



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 12/20/2021 | Report No: ESRSC02328



**BASIC INFORMATION**

**A. Basic Project Data**

|  |  |                          |                            |
|--|--|--------------------------|----------------------------|
| Country  | Region   | Project ID               | Parent Project ID (if any) |
| Somalia  | AFRICA EAST  | P176898                  |                            |
| Project Name                                     | Somalia Empowering Women through Education and Skills Project - "Rajo Kaaba"     |                          |                            |
| Practice Area (Lead)                             | Financing Instrument   | Estimated Appraisal Date | Estimated Board Date       |
| Education  | Investment Project Financing   | 3/16/2022                | 5/26/2022                  |
| Borrower(s)                                      | Implementing Agency(ies)   |                          |                            |
| Ministry of Finance, Federal Republic of Somalia | Ministry of Education, Culture and Higher Education, Federal Republic of Somalia |                          |                            |

Proposed Development Objective

To improve literacy and numeracy skills, skills for income generation, and skills for leadership in targeted populations.

| Financing (in USD Million) | Amount       |
|----------------------------|--------------|
| <b>Total Project Cost</b>  | <b>50.00</b> |

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

No

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

The project aims to enhance the conditions for women's empowerment through improved literacy and numeracy skills, skills for income generation, and skills for leadership. Key project intervention areas include: (1) second-chance education, (2) technical and vocational education and training (TVET), and (3) a Women's College of Leadership. In addition to direct provision of education opportunities the the project will, as appropriate to different levels of education, address economic constraints (e.g. through scholarships), cultural constraints (e.g. through provision of information and awareness campaigns), and childcare constraints (e.g. by providing an on-site childcare option for beneficiaries). At each level the project will also incorporate transferrable skills such as self-efficacy, communications,



and negotiation skills, which have been shown to increase educational attainment by helping girls and women advocate for their own needs and goals.

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

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

Twenty years of conflict have led to conditions of abject poverty in Somalia, with the destruction of infrastructure, economy and institutions. In 1991, the government collapsed, leaving the country fragmented. Even with the establishment of a new government, conflict continues in Southern Somalia, leaving the country in the midst of poverty, famine and recurring violence. Due to independent governing bodies, two areas, Somaliland and Puntland, experience more stability with regard to socioeconomic conditions. A sustained period of political and institutional progress reflects a country transitioning out of fragility and protracted crisis. The 2011 Provisional Constitution, the 2012 establishment of the federal government, and the subsequent formation of four new Federal Member States are re-drawing Somalia's new federal map and creating the space for a political settlement. Somalia reached the Decision Point of the Heavily Indebted Poor Countries (HIPC) initiative on March 25, 2020, restoring the country's access to regular concessional financing and launching the process toward debt relief. It cleared its arrears to the African Development Bank (AfDB), the International Monetary Fund and the International Development Association, and reduced its external debt to \$3.9 billion (78% of the revised 2020 gross domestic product (GDP) from \$5.3 billion. About 72 percent of women aged 15-49 years living in rural areas and 59 percent of women from urban areas have never attended formal schooling. The gender gap in school enrolment is wide with girls estimated to account for 43 percent of those enrolled in school in Somalia. The gender parity index is seen to decrease slightly from primary to secondary level and significantly at tertiary levels due to different roles that girls and boys take up as their age increases, including marriage and childbearing and societal expectations, which determine the education investments by families for males and females in a society where resources are minimal. Lower literacy levels in addition to restrictive social- cultural norms, the risks and fear of gender-based violence such as sexual harassment and rape are some factors that keep women within the household and prevent them from searching for employment/ opportunities. Large distances to school which leads to increased risks of gender-based violence create barriers to girls accessing education services. Women also suffer from the precarious labour market situation in general and gender-specific barriers that impede their access to employment, including favourism resulting from clanism over qualification. Security and safety are also impacting opportunities for both males and females, particularly on infrastructure destruction, closure of schools and the fear of moving freely around, especially for young women. Importantly, over 90 percent of primary school teachers in Somalia are male which plays a role in girls' enrolment in school. More details can be found in the CN and will further be elaborated during project preparation. Social norms around early marriage, expectations that girls support households and rearing of younger siblings and greater 'social value' in boys accessing education over girls also play a role in lower enrolment rates of girls. The COVID-19 pandemic is expected to disproportionately impact girls, including by increasing the burden and constraints due to social expectations such as taking on household responsibilities and care-related tasks. In Somalia, the availability of water, gender segregated WASH facilities and sanitary materials for girls has also shown to minimize the risk of girls dropping out of school. The key physical footprint of this project will be the eventual construction of a college, situated in Mogadishu. Details on the site to be selected, will be identified during project preparation, but are planned within an existing government facility.



**D. 2. Borrower’s Institutional Capacity**

The proposed project will be implemented by the Federal Ministry of Education. According to the Provisional Somali Constitution of 2012, the Federal Member States are mandated to implement education programs and policies. This therefore means that the project's implementation will include the member states in Somalia. Administrative structures of the Federal Ministry of Education have been established only in the last few years, started virtually from scratch, and as a result, capacity within the Ministry remains generally low in relation to staffing, skills and training of personnel. Gender disparities and representation of disadvantaged, vulnerable and marginalised groups including minority groups are especially prevalent among education ministry personnel and teachers. Capacity for management of environmental and social risks is weak, although the ministry is commencing with implementing the Somalia Education for Human Capital Development Project (P1722434) which allows learning during implementation. Further, there is limited infrastructure in place to support the organizational capacity of the ministry (offices, vehicles, computers, and logistics).

There is also likelihood of limited capacity among contractors which could undermine the implementation of the mitigation E&S measures. As has been successfully piloted in the Somalia Urban Resilience Project II, dedicated contractor E&S seminars and capacity building sessions (both pre-bidding and post-contracting, focus on E&S parameters and contract management) will be conducted in order to enhance their capacity to understand, characterize, mitigate and respond to environmental and social risks. Close monitoring by PIU staff could monitor the relatively substantial civil works for the Women’s College. Due to inherent system and staffing weaknesses, the ministry relies on additional support in the form of technical advisors who typically come from the Somali diaspora community with the aim of supporting state building and recovery processes inside the country. Past projects showed a positive impact of noted approach. Project-specific interventions will be complemented with Bank Executed capacity building activities under a respective large MDTF ASA working on building environmental and social capacity portfolio-wide.

Public Disclosure

**II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)** Substantial

**Environmental Risk Rating** Substantial

The environmental risk rating is Substantial at this time. This is due to the environmental risks that may arise from proposed construction activities under Component III in the project. Construction of the College of Leadership for Women is likely to result in the occurrence of environmental impacts, including noise pollution, soil erosion, waste and wastewater management, loss of vegetation, e-waste, as well as possible occupational health and fire safety risks. Congregating large numbers of persons during the COVID-19 pandemic is likely to result in exposure to the virus. The project is likely to be implemented by under-strength and inexperienced construction companies who have unknown capacities for E&S implementation, and lack of regulations for ESAs and OHS requirements, and with little knowledge of Good International Industry Practice (GIIP). The capacity for environmental governance at the Ministry of Education is weak at the moment.

**Social Risk Rating** Substantial



Social risk rating for the project is Substantial. Overall, it is expected that the project contributes considerably to the strengthening of women empowerment, not just among the immediate beneficiaries but also indirectly to the society at large. Based on international research, this is consequently also expected to lead to positive social outcomes on peace processes, institutions building, respect for vulnerable groups, etc. However, during the transition towards stronger gender equity, social risks may increase, both, towards project beneficiaries and project implementors. Social norms around early marriage, expectations that girls support households and rearing of younger siblings and greater 'social value' in boys accessing education over girls play a role in lower enrolment and completion rates of girls in addition to a predominantly male teaching force and long distances to schools will need to be addressed as part of implementation. Thus, the project has to address an imbalanced power structure which may trigger intentional and unintentional backlash, including varying forms of GBV, including by extreme-conservative political groups, in an already very challenging FCV situation with considerable security risks. This relates above all to second chance education activities as well as the operation of the women's college. The project must also address risks of exclusion via an inclusion assessment and management instrument, which equally will address the risk resulting from data collection activities. This extends to data collection. The project also entails more standard ESF risks on eventual small-scale land acquisition and involuntary resettlement, inward migration, labour influx and possible use of child labour, elite capture of project benefits, human trafficking, exclusion and access to beneficiaries for effective consultations and grievance redress. Respective risk management instruments are being developed accordingly.

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

### B.1. General Assessment

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

##### **Overview of the relevance of the Standard for the Project:**

The assessment of environmental and social risks is based on the review of the PCN that elaborates the technical design of the project, analytical papers on similar interventions in the past, UNDP development reports and education sector strategic plans. Initial due diligence has been conducted on government capacity, existing environmental and social risk management capacity, and the general security situation. However, there is need for further screening of environmental and social risks, during project preparation.

Environmental risks and impacts envisaged during the construction of the Women's College of Leadership includes noise pollution, soil erosion, waste and wastewater management, loss of vegetation, e-waste, as well as possible occupational health and fire safety risks. Congregating large numbers of persons during the COVID-19 pandemic is likely to result in exposure to the virus. While the final determination of the scope of the Women's College is yet to be determined, in the event it becomes a STEM facility with laboratories the PIU will ensure that there is adequate ventilation and fire safety measures, as well as safe and secure storage of flammable or toxic substances. Further reconnaissance of this proposed subproject area is needed as at this point the project does not know the exact location where the subproject will be implemented and its particular social and environmental baselines.

Further work is needed to determine the existing capacity for ES management at FGS level (including at Ministry of Education). This is in addition to identification of the major subproject activities to be implemented. This will be



followed by a joint preliminary assessment of the impacts of these activities on the ecological, physicochemical and socio-economic environments; all during preparation preparation.

In order to understand the potential risks to the environment, individuals, households and communities potentially linked to the project, the project will prepare an Environmental and Social Management Framework (ESMF). The ESMF will allow for a deeper understanding of the community impacts, including on disadvantaged groups and community structures. It will also incorporate an inclusion assessment and plan. In addition, the project will prepare a Stakeholder Engagement Plan (SEP), which will incorporate procedures for Information Sharing. The project will also need to prepare Labour Management Procedures (LMP), a Security Management Plan (SMP), as well as an Environmental and Social Commitment Plan (ESCP). Environmental and Social Management Plans (ESMPs) will be prepared at two levels: construction ESMP (where civil works will be undertaken) and operational ESMP (to govern environmental and social risks once the College of Leadership is up and running).

As the project will likely be nationwide, some existing national (federal) and state laws and regulations will need to be considered. Among the national laws and standards include the Ministry of Public Works' construction standards, which provide criteria to be met, including on universal access by PWDs, etc. Other national laws include the National Environment Policy, and the newly developed ESIA Regulations (2020), which provide framework for environmental and social risk management.

At the FMS level, some states have pertinent laws. In Puntland, the project may likely be subject to the licensing requirements of the Environmental Impact Assessment Act.

Schedule 1 of the Act classifies projects based on likely scale of adverse environmental impacts on the environment.

Because of the nature and relatively moderate scale of the works expected under the project, the environmental impacts will be substantial but temporary, and confined to the area and time period immediately surrounding the construction activities for the proposed College of Leadership for Women, which may also include land acquisition needs. The project will also adhere to the recently published national construction standards by the Ministry of Public Works and Reconstruction which establishes standards for construction or renovation projects funded by, or on behalf of, the government of Somalia. The policy aims at providing access to public buildings by people with disabilities (PWDs) through "universal design," which ensures usability by all people, to the greatest extent possible, without the need for adaptation or specialized designs.

On the social side, the social assessment as part of the ESMF will have to take into consideration a considerable number of risks: the project addresses an imbalanced gender power structure which may trigger intentional and unintentional backlash, including risks of varying forms of GBV, including by extreme-conservative political groups, in an already very challenging FCV situation with considerable security risks. The project will also address risks of exclusion, e.g. related to the clan system, via an inclusion assessment and management instrument, which equally will address the risk resulting from data collection activities. This adds to the more standard ESF challenges on noted eventual land acquisition and involuntary resettlement, security risks, inward migration, labour influx and possible use of child labour, sexual exploitation and abuse and sexual harassment, as well as other forms of GBV, elite capture of project benefits, human trafficking, exclusion and access to beneficiaries for effective consultations and grievance redress.

**Areas where "Use of Borrower Framework" is being considered:**



None

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

The project will engage a large and diverse array of stakeholders during, both, the preparation and implementation of this project. Primarily the project will engage with the Federal Government of Somalia (FGS) and the participating Federal Member States (FMS), who will be responsible for project implementation and management. Non-state actors such as Development Partners (DPs), communities (through the Community Education Committees or CECs), parents, teachers and vocational training students will be engaged regularly through the life of the project. Religious and other leaders and providers of religious education, who may influence uptake or the involvement of women or minority groups and IDPs will also be specifically engaged. Additional diverse groups who will support and provide input into implementation include e-learning providers, teacher training institutes, entrepreneurs, professional associations, and community groups who will similarly be engaged as appropriate. Relationships with existing non-government education actors, including UN agencies, NGOs and private sector organizations, will also be strengthened to promote synergy and collaboration.

The project will develop a detailed Stakeholder Engagement Plan which will include a stakeholder identification and analysis summary, plans for engagement (e.g., type, regularity, etc.), communication activities and grievance redress mechanism. The SEP will incorporate measures to insure inclusive meaningful consultations and will outline both the initial and ongoing process by which stakeholders will be engaged to ensure the design of the project aligns with stakeholders current and ongoing needs and also helps reducing the risks related to traditional social norms and related backlashes. As such it is important that stakeholder engagement is not an add-on but squarely included in the Project's design.

All stakeholder engagements undertaken under the aegis of this project will have to observe government and WHO guidelines for COVID-19 prevention.

### **B.2. Specific Risks and Impacts**

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

#### **ESS2 Labor and Working Conditions**

It is anticipated that the project workers engaged or employed will include teachers and other government officers such as Regional and District Education Officers as well as contracted workers that will be directly involved in the projects works,. This may include community members engaged by the contractors from disadvantaged groups such as IDPs, minority groups and female workers. Other stakeholders working in connection with the project include government civil servants, (such as federal, state and district officers and district police officers) and teachers. All civil servants will remain subject to the terms and conditions of their existing public sector employment. It is expected there will be use of security personnel to help secure construction sites as required.

Potential risks related to labour and working conditions include (1) OHS risks; (2) child labour; (3) labour influx; (4) labour disputes over terms and conditions of employment; (5) discrimination and exclusion of disadvantaged groups; (6) security risks (workers exposure to attacks); and (7) the risk of sexual exploitation and abuse, sexual harassment,



and other forms of gender-based violence (GBV) for students, teachers community members from construction workers and other teachers.

The specific nature and requirements of labour for the project is yet to be fully determined (including the number of project workers, their characteristics and timing of workforce mobilization or the type of contractors). Once this is clarified through a consultative assessment process, Labour Management Procedures (LMP) will be developed to address the working conditions (hours of work, pay, rest periods etc), OHS risks facing workers as well as security considerations. The assessment will also identify the likely capacity of construction companies and suppliers of construction materials to meet E&S requirements and assess the likely labour influx.

The LMP will outline requirements for construction companies and primary suppliers including mechanisms to prevent child and forced labour and reporting requirements on serious incidents. However, it is expected that the Community Education Committees (CECs) will have a significant role in monitoring of any social impacts of construction and community awareness and social accountability on the same.

The LMP will detail the modalities of a GRM for project workers that will be established during project implementation. Dedicated channels to enable reporting of sexual harassment and other forms of GBV will be elaborated under the SEAH Prevention and Response Action Plan.

To prevent engagement of under-aged labor, all contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance. The contractor and primary suppliers will be required to maintain labor registry of all contracted workers with age verification. Minimum working age under the project is 18 years.

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

As a result of the relatively moderate scale of the physical civil works and construction envisaged under this project, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction. These risks related to ESS3 include the normal impacts of civil works (i.e., generation of solid waste, dust and noise generation, soil erosion, pollution from construction wastes and water use). To address these short-term impacts, construction ESMPs will be prepared and will include standard operating procedures (such as appropriate classroom designs and provision of refuse bins and sanitary bins) and good construction management practices, including those proposed in WB Environmental and Health Safety Guidelines (EHSOs).

The project teams will adopt climate-resilient building designs, while daily college operations will be guided by the seven qualities of resilience: reflective, robust, flexible, integrated, resourceful, redundant, and inclusive. The project team will look closely into the possibilities for incorporating into the college construction designs green-growth aspects, including solar power systems, in order to not only minimise the carbon footprint but also contribute to mitigation. Finishing and furnishings in the College of Leadership will be low-maintenance and durable to reduce O+M costs, thereby reducing carbon footprint of the new infrastructure. The project design will promote rainwater harvesting: therefore, the project design will be curated to emphasize on the use of grey water for irrigation and



gardening. All of these will contribute to the reduction in energy and water use by the project-supported learning communities.

#### **ESS4 Community Health and Safety**

As the project will be implemented in areas experiencing fragility due to endemic poverty, recurrent droughts, occasional floods and protracted conflict and insecurity, some project activities may require use of armed security. Risks associated with use of armed security to communities including GBV/SEA will be included in the Security Management Plan. This plan will also address the wider contextual security risks and outline a project approach to reduce risks while highlighting residual risks. The plan will also link to wider project activities, including stakeholder engagement, which should limit the increase of project-specific security risks beyond the existing contextual challenges.

During consultations, trainings, etc. and as a result of any labor influx the project will need to assess the risks of communicable disease transmission, above all COVID19, and implement respective mitigation measures.

During the construction/refurbishment of the college, respective construction safety risks need to be assessed and management measures included in the ESMP to ensure no harm to neighboring communities (see also ESS3).

GBV in Somalia remains one of the most prevalent and persistent challenges facing women and girls, contributing to potential risks of sexual exploitation and abuse, sexual harassment and other forms of GBV extending from project-related activities. The risks of GBV/SEAH can heighten the risk of disengagement from school due to fear of harmful impacts on security, health and well-being extending from violations. There might be risks of exploitation by teachers/facilitators/ administrators against girls and young women participating in the program which might potentially compromise the safety and wellbeing of teachers, students and local community.

To address risks related to SEA/H, a SEAH Prevention and Response Action Plan will be developed. The SEAH Prevention and Response Action Plan will articulate the key risks, as well as the full scope of prevention and mitigation measures; both, as part of project design and as additional risk management measures. This includes also addressing key risks that may arise due to construction but also through potential risks extending from the project focus on women's empowerment, potential tensions that may arise from challenging social norms and dynamics around women's and girl's participation in the public sphere and from potential backlash from opposition to such a development pathway.

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

The project will support the renovation of government facilities in order to establish the College of Leadership. At the current planning stage, the project targets to identify an existing structure within a government's education facility. If the Project would not be able to succeed with this approach and land acquisition would need to be required at a later stage, a RAP shall be developed, disclosed, and implemented to the satisfaction of the Bank. This would include an E&S screening to determine whether there is a land title and map out all residents and users of the land for consultation on the proposed site(s) for the College and over which traditional leaders and government officials have jurisdiction over the land for their concurrence. A respective requirement will be included in the ESCP.



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

While some locations in Somalia may contain some land with inherent environmental sensitivity relevant to ESS6, the subproject screening process in the ESMF and the construction-stage ESMP will exclude such sensitive areas, which will also be screened out. The ESMF and ESMP will also include specific measures to avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas. The impact (whether singular or cumulative) of small-scale civil works associated with college construction on sensitive areas will likely be minor. Site selection will include an analysis of the immediate area in terms of population, buildings, slope, nearby wadis/seasonal water flows, and will exclude those which may be adjacent to areas with environmental sensitivities.

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

The project will ensure appropriate access to benefits for women and girls with different cultural, ethnic and (sub)clan backgrounds. An inclusion plan will be part of the ESF instruments, annexed to the ESMF, covering all aspects of the project, including supported pedagogical approaches. The SEP will outline appropriate communication and consultation approaches to further strengthen such an approach.

That being said, at this point the applicability of ESS7 to different social groups in Somalia is still under investigation by the Bank. A respective discussion will be conducted during the preparation phase, involving respective stakeholders within and outside the World Bank.

### **ESS8 Cultural Heritage**

There is the potential for chance finds of cultural or archeological significance during the College of Leadership construction that could potentially be impacted. The ESMF will cover risks associated with intangible cultural heritage (such as disruption to religious/cultural festivity in the community by civil work). A subproject specific ESMP will address these issues through the inclusion of chance finds procedures and site-specific mitigation measures for the Women's college.

### **ESS9 Financial Intermediaries**

None

## **C. Legal Operational Policies that Apply**

### **OP 7.50 Projects on International Waterways**

### **OP 7.60 Projects in Disputed Areas**



**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?**

No

**Financing Partners**

None

**B. Proposed Measures, Actions and Timing (Borrower’s commitments)**

**Actions to be completed prior to Bank Board Approval:**

The following instruments will be prepared prior to Approval

- Environmental and Social Management Framework which will incorporate, amongst others, an Inclusion Plan
- Stakeholder Engagement Plan, which will incorporate procedures for Information Sharing and grievance redress
- Labour Management Procedures (LMP)
- a Security Management Plan (SMP)
- A SEA/HS Assessment and Action Plan
- Environmental and Social Commitment Plan (ESCP).

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

The above instruments will be summarized in the ESCP and commitment to its implementation included. In addition, the ESCP will also ensure that the Environmental and Social Management Plans (ESMPs) will be prepared as necessary. Furthermore, the ESCP will ensure that if any changes in project design would require land acquisition, a RAP would be prepared and disclosed to the satisfaction of the Bank.

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

30-Dec-2021

**IV. CONTACT POINTS**

**World Bank**

|               |                             |        |                             |
|---------------|-----------------------------|--------|-----------------------------|
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**Borrower/Client/Recipient**

Borrower: Ministry of Finance, Federal Republic of Somalia

**Implementing Agency(ies)**

Public Disclosure



Implementing Agency: Ministry of Education, Culture and Higher Education, Federal Republic of Somalia

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

|                               |   |
|-------------------------------|---|
| Task Team Leader(s):          | Shawn Michael Powers, Amanda Epstein Devercelli                     |
| Practice Manager (ENR/Social) | Iain G. Shuker Recommended on 06-Nov-2021 at 19:58:49 GMT-04:00     |
| Safeguards Advisor ESSA       | Peter Leonard (SAESSA) Cleared on 20-Dec-2021 at 22:12:13 GMT-05:00 |