentially cause incidents, before or during work activities.

Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behaviour (e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.).

Not engage in sexual favours—for instance, making promises or favourable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.

Not participate in sexual contact or activity with children—including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.

Unless there is the full consent by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this CoC.

Report to my manager any suspected or actual GBV or VAC (Violence against Children) by a fellow worker, whether employed by my company or not, or any breaches of this CoC.

With regard to children under the age of 18:

Wherever possible, ensure that another adult is present when working in the proximity of children.

Not invite unaccompanied children unrelated to my family into my home, or the works site unless they are at immediate risk of injury or in physical danger.

Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.

Refrain from physical punishment or discipline of children.

Refrain from hiring children for domestic or other labour below the minimum age of 18, Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank's Environmental and Social Framework on child labour and minimum age.

Sanctions

I understand that if I breach this CoC, my employer will take disciplinary action which could include:

Informal warning.

Formal warning.

Additional Training.

Loss of up to one week's salary.

Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.

Termination of employment.

Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental and social, provisions within the CoC are met; that I will adhere to any additional OHS and EHS management detailed by the Project or the World Bank. I do hereby acknowledge that I have read the aforementioned CoC, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to COC and OHS issues. I understand that any action inconsistent with this COC or failure to act mandated by this COC may result in disciplinary action and may affect my ongoing employment.

Signature:

Date:

Location:

Annex 3: Chance Find Procedures

This procedure was developed in accordance with the World Bank's ESS8 (to protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage. To promote the equitable sharing of benefits from the cultural heritage).

This procedure is included as a standard provision in the implementation of Public Works contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). All implementers / contractors will be required to observe this procedure as documented hereafter.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the PIU and the World Bank in order to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

Stop construction activities;

Delineate the discovered site area;

Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the responsible authority takes over;

Notify the responsible foreman/archaeologist, who in turn should notify the PIU and the World Bank and local authorities (within less than 24 hours);

The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values;

Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;

Implementation of the decision concerning the management of the finding;

Construction work can resume only when permission is given from the respective authorities, PIU and World Bank after the decision concerning the safeguard of the heritage is fully executed;

In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings works and protections

Annex 4 -Sample Photos: Stakeholders consultation meeting



Annex 5: Document - ownership of Land

DOWLADDA KOONFUR GALBEED EE
SOOMAALIYA
MAAMULKA DEEGAANKA JAZIIRA EE
GOBOLKA SHABEELAHA HOOSE
XAFIISKA GUDOOMIYAHA



ولاية جنوب غرب الصومال
إدارة المحلية جزيرة في اقليم
شبيلي السفلي
مكتب الوالي

SOUTHWEST STATE OF SOMALIA
JAZIIRA LOCAL AUTHORITY ADMINISTRATION OF LOWER
SHABELE REGION
OFFICE OF THE COMMISSIONER

REF: XG/MDJ/GSHH/010/G3/23

Date: 04/12/2023

Ku: Wasaaradda Kalluumeysiga iyo Kheyraadka Badda- Koonfur Galbeed
OG: Gudoomiye kuxigeenada Deegaanka Jaziira
OG: Waaxda Dhulka Degmada Afoooye
OG: Gudoomiyaha Degmada Afoooye
OG: Gudoomiyaha Gobolka Shabeelaha Hoose
OG: Wasaaradda Howlaha Guud iyo Guryeynta - Koonfur Galbeed
OG: Wasaaradda Arrimaha Gudaha iyo Dowladaha Hoose - Koonfur Galbeed

UJEEDDO: CADDAYN BIXIN DHUL DANGUUD

Kadib Codsii ka yimid Wasaaradda Kalluumeysiga iyo Kheyraadka Badda ee Dowlad goboleedka Koonfur Galbeed wuxuu Maamulka Deegaanka Jaziira halkaan ku caddaynayaa in uu bixiyay dhul danguud ah oo cabirkiiisu yahay **20x60M² (N 1°57'0.10170 E 45°10'45.70340 | N 1°56'59.41110 E 45°10'45.54120 | N 1°57'0.17280 E 45°10'44.22580 | N 1°57'59.60860 E 45°10'44.41380)** kuna yaala xeebta Deegaanka Jaziira, Dhulkan oo laga dhisi doono **Suuq Kalluumeysi (Fish Market) Kayd Qaboojiye (Cold Storage)** iyo Goob doomaha lagu dayactiro (**Boat repairing workshop**) oo loogu talagalay horumarinta Kalluumeysiga iyo Kalluumeysatada deegaanka Jaziira isla markaana uu taageeraayo **Mashruuca Badmaal – SSFDP**.

Haddaba, waxaa halkaan ku caddaynaynaa in maamulka uu bixiyay dhulkaas danta guud ah maadaama ay jirto baahi weyn oo loo qabo in la hirgeliyo Suuq Kalluumeysi, Kayd Qaboojiye iyo goob doomaha lagu dayactiro si loo hormariyo Kalluumeysiga Deegaanka iyo shaqo abuurka dhallinyarada iyo dumarka Deegaanka Jaziira ee Gobolka Shabeelaha Hoose.

Sidoo kale dhulka waxaa lagu bixiyey si waafaqsan nidaamka iyo xeerarka u yaala Dowlad Goboleedka Koonfur Galbeed gaar ahaan Gobolka Sheebeellada Hoose – Deegaanka Jaziira.

ALLAA – MAHADLEH

Mudane: Cabdullaahi Maxamuud Nuur (Assad)
Gudoomiyaha Deegaanka Jaziira ee
Gobolka Shabeelaha Hoose



COMMISSIONER OFFICE : Contact : +252-615586290 / +252-613994408

E-mail: mdjaziira@gmail.com