



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 10/31/2023 | Report No: ESRSA03103



I. BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P181341	Investment Project Financing (IPF)	ASCENT - SOMALIA	2024
Operation Name	Accelerating Sustainable and Clean Energy Access Transformation in SOMALIA		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Somalia	Somalia	EASTERN AND SOUTHERN AFRICA	Energy & Extractives
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Federal Ministry of Finance Somalia	Ministry of Energy and Water Resources	23-Oct-2023	04-Dec-2023
Estimated Decision Review Date	Total Project Cost		
	100,000,000.00		

Proposed Development Objective

The PDO is to increase access to sustainable and clean energy through private sector participation in Somalia

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

No

C. Summary Description of Proposed Project Activities

[Description imported from the PAD Data Sheet in the Portal providing information about the key aspects and components/sub-components of the project]

The proposed project Accelerating Sustainable and Clean Energy Access Transformation (ASCENT) seeks to increase access to sustainable and clean energy through private sector participation in Somalia, which aligns with the ASCENT Multi-Programmatic Approach (MPA) Program Development Objective (PrDO) of accelerating access to sustainable, reliable, and clean energy in Eastern and Southern Africa. The Project components will support (i) Distributed solar generation and expansion of electricity connections on larger mini grids serving the capital area; (ii) Hybridization and expansion of mini grids outside of the capital area; and (iii) Sector capacity and institution building. The Project will rely



on the existing institutional and implementation arrangements established under the ongoing Somali Electricity Sector Recovery Project (SESRP). These arrangements include the Project Implementation Unit (PIU) established at the Ministry of Energy and Water Resources (MoEWR), in close coordination with the Private Energy Service Providers (ESPs).

D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

[Description of key features relevant to the operation’s environmental and social risks and opportunities (e.g., whether the project is nationwide or regional in scope, urban/rural, in an FCV context, presence of Indigenous Peoples or other minorities, involves associated facilities, high-biodiversity settings, etc.) – Max. character limit 10,000]

Pre-conflict, the Somalia National Electric Corporation (ENEE) was the only public utility, supplying Mogadishu and the main regional centers of Hargeisa, Berbera, Burao, Baidoa, and Kismayo through diesel generators and localized distribution grids with a combined total installed capacity of about 70 MW and annual energy production of about 250 GWh (1987). However, years of conflict has resulted in destruction of the country’s energy infrastructure, rendering utility services defunct. In response, private energy service providers (ESPs) emerged, often with investments in low-capacity medium voltage (MV) and low voltage (LV) networks with embedded small-scale high-speed diesel generators (HSDGs). This has led to a highly fragmented electricity sector in the country.

The project activities will be implemented in urban and populated areas (including the broader Mogadishu area) and big urban centres outside Mogadishu where ESPs operate with sizeable load requirements. Specific sites for the project interventions have not been identified at this stage. Yet, experience from similar undertakings under SESRP suggest that that EHS concerns including emission from diesel generators, wastewater treatment, disposal of used oil, and emergency response measures and worker safety are apparent. The location of the target cities along the coast of the Indian Ocean also present risks to project infrastructure, and include sea level risks coastal erosion and sea-level rise that exposes infrastructure and vulnerable communities to cyclical floods and droughts. Short- and long-term climate change and disaster risks. The climate is generally arid climate with irregular rainfall, leading to water scarcity and reliance on wells and boreholes for water supply.

Given the rapid urbanization, most of the key cities in Somalia face challenges related to urban sprawl, uncontrolled construction, and pressure on natural habitats and agricultural land. Cities and major urban centers grapple with waste management issues, including inadequate collection and disposal systems, leading to pollution and health hazards. In addition, due to years of conflict, the infrastructure in major towns including Mogadishu is in disrepair, requiring significant efforts for reconstruction and rehabilitation.

Clan-based politics and influence in Somalia underpin is governance, conflict resolution, and social relationships; and sometimes induce spontaneous localized confrontations and armed clashes. These elements of governance need to be considered during design, site selection and land acquisition for specific project activities. Regardless, land acquisition is expected to remain challenging through out the project implementation as Somalia has no land acquisition law or streamlined practice for project-induced land access. Population influx to Mogadishu due to internal displacement and rural-to-urban migration is overwhelming city’s resources and services; suggesting the need for contractors to use resources efficiently. Significant youth population in the city may readily service the project’s labor requirements; but could also strain contractor-community relations as the project’s demand for workers is less than labor supply. Booming micro and medium size enterprises, mostly informal, in Mogadishu will benefit from increased power supply from the project, and create further opportunities for expanding local economic activities and enhancing social development.



Consultation with business owners, including vulnerable and marginalized groups, is critical to address the risks of exclusion from enhanced power access from the project.

Security remains a paramount concern in urban centers due to the ongoing insurgency by Al-Shabaab and other armed groups. This poses a threat to the security of workers and property throughout the project life cycle.

D.2 Overview of Borrower’s Institutional Capacity for Managing Environmental and Social Risks and Impacts

[Description of Borrower’s capacity (i.e., prior performance under the Safeguard Policies or ESF, experience applying E&S policies of IFIs, Environmental and social unit/staff already in place) and willingness to manage risks and impacts and of provisions planned or required to have capabilities in place, along with the needs for enhanced support to the Borrower – Max. character limit 10,000]

The institutional capacity for managing environmental and social risks of projects in Somalia is weak but evolving. The regulatory landscape and institutional mandates for oversight on key social (e.g., land issues and OHS) are undeveloped. Specific to this project, the Ministry of Energy and Water resources will rely on the existing institutional and implementation arrangements established under the ongoing Somali electricity Sector Recovery Project (P173088) implemented under ESF. Overtime, the capacity of SESRP to manage risks related to the project has improved, and is characterized by dedicated E&S staff with good understanding and experience in implementing environmental and social mitigation plans. At the last ISR in MM/YR, the environmental and social performance on of the project relative to the ESCP was rated moderately satisfactory. SESRP has one environmental specialist, one security specialist, one gender/GBV specialist a communication specialist and one social expert with acceptable level of expertise on ESF. The specialist have been engaged in preparation of the new project ASCENT. Given the activities under ASCENT is a scale up of SESRP, the E&S unit within PIU will continue to support the project during preparation and implementation of the new project. In addition, PIU will hire a gender/GBV specialist a communication. The E&S team within the PIU will be responsible for the entire scope of the project to coordinate and supervise the E&S compliance across all components and provide regular reports.

