



**FEDERAL REPUBLIC OF SOMALIA**

**SOMALIA URBAN RESILIENCE PROJECT II (P170922)**

**ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK  
(ESMF)**

**FOR COMPONENT 4: CONTINGENT EMERGENCY RESPONSE  
COMPONENT (CERC)**

**FINAL**

**20 June 2022**

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## Abbreviations and Acronyms

AAP	Accountability to Affected Persons
BRA	Benadir Regional Administration
CCCM	Camp Coordination and Camp Management
CERC	Contingency Emergency Response Component
CFW	Cash For Work
CFRM	Complaints Feedback and Response Mechanism
CWW	Concern Worldwide
E&S	Environmental & Social
EA	Environmental Audit
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESRC	Environmental and Social Risk Classification system
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FGM	Female Genital Mutilation
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
HH	Household
IDP	Internally Displaced Person
IOM	International Organization for Migration
IP	Implementing Partner
IPC	Integrated Food Security Phase Classification
IPV	Intimate Partner Violence
LMP	Labor Management Procedures
MoF	Ministry of Finance
MoH	Ministry of Health
MOPW	Ministry of Public Works
NGO	Non-Governmental Organization
NRC	Norwegian Refugee Council
OHS	Occupational Health and Safety
PAP	Project-Affected Person
PCU	Project Coordination Unit
PDO	Project Development Objective
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
RAP	Resettlement Action Plan

RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Security Management Plan
STD	Sexually-Transmitted Disease
SURP	Somalia Urban Resilience Project
SWS	South West State
TA	Technical Assistance
WHO	World Health Organization

## 1. Introduction

- 1. Historical drought in Somalia and CERC activation under SURP II.** Given the current historical drought in Somalia, it has been estimated that 4.6 million Somalis will face acute food shortages by May 2022. It is further projected that some 7.7 million people will require humanitarian assistance, and 1,379,000 may be displaced through drought in the first 6 months of the year.<sup>1</sup> The World Bank is providing support to the Federal Government of Somalia (FGS) and the Federal Member States (FMS) including Puntland, South West State and the Banadir Regional Administration (BRA) through the Somalia Urban Resilience Project Phase II (SURP-II)<sup>2</sup> to strengthen public service delivery capacity of local governments and increase access to urban infrastructure and services in selected areas. The SURP-II includes a Contingency Emergency Response Component (CERC) that can be activated to address situations of urgent need of assistance, allowing for rapid reallocation of uncommitted project funds in the event of a natural or man-made crisis. In response to the expected Internally Displaced Persons (IDP) crisis following the current drought, the FGS formally requested the World Bank's activation of the CERC on 3 March 2022 in the amount of 20 million USD to respond to the current drought.
- 2. Overview of CERC activities.** The CERC will finance the approved drought response activities in the three cities of Mogadishu, Baidoa, and Garowe that would likely receive a large inflow of IDPs triggered by the drought. Support will be provided for multiple activities in terms of basic services in (i) water sanitation and hygiene (WASH), (ii) health, and (iii) housing, land and property (HLP) for IDPs, aimed at strengthening government responses to the drought. The implementation of activities will be led by the International Organization for Migration (IOM) in partnership with their partners in the Danwadaag Consortium, which comprise the Norwegian Refugee Council (NRC), Concern Worldwide (CWW) and Gargaar Relief and Development Organization (GREDO). The field level presence and technical experience of IOM and the Danwadaag Consortium will maximize rapid implementation and benefits of the drought response activities. While CERC activities will be implemented under a different modality to ensure timely implementation, the IOM will closely coordinate with the existing SURP-II institutional arrangements. IOM will sign an Output Agreement with the federal-level Project Coordination Unit (PCU), who will be responsible for the monitoring and supervision of overall CERC activities, while the municipality-level Project Implementation Units (PIUs) will oversee the city-level day-to-day activities implemented by IOM and its partners.
- 3. CERC-ESMF.** While the proposed CERC activities cover relevant but different sectors (WASH, health and HLP) from main activities of SURP II (which is focused on urban infrastructure), an Environmental and Social Management Framework (ESMF) specific to CERC activities ("CERC-ESMF") has been hereby prepared to address E&S risks and impacts of such activities. As per World Bank Guidance on CERC<sup>3</sup>, **the CERC-ESMF will rely on the existing E&S framework instruments for**

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<sup>1</sup> Drought Response Plan Somalia 2022, p. 3.

<sup>2</sup> An additional financing to the SURP II is currently under preparation as of May 2022.

<sup>3</sup> As per WB Guidance (October 2017), the CERC-ESMF describes the potential emergencies and the **types of activities likely to be financed** and evaluates the **potential risks and mitigation measures** associated with them. It also identifies likely **vulnerable locations and/or groups** and includes, where needed, some social assessment to guide emergency responses. The CERC-ESMF includes a **screening process** for the potential activities, the **institutional arrangements** for environmental and social due diligence and **monitoring**, any needed **capacity-**

**SURP II as much as possible** (including the ESMF, SEA/SH Action Plan, LMP and SEF, which were updated in April 2022), so that the existing E&S risks management approach under SURP II will facilitate swift implementation of emergency response activities. While the CERC-ESMF has been designed to be as concise and action-oriented as possible, it should be read in conjunction with the E&S instruments of SURP II, which provides relevant baseline information, such as legal and institutional framework, applicable WB E&S standards and guidelines and gap analysis. As per the ESCP of SURP II, the CERC-ESMF is applicable to all CERC activities, which will cascade to all implementing partners (IPs) and their contractors/subcontractors and service providers. The CERC-ESMF consists of the following:

1. Introduction
  2. Proposed CERC Activities
  3. Potential Environmental & Social Risks and Impacts
  4. Environmental & Social Risk Management
  5. E&S Screening Process
  6. Labor Management Procedures
  7. Stakeholder Engagement
  8. Monitoring and Reporting
  9. Project Coordination and Implementation Arrangements
  10. Estimated Costs of CERC-ESMF
- Annex 1: Details on CERC Activities  
Annex 2: Details on Consortium Partners  
Annex 3: GRM Checklist

## 2. Proposed CERC Activities

4. **Positive list and excluded activities.** Based on the following positive list and the excluded activities agreed between the borrower and the WB, the CERC activities will focus on small-scale emergency activities with limited E&S risks and impacts, while excluding activities with potentially significant E&S risks and impacts. *Table 1* presents a positive list that should be used for the procurement of goods and services that might be required for the Government’s emergency recovery effort, as well as services, works and operational costs. This CERC-ESMF includes guidelines on assessment and management of all EHS impacts and risks associated with use (e.g., operation activities) of the goods procured from the project (see more details in Sections 4, 5 6, and 8).

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**building measures**, and generic guidance on emergency small-scale civil works. The CERC-ESMF indicates which kinds of emergency response actions can proceed with **no additional environmental or social assessment**, and which ones would **require assessment (and at what level) prior to being initiated**.

Table 1 Positive list of goods, services and works

Item
<b>Goods</b>
<ul style="list-style-type: none"> <li>• Medical equipment and supplies including but not limited to rehydration fluids, antibiotics, antivirals, ventilators, respiratory care equipment, IV pumps, referral equipment, isolation area equipment;</li> <li>• Cleaning supplies including hand hygiene and disinfectants;</li> <li>• Personal Protective Equipment (PPE) stockpiles, including masks, gowns and gloves;</li> <li>• Morgue Packs;</li> <li>• Medical equipment and supplies;</li> <li>• Non-perishable foods, bottled water and containers;</li> <li>• Tents for advanced medical posts, temporary housing, and classroom/daycare substitution;</li> <li>• Equipment and supplies for temporary housing/living (gas stoves, utensils, tents, beds, sleeping bags, mattresses, blankets, hammocks, mosquito nets, kit of personal and family hygiene, etc.) and school;</li> <li>• Gasoline and diesel (for air, land and sea transport) and engine lubricants;</li> <li>• Spare parts, equipment and supplies for engines, transport, construction vehicles;</li> <li>• Lease of vehicles (Vans, trucks and SUVs);</li> <li>• Equipment, tools, materials and supplies for search and rescue (including light motor boats and engines for transport and rescue)</li> <li>• Tools and construction supplies (roofing, cement, iron, stone, blocks, etc.);</li> <li>• Equipment and supplies for communications and broadcasting (radios, antennas, batteries)</li> <li>• Water pumps and tanks for water storage;</li> <li>• Equipment, materials and supplies for disinfection of drinking water and repair/rehabilitate of black water collection systems;</li> <li>• Equipment, tools and supplies for agricultural, forestry, and fisheries;</li> <li>• Feed and veterinary inputs (vaccines, vitamin tablets, etc.);</li> <li>• Construction materials, equipment and industrial machinery;</li> <li>• Water, air, and land transport equipment, including spare parts;</li> <li>• Temporary toilets;</li> <li>• Groundwater boreholes, cargo equipment to allow access to affected site, storage units; and</li> <li>• Any other item agreed on between the World Bank and the Recipient (as documented in an Aide-Memoire or other appropriate formal project document).</li> </ul>
<b>Services<sup>4</sup></b>
<ul style="list-style-type: none"> <li>• Consulting services related to emergency response including, but not limited to urgent studies and surveys necessary to determine the impact of the disaster and to serve as a baseline for the recovery and reconstruction process, and support to the implementation of emergency response activities;</li> <li>• Feasibility studies and technical designs;</li> <li>• Works supervision;</li> </ul>

<sup>4</sup> All consulting/non-consulting services financed by CERC will be conducted in a manner consistent with relevant ESSs as per this CERC-ESMF. Relevant activities supported by such services will be accompanied by site-specific ESMPs (for example, feasible studies, DED, and procurement document for civil works).

<ul style="list-style-type: none"> <li>• Technical Assistance in developing TORs, preparing Technical Specifications and drafting tendering documents (Bidding Documents, Invitation to Quote, RFP);</li> <li>• Non-consultant services including, but not limited to: drilling, aerial photographs, satellite images, maps and other similar operations, information and awareness campaigns; and</li> <li>• Non-consultant services to deliver any of the activities described in the “Goods” section of this table (e.g., debris removal, dump trucks, drones survey).</li> </ul>
<p><b>Works</b></p> <ul style="list-style-type: none"> <li>• New construction and land clearance of government sites (without resettlement issues) with a limited scope<sup>5</sup> to address the smaller-scale infrastructure needs to expedite emergency response;</li> <li>• Repair of damaged infrastructure including, but not limited to: water supply and sanitation systems, and other infrastructure damaged by the event;</li> <li>• Re-establishment of the urban water supply and sanitation (including urban drainage);</li> <li>• Repair, restoration, rehabilitation of schools, clinics, hospitals, community centers, transitional shelters, and other administrative buildings; and</li> <li>• Removal and disposal of debris associated with any eligible activity; and</li> </ul>
<p><b>Training</b></p> <ul style="list-style-type: none"> <li>• Conduct necessary training related to emergency response including, but not limited to the Implementation of CERC activities; and</li> <li>• Training on rapid needs assessment and other related assessments.</li> </ul>
<p><b>Emergency Operating Costs</b></p> <ul style="list-style-type: none"> <li>• Incremental expenses by the Government for a defined period related to early recovery efforts arising as a result of the impact of an eligible emergency. This includes, but is not limited to: costs of staff attending emergency response, operational costs and rental of equipment.</li> </ul>

**Excluded Activities**

- 1) Activities of any type classifiable as “High” Environmental and Social Risk with significant environmental and social impacts pursuant to the Bank’s ESF;
- 2) Activities that would lead to conversion or degradation of critical forest areas, critical natural habitats, and clearing of forests or forest ecosystems;
- 3) Activities affecting protected areas (or buffer zones thereof), other than to rehabilitate areas damaged by previous natural disasters;
- 4) Land reclamation (i.e., drainage of wetlands or filling of water bodies to create land)
- 5) River training (i.e., realignment, contraction or deepening of an existing river channel, or excavation of a new river channel);
- 6) Activities that will result in the involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households’ use of land and livelihoods;
- 7) Construction of new roads, realignment of roads, or expansion of roads, or rehabilitation of roads that are currently located on communal lands but will be registered as government assets after rehabilitation;
- 8) Use of goods and equipment on lands abandoned due to social tension / conflict, or the ownership of the land is disputed or cannot be ascertained;

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<sup>5</sup> each project should be able to complete within 12 months.