The general orientation of ESPs in managing E&S impacts of their operations is also weak in areas of worker safety, waste management including of hazardous material, community health concerns around the power plants/ ESP generally lack the relevant policies, systems, capacity and procedures to effectively manage E&S aspects. The E&S capacity of all ESP need to be strengthened. ESPs will undergo a comprehensive assessment of E&S capacity before any transfer of responsibility can take place, ESPs will also be required to have satisfactory environmental and social risk management capacity. A Memorandum of understanding (MoUs) between the project and ESPs with specific EHS requirements including ESP staffing, EHS management, training, reporting will be prepared and signed prior to ESP joining the program.

The PIU staff shall have the responsibility to oversee the project implementation, perform the required technical functions, and serve as the focal points for communication with the World Bank, contractors, and consultants. An Owner’s Engineer (OE) firm with EHS related responsibilities will be recruited to support the PIUs in the detailed designs, procurement, and contract management, including fiduciary, environment, and social risk management aspects, and project monitoring and evaluation. In addition to ensuring that procurement of project-related goods, works, and services are undertaken in accordance with the agreed Procurement Regulations, the OE shall support the PIU in inspection and supervision of the construction works, site supervision during the installation of equipment, and



testing, in order to ensure that the goods, the works and services are implemented in accordance with the designs, specifications and terms and conditions of the relevant contracts. A Project Implementation Manual that has been prepared for the ongoing SESRP will also be used for the proposed project. An independent monitoring and verification firm will be hired to provide independent audits (covering technical, fiduciary and safeguards among others) including assessment of E&S performance of contractors and ESPs against the subproject specific mitigation plans.

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

A.1 Environmental Risk Rating

Substantial

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 4,000]

The project has a significant environmental risk and is rated substantial; There will be environmental co-benefits through installation of BESS and solar PV systems, optimizing renewable energy generation, reducing GHG emissions, and diversifying energy supply to adapt to climate change. Component 3 will help the government and ESPs access additional funding sources, including carbon revenue and other climate/sustainability financing sources. Despite the benefits, there are various EHS risks. Construction phase EHS impacts and risks related to Component 1 (Solar PV and Battery Energy Storage Systems in the capital city of Mogadishu and other major load centers in FMS) in Mogadishu may pose EHS impacts and risks. Key concerns include the management of environmental and social risks associated with facilities such as operation centers, warehouses, storage facilities, and waste treatment facilities. Other risks involve the disposal and management of liquid and solid waste, especially hazardous wastes like battery systems. Additional concerns encompass soil erosion and degradation, disturbance to fauna and flora, dust and noise pollution, as well as soil and water contamination and managing potential existing EHS liabilities and ensuring health and safety for employees and nearby communities. Cumulative impacts from ESP diesel generators also need consideration. In the operation and maintenance phase component 1 activities risks involve ongoing management of environmental and social risks associated with facilities. Proper disposal and management of hazardous wastes, especially battery systems, remains crucial, with a potentially higher level of complexity due to the involvement of private sector operators. Additionally, there may be limitations in the borrower's capacity to handle non-biodegradable hazardous waste from electrical equipment, further elevating these risks. Construction phase EHS impacts and risks related to Component 2 (Electricity Distribution Network Rehabilitation and Reinforcement of the mini grids serving the Mogadishu capital city area and other FMS major load centers) also present significant EHS impacts and risks including managing environmental and social concerns related to associated facilities as well as associated facilities cumulative impacts from ESP diesel generators, disposal and management of hazardous wastes especially for electrical equipment. Soil erosion and degradation, disturbance to fauna and flora, dust and noise pollution, and soil and water contamination and potential existing EHS liabilities and ensuring health and safety for employees and communities. These liabilities could involve existing EPSs, sites, lines, or other infrastructure. The potential project risks associated with the disposal and management of hazardous wastes will be more aggravated due to private sector operators and borrower’s limited capacity on disposal, recycling, and management of nonbiodegradable hazardous wastes from electrical equipment. This risk is further compounded by limited capacity of PIU and poor environmental performance, compliance, and safety records of ESPs, in addition to the government's low capacity to oversee the environmental risks of the project. There is also little enactment country regulations or codes of standards

For Official Use Only



of practice and mechanisms to vet and enforce electricity services quality, health and safety standards, and concerns about the willingness and capacity of participating ESPs on EHS commitment. Under component 3 the project will provide ESP with assistance to help them adopt or mainstream WBG ESF requirements in their operations and the management of E&S aspects for the mini grid grant to private sector will be done according to the World Bank ESF requirement. PIU will be responsible to check on the ESPs to ensure compliance. Activities to be financed under GCF funding focus on TA, capacity building, and project management, which are not expected to have environmental footprints.

A.2 Social Risk Rating

Substantial

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 4,000]

The Social Risk is Substantial, based on the probability of the following risks to materialize and considering the capacity of the PIU and ESPs to manage them; (i) land acquisition and involuntary resettlement with extended impacts on livelihoods; (ii) the potential for labor influx with associated risks for increased SEA/SH cases and the transmission of diseases, including sexually transmitted diseases; (iii) potential intensification of tensions and conflict between communities and workers; and (iv) risks associated with labor and working conditions, including child labor and forced labor, particularly among the primary suppliers of the components and materials for solar panels . The latter will be addressed in line with similar interventions globally and within the power of the project. Security might be also an issue, particularly in the cities, where the presence of armed groups, or internal communities’ conflicts, might impact the implementation and supervision of activities. The security risk assessment and managed plan developed including the system and the resources in place (security specialist and security risk management company) under the Electricity Sector Recovery Project (SESRP) P173088 will be adapted to accommodate new activities under this project. The nature and extent of these risks will vary depending on the location of the investment, since the urban centres are known to have higher risks of tension and social conflict for a range of reasons, including access to natural resources, historical tensions/conflict between different groups, and migration (including displaced persons).

[Summary of key factors contributing to risk rating. This attribute is only for the internal version of the download document and not a part of the disclosable version – Max. character limit 8,000]

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

B.1 Relevance of Environmental and Social Standards

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

Relevant

[Explanation - Max. character limit 10,000]

Activities planned under components 1 and 2 will involve civil works that will entail risks related to disposal and management of liquid and solid waste, such as spoils metals, cables, capacitor, wood, glass, and packaging materials; disposal and management of hazardous wastes such as polychlorinated biphenyls (PCBs) from older imported transformers and capacitors in use by ESPs, transformer parts and oils, certain amount of heavy metals, used and damaged solar panels, and batteries; soil erosion and degradation; fauna and flora disturbance leading to loss of habitats due to land clearance; dust and noise; contamination and degradation of soil and water; and health and safety of employees and communities including those associated with operation of vehicles, plant and equipment,

For Official Use Only



working at height, contaminations associated with improper handling of e-wastes including faculty meters, electrocution and aesthetic and light reflection, and resource use, mainly in areas of less availability. Disposal and management of hazardous wastes will be more aggravated due to limited capacity on disposal, recycling, and management of nonbiodegradable hazardous wastes from electrical equipment; damaged or leftover solar panels and used or damaged batteries. Other risks include management of environmental and social risks and impacts of the associated facilities such as operation centers, warehouses, storage facilities, waste treatment facilities, dealing with potential existing EHS liabilities and health and safety risks for employees and communities. These risks and impacts are expected to be managed in accordance with the World Bank Group General Environment, Health, and Safety (EHS) Guidelines as well as the EHS Guidelines for Electric Power Transmission and Distribution, and the relevant requirements of Environmental and Social Standards ESS1, ESS2, ESS3, ESS4, ESS6, ESS8 and ESS9. A range of social risks may occur including i) physical and/ or economic displacement as a result of land take; (ii) interaction between project workers and local communities can create conditions for disease transmission and social conflict etc; (iii) presence of security personnel (if required) notably during construction of infrastructure but also to protect assets during operation; and (iv) adverse impacts to land used by vulnerable groups depending on siting of infrastructure. Differential impacts may be experienced by vulnerable groups. Potential environmental and social (E&S) risks and impacts, including cumulative impacts will need to be considered as part of the decision-making process through due diligence and E&S screening to determine sub-projects to be invested in. Screening of the sub-projects should be undertaken as early as possible (and as part of their preparation process) to determine if proposed activities are likely to be environmentally and socially sound and sustainable against pre-defined criteria which will include but not be limited to consideration of access to land, livelihoods, presence of ESS7 communities, existing land uses etc. The World Bank's E&S due diligence of the project included review of the environmental and social instruments. The client has developed the Environmental and Social Management Framework (ESMF) for Somalia ASCENT, leveraging the existing ESMF and RPF for the Electricity Sector Recovery Project (SESRP) P173088. The ESMF includes E&S risk and impact screening criteria, and a template for preparing Environmental and Social Impact Assessments (ESIA), and Environmental and Social Management Plans (ESMPs), as necessary for managing risks and impacts related site-specific sub-projects. The ESMF also outlines implementation arrangements to be put in place for E&S management, including mitigation of associated Facilities risks, SEA/SH risks via an action plan, training programs, and compliance monitoring and reporting requirements. Security Risk Management Plan prepared for SESRP will be updated to cover activities under the project before the commencement of sub project activities. E&S risk assessment will include analysis of alternative with the aim to minimize impacts on sensitive environmental, social and cultural receptors, potential land acquisition as set out in relevant ESSs. ESIA or other site specific instruments for civil works, if any, will be prepared during implementation stage, when specific sub-projects have been defined, following the requirements of the ESMF and other frameworks (eg site-specific RAPs based on the Project's Resettlement Policy Framework) prior to commencement of construction activities. Associated facilities types will be scoped and assessed further as part of the ESIA and the ESPs will undergo a comprehensive assessment of E&S capacity before any transfer of responsibility can take place. TA activities will be implemented in compliance with the Bank's Advisory Note on TA. Relevant capacity building measures will be included in the ESMF and ESCP The project Environmental and social Commitment Plan (ESCP) will include commitments to undertake the required subproject ES assessments, and evaluation of TA EHS risk and production of necessary project instruments . Mitigation measures for site-specific impacts will be managed through implementation of required safeguards instruments to be prepared as per the ESMF and other frameworks. Relevant capacity building measures have been included in the ESMF and ESCP. During implementation, the project will ensure application of stringent measures appropriate to the nature and scale of the risk and impact, including: - Avoiding involuntary resettlement or if unavoidable, minimizing it by considering alternatives when designing the

For Official Use Only



project and avoiding forced eviction. Electrical substations for low power transformers will need to acquire private land, while electricity infrastructure being installed in densely populated urban areas may lead to displacement even along existing rights of way if encroachment has occurred. - Mitigating the adverse social and economic effects of land acquisition or land use restrictions. The project will prepare, consult, obtain approval, and disclose the RAPs and implement them before the start of civil works. - to prevent, mitigate and adequately respond to the SEA/SH risks, Conduct an SEA/SH risk assessment and develop an SEA/SH action plan has been developed containing certain measures, including the introduction of women's empowerment actions that will be integrated into other relevant activities and programmed for both women and men. The project will- Prepare, have approved, disclose, and implement the GRM in the project area, to allow anyone who alleges an abuse or harm due to project activities to file verbal or written complaints to seek redress. Construction Contractors will be required, as a condition of their contracts, to implement and comply with the ESMP, including preparing construction management plans consistent with the specific management plans provided in the ESMP.

ESS10 - Stakeholder Engagement and Information Disclosure

Relevant

[Explanation - Max. character limit 10,000]

The client has prepared a Stakeholder Engagement Plans (SEP), taking into consideration the nature and scale of the project, its associated risks and impacts, and reflecting experiences drawn from the consultation activities implemented under the SESRP. Considering that information about project locations will be only known during the project’s implementation stage, part of the SEP take the form of a framework, in accordance with paragraph 18 of ESS10. Key stakeholders in this project include project-affected persons and households, domestic and commercial power consumers, ESPs, municipal authorities, security officials, clan heads and landowners, and civil society organizations, and business organizations and bodies such as Electricity sector working group (EWSG) As part of the project preparation, and based on the draft SEP, all drafts ESA instruments including the SEP will be disclosed prior to appraisal. Final versions and other ESA instruments will be consulted, approved/adopted prior to effectiveness. The Stakeholder engagement is expected to span over the project life, starting at the design phase all the way to project closure. The SEP will ensure engagement at the national level and outline the approach to engagement for the sub-projects to be implemented. The SEP will outline approaches to sharing information on the project activities, incorporating stakeholder feedback into the Project, and reporting and disclosure of project documents. In addition, the needs of different groups including vulnerable groups (women, PLWD etc.) will need to be considered in planning such activities. The SEP outlines the engagement during project preparation and implementation including stakeholder identification and mapping, proposed approaches to engagement for different stakeholder groups as well as timings. Several consultations have been undertaken during the project preparation with several key stakeholders, such as the FMS and the ESPs. As a result, the project activities have been prioritized based on the consultations and stakeholder buy-in especially the Federal Member States (FMS) and ESPs. This has reduced the potential risk that the FMs and other ESPPS may feel left out or higher expectations for project outcomes than can be supported. The key concerns and queries from the participants were related to project design, including its components and their interaction. The project has the PSC to provide oversight of the project as well as ensure interests of various groups are taken on board. The results of the engagement for the preparation phase is further explained as part of the SEP and includes inputs considered in project design and E&S instrument preparation. The SEP will be updated as and when necessary, throughout the project lifecycle and the Borrower will undertake meaningful engagement with stakeholders ensuring the provision of timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and

For Official Use Only



intimidation. The PIU will ensure that private electricity operators engage with stakeholders in a manner proportionate to the potential risks and impacts of the subprojects and in accordance with ESS 10. The SEP includes a description of a Project Grievance Mechanism which will include confidential mechanisms for receiving complaints of sexual exploitation and abuse and sexual harassment, and establishes a protocol to enable survivor-centered responses. The GRM will address complaints and suggestions coming from both project-beneficiaries and other interested parties. Consideration will be given to utilizing or strengthening existing grievance redress mechanisms under SESRP

ESS2 - Labor and Working Conditions

Relevant

[Explanation - Max. character limit 10,000]

The Borrower prepared a Labor Management Procedures (LMP) that set out the ways in which project workers will be managed in accordance with the requirements of national law and ESS2..The LMP includes requirements on employment terms and conditions, non-discrimination and opportunity, the project will also apply enhanced due diligence for evaluation of forced labor risks in the solar supply chain; in line with OPCS guidance. The Labor Management Procedures (LMP) identifies the main labor requirements and labor risks associated with the project based on the requirements of ESS2 and national labor laws. The LMP and subprojects ESMPs and C-ESMPs will provide procedures to address labor issues and OHS including, but not limited to: (i) the prohibition and prevention of child and forced labor; (ii) Contracts of employment and terms and conditions of employment, (iii) protection of wages including fair treatment, non-discrimination and equal opportunity of project workers, (iv) occupation, health and safety issues, (v) labor influx and associated risks (vi) SEA/SH risks and mitigation measures including codes of conduct with SEA/SH provisions; and (vii) grievance mechanism for workers with accessible means to raise workplace concerns including SEA/SH grievances in a confidential manner. The project will also apply enhanced due diligence for evaluation of forced labor risks in the solar supply chain; in line with OPCS guidance. Bidders will be required to provide a Forced Labor Performance Declaration (covering past performance), and a Forced Labor Declaration (covering future commitments to prevent, monitor and report on any forced labor). Bidding documents for the energy infrastructure shall include budgets for all OHS provisions including OHS plan/procedures and this will cover both (for EPSs) construction and operation/maintenance) as well as other costs associated with labor management e.g., the operation of a grievance redress mechanism, security of project personnel and SEA/SH prevention measures. The Project implementing entities will regularly monitor the contractor’s performance in implementing the LMP and OHS measures in site-specific ESMPs and/or OHS plans. Project workers will include (i) Direct Workers who will be directly engaged by the Borrowers to work on the project; (ii) supervisory engineering firms and other contracted workers employed by third parties to undertake activities during construction and operation/maintenance, provide technical inputs and support the TA activities; (iii) primary supply workers to provide goods or materials needed for the project and (iv) Private sector ESP will engage different categories of workers: direct workers, contracted workers, primary supply workers . At this stage, the use of community workers is not anticipated. Workers may be subject to labor risks including terms and conditions of employment which are not in line with national law and/ or ESS2 including in relation to hours of work, remuneration, living conditions etc. Risks associated with Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) may also occur especially affecting women and girls e.g., in return for or to maintain employment opportunities. OHS issues during both construction and operation/maintenance phases are one of the anticipated risks of the Occupational Health and Safety (OHS) measures will be applicable to all project workers. Attention will be given to training of workers on OHS risks and awareness to minimize the risks. The OHS measures will be designed and implemented to address: (a) identification of potential hazards to project workers; (b) provision of

For Official Use Only



preventive and protective measures, including elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements to emergency situations; and (f) remedies for adverse impacts such as occupational injuries, disability and disease. Contractors will be required to prepare and implement Occupational Health & Safety Plans (OHSP) following the World Bank Group General Environment, Health, and Safety (EHS) Guidelines as well as the EHS Guidelines for Electric Power Transmission and Distribution, adopt a code of conduct for all workers and establish GRM (accessible for direct and contracted workers) before commencement of the civil works. The project will ensure that regular trainings for workers are conducted by the contractor on labor provisions, signing of codes of conduct with clauses against SEA/SH behaviors and sanction case of non-compliance, SEA/SH mitigation measures, including SEA/SH-sensitive grievance redress mechanisms (GRM), etc. A workers' GRM will be put in place specifically to manage the various employers (contractors, national and private agencies)/workers related grievances, including but not limited to: misconduct, wages, overtime, injuries/accidents, worker relations with neighboring communities, SEA/SH incidents against or by project workers, etc. This GRM will be included in the LMP and managed by the relevant implementing agency for each component. For SEA/SH related incidents, the GRM managers will be trained on a survivor-centered approach, including non-judgmental and empathetic listening and referral pathways, and the appropriate channels for managing grievances will be set up. The project will partner with local service providers to ensure that basic services are provided to survivors (these include medical, psychosocial, livelihoods, and judicial services). Where on-site workers accommodation is confirmed, a Labor Camp Management Plan will be required as part of the C-ESMP. The PIU will cause all eligible ESPs shall to prepare and implement Labor Management Plans (LMPs) appropriate to the scale and nature of their business, for their own staff in accordance with ESS2, including occupational health and safety (OHS) measures (and measures on emergency preparedness and response) and complaint resolution mechanisms for their own staff prior to start of project activities within ESP sites. Security risks to project workers based on the contextual situation will be managed through the existing SESRP SMP, The SMP will be updated where necessary to address the risks to the extent possible

ESS3 - Resource Efficiency and Pollution Prevention and Management

Relevant

[Explanation - Max. character limit 10,000]

This project tackles climate change both from a mitigation and an adaptation perspective. By reducing technical losses, there will be energy savings annually in addition to reduced generator fuel consumption from wet stacking. Both the reduction in losses and reduced fuel consumption are estimated to lead to reduced GHG emissions. Assessment of risks and impacts and proposed mitigation measures related to relevant requirements of ESS3, including raw materials, water use, air emissions, construction and hazardous waste are included within scope of the ESMF, and will be included in site specific ESIA/ESMPs, as relevant. The required construction material will potentially include stones, sand, concrete blocks and timber. Potential issue related with project activities under component 1 and 2 activities is generation of hazardous wastes due to the generation of solid and hazardous wastes associated with Photovoltaic panels and used solar batteries. The potential for environmental contamination will be a significant if the PV panels and solar batteries are damaged or improperly disposed upon their end life and decommissioning. ESMF will include guidance for sub project ESIA/ESMP to include proper planning and good maintenance practices to minimize impacts from hazardous materials through development of a waste management plan and Hazardous waste handling, storage and disposal protocol focusing on used and damaged PV- panels and batteries as part of comprehensive ESMP. A wide range of pollution and resource efficiency issues is expected to arise in the supported projects under

For Official Use Only



component 1 and 2. The project is likely to generate waste and cause pollution. During construction and operation, mitigation measures at the construction and operation sites will include standard construction pollution prevention and control measures, such as: (i) solid and hazardous waste handling and disposal (ii) domestic/camp wastewater treatment; (iii) storage and handling of hazardous materials; (iv) control of erosion and storm water runoff; and (vi) noise, and dust abatement measures; among others. Other risks are adverse impacts around solid and liquid waste spoils metals, cables, capacitor wood, glass, packaging materials as well as hazardous wastes such as polychlorinated biphenyls (PCBs) from older imported transformers and capacitors, transformer parts & oils, fluorescent bulbs and a certain number of heavy metals (chromium, copper and arsenic). While replacing old electrical equipment (e.g. Transformers) during the rehabilitation of distribution networks and upgrades of overloaded substations, there are serious health and environmental risks related to the presence of polychlorinated biphenyls (PCBs), which are Persistent Organic Pollutants (POPs). The use of PCB in transformer oil or any other equipment is prohibited and this will be specified in the bidding documents. PCBs will be identified in decommissioned transformers; PCB transformers will be examined for leaks and disposed of properly. These control and mitigation measures will also be included and required in contractor’s ESMP (i.e., waste management plan, hazardous materials management plan). If non-compliances identified, operators will be required to implement immediate corrective actions. The use of water, energy and raw materials should be assessed considering the mitigation hierarchy and efficient use and management of all types of material, including waste. ESP and the government utilities managing the assets during operation/maintenance phase will establish an operational health and safety management system and plan to control and mitigate operational risks.

ESS4 - Community Health and Safety

Relevant

[Explanation - Max. character limit 10,000]

Given the scale of the works under component 1 and 2 some labor influx is considered to be likely but will vary depending on the nature of the civil works and geographical location and is not expected to be major. Skilled and semi-skilled workers are likely to be sourced from outside the local areas, but it is expected that unskilled workers would be sourced from the community close to the project sites. The project will need to put in place security and safety provisions to ensure the security of personnel and community members, and to conduct worker training on appropriate behavior during the implementation of the project. Labor influx can lead to an increased risk of sexual exploitation and abuse (SEA) notably of women and girls especially associated with construction activities and locations where camps are established. Sexual exploitation and abuse (SEA) especially due to poverty situation which may see even young girls engaging in survival sex; transaction sex, sexual harassment (SH) and other forms of GBV. Sexual violence and GBV are known to be prevalent with many forms of SEA including child marriage, FGM/C, rape and intimate domestic violence being normalized especially in conflict areas. To address these risks SEA/SH Action Plans have been developed and will be disclosed. As part of this plan’s Accountability and Response Framework, a GBV consultant/contractor will need to be involved to support the implementation of the SEA/SH plan. Component 1 and 2 activities may also pose marginal community health and safety risks related to infrastructure and equipment design and safety, management and safety of hazardous materials, traffic and road safety, disaster risk, emergency preparedness and response. A community and safety risk assessment and management plan will be prepared as part of sub project specific ESIA/ESMPs. In addition, transmission of communicable diseases is also a concern including Covid-19 and Sexually Transmitted Diseases notably HIV/AIDS. Workers may also increase the rates of crime, social conflict and violence especially if they are unfamiliar with cultural norms in the areas where they are working. Construction activities may pose potential health and safety concerns for the inhabitants within the vicinity of works

For Official Use Only



especially when construction is carried out near a village/community. These risks have been assessed as part of the ESMF and appropriate mitigation measures included and elaborated in subsequent ESMPs or ESIA's depending on the nature of the investment including scoping and assessment of ecosystem services risks to provisioning or regulating services to local communities. The project will look at ways to maximize use of local labor, including requirements in bidding documents that specify hiring percentages for local labor. Additionally, the project will need to ensure that a robust project-level GRM is operational to manage potential complaints, including those related to SEA/SH, that might arise from the community due to poverty, deviations from the cultural behavior of workers from elsewhere, or gender discrimination. A community awareness-raising strategy will be developed to inform the communities about identified risks and consequences, prohibited behaviors, and GRM procedures to report SEA/SH incidents safely and confidentially. The project will identify the GBV services providers in the areas of intervention. In addition, the project will elaborate a referral pathway for SEA/SH survivors which will include at least quality medical services, psychosocial assistance, and legal support. Finally, the ESIA's/ESMPs will include measures to address the risks of SEA/SH according to the Good Practice Note for Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works (GPN-SEA). Security is a key risk given Somalia's conflict context there is likely to be a need to secure project workers and assets during construction and operation including maintenance activities. Deployment of security forces may be required to prevent vandalism, theft or attacks on assets as well as protect workers during construction and operation but presents risk to the community include SEA/SH. The presence of security can result in risks to the community including undue use of force, inappropriate conduct to the community, increased risk of SEA/SH etc. The SESRP SMP to be adopted for this project have assessed the use of security personal including risks posed to communities will be following security personnel GPN and security assessments and security management plans including Codes of Conduct and other measures that will govern their interaction with the local communities will be developed The contractors will need to ensure that there be no use of force while on premises (except for defense purposes); that interactions with local community be limited to a minimum; and that the work site is off-limits to non-authorized personnel. These measures and more will be included in the ESMPs, including mitigation measures, community protection, labor influx, health (transmission of infectious diseases), OHS measures, etc. The ESMP will be integrated into the bidding documents and contracts of the Contractors, and will be monitored and reviewed by the supervising engineer as well as the project team. The PIU will need to ensure that the private electricity operators' instruments and management tools include measures and actions to assess and manage specific risks and impacts to the community arising from subproject activities, e.g. behavior of workers risks of labor influx, response to emergency situations, etc.

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

Relevant

[Explanation - Max. character limit 10,000]

ESS5 is relevant. In Somalia, formalized land titles barely exists. Lands are largely unregistered, communally-owned and customarily administered by clan heads. This patterns of land ownership and governance can complicate land acquisition activities for the project interventions which may include sites for hosting solar farms and easements for its associated infrastructure. Land related risks include (i) i) impacts associated with land acquisition and involuntary resettlement, including physical and economic displacement, and restrictions on land use (ii) conflict over rights to the land and resources; (iii) exclusion of land users (especially seasonal users) in decision making and provision of resettlement support including compensation; (iv) failure to acquire land in line with the requirements of ESS5 given the potentially limited capacity and (v) impacts to livelihoods. Key to mitigating these risks will be coordination with all stakeholders including the customary land rights authorities of the respective areas as well as members of the

For Official Use Only



communities and seasonal users to ensure that their land usage is not affected. Livelihood losses will also need to be considered and assessed including from temporary disruption due to construction activities, easements, and permanent loss of access to land. The extent of these impacts will be considered further during project preparation as the sub-project activities and locations are further defined/ prioritized and screened to determine if they are environmentally and socially sustainable. This will include assessing the nature, extent, and risks of any potential resettlement. A Resettlement Policy Framework (RPF) has been prepared will be disclosed prior to effective date, outlining the approaches to avoid and minimize physical and economic displacement where possible. The RPF identifies screening procedures to assess the risks and impacts of activities which may lead to temporary or permanent physical or economic displacement. The RPF identifies measures to be applied during project design and implementation, in particular:

- Avoiding involuntary resettlement or, where unavoidable, minimizing it by considering alternatives when designing the project.
- Avoiding forced eviction.
- Mitigating the adverse social and economic effects of land acquisition or land use restrictions, as well as temporary income losses from economic displacement (such as loss of customer access to businesses along corridors that will be affected by construction activities).

At this stage, the number of people likely to be affected by land acquisition, land use restrictions, or involuntary resettlement has not been determined. The RPF also includes the approach and guidance to prepare site-specific Resettlement Action Plans (RAPs), which will be needed to acquire land, procedures for voluntary land donation. measures to address the potential risks and impacts of land acquisition associated with the various activities and likely geographical areas, as well as assessing livelihood losses and associated restoration plans including interference with pastoral uses and other access to collective resources; identifying and avoiding flood-prone areas; business interruption or disruption even if land not directly or fully acquired and impacts of influx. This requirement is captured in the ESCP. The requirements of ESS5 will be included in all TA activities where relevant, in accordance with the Bank's Advisory Note on TA..

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Relevant

[Explanation - Max. character limit 10,000]

The project's activities are likely to be restricted to modified areas around or on the outskirts of urban areas where there are major load centers, existing road, energy corridors or Way leave/ROW and within mini grids existing footprint and therefore impacts on natural and sensitive habitats is expected to be limited. Nevertheless, as the location of actual physical infrastructure are still not identified, the potential direct, indirect and any cumulative impacts will only be identified during project design when specific routes are known and will be addressed in the in the site specific ESIA/ESMP/RAP instruments to be prepared for this project. The screening checklist developed as a part of ESMF will be used to screen out subproject sites deemed to cause risks/impacts to areas of high biodiversity values, critical or sensitive natural habitats within project areas, protected areas, and endemic flora and fauna including protected animal or plant species. The screening process to be carried out by the implementing entities shall include an identification of the types of habitats which will be affected and consider potential risks and impacts on ecological function of the habitats at which PV Solar panels will be installed on specific site within remote or rural areas. The ESMF (with embedded screening procedures) and Subproject environmental and social risk management instruments included provisions for biodiversity assessment management and conservation measures to manage risks and impacts to any natural habitats consistent with the requirements of ESS6 (including bird collision and electrocutions from the grid network rehabilitations), including fauna, flora, species of conservation concern, integrity/fragmentation of habitats. Impacts resulting from both construction activities and O&M activities and



indirect impacts such as increased access to previously inaccessible high-biodiversity areas. Cumulative impacts will also be considered if other activities or developments are identified in the vicinity of the project footprint. Where project activity is implemented in or adjacent to the protected areas the project obtain approvals from authorities. The Feasibility study/technical design will include provision to explore alternatives that would avoid sensitive / protected areas. The project design will consider use of bird-friendly types of power poles for medium voltage range (distribution lines): Suspended insulators; Insulated wires; Insulated cross-arms. To avoid raptor electrocution, the ESIA will look at mitigation around installing nest platforms on towers to reduce hazards to both birds and the electrical. To reduce collisions with existing wires, the ESIA will look at mitigation areas around installing vertical clearly visible hanging markers. to adopting a single-level arrangement of high-voltage conductor cables to avoid collision.

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

Not Currently Relevant

[Explanation - Max. character limit 10,000]

Somalia distinct (often minority) tribal or clinic groups exist who may not meet the requirements of ESS7 but may need differential measures to ensure inclusion and access to benefits are present. Respective planning and measures will be included in the project risk management instruments (E&S frameworks and plans).

ESS8 - Cultural Heritage

Relevant

[Explanation - Max. character limit 10,000]

Given the nature and scale of these activities impacts to cultural heritage are likely to be avoidable or limited. The impact on cultural heritage and relevance of this ESS8 will be further assessed during the implementation. Environmental and social screening procedures shall consider impact identification of cultural heritage and assessment of tangible and intangible heritage in consultation with affected stakeholders. A standardized chance-find procedures including screening process will be included as an Annex to the ESMF. The ESIA's and ESMPs will also include measures to meet the requirements of ESS8 including stakeholder consultation, identification of tangible and intangible cultural heritage, documentation of impact assessment and action plans and mitigation measures

ESS9 - Financial Intermediaries

Not Currently Relevant

[Explanation - Max. character limit 10,000]

This ESS9 is not relevant to the project as the project would not involve financial intermediaries.

B.2 Legal Operational Policies that Apply

OP 7.50 Operations on International Waterways

No

Not applicable

OP 7.60 Operations in Disputed Areas

No

Not applicable

For Official Use Only



B.3 Other Salient Features

Use of Borrower Framework

No

[Explanation including areas where "Use of Borrower Framework" is being considered - Max. character limit 10,000]

The use of Borrower Frameworks is not being considered

Use of Common Approach

No

[Explanation including list of possible financing partners – Max. character limit 4,000]

Component 1 and Component 2 will be supported from the Somalia portion (US\$ 18.5 million) of GCF funding under Sustainable Renewables Risk Mitigation Initiative (SRMI). All E&S standards covering the project fall within the World Bank group standards and safeguard policy requirements, including requirements for ESF. This includes any support and respective investments by the ESP

B.4 Summary of Assessment of Environmental and Social Risks and Impacts

[Description provided will not be disclosed but will flow as a one time flow to the Appraisal Stage PID and PAD – Max. character limit 10,000]

The project has a significant environmental risk and is rated substantial; There will be environmental co-benefits through installation of BESS and solar PV systems, optimizing renewable energy generation, reducing GHG emissions, and diversifying energy supply to adapt to climate change. Component 3 will help the government and ESPs access additional funding sources, including carbon revenue and other climate/sustainability financing sources. Despite the benefits, there are various EHS risks. Construction phase EHS impacts and risks related to Component 1 (Solar PV and Battery Energy Storage Systems (BESS) in the capital city of Mogadishu and other major load centers in FMS) in Mogadishu may pose EHS impacts and risks. Key concerns include the management of environmental and social risks associated with facilities such as operation centers, warehouses, storage facilities, and waste treatment facilities. Other risks involve the disposal and management of liquid and solid waste, especially hazardous wastes like battery systems. Additional concerns encompass soil erosion and degradation, disturbance to fauna and flora, dust and noise pollution, as well as soil and water contamination and managing potential existing EHS liabilities and ensuring health and safety for employees and nearby communities. Cumulative impacts from ESP diesel generators also need consideration. In the operation and maintenance phase component 1 activities risks involve ongoing management of environmental and social risks associated with facilities. Proper disposal and management of hazardous wastes, especially battery systems, remains crucial, with a potentially higher level of complexity due to the involvement of private sector operators. Additionally, there may be limitations in the borrower's capacity to handle non-biodegradable hazardous waste from electrical equipment, further elevating these risks. Construction phase EHS impacts and risks related to Component 2 (Electricity Distribution Network Rehabilitation and Reinforcement of the mini grids serving the Mogadishu capital city area and other FMS major load centers) also present significant EHS impacts and risks including managing environmental and social concerns related to associated facilities as well as associated facilities cumulative impacts from ESP diesel generators, disposal and management of hazardous wastes especially for electrical equipment. Soil erosion and degradation, disturbance to fauna and flora, dust and noise pollution, and soil and water contamination and potential existing EHS liabilities and ensuring health and safety for employees and communities. These liabilities could involve existing EPSs, sites, lines, or other infrastructure. The potential project risks associated with the disposal and management of hazardous wastes will be more aggravated due to private sector operators and borrower's limited capacity on disposal, recycling,

For Official Use Only



and management of nonbiodegradable hazardous wastes from electrical equipment. This risk is further compounded by limited capacity of PIU and poor environmental performance, compliance, and safety records of ESPs, in addition to the government's low capacity to oversee the environmental risks of the project. There is also little enactment country regulations or codes of standards of practice and mechanisms to vet and enforce electricity services quality, health and safety standards, and concerns about the willingness and capacity of participating ESPs on EHS commitment. Under component 3 the project will provide ESP with assistance to help them adopt or mainstream WBG ESF requirements in their operations and the management of E&S aspects for the mini grid grant to private sector players will be done according to the World Bank ESF requirement. PIU will be responsible to check on the ESPs to ensure compliance. Activities to be financed under GCF funding focus on TA, capacity building, and project management, which are not expected to have any environmental footprints. The project TAs will be implemented in compliance with the Bank's Advisory Note on Technical Assistance and the ESF. Social (Substantial). Key social risks include: (1) ensuring security for project operations and associated workers, (2) potential land acquisition required medium voltage lines (<33kV) corridors and possible expansion of existing and green field mini-grids and Distribution network, (3) forced displacement of IDPs is said to be rampant especially in urban centers such as Mogadishu and may be carried out in anticipation of project investment (4) Past issues around land and unsettled/multiple claims with the existing generation sites occupied by the ESPs and the distribution network (5) systemic weakness in the capacity of implementing agencies to identify, understand and prevent adverse environmental and social impacts of the project, (6) fragility, conflict, and violence; (7) vulnerability and social exclusion; (8) spatial dynamics linked to urban growth and rural poverty; (9) social impacts of climate-related risks and environmental degradation (10) Potential establishment of workers camp may exacerbate risks associated with gender-based violence (GBV) or sexual abuse and exploitation (SAE) sexual exploitation and abuse, and other forms of GBV; Labor influx and associated gender-based violence risks, given the stark poverty rates in the country. Currently GBV risk for the project has been assessed to be substantial, based on the available information and GBV risk assessment Tool results. A GBV action plan has been prepared. Social risks are also raised by the absence of a formal legal framework for the management of E&S risks, the intricate stakeholder engagement process due to clan considerations, fragility, conflict and violence, vulnerability and social exclusion and the weak institutional capacity to address related social risks — including GBV considerations— that may occur during stakeholder consultations under project activities and subprojects implementation. All E&S risk mitigation measures have been detailed ESF instruments prepared under the ongoing ESRP project line with ESS1, 2, 4, 5, 7 and 10 and the ESCP. The investments in the, distribution network reconstruction, reinforcement and operations efficiency in the major load centers is likely to involve compensation requirements for affected assets. Compounded by gaps in legal and regulatory frameworks, land appropriation and asset valuation will be challenging. Given the government's own budget situation, the project will require making an exceptional provision for payments of land compensation through World Bank funds. Several consultations have been undertaken during the project preparation with several key stakeholders, such as the FMS and the ESPs. As a result, the project activities have been prioritized based on the consultations and stakeholder buy-in especially the FMS and ESPs. This has mitigated the potential risk that the FMs and other ESPPS may feel left out or higher expectations for project outcomes than can be supported. The project has the PSC to provide oversight of the project as well as ensure interests of various groups are taken on board. With regards to security. much of Somalia remains in conflict, which affects access to the project sites and insecurity for staff, of both government agencies and contractors. In addition to flexibility with regard to the selection of the project sites subject to the security situation, the project implementation will consider contingency plans and require the contractors to put in place standard operating procedures to undertake the project activities in case of restricted sites' access. Specifically, the project component design offers flexibility to undertake the activities in areas that are of low security risk and, when required, to select new sites. Given that the SESRP will be implemented across a diverse and contested geographical space, concrete threat vectors will require in-depth security risks assessments (SRA)

For Official Use Only



to ensure the safety of Project workers, contractors and local communities. The security threat assessments and mitigation measures will vary considerably depending on the metropolitan and rural Districts under the scope of the project: urban centers and peri-urban are generally more accessible for development and humanitarian actors. To identify and manage the E&S risks and impacts of the Project, MoEWR will leverage the existing E&S instruments for the SESRP (P173088) and have developed ESMF that includes OHS Plan and SEA/SH Action. In addition, MoEWR have prepared ESCP, RPF, LMP and Stakeholder Engagement Plan (SEP) including a Grievance Redress Mechanism (GRM) per the requirements of ESS10. The Security Risk Management Plan prepared for SESRP will be updated to cover activities under the ASCENT project before the commencement of sub project activities. E&S risk assessment will include an analysis of alternative with the aim to minimize impacts on sensitive environmental, social and cultural receptors, potential land acquisition as set out in relevant ESSs. ESIA or other site-specific instruments for civil works when specific sub-projects have been defined, following the requirements of the ESMF and other frameworks (eg Resettlement Policy Framework) prior to commencement of construction activities. Associated facilities types will be scoped and assessed further as part of the ESIA. TA activities will be implemented in compliance with the Bank's Advisory Note on TA. Relevant capacity building measures will be included in the ESMF and ESCP.

C. Overview of Required Environmental and Social Risk Management Activities

C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by implementation?

[Description of expectations in terms of documents to be prepared to assess and manage the project's environmental and social risks and by when (i.e., prior to Effectiveness, or during implementation), highlighted features of ESA documents, other project documents where environmental and social measures are to be included, and the related due diligence process planned to be carried out by the World Bank, including sources of information for the due diligence - Max. character limit 10,000]

The following documents have been prepared in draft from by the client:

1. Environmental and Social Management Framework
2. Environmental and Social Commitment Plan
3. Stakeholder Engagement Plan
4. Resettlement Policy Framework
5. Labour Management Procedure

Possible issues to be addressed in the ESCPs among other may include:

1. Establishment of a functioning E&S risk management implementation arrangement including hiring of qualified staff.
2. Implementation of the Project activities in compliance with the applicable Environmental and Social Standards and Project specific ES instruments and ESCP.
3. Preparation of site specific environmental and social risk management plans (ESIAs and /or ESMPs) following the requirements of the ESMF.
4. Development of Labor Management Procedures
5. Development of SEA/SH Action Plans including prevention and response measures
6. Allocating budget for environmental and social risk management activities
7. Development of site-specific resettlement action plans including livelihood restoration measures as required in line with the national law and ESS5.
8. Security Risk Assessment and Management Plans for the proposed project sites



- 9. Establishment of functioning GRMs consistent with ESS10 provisions, and the need to carry out consultations during project implementation
- 10. EHS Capacity building for PIU, contractors, and ESPs

III. CONTACT POINT

World Bank

Task Team Leader:	Patrick Thaddayos Balla	Title:	Senior Energy Specialist
Email:	pballa@worldbank.org		
TTL Contact:	Paul Baringanire	Job Title:	Senior Power Engineer
Email:	pbaringanire@worldbank.org		

IV. FOR MORE INFORMATION CONTACT

The World Bank
 1818 H Street, NW
 Washington, D.C. 20433
 Telephone: (202) 473-1000
 Web: <http://www.worldbank.org/projects>

V. APPROVAL

Task Team Leader(s):	Patrick Thaddayos Balla, Paul Baringanire
ADM Environmental Specialist:	Haroub Ahmed Haroub
ADM Social Specialist:	Alidu Babatu Adam

For Official Use Only