- 9) Use of goods and equipment to demolish or remove assets, unless the ownership of the assets can be ascertained, and the owners are consulted;
- 10) Use of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor;
- 11) Use of goods and equipment for activities that would affect indigenous peoples
- 12) Use of goods and equipment for military or paramilitary purposes
- 13) Use of goods and equipment in military or paramilitary response to conflict, in any area with active military or armed group operations; and
- 14) Activities which, when being carried out, would affect, or involve the use of, water of rivers or of other bodies of water (or their tributaries) which flow through or are bordered by countries other than the Borrower/Recipient, in such a manner as to in any way adversely change the quality or quantity of water flowing to or bordering said countries.

5. **Proposed CERC activities.** The CERC activities will be implemented in Garowe, Mogadishu/Benadir Regional Administration (BRA) and Baidoa as these cities are expected to receive a large influx of IDPs displaced in Bari, Lower Shabelle and Bay regions respectively. Further, the decision is based on Integrated Food Security Phase Classification (IPC) rating, eviction risk for IDPs, and stability of the locations. The CERC activities will focus on enhancing absorption capacities of relevant municipalities in the following sectors: (i) WASH: Enhancing WASH services for newly displaced IDPs, (ii) HEALTH: enhancing basic health services for newly displaced IDPs, and (iii) HLP: developing relocation sites and mitigating forced evictions of newly displaced IDPs. The CERC activities will be government-led, embedded in the SURP-II, while also being community-driven. Investments will benefit IDPs and returnees, as well as host communities. The CERC activities will be completed in 12-18 months, building on quick impact activities that the IOM and its implementing partners can complete in the first 12 months (the last six months will focus on the O&M). Based on the positive list, excluded activities and above considerations, below table 2 below presents the planned CERC activities agreed between the borrower, the implementing partners and the World Bank (See Annex 1 for further details with indicative targeted outputs for individual activities).

Table 2 Planned CERC Activities

1. <b>WASH: Enhanced WASH services (approx. \$5.97M<sup>6</sup>)</b>	Baidoa	Garowe	Mogadishu
Activity 1.1.: Construction of boreholes (40m <sup>3</sup> water storage tanks, installation of solar system, genset, submersible pump and rooms for generator and guards). (US\$ 2.1 M)	IOM	IOM	IOM
Activity 1.2.: Installation of piping networks from the water sources to the distribution points in the three cities (US\$ 868,000)	IOM	IOM	IOM
Activity 1.3.: Construction of water distribution points (kiosks) (US\$ 527.000)	IOM	IOM	IOM

<sup>6</sup> The approximate operational costs are presented to help understand the type and scale of each group of activities, excluding general project management costs and fees. The final costs for each activity will be determined after CERC activation.

Activity 1.4.: Construction of transitional/permanent twin latrines (including gender-disaggregated and lockable latrines). (US\$ 2.3 M)	IOM	IOM	IOM
Activity 1.5.: Operation and maintenance of WASH infrastructure (with hand over to community O&M groups at the end of project). (US\$ 175,000)	IOM	IOM	IOM

2. <b>HEALTH: Enhanced basic health service delivery (approx.US\$1.8M)</b>	Baidoa	Garowe	Mogadishu
Activity 2.1.: Support health care provision through community level, mobile, and fixed health care facilities. (US\$ 866,000)	GREDO	No activity	CWW
Activity 2.2.: Train and support community health workers (CHWs) and health staff in targeted health clinics on preventive measures, screening, and basic curative care. (US\$ 54,000)	GREDO	No activity	CWW
Activity 2.3. Equipping & rehabilitation of mobile and fixed health clinics. (US\$ 813,000)	GREDO	No activity	CWW

3. <b>HLP: Relocation site development and (Garowe and Baidoa) (US\$1.9M) and mitigation of forced eviction (US\$ 8.97M)</b>	Baidoa	Garowe	Mogadishu
Activity 3.1. Preparation of housing and property capacity needs assessments of local authorities. Based on the outcomes of the assessments, provision of technical support to local authorities to strengthen HLP drought response. (US\$ 46,000)	NRC	NRC	NRC
Activity 3.2 Undertake topographical survey, environmental impact assessment, site planning, land development, provision of basic services such as drainage network, compaction of existing access road for Armale IDP site (Garowe). (US\$ 1.9 M)	IOM	NRC (IOM for WASH)	No activity
Activity 3.3 Support the beneficiary selection and relocation to the government sites; ensure provision of information on HLP rights and awareness of established community feedback mechanism for accountability. (US\$ 784,000)	IOM	NRC	No activity
Activity 3.4 Support establishment of temporary housing for new IDPs (US\$ 4.7 M)	IOM	NRC	No activity

<u>Activity 3.5</u> Provide legal support to secure individual land titles and other tenure documents, including prevention of forced evictions through support to negotiations with landlords and local authorities and targeted legal aid and training of people in eviction prone sites with newly drought displaced IDPs to resolve land related disputes. (US\$ 1.2 M)	<u>NRC</u>	<u>NRC</u>	<u>No activity</u>
<u>Activity 3.6.</u> Installation of solar streetlights. (US\$ 340.000)	<u>IOM</u>	<u>NRC</u>	<u>No activity</u>

6. **Project locations.** The selection of the target cities, IDP sites and budgetary allocation are based on several factors: (i) drought displacement projected arrivals; (ii) IDPs' IPC rating from the Famine Early Warning Systems Network (FEWSNET), which measures the level of food insecurity; (iii) eviction risk – as measured by IDP sites' security of tenure and recent issuance of eviction notices; (iv) city's absorption capacity – as measured by the level of political willingness to accommodate IDPs and availability of existing settlement sites for IDPs; and (v) overall balance within the World Bank's portfolio-wide drought response to different areas in Somalia.

Table 3 Beneficiaries

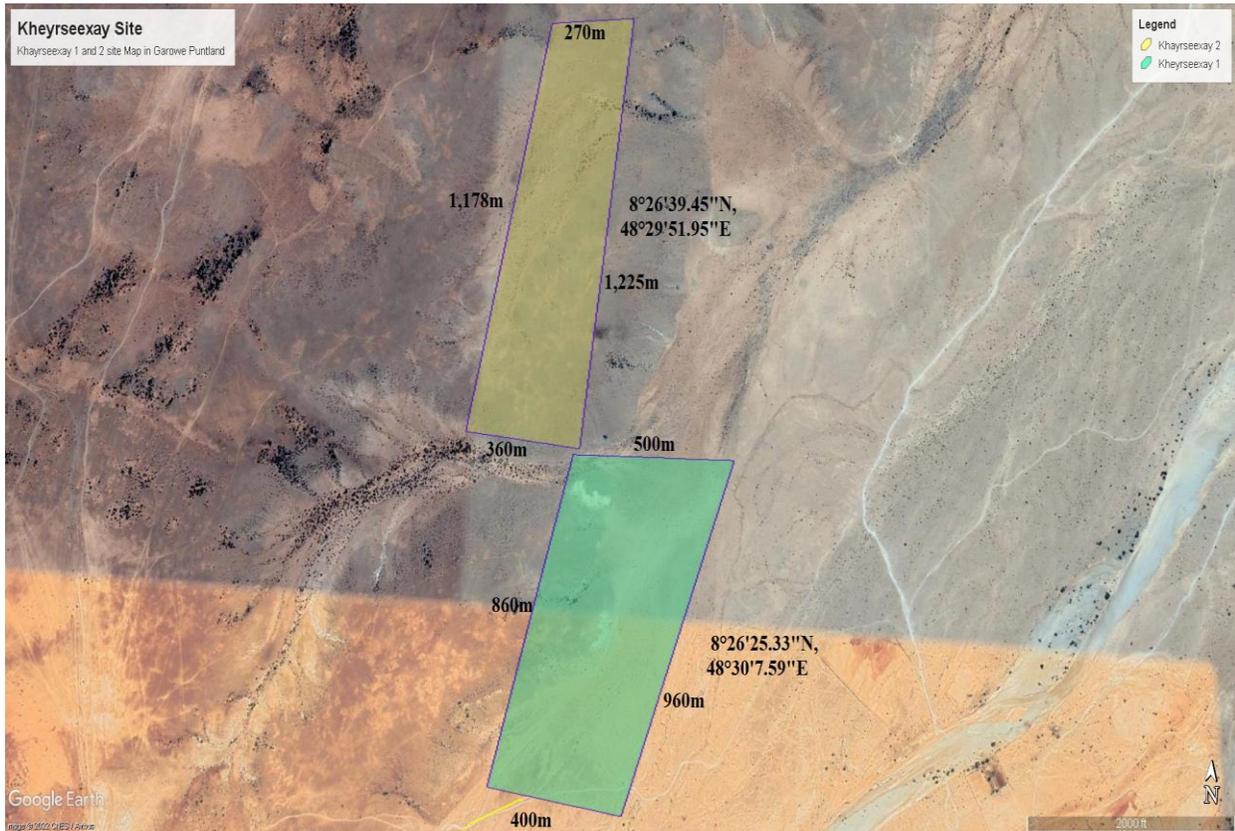
City	IDP Site / Urban Centre	Est. No. of IDPs targeted	CERC Budget allocation (USD)
BRA/Mogadishu	<ul style="list-style-type: none"> <li>Daynille District (Zone 4 &amp; 5)</li> <li>Kahda District (Garasbaley sub-district)</li> </ul>	45,000	5.1 M
Baidoa	<ul style="list-style-type: none"> <li>Barwaqo extension (formal resettlement site)</li> <li>ADC IDP site (Isha)</li> </ul>	21,000	8.9 M
Garowe	<ul style="list-style-type: none"> <li>Aramale site (formal resettlement site)</li> </ul>	10,600	6 M

**Puntland** state government, in collaboration with the **Garowe** municipality, has secured a resettlement site for IDPs called Armale (a.k.a., Kheyrsexay), which is 6km from the town – see map below. Currently there are no services provided at the site.

Table 4 Overview Armale site

<b>Kheyrsexay (Aramale) site:</b>	
Size	762,346 sqm
No of IDP household (HH)	1,800
Individual Plot Size	13m x 13m
Distance from town	6 km
GPS	8.44395415, 48.50081019
Land Status	Public land with supporting documentation

Figure 1 Aramale site physical map

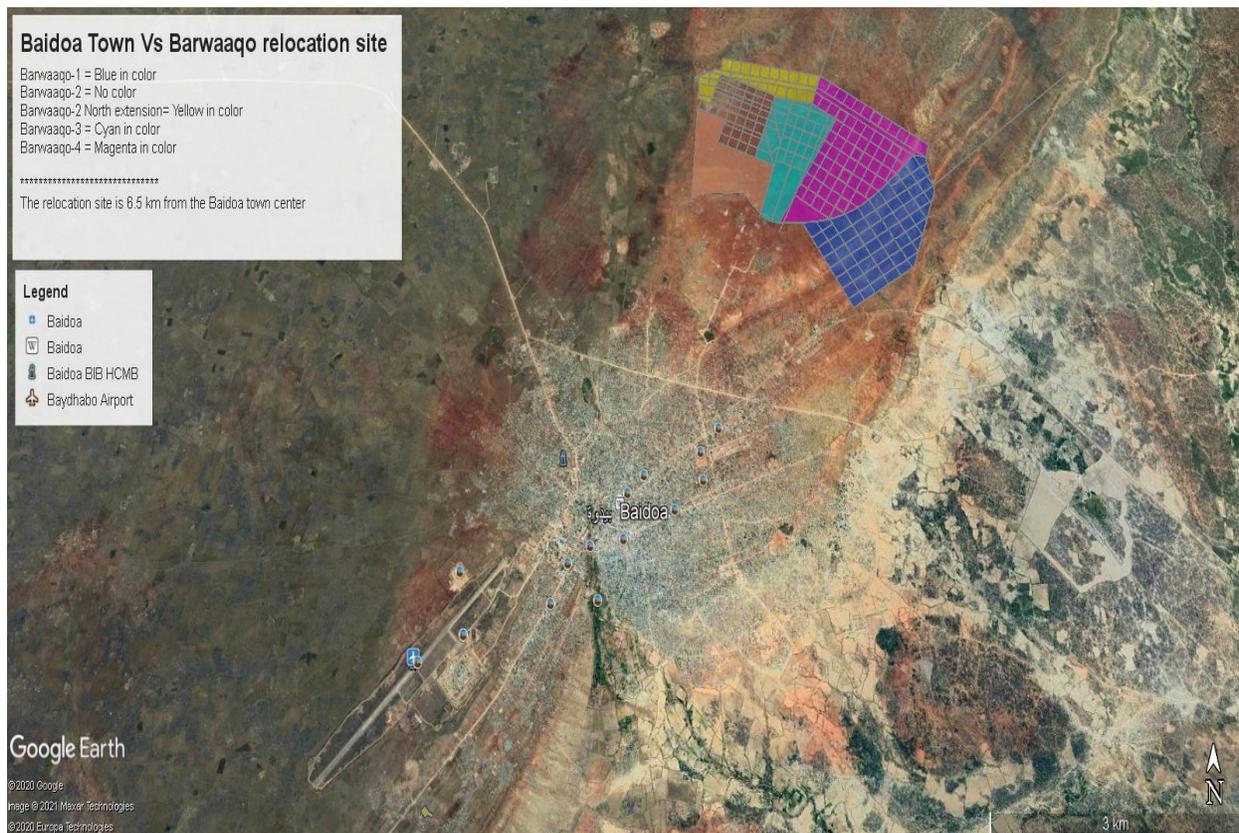


**South West State (SWS)** government, in collaboration with the **Baidoa** municipality, secured land for resettlement of IDPs called the Barwaqo site and its extension area north of Baidoa city. Over the past 3 years, 2,009 HH or over 13,000 IDPs and vulnerable host community have been relocated to Barwaqo and issued with title deeds for the land. The next phase of Barwaqo is proposed to develop the land, 500 m to the East and 2 km to the North – the area yellow in color on the figure below. While this land is slightly further from the town, it would benefit from the World Bank SURP road infrastructure which connects Barwaqo to the main Baidoa town center. Services are available in the Northern extension through the Barwaqo 2 site. However, increased access to water is essential, so this proposed project will ensure additional access to water, sanitation and transitional housing for the 1,150 relocated households.

Table 5 Overview Barwaqo extension site

Barwaqo extension site:	
Size	15 km <sup>2</sup> (3 km <sup>2</sup> utilized)
No. of HH	1150 HH (2009 HH currently on site)
Individual Plot Size	20m x 10m
Distance from town	8 km
GPS	3.180958, 43.674081
Land Status	Public land with supporting documentation

Figure 2 Barwaqo extension site map

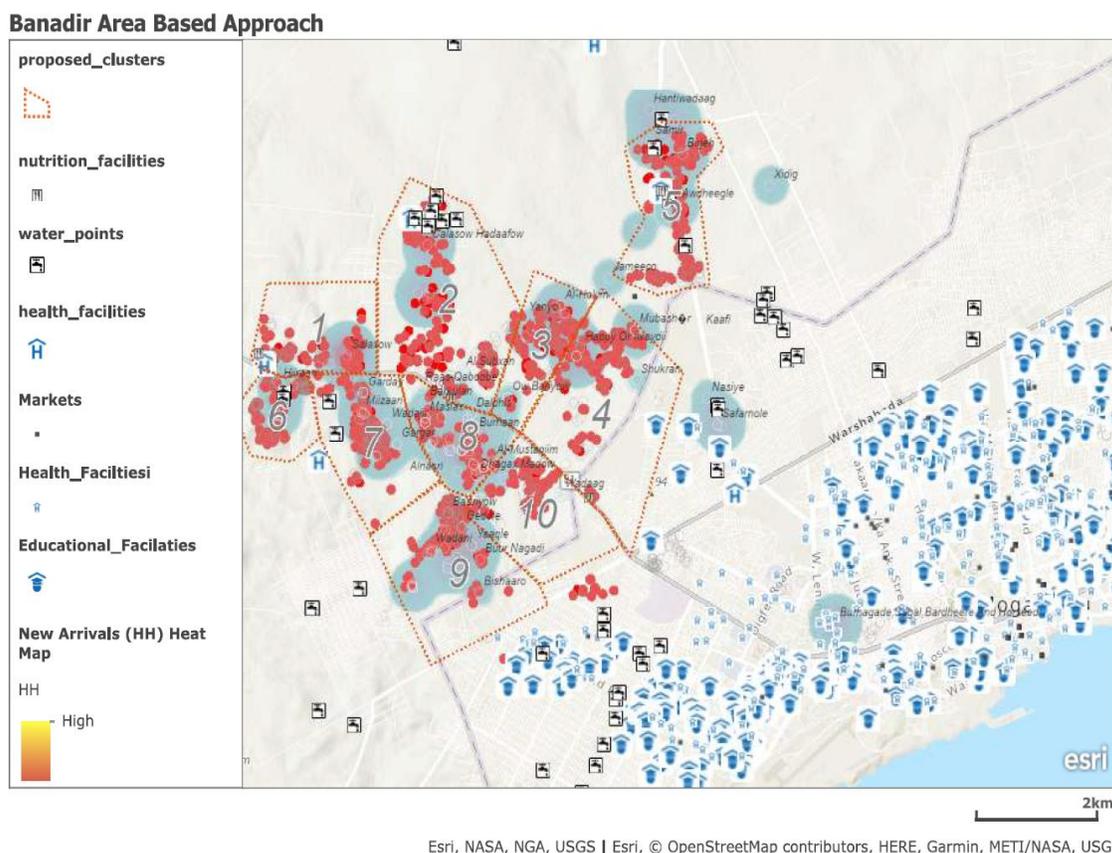


**Mogadishu/BRA:** In July 2021, the Camp Coordination and Camp Management (CCCM) cluster recorded almost 850,000 IDPs in Daynille and Kahda districts of BRA alone (see map below). This figure has increased by a further 120,000 IDPs in the first three months of 2022.<sup>7</sup> Land in BRA is highly contested and the government has not been able to secure a large plot of land for IDP settlement. Consequently, the majority of IDPs are squatting on vacant private land without formal lease agreements with the private landowners, rendering them highly vulnerable to repeated forced evictions. In September 2021, Mogadishu accommodated more than 170,000 new drought-related IDPs from neighboring Lower

<sup>7</sup> CCCM New Arrival tracker

Shabelle, Middle Shabelle, Bakool and Bay Regions.<sup>8</sup> According to the Government’s needs assessment, the sites which are already overcrowded and overstretched with scarce basic services such as food, shelter and water and sanitation are also dealing with increased evictions of IDPs by private landowners.<sup>9</sup> More than 42,000 IDPs are in urgent need of water; and 50 children in Daynile and Kahda Districts are suspected to have measles cases with deaths reported among new arrivals.<sup>10</sup> Given the number of newly drought displaced arrivals and the severity of the needs in BRA, the proposed CERC activities will focus on two zones in Daynille (zone 4 and 5) districts marked on the figure below and Kahda district (Garasbaley subdistrict area). This area-based approach will leverage the existing operational footprint of the Danwadaag partners and provide complementarity to other humanitarian funding such as ECHO.

Figure 3 BRA area map



<sup>8</sup> PRMN Monitoring figures

<sup>9</sup> The Government of Somalia, Contingency Emergency Response Implementation Plan – CERIP, Somalia Drought Displacement Impact Response, March 22. In February, more than 500 IDPs were evicted from two settlements in Bangala area in Daynille, at the expiry of their tenure on the private land; and 2,700 IDPs were ordered to vacate Mandeeq, Balanbalis and Wardhere settlements in Section Three of Kahda District by a private landowner. Source: NRC eviction tracker.

<sup>10</sup> The Government of Somalia, Contingency Emergency Response Implementation Plan – CERIP, Somalia Drought Displacement Impact Response, March 22.

## Potential Environmental and Social Risks and Impacts

7. **E&S Benefits of CERC activities.** The CERC activities will bring broad benefits to IDPs in Baidoa, Garowe and Mogadishu. They will contribute to enhanced WASH and health services for new arrived IDPs, and will support the land development of IDP sites as well as provide legal advice and support to IDPs in order to avoid forced evictions and ensure more secure title situations. Especially since the activities are based on solid planning processes and long-term perspectives of integrating IDPs into the urban environment, the CERC activities will far outweigh its risks and adverse impacts. In addition, the activities will be making use of local labor and will therefore create temporary job opportunities for IDPs and host communities.
  
8. **E&S risks and impacts typical for general civil works.** The proposed CERC activities (WASH, health and HLP) include general civil works, which are in smaller scale but similar nature with SURP II's main activities (urban infrastructure). The typical E&S risks and impacts of such civil works are well identified and relevant mitigation measures are already specified in the SURP II's ESMF (updated in April 2022). Table 6 below describes in summary the potential E&S risks and impacts and anticipated risk levels of such civil works. Table 6 is followed by Table 7, which summarizes different E&S risks and impacts specific to CERC activities. These two tables will help project stakeholders understand the differentiated E&S risks anticipated for CERC.

Table 6 Risks and Impacts

ACTIVITIES	POTENTIAL RISK AND IMPACTS	RISK LEVEL
<p>General civil works under WASH, Health and HLP activities</p>	<p><i>Environmental:</i></p> <ul style="list-style-type: none"> <li>• Increased levels of <b>air pollution</b>, particulate matter from dust, and emissions of noxious fumes and greenhouse gases caused by the operations of construction vehicles and heavy equipment; truck traffic, operation phase equipment,</li> <li>• Water and <b>soil pollution</b> may be caused by accidental leaks/spills of oil/fuel from on-site construction facilities, equipment, or machinery, and accidental damage to septic tanks located on the right of way; Improper waste water disposal, soil erosion from cleared lands, , solid disposal of wastes from housing areas</li> <li>• Adverse <b>impacts on river and coastal ecosystem</b> resulting from: (i) alterations of surface runoff through compaction of soils and increase in impermeable surfaces, (ii) changes to flow regimes of ephemeral streams and intermittent rivers (water velocity, depth, depositional patterns, and channel morphology) and, (iii) locating of outfall points at or near the shorelines;</li> <li>• Enhanced risk of <b>flooding</b> due to: (i) increased storm-water runoff resulting from reduction in infiltration rates following compaction of soils and surface paving, (ii) changes in surface water flow due to terrain modification during earthworks, and (iii) reduced water conveyance capacity as a result of increase in the volume of sediments;</li> <li>• Excessive <b>solid waste</b> generation and inappropriate disposal. Uncollected or improperly disposed garbage may cause foul odor, rodent and insect infestation leading to public health issues;</li> <li>• Increased <b>Soil erosion</b> and accompanying sedimentation caused by site terrain modification and loss of soil biodiversity due to contamination from chemical substances;</li> <li>• <b>Degradation of water quality</b> due to increase in the sediment loads of the seasonal river Shabelle and the ephemeral streams; waste water, improper solid and waste disposal</li> <li>• Increased <b>noise</b> levels due to construction works and operation of vehicles and heavy equipment; noise from all the people in housing and support workers</li> <li>• Disruption or <b>loss of biodiversity and natural landscape</b> at burrow pit sites and at riparian locations which have an extensive wetland area due to sub-surface ponding during the frequent flooding episodes;</li> <li>• Possible <b>damage or loss of vegetation</b> including trees;</li> <li>• <b>Transmission of infectious diseases (STD)</b> among workers and other stakeholders, including HIV and COVID-19; and water based vectors, vectors from waste disposal areas (both temp and permanent)</li> </ul>	<p>The anticipated environmental risks are considered <b>“Moderate”</b> but they could be increased to <b>“Substantial”</b> considering the limited capacity and experience of implementing agencies to manage those risks as per WB ESF.</p>

ACTIVITIES	POTENTIAL RISK AND IMPACTS	RISK LEVEL
	<ul style="list-style-type: none"> <li>• <b>Limited capacity</b> of implementing agencies to manage E&amp;S risks as per the WB ESF.</li> <li>• <b>Emergencies – due to fires, natural risks, etc.</b></li> <li>• <b>Risks to people due to provision of public services (housing, water supply)</b></li> </ul>	
	<p><i>Social</i></p> <ul style="list-style-type: none"> <li>• <b>Exclusion</b> of women and vulnerable groups from project benefit</li> <li>• Unsafe and poor <b>working conditions</b></li> <li>• <b>Child labor/Forced labor</b></li> <li>• <b>Labor influx</b></li> <li>• <b>labor disputes</b> over terms and conditions of employment</li> <li>• <b>Community and workers’ health and safety:</b> Risks associated with construction/rehabilitation work and operation, including risks of the COVID-19 transmission;</li> <li>• <b>SEA/SH or other forms of GBV</b></li> <li>• <b>Social tensions and security risks:</b> Somalia is a fragile country that still bears the scars of war and continues to face the risk of terrorism and civil unrest in the absence of effective law enforcement mechanism. Social tension triggered by competition over limited project benefits and resources can be devastating given many community members (including PAPs) are likely to be armed</li> <li>• Physical and economic <b>displacement</b> (if not avoided through exclusion of activities)</li> <li>• Damage or disruption to <b>tangible/intangible cultural heritage</b></li> <li>• <b>Lack of inclusive and meaningful consultations</b></li> </ul>	<p>The anticipated social risks are broadly considered <b>“Substantial.”</b> However, some contextual risks such as security risks and GBV risks are considered <b>“High”</b> in particular in fragile and insecure project environment in IDP sites.</p>

9. **E&S risks and impacts specific to CERC activities.** The proposed CERC activities include different types of interventions from SURP II's main activities, which will focus on WASH, health and HLP sectors. While the potential E&S risks and impacts associated with such different activities are not covered in the SURP II's E&S instruments, Table 7 below summarizes the potential E&S risks and impacts and anticipated risk levels **specific to such CERC activities**.

*Table 7 CERC Risks and Impacts*

ACTIVITIES	POTENTIAL RISK AND IMPACTS	RISK LEVEL
<p><b>OUTCOME 1: Enhanced WASH services for newly drought-displaced IDPs</b></p> <p>Construction of boreholes (40 m<sup>3</sup> water storage tanks, installation of solar system, genset, submersible pump and rooms for generator and guards)</p> <p>Installation of piping networks</p> <p>Construction of water distribution points</p> <p>Construction of transitional/permanent twin latrines (including gender-disaggregated and lockable latrines)</p>	<p><i>Environmental:</i></p> <ul style="list-style-type: none"> <li>• Overall withdrawal of ground water and impacts on other ground water users and other risks (e.g., subsidence)</li> <li>• Provision of non-potable water for drinking or other uses</li> <li>• Use of chemicals (storage, use, disposal, etc.) associated with water supply and waste water treatment – fires, spills, OHS, etc.</li> <li>• Pit latrines can be a source of foul smell affecting those within the area</li> <li>• Faecal matter may lead to underground water contamination if the water table is high or in the case of pit latrines, when there is an overflow due to heavy rains. Contamination of water may lead to outbreak of diseases e.g. cholera, dysentery, typhoid, diarrhea, etc.</li> <li>• Pit latrines can be breeding grounds for flies and mosquitoes, which are disease vectors</li> <li>• Final disposal of sludge (if removed) from latrines</li> <li>• Attraction of common pests/disease vectors due to dirty environments associated with WASH facilities, including rats, cockroaches, flies; - And associated use of pesticides for their control (thus hazardous material storage, use, disposal, spills, OHS, community exposure)</li> <li>• Water quality issues from boreholes</li> <li>• Environmental pollution from access roads for borehole construction, installation of piping network</li> </ul>	<p>The anticipated environmental risks with WASH activities are considered “<b>Moderate</b>” but they could be increased to “<b>Substantial</b>” considering the limited capacity and experience of implementing agencies (IOM) to manage those risks as per WB ESF.</p>
<p>Operation and maintenance of WASH infrastructure</p>	<p><i>Social</i></p> <ul style="list-style-type: none"> <li>• Exclusion/discrimination of vulnerable groups from accessing WASH facilities, including for persons with disabilities</li> <li>• Increased community safety and GBV risks if the latrines are not gender-sensitive, especially for women, such as lack of functional locks and night-time lighting</li> <li>• Increased security risks for all stakeholders in IDP sites, such as project workers and beneficiaries</li> <li>• Land and resettlement issues in regards to land required for boreholes and piping networks and latrine19f resettlement issues are not properly excluded in the screening process.</li> </ul>	<p>The anticipated social risks with WASH are broadly considered “<b>Substantial.</b>” However, some contextual risks such as security risks and GBV risks are considered “<b>High</b>” in particular in fragile and insecure project environment in IDP sites.</p>

ACTIVITIES	POTENTIAL RISK AND IMPACTS	RISK LEVEL
<p><b>OUCTOME 2: Enhanced basic health service delivery for newly drought displaced IDPs</b></p> <p>Support health care provision through community level, mobile, and fixed health care facilities</p> <p>Train and support community health workers (CHWs) and health staff in targeted health clinics on preventive measures, screening, and basic curative care</p> <p>Equipping &amp; rehabilitation of mobile and fixed health clinics</p>	<p><i>Environmental:</i></p> <ul style="list-style-type: none"> <li>• Environmental risks and impacts, which would include Risk of indiscriminate disposal of medical waste, wastewater and air emissions</li> <li>• Impacts of air emissions and residues from incinerator</li> <li>• OHS related risks and impacts, including manual handling injuries, falls, trips and slips, injuries caused by moving objects, and mental stress</li> <li>• Specific HCF risks and impacts, which would include Risk of infection among health professionals, Risk of infection to the hazardous material/ waste handlers and secondary handlers</li> <li>• Exposure of workers/visitors to radiation, indoor air quality, and fire hazards</li> <li>• Infection control and health care waste risks leading to contamination if not properly managed/disposed (infections including COVID-19, pollution/contamination of the environment – air, land, water physical injuries, effect on domestic animals)</li> <li>• Water borne diseases for health care facilities with inadequate portable water.</li> <li>• Risk of vehicle emissions</li> <li>• Community health and safety risks and impacts, which would include cross infection from HCF daily activities, water-borne diseases, poor sanitation conditions, air emissions/ vector breeding from improper onsite storage/ treatment of general and medical waste streams, Risks of traffic and road safety while transferring waste to disposal sites including accidental spills, as well as general astheric impacts</li> <li>• Risks of petroleum waste disposal</li> </ul> <p><i>Social:</i></p> <ul style="list-style-type: none"> <li>• Exclusion/discrimination of vulnerable groups from health services</li> <li>• Increased GBV and SEA/SH risks for health service providers as well as project beneficiaries</li> <li>• Increased security risks for all stakeholders in IDP sites, such as project workersand beneficiaries</li> </ul>	<p>The anticipated environmental risks with health activities are considered “<b>Moderate</b>” but they could be increased to “<b>Substantial</b>” considering the limited capacity and experience of implementing agencies (CWW and GREDO) to manage those risks as per WB ESF.</p> <p>The anticipated social risks with health activities are broadly considered “<b>Substantial.</b>” However, some contextual risks such as security risks and GBV risks are considered “<b>High</b>” in particular in fragile and</p>

ACTIVITIES	POTENTIAL RISK AND IMPACTS	RISK LEVEL
		insecure project environment in IDP sites.
<p><b>OUTCOME 3: Relocation site development and mitigation of forced evictions for new drought displaced populations</b></p> <p>Preparation of HP capacity needs assessments of local authorities.</p> <p>Topographical surveys, site planning, land development, provision of basic services such as drainage network</p> <p>Support to beneficiary selection and relocation to the government sites; ensure provision of information on HLP rights and awareness of established community feedback mechanism for accountability.</p> <p>Support establishment of owner-driven incremental transitional housing</p> <p>Provide legal support to secure individual land titles and other tenure documents</p>	<p><i>Environmental:</i></p> <ul style="list-style-type: none"> <li>• Risk of storm water runoff</li> <li>• Risks related to vector control</li> <li>• Risks associated with material supplies for construction and operation (road, truck traffic)</li> <li>• Risks of man-made fire</li> <li>• Risk of temporary housing failure</li> <li>• Risk of flooding</li> <li>• Depletion of available wood in the area due to requirements for cooking fuels</li> <li>• Demands on environment due to cooking facilities</li> <li>• Waste impacts from households leading to community health</li> <li>• Emergency shelter structures will degrade over time. Resources to make repairs may be taken directly from the environment in an unsustainable manner if not provided by the organization managing the site</li> <li>• Sewage polluting the environment and being a health hazard for community members</li> <li>• Impact of rock or other surface covers (used for shelter base) on water infiltration and drainage</li> <li>• Impacts on environment through temporary use of building materials.</li> <li>• The removal of temporary housing from a site can lead to conditions which promote erosion</li> </ul> <p><i>Solar Streetlights:</i></p> <ul style="list-style-type: none"> <li>• Waste generation from discarding broken solar panels (street lights)</li> </ul> <p><i>Transitional Housing/Shelter:</i></p> <ul style="list-style-type: none"> <li>• Impacts on environment through temporary use of building materials</li> </ul>	<p>The anticipated environmental risks with HLP activities are considered “<b>Moderate</b>” but they could be increased to “<b>Substantial</b>” considering the limited capacity and experience of implementing agencies (IOM and NRC) to manage those risks as per WB ESF.</p>

ACTIVITIES	POTENTIAL RISK AND IMPACTS	RISK LEVEL
<p>Installation of solar streetlights</p> <p>facilitating the signing of a written longer-term lease agreement between the private landowners and IDPs</p>	<p>and improper disposal of waste.</p> <p><i>Land clearance and drainage:</i></p> <ul style="list-style-type: none"> <li>• Habitat loss/vegetation through land clearing.</li> </ul>	
	<p><i>Social:</i></p> <ul style="list-style-type: none"> <li>• Exclusion/discrimination of vulnerable groups from HLP services</li> <li>• Poor stakeholder engagement processes</li> <li>• Increased GBV and SEA/SH risks for HLP service providers as well as project beneficiaries</li> <li>• Increased security risks for all stakeholders in IDP sites, such as project workers and beneficiaries</li> <li>• Previous land allocation by government may not have been consistent with ESS 5</li> <li>• Land owners reject formalized lease agreements</li> <li>• Land owners interested in selling land after service improvements on the land have been undertaken</li> <li>• Disputes over land ownership, especially as it becomes economically more viable</li> </ul>	<p>The anticipated social risks with HLP are broadly considered “<b>Substantial.</b>” However, some contextual risks such as security risks and GBV risks are considered “<b>High</b>” in particular in fragile and insecure project environment in IDP sites. Also, the social risks related to eviction prevention is not fully known.</p>

## 4. Environmental and Social Risk Management

### 4.1. ESMP Tables

10. Table 8 presents indicative mitigation measures proposed in the ESMF of SURP II (updated in April 2022) that are being implemented to address negative environmental and social risks and impacts associated with general civil works under SURP II. The CERC activities will rely on this table, which will be applied to all relevant civil works to be undertaken under CERC activities. Additionally, Table 9 presents newly proposed mitigation measures to address CERC specific activities (WASH, health and HLP sectors) that are different from SURP II's main activities (urban infrastructure). While these measures are not covered in the SURP II's ESMF, this second table will be applied to relevant CERC activities for WASH, health or HLP, respectively. In addition to relevant ESSs, Table 9 includes relevant mitigation measures recommended in WB General EHSs, the EHS for Health Care Facilities and the recently issued WB ESF Life Safety Tip sheet (2021), which are applicable to relevant CERC activities. Site-specific ESMPs will further clarify applicable measures and mitigations of such standards and guidelines.
11. Considering the nature of the CERC to urgently address emergency situations, the CERC activities will focus on quick interventions that can be completed in the first 12 months. As such, Tables 8 and 9 are primarily focused on E&S mitigations to be implemented during the **construction phase**. While the following 6 months will focus on operation and maintenance, more detailed E&S measures to address the **operational phase** (such as maintenance of WASH facilities and management of IDP sites) will be considered and implemented in collaboration with the government and relevant implementing partners. Given the type of operation phase activities (e.g., operation of health care facilities, provision of potable water and waste-water disposal, operation of housing, etc.), the potential EHS risks and impacts during operation phase will be appropriately managed, which will include preparation and implementation of operational phase E&S approach and institutional arrangement (e.g., responsibilities, budgets, capacity, monitoring, etc.) (See also Section 5, which clarifies this process as part of the key steps to manage E&S risks and impacts under CERC).
12. The implementation of the measures proposed in Tables 8 and 9 will be **monitored and reported** through the indicative indicators presented in the tables and mechanisms as described in the following section on monitoring and reporting section of this document (section 8). The effectiveness of these measures will be continuously reviewed and improved throughout project life of CERC activities. More details on site-specific environmental and social monitoring indicators will be established during the implementation.

*Table 8 Environmental and Social Mitigation Plan for general civil work activities*

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
Noise pollution	<ul style="list-style-type: none"> <li>• Restrict construction working hours between 7am to 5pm</li> <li>• Educate workers on noise reduction measures</li> <li>• Ensure an effective routine maintenance for construction vehicles and machinery</li> </ul>	Recorded cases of complaints by the project workers and

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<ul style="list-style-type: none"> <li>● Consideration of specific noise control measures for works near sensitive receptors (e.g., schools, health clinics and hospitals, etc.)</li> <li>● Select equipment with lower noise levels, e.g., the use of hand drilling machines</li> <li>● Install suitable mufflers on engine exhausts and compressor components in cases where the service provider uses generators.</li> <li>● Provide fit for work PPE (ear plug/earmuffs) for all workers involved in the areas with elevated noise levels.</li> <li>● The contractor should use equipment that is/are in good working condition and are periodically serviced.</li> </ul>	community members
Fire hazards	<ul style="list-style-type: none"> <li>● Provide fire hazard training to construction workers.</li> <li>● Provide fire extinguishers.</li> <li>● Designate areas as “assembly points”.</li> <li>● Establish, where possible, live fire breaks in form of appropriate vegetation.</li> </ul>	<ul style="list-style-type: none"> <li>- # of fire extinguishers installed</li> <li>- # of fire hydrants installed</li> <li>- # of assembly points designated</li> </ul>
Air pollution	<ul style="list-style-type: none"> <li>● Educate workers about air pollution impacts from construction activities on human health, and good practices to avoid, reduce and mitigate</li> <li>● As feasible, minimize the amount of time of areas of exposed soil (source of particulate material)</li> <li>● Sprinkle water on exposed road surfaces as appropriate</li> <li>● Proper storage of road base materials (e.g., soil, gravel, etc.)</li> <li>● Covering road base material and construction waste soil/material transport trucks with tarpaulin or other heavy material to control dust emission and spillage hazards</li> <li>● No unnecessary idling during operation of vehicles and machines</li> <li>● Regular and effective maintenance of construction vehicles and machineries to ensure that they are in good working condition</li> <li>● No unauthorized slash-and-burn activity</li> </ul>	# of complaints related to air pollution
Water pollution	<ul style="list-style-type: none"> <li>● Educate workers about chemical hazards and safety</li> <li>● Proper handling and storage of Contaminants</li> <li>● Proper waste management</li> <li>● Proper soil erosion controls and management</li> <li>● Emergency procedure to control storm water and soil erosion during significant rain fall events or flooding</li> <li>● Careful measures taken not to pollute boreholes, stream and other water sources</li> <li>● Maintain register of any significant releases into surface or ground water</li> </ul>	# of complaints or incidents recorded
Soil pollution	<ul style="list-style-type: none"> <li>● Educate workers about chemical hazards</li> <li>● Proper chemical, material and waste handling and storage</li> <li>● Effective vehicular and machinery maintenance</li> <li>● Maintain a register of any chemical or petroleum spills</li> <li>● Ensure proper site clean-up and closure upon completion of construction</li> </ul>	<ul style="list-style-type: none"> <li># of incidents recorded</li> <li># of grievances registered</li> </ul>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
Loss of flora and fauna	<ul style="list-style-type: none"> <li>● Minimize unnecessary vegetation clearance</li> <li>● Where vegetation/trees cut down, plant replacement</li> <li>● Sensitize workers about fauna conservation</li> <li>● Discourage fauna killings and set penalties for killing them</li> </ul>	<p># of trees cut and planted</p> <p># of grievances recorded</p> <p>-Record of sensitization workshops</p>
Generation of solid waste	<ul style="list-style-type: none"> <li>● Educate workers about proper waste collection, storage and disposal</li> <li>● Preparation of waste management plan for each waste stream and implementation of the waste hierarchy</li> <li>● Disposal of project-generated wastes at Municipal approved sites only</li> <li>● The contractors shall ensure provision of waste bin at the project sites in the six cities to handle wastes generated.</li> <li>● Efficient use of materials to as much as possible avoid and minimize waste production.</li> <li>● Ensure waste are recycled/reused before opting to dispose.</li> <li>● Use of durable, long-lasting materials that shall not need to be replaced often.</li> <li>● Ensure waste is collected and disposed in accordance to Somalia Government regulations.</li> </ul>	<p>-# of waste bins at the sites</p> <p>-# of waste management plans</p> <p>-Volume of total waste generated</p> <p>-% of waste collected</p>
Occupational health and safety	<ul style="list-style-type: none"> <li>● Select legitimate and reliable contractors through screening OHS records</li> <li>● Address OHS risks with non-compliance remedies in procurement documents.</li> <li>● Proper and effective Contractor OHS plan to be in place that meets applicable Somalia requirements and World Bank ESS2 and World Bank Environmental and Health and Safety General Guideline requirements</li> <li>● The contractor shall always provide the workers with the required PPE and enforce their use while at the work sites.</li> <li>● Provide drinking water</li> <li>● The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality.</li> <li>●</li> <li>● Use of safety signage “MEN/WOMEN AT WORK” to warn contractor workers and visitors to worksites.</li> <li>● Provision of adequate signage and communication of risk to workers and communities.</li> <li>● Training and use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards, where possible.</li> <li>● Electrical works should be performed by trained and qualified experts.</li> <li>● Ensure that electrical equipment is properly connected before switching on sockets.</li> <li>● In case on any spillage at working areas, this should be cleaned off immediately, anti-slip hazard warning when mopping floors should be provided to reduce on chances on slip and falls.</li> <li>● Insurance coverage for all project workers</li> </ul>	<p>Availability of accident logs</p> <p># of first Aid Kits</p> <p># of fire extinguishers</p> <p>Availability of insurance policy</p> <p>% of workers using PPE</p> <p># of trainings conducted</p> <p># of HH that have drinking water supply</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<ul style="list-style-type: none"> <li>● Site construction layout and planning to help minimize potential project OHS risks</li> <li>● Safety induction for workers during induction process</li> <li>● Ongoing OHS training for workers and specialized OHS training for workers with specific risks (e.g., heavy equipment operators, welding, hazardous materials, etc.)</li> <li>● OHS Officer should be on site to implement OHS requirements Proper PPE provided for workers</li> <li>● Provision of sanitary facilities for workers</li> <li>● Separate toilets and change rooms for male and female employees</li> <li>● Worker health screening and monitoring where appropriate</li> <li>● Maintain onsite appropriate first aid and other equipment associated with the level of worker OHS risk, and establish procedure to transport of injured worker to nearby hospital</li> <li>● Ongoing monitoring and reporting of OHS performance</li> <li>● Proper investigation of all worker accidents or project-related health issues, including documentation of investigation results and as needed implementation of corrective measures</li> <li>● Establish emergency plan/procedure in case of emergencies such as chemical spills, fires, explosions, flooding.</li> </ul>	
Spread of infectious diseases, in particular COVID-19	<ul style="list-style-type: none"> <li>● Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves, and the need to be tested if they have symptoms.</li> <li>● Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing.</li> <li>● All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs.</li> <li>● Mandatory provision and use of appropriate PPE such as masks shall be required for all project personnel including workers and visitors.</li> <li>● Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks.</li> <li>● Avoid congregation of more than 15 workers at one location. Where more than one person gathered, maintain social distancing of at least 2 meters.</li> <li>● Restrict the number of people accessing the work areas.</li> <li>● Fumigate offices and work areas</li> <li>● Train all workers in respiratory hygiene, cough etiquette and hand hygiene.</li> <li>● Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the work.</li> </ul>	<p>-# of reported cases at site</p> <p># of training undertaken</p>
Traffic and Road Safety	<ul style="list-style-type: none"> <li>● Good and effective Traffic Management Plan, including at macro and micro level and consideration of pedestrians</li> <li>● Use of competent drivers with defensive driving techniques.</li> <li>● Respective PIUs shall regularly inspect vehicle safety and maintenance.</li> <li>● All fleet handling deliveries shall observe speeds limits to a maximum of 80km/h out of major towns but 30kms in the built-up areas in project areas.</li> <li>● All drivers and loaders should sign the CoC.</li> <li>● Drivers (especially going to high insecurity areas) should follow guidance on safe</li> </ul>	<p>-# of accidents recorded</p> <p># vehicle inspection reports</p> <p># of trip management</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<p>emergency driving.</p> <ul style="list-style-type: none"> <li>● Public notification for planned road closures, road deviations, and construction works.</li> <li>● Information to direct affected local population on potential safety risks from pedestrian movements.</li> <li>● Provide alternative route (detour) if technically and financially feasible.</li> <li>● Take appropriate safety measures, which are technically and financially feasible, to avoid the occurrence of incidents and injuries to members of the public associated with the operation of construction equipment.</li> <li>● Install and maintain traffic and construction signs and controls</li> <li>● Safe driving awareness for construction drivers.</li> <li>● Clearance of road and footpath from construction wastes, materials or equipment.</li> <li>● As appropriate, separation of work areas from public spaces/areas such as barriers, fencing and signs highlighting potential risks or limitations.</li> <li>● In case of project related traffic or pedestrian accident, implement adequate accident investigation procedure (reporting, cause assessment, corrective measures as appropriate, etc.).</li> </ul>	plans
Poor management of ESHS risks, as well as risks to community health and safety	<ul style="list-style-type: none"> <li>● Establish and maintain continuous liaison with the communities in project areas, including sensitization on ESHS risks and mitigation measures.</li> <li>● Use of local language and images for ESHS signage shall be encouraged.</li> <li>● Ensure proper and adequate provision of sanitation and waste management facilities at all construction sites.</li> <li>● Selected construction staff to be trained on EHS monitoring during civil works.</li> </ul>	# of ESHS incidents occurring
Management of chemicals and hazardous Materials	<ul style="list-style-type: none"> <li>● Educate workers about proper management of chemicals, hazardous materials and waste management (use, storage, and waste collection, storage and disposal).</li> <li>● Waste separation and segregation to be undertaken by competent and well-trained staff only.</li> <li>● Provide necessary PPE to workers and other equipment for chemical hazardous material use.</li> <li>● Provide proper storage area for temporary storage of chemicals and hazardous materials.</li> <li>● If pesticides are used, for example for pest control at construction storage area or work camp, ensure not to use any pesticide products that contain active ingredients that are restricted under applicable international conventions or their protocols.</li> <li>● Provide waste bins and procedure for collection, temporary storage and disposal of chemical and hazardous wastes including waste oils and petroleum products, batteries, contaminated soil, empty chemical or hazardous material containers, etc.</li> <li>● Disposal of project-generated hazardous wastes at Municipal approved sites only.</li> <li>● Ensure proper clean-up and closure upon completion of work.</li> </ul>	<p># of waste management plans</p> <p>Volume of total waste generated</p> <p>% of waste collected</p> <p># of trainings records</p>
Labor risks other than OHS: i) labor	<ul style="list-style-type: none"> <li>● Implement the LMP including the following (See LMP section for detailed procedures):</li> <li>● all contracts shall have contractual provisions to comply with the minimum age</li> </ul>	Labor registry with breakdown

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p>influx; ii) social tensions; iii) labor disputes over terms and conditions of employment; iv) Child labor risks, and v) Discrimination and exclusion of disadvantaged/vulnerable groups</p>	<p>requirements including penalties for non-compliance. The contractor is required to maintain labor registry of all contracted workers with age verification. Verification of the age shall be undertaken prior to the engagement of labor and documented.</p> <ul style="list-style-type: none"> <li>● The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship.</li> <li>● Contractually require the contractor to preferentially recruit unskilled labor from the local communities and nearby areas with priority given to hiring of qualified members of project affected households, female community members, local residents and IDPs.</li> <li>● Ensure fair terms and employment conditions consistent with national Labor Code in contracts.</li> <li>● Develop and operationalize grievance redress mechanisms (GRMs) for project workers (direct workers and contracted workers) to promptly address their workplace grievance.</li> <li>● Relevant trainings provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values, customs and traditions.</li> <li>● Develop remedial procedures to deal with child labor incidents as detailed in the LMP (Where a young looking person's age cannot be confirmed, use the GRC members from the area for age verification; assigning non-hazardous work for the child; employing adult family member; continue to pay the wage without work).</li> </ul>	<p>information of project workers (age, gender, contact info, etc.)</p> <p># of reported cases of disputes by workers</p> <p>Review of employment contracts</p>
<p>Physical and economic displacement</p>	<ul style="list-style-type: none"> <li>● Exclude activities that will entail economic and physical displacement.</li> </ul>	
<p>SEA/ SH and other forms of GBV</p>	<ul style="list-style-type: none"> <li>● Implement the SEA/SH Action Plan including the following:</li> <li>● Hiring/assigning of a GBV Specialist in each implementing agencies for the project implementation and monitoring;</li> <li>● Codes of conduct (CoC) for project workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA/SH provisions, GRM and services available.</li> <li>● Mapping and partnership with identified GBV service providers and development of referral pathways.</li> <li>● A Reporting and Response protocol that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response.</li> <li>● An Accountability Framework that outlines how the PIU/contractor will handle SEA/SH allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators.</li> <li>● Establishment of special channel/procedures for safe, confidential reporting of GBV incidence that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward.</li> <li>● Development of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace.</li> <li>● Clarification of GBV requirements in bidding documents (including requirements for CoCs, training of workers, and how GBV related costs will be covered in the</li> </ul>	<p>Progress report of the SEA/SH action plan</p> <p>% of female workers engaged in each subproject</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<p>contract); bid evaluation to include consideration for GBV response proposal.</p> <ul style="list-style-type: none"> <li>● Engagement of female workers in project civil work.</li> <li>● Arrange enough and suitable toilet and washing facilities, separate from men and women workers.</li> </ul>	
Security risks	<ul style="list-style-type: none"> <li>● Where appropriate, prepare and implement security management plans (SMP) in line with ESS4 and WB GPN on the use of security personnel including code of conduct, incident reporting, grievance redress and training/awareness-raising for security officers on the principles of proportionality in the use of force.</li> <li>● Close coordination with security authorities and local communities.</li> <li>● Deploy police officers to provide site security for the workers where appropriate.</li> <li>● Active use of remote monitoring tools, and cautious management of project visibility, e.g., public display of project information such as signboards at works sites.</li> <li>● Carry out consultations in small numbers and also through the telephone when necessary.</li> <li>● Minimize the time spent collecting project-related data and avoiding predictability in the sequencing of data collection locations.</li> </ul>	# of reported insecurity incidents
Damage or disruption to tangible and intangible cultural heritage	<ul style="list-style-type: none"> <li>● Chance find procedures will be used as follows:</li> <li>● Stop the construction activities in the area of the chance find;</li> <li>● Delineate the discovered site or area.</li> <li>● Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums take over.</li> <li>● Notify the supervisory Engineer who in turn will notify the responsible local authorities and the Ministry of Culture immediately (within 24 hours or less).</li> <li>● Avoid disturbance to local religious and cultural activities.</li> </ul>	
Lack of inclusive stakeholder engagement	<ul style="list-style-type: none"> <li>● Implement the stakeholder engagement activities, including the following:</li> <li>● Identify disadvantage groups in each subproject.</li> <li>● Establish and maintain continuous liaison with the communities including disadvantaged groups.</li> <li>● Facilitate the participation of vulnerable groups to consultations (such as provision of transportation and accessible venues)</li> <li>● Establish GRCs involving vulnerable groups.</li> <li>● Inform and sensitize all stakeholders on accessible GRM.</li> </ul>	<p>% of disadvantaged groups consulted</p> <p>% of disadvantaged groups in the GRC</p> <p>Functionality of GRM (review of grievance logs and actions taken)</p>

Table 9 Environmental and Social Mitigation Plan specific to CERC activities (WASH, health and HLP)

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p><b>Activity 1: WASH activities by IOM in all cities</b></p> <p>1) Overall withdrawal of groundwater and impacts on other ground water users and other risks (e.g., subsidence)</p> <p>2) Provision of non-potable water for drinking or other uses</p> <p>3) Use of chemicals (storage, use, disposal, etc.) associated with water supply and waste water treatment</p> <p>4) Pit latrines and septic tanks if not well sited and maintained will be a source of foul smell that will affect those within the area</p> <p>5) Faecal matter may lead to underground water contamination if the water table is high or in the case of latrines, when there is an overflow due to heavy rains.</p> <p>6) Contamination of water may lead to outbreak of diseases e.g. cholera, dysentery, typhoid, diarrhea etc.</p> <p>7) Pit latrines can be breeding grounds for flies and mosquitoes, which are disease vectors</p> <p>8) Final disposal of sludge (if removed) from latrines</p>	<ul style="list-style-type: none"> <li>• Ensure water balance is determined which will guide on the amount of water to be abstracted, and subsequently eradicating uncontrolled water abstraction by the relevant authorities such as the local council</li> <li>• Protect drinking water sources to meet WHO guidelines for drinking water quality.</li> <li>• Safe storage and administration of chemicals associated with water supply</li> <li>• Keep number of employees handling chemicals to a minimum</li> <li>• Ensure proper siting of septic tanks and pit latrines in accordance with the MOH guidelines for siting and construction of pit latrines, including incorporation of roofing and ventilation pipes.</li> <li>• Promotion of appropriate latrine design (i.e., above ground, not pit latrines) in areas of high water table.</li> <li>• Ensure proper maintenance of sanitation facilities including cleaning and hygiene training.</li> <li>• Provide hand washing facilities and water in all the sanitation infrastructures.</li> <li>• Ensure and provide training on cleaning of toilet for communities.</li> <li>• Use biopesticides to manage pests.</li> <li>• Precede borehole drilling with proper assessment on location and sustainable yield potential of water in the area.</li> <li>• Ensure continuous monitoring of groundwater quantity.</li> <li>• Introduce point-of-use treatment of drinking water.</li> <li>• Assess horizontal and vertical distance between latrines and drinking water source.</li> <li>• Ensure good siting of latrines so as to not pollute groundwater.</li> <li>• Design treatment technology to reduce pathogen hazard within the sludge by removal to a level appropriate for the intended end use or disposal practice</li> <li>• Dewater and dry sludge</li> <li>• Consider siting and design of WASH facilities to ensure accessibility for all users.</li> <li>• Define GBV requirements and expectations included in the contractual obligations as well as re-enforce CoCs that addresses GBV in the project</li> </ul>	<p>Evidence of water balance having been determined</p> <p># of sites where quality of drinking water in accordance with WHO standards</p> <p># of sites where chemicals for water treatment are stored in a lockable storage</p> <p># of sites where construction of septic tanks consistent with MOH guidelines</p> <p># of checklists developed and used to indicate status of WASH facilities</p> <p># of hand washing facilities provided</p> <p># of checklists developed and utilized to record hygiene status of toilets</p> <p># of trainings on cleaning toilets</p> <p># of sites in which appropriate sludge treatment technologies are used</p> <p># of site in which disposed sludge is dewatered and dried</p> <p>% of workers that have signed a CoC</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p>9) Attraction of common pests/disease vectors due to dirty environments, including rats, cockroaches, flies.</p> <p>10) Water quality issues from boreholes</p> <p>11) Exclusion/discrimination of vulnerable groups from accessing WASH facilities, including for persons with disabilities</p> <p>12) Increased community safety and GBV risks if the latrines are not gender-sensitive, especially for women, such as lack of functional locks and night-time lighting.</p>	<p>locations.</p> <ul style="list-style-type: none"> <li>• Ensure regular consultation with women and key stakeholders including vulnerable groups, persons with disability to facilitate safe access to WASH facilities.</li> <li>• Ensure well-lit, safe and separate WASH facilities for males and females.</li> <li>• Put in place lockable WASH facilities to guarantee privacy and safety for the users.</li> <li>• Conduct regular safety audits to understand the GBV risks and limiting factors that female staff have and may experience in their working and learning environment.</li> <li>• Develop and deliver information, education, and communication materials for stakeholders to indicate that the project and/area is a GBV/SEA/SH free zone.</li> <li>• Train all project staff and workers and integrate understanding of the CoC, GBV, SEA/SH as well as accountability and response framework including the referral processes, responsibilities and reporting in other trainings.</li> <li>• Sensitize communities on SEA/SH, services available, GRM including reporting channels.</li> <li>• Put in place a GBV sensitive GRM for project workers and for communities.</li> <li>• Conduct GBV service mapping and establish referral pathways.</li> <li>• Establish a partnership with existing GBV service providers to facilitate safe referrals to services and/or project GRM.</li> </ul>	
<p><b>Activity 2: Health activities in Baidoa by GREDO and in Mogadishu by CWW</b></p> <p>1) Risk of indiscriminate disposal of medical waste</p> <p>2) Risk of medical wastes, wastewater and air emissions leading to contamination of the environment</p> <p>3) Impacts of air emissions from incinerator</p>	<ul style="list-style-type: none"> <li>• Implement and monitor health care waste management procedures based on <i>WBG Environmental, Health, and Safety General and Health Care Facilities Guidelines</i>, including training of health care workers and auxiliary staff on how to safely handle health care waste up to its final disposal.</li> <li>• Provide adequate and appropriate protective clothing; use appropriate types of polyethylene bags and containers for waste; appropriate storage of health care waste until end of day; treat health care waste appropriately at hospitals, etc.</li> <li>• Ensure incineration of relevant delivered hazardous waste and appropriate disposal of the resulting ash at a licensed landfill.</li> <li>• Estimate and record potential waste streams including general,</li> </ul>	<p># of trainings held for health care workers</p> <p>% of workers with appropriate PPE available</p> <p>% of health care facilities in which health care waste is stored in appropriate colored containers</p> <p>% of health care facilities in which protocols for collection and</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p>4) Risks of incineration residues</p> <p>5) Risks of carriage of healthcare waste through public streets can be a risk in case of an accident or spill of health care waste</p> <p>6) Risk of poor sanitation conditions at the HCF leading to discomfort and poor aesthetic values</p> <p>7) Risk of infection among health professionals</p> <p>8) Risk of infection to the handlers</p> <p>9) Risk of infection to the handlers due to secondary handling</p> <p>10) Indoor air quality at health care facility</p> <p>11) Water borne diseases for health care facilities with inadequate portable water.</p> <p>12) Risk of vehicle emissions</p> <p>13) Risks of traffic and road safety</p>	<p>hazardous and medical before leaving the HCF and also recorded at incineration point to account for every medical waste that is moved from the HCF.</p> <ul style="list-style-type: none"> <li>• Require that receptacles for waste should be sized appropriately for the waste volumes generated, and color coded and labeled according to the types of waste to be deposited. Provide guidelines on color-coding.</li> <li>• Develop appropriate protocols for the collection of waste and transportation to storage/disposal areas in accordance with WHO guidance. Design training for staff in the segregation of wastes at the time of use.</li> <li>• Waste segregation and selection including removal of the following items from waste destined for incineration: halogenated plastics, pressurized gas containers, large amounts of active chemical waste, silver salts and photographic / radiographic waste, waste with high heavy metal content, and sealed ampoules or ampoules containing heavy metals</li> <li>• Management of incineration residues such as fly ash, bottom ash and liquid effluents from flue gas cleaning as a hazardous waste (see WBG General EHS Guidelines) as they may contain high concentrations of POPs.<sup>11</sup></li> <li>• Transportation of medical waste will be done according to the WHO specifications which guides that during transportation, a defined route is used always and the vehicle is well labelled to indicate its transporting hazardous materials.</li> <li>• Avoid disposing hazardous wastewater into domestic streams, and separate, collect and dispose at licensed dumpsites.</li> <li>• Provide cleaning staff with adequate cleaning equipment, materials and disinfectant. Provide adequate facilities to disinfect the cleaning equipment and dispose of the used consumables in a safe manner;</li> <li>• Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.</li> <li>• Train cleaners in proper hygiene (including handwashing) prior to,</li> </ul>	<p>transportation of waste are available</p> <p># of health care staff that has been trained in segregation of waste</p> <p># of health care facilities in which waste segregation and selection undertaken</p> <p># of health care facilities with incinerator in which incineration residues have been managed appropriately</p> <p># of times the defined route for transportation of medical waste and the vehicle properly labelled</p> <p># of times records are made available</p> <p>% of health care facilities in which cleaning equipment is available</p> <p>#Effective cleaning system</p> <p>% of cleaners trained</p> <p># of trainings held and who has been trained</p> <p># of facilities in which protocols are available at location</p> <p># of trainings held</p>

<sup>11</sup> See for WHO standards / specifications: <https://www.who.int/teams/health-product-and-policy-standards/standards-and-specifications>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	<p>during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials)</p> <ul style="list-style-type: none"> <li>• Ensure appropriate training on Infectious Prevention and Control for healthcare workers and other staff.</li> <li>• WHO prescribed protocols for personal protection of healthcare professionals is to be enforced at all times</li> <li>• Ensure training in Health care waste management systems, which enable health care waste to be managed responsibly, without harming the community or the environment. Staff engaged in medical waste management should wear PPE.</li> <li>• Staff engaged in auxiliary activities, such as food supply, medical waste management should wear PPE.</li> <li>• Medical waste should be treated as infectious clinical waste Category B (UN3291) [30] and handled in accordance with healthcare facility policies and local regulations</li> <li>• Segregate medical/health care waste at generation point</li> <li>• Disinfect infectious medical waste before handling, storage and disposal</li> <li>• Avoid burning both general and medical waste in open air, either on- or offsite</li> <li>• Place the different types of medical/health care waste in secured bags color-coded and labelled</li> <li>• Conduct air quality baseline assessments at facility level</li> <li>• Conduct water quality assessments at health care facilities with lack of portable water.</li> <li>• All unnecessary traffic must be strictly limited on site speed controls are to be enforced</li> <li>• Monitor exhaust emissions to ambient air, waste pollutant releases to land and water.</li> <li>• Install signage for speed control in front of settlements</li> <li>• Safety/warning signage, safety barrier,</li> <li>• Life and fire safety measures in fixed health care facilities</li> </ul>	<p>% of staff that wears PPE</p> <p>% of staff that wears PPE</p> <p># of health care facilities with records of medical waste treatment</p> <p># of health care facilities where medical is waste segregated at source to avoid double handling</p> <p># of health care facilities in which medical waste in secured bags which are color-coded and labelled</p> <p>% of health care facilities in which indoor air quality baseline assessment are undertaken</p> <p>% of health care facilities where water quality assessments are undertaken</p> <p>% of vehicles well maintained</p> <p>% of engine exhausts with mufflers installed</p> <p>% of activities implemented during the days</p> <p># of speed control signage</p> <p># of safety/warning signs installed</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p><b>Activity 3: HLP: IDP sites development by IOM in Baidoa and NRC in Garowe (activities 3.2, 3.3, 3.4 and 3.6)</b></p> <p>1) Risk of storm water runoff</p> <p>2) Risks associated with material supplies for construction and operation (road, truck traffic)</p> <p>3) Risks of man-made fire</p> <p>4) Risk of temporary housing failure</p> <p>5) Risk of flooding</p> <p>6) Depletion of available wood in the area due to requirements for cooking fuels</p> <p>7) Demands on environment due to cooking facilities</p> <p>8) Waste impacts from households leading to community health issues</p> <p>9) Emergency shelter structures will degrade over time. Resources to make repairs may be taken directly from the environment in an unsustainable manner if not provided by the organization managing the site</p> <p>10) Sewage polluting the environment and being a health hazard for community members</p>	<ul style="list-style-type: none"> <li>Plan and implement the segregation of liquid effluents principally along industrial, utility, sanitary and stormwater categories in order to limit the volume of water requiring specialized treatment</li> <li>Meet the pretreatment and monitoring requirements of the sewer treatment system into which stormwater discharges</li> <li>No interference with the operation and maintenance of the collection and treatment systems</li> <li>Discharge storm water into municipal wastewater treatment system with adequate capacity to meet local regulatory requirements</li> <li>Install signage for speed control in front of settlements</li> <li>Safety/warning signage, safety barrier</li> <li>Avoid or minimize clearing of vegetation during preparation for works.</li> <li>Carry out works in areas that have been cleared.</li> <li>Revegetate around structures following completion of works.</li> <li>Buildings should use as few resources as possible while meeting cost criteria. Use of renewable resources (e.g. vegetative matter) is preferred over non-renewable (e.g., sheet metal) on the basis of the environmental sustainability of renewable resources.</li> <li>Encourage the planning for reuse to allow emergency shelter occupant to “carry over” the building materials as assets when they move to their new housing.</li> <li>Materials which cannot be reused should be recycled.</li> <li>Standard soil and water conservation measures should be applied to limit the resource use.</li> <li>Ensure conducting regular fire drills</li> <li>Appropriate storage areas for flammable materials</li> <li>Awareness and sensitization campaign on causes of wildfires/safety practices to adopt</li> <li>Ensure appropriate training to beneficiaries in the construction of temporary housing</li> <li>Ensure appropriate elevation of infrastructure to prevent risk of flooding</li> <li>Ensure appropriate drainage of infrastructure to prevent risk of flooding</li> <li>Incorporate provision of fuel-efficient stoves</li> <li>Provide training on the use of stoves</li> <li>Solid waste collection to take place at least weekly, or more often if</li> </ul>	<p># Of sites where segregation of liquid effluents is undertaken</p> <p># of sites where the stormwater is discharged into the municipal wastewater treatment system</p> <p># of speed control signage</p> <p># of safety/warning signs have been installed</p> <p># of ha of vegetation cleared</p> <p>% of ha of vegetation rehabilitated</p> <p># of people trained on non-damaging land management techniques</p> <p># of sites with evidence of renewable resources as building materials</p> <p># of sites with evidence of recycling of materials</p> <p># of trainings for beneficiaries on construction of temporary housing</p> <p># of flooding incidents</p> <p># of households with fuel-efficient stoves provided</p> <p># of IDPs trained on use of stoves</p> <p># of waste collection per week</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p>11) Impact of rock or other surface covers (used for shelter base) on water infiltration and drainage</p> <p>12) Impacts on environment through temporary use of building materials.</p> <p>13) The removal of temporary housing from a site can lead to conditions which promote erosion</p>	<p>necessary.</p> <ul style="list-style-type: none"> <li>• Specific waste collection sites to be established.</li> <li>• Disposal methods to incorporate recycling and composting, managed by community members</li> <li>• Provide resources to IDPs to repair damage to structures through a community-managed approach</li> <li>• Sewage collection to take place as dictated by local circumstances, including toilet use, ground water levels and surface water inflows. Disposal of sewage to not lead to ground or surface water pollution and should be approved by the appropriate government authority</li> <li>• Buildings should use as few resources as possible while meeting cost criteria and Sphere standards. Use of renewable resources (e.g. vegetative matter) is preferred over non-renewable (e.g., sheet metal) on the basis of the environmental sustainability of renewable resources</li> <li>• Planning for reuse allows emergency shelter occupant to “carry over” the building materials as assets when they move to their new housing.</li> <li>• Materials which cannot be reused should be recycled.</li> <li>• Develop a decommissioning plan with community participation</li> <li>• Standard soil conservation measures should be used to limit this outcome</li> </ul>	<p># of waste collection sites established</p> <p># of IDPs provided with resources to repair shelter</p> <p># of sites with evidence of sewage collection taking place</p> <p># of houses with evidence of renewable resources as building materials</p> <p># of sites with evidence of recycling of materials</p> <p># of sites with evidence of a Decommissioning Plan</p> <p># of sites with evidence of application of soil conservation measures</p>
<p><b>Activity 3: HLP: Legal support to secure land tenure and prevent forced evictions by NRC in all cities (activities 3.5 and 3.7).</b></p> <p>1) Previous land allocation of IDP sites by government may not have been consistent with ESS 5 (such as land acquisition through forced evictions)</p> <p>2) Land owners reject formalized lease agreements</p> <p>3) Land owners interested in selling land</p>	<ul style="list-style-type: none"> <li>• Conduct retroactive screening on the IDP sites provided by the government as laid out in the SURP II RPF (updated in April 2022).</li> <li>• Facilitate legal agreements between the local authorities, camp management and land owners.</li> <li>• Ensure the participation and witnessing of legal agreements by traditional and formal authorities.</li> <li>• Get agreement from all residents and users of the land and relevant departments on the use of land.</li> <li>• Ascertaining land ownership and claims and ensure all resettlement issues are resolved prior to the start of relevant work.</li> <li>• Exclude activities that will cause economic and physical displacement.</li> <li>• Ensure that the affected parties have access to functional GRM.</li> </ul>	<p># of legal agreements entered that had local authorities as witnesses</p> <p># of land related complaints captured and addressed through the GRM</p> <p># of site specific ESMPs consistent with the excluded resettlement.</p> <p># of consultations with the affected population to discuss GBV risk factors</p>

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
<p>after service improvements on the land have been undertaken</p> <p>4) Disputes over land ownership/different people claiming land, especially as it becomes economically more viable</p>	<ul style="list-style-type: none"> <li>Regular community consultations with the affected population on GBV risk factors in accessing HLP.</li> </ul>	<p>in accessing HLP</p>

13. While the above ESMP tables broadly cover key E&S risks and proposed mitigations, the project will pay particular attention to the following three key issues where the project locations and the nature of the CERC activities may have significant risks. The effectiveness of the mitigations proposed in the ESMP tables on these key issues will be closely monitored and additional measures will be considered in an adaptive manner.

#### 4.2. Management of Gender-Based Violence and SEA/SH risks

14. **GBV and SEA/SH risks in CERC activities.** Gender-based violence (GBV) in Somalia continues to be an issue of major concern, especially in the event of the COVID-19. Available evidence indicates recent spikes in Intimate Partner Violence, rape, sexual exploitation, sexual harassment and abuse have multiplied GBV risks for women and girls, with a worsening impact on women and girls living with disabilities. GBV affects both men, women and children, but it disproportionately affects women and girls. Conflict and disaster-related displacement magnifies risks of sexual violence for women and girls in Somalia. Women and girls are at heightened risk of sexual assault during movement to new areas and once settled in displaced settings. Unsafe environments, eroded protection mechanisms and social cohesion, and a lack of safe livelihoods options all increase the incidence of opportunistic sexual violence perpetrated in and around displaced settings when women and girls are collecting water, firewood and other resources, and when in public spaces and accessing public facilities. Ongoing insecurity in the country coupled with the increase in climate-related shocks and disasters are likely to create ongoing population displacement, further entrenching poverty among internal migrants and increasing exposure to GBV risks. Displaced, migrant and women from minority clans, or with no clan affiliation, are at particular risk of sexual exploitation and abuse and sex trafficking because of the double discrimination they face due to their economic and social vulnerability, discrimination and lack of access to protective resources and redress mechanisms. The project has identified the following key GBV/SEA/SH risks that may emerge as a result of CERC activities:

- Potential abuse of power and sexual exploitation in labour practices, especially during recruitment, can distort power relations and lead to opportunities for abuse. For example, labour-intensive work schemes and/or cash for work programs (in general) can expose women to sexual exploitation, harassment, or violence; when moving about communities and engaging with male leaders and/or community members.
- Unequal gender norms and harmful beliefs run the risk of creating hostile environments for female workers, in instances where unethical sub-project workers may take advantage of their positions and sexually exploit other personnel or the community while accessing the cash for work programs, housing, land property, health and water infrastructure/ distribution points.
- Limited or lack of information throughout the project's cycle can lead to harm and violence towards the communities, especially those with less agency and power. With limited or lack of information, staff may have no /limited knowledge in identifying, supporting and reporting GBV, SEA and SH related cases as such may cause more harm than good leading to a slew of consequences including retaliation by perpetrator(s), intimate partners or family members, social isolation, targeted physical attack and death.
- Pre-existing gender inequality and discrimination can exacerbate the risk of gender-based violence (GBV) for women especially where female workers have less time for traditional

gender-related work such as child care, this can also lead to a potential increase in Intimate Partner Violence (IPV).

- Exclusion from spaces of voice, agency and decision-making for women and girls can lead to decisions that further harm or marginalize women and girls. In WASH, health and HLP sectors, this can lead to prioritization that does not take women and girls' safety or needs into account via requirements that are not correctly met or assessed, thereby increasing their risk to GBV – i.e., via the water structures, solar streetlights, provision of temporary housing.
- Community or social governance resolution processes might reinforce gender inequality pushing for resolutions that widen inequalities, are not survivor-centered and may lead to impunity and more harm to a survivor (through marriage to a perpetrator, re-victimization or other consequences).

**15. Mitigations to address GBV and SEA/SH risks in CERC activities.** To address the GBV and SEA/SH risks, the SURP II SEA/SH prevention and response Action Plan is under implementation with the following key measures:

- Code of conduct (CoC) for project workers with SEA/SH/GBV-related protections, to be signed and understood by all project workers including contractors, service providers and consultant staff;
- Plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA provisions;
- Map out GBV prevention and response service providers and develop referral pathways in the CERC locations;
- Develop a Reporting and Response Protocol that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response;
- An Accountability Framework that outlines how the PIUs/contractors, IOM and IPs will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators.
- Establish of special channel/procedures for safe, confidential reporting of GBV incidence that connect to the project GRM, and enable training of GRM operators on how to respond to cases that come forward.
- GBV requirements to be clarified in bidding documents (including requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract); bid evaluation to include consideration for GBV response proposal.
- The SURP II is also providing capacity building and training of relevant stakeholders, including contractors and project workers, in addition to capacity building for government partners.
- A GBV expert has been hired to support the PCU and a technical specialist has been also brought on board to support the project.

### 4.3. Involuntary Resettlement

**16. Exclusion of activities with economic and physical displacement.** As specified in the list of excluded activities, the CERC will not support any activities that will cause economic or physical displacement. All project activities will be conducted on the land secured by the government, which will be subject to prior screening to confirm the consistency with the SURP II Resettlement Policy Framework (RPF, updated in April 2022). Where the CERC activities will cause unanticipated/unintended resettlement

impact (for example, minor loss or damage to neighboring household assets during installation of water piping systems under WASH activities by IOM), relevant measures of the RPF will be applied.

17. **Legal support to land tenure security and mitigation of forced eviction.** The CERC activities include technical assistance to be conducted under HLP by NRC, which will provide legal support to IDPs (who are informally settling on private land outside IDP sites provided by the government) to promote land tenure security and mitigate forced evictions (Activities 3.5 and 3.7). Most of the evictions of IDPs in Somalia are driven by insecure tenure, inadequate legal and policy frameworks, and weak rule of law. The three most cited reasons for evictions in Somalia are the desire of owners to develop their properties, irregular and arbitrary increase of rental fees, and the inability of tenants to fulfil rental obligations. To address such evictions, NRC is conducting an eviction monitoring & response programme. Monitoring is done through a local network of community leaders, informal settlement leaders, monitors, NRC paralegals and community volunteers. When an eviction event is identified, a diversion or mitigation response is activated. Government focal points are notified and either they or a qualified NRC staff establish contact with the landowner or representative(s) attempt to resolve the dispute so that the eviction threat is dropped and the occupants' tenure is temporarily assured (diversion) or, if eviction is unavoidable, to negotiate sufficient time to safely relocate the land occupants to a new site. With that extra time, NRC and its partners attempt to find a new site or accommodations for dignified relocation (mitigation). Once the eviction threat is diverted or mitigated, government focal points and NRC staff negotiate with landowners to provide a written commitment to secure the tenure of occupants for several years as a means to prevent future arbitrary evictions. While the WB ESS5 does not apply to disputes between private parties in land titling and related contexts (ESS5 para 7), the project will take the following measures to address potential risks in this TA component:

- Facilitate legal agreements between the local authorities, camp management and land owners.
- Ensure the participation and witnessing of legal agreements by traditional and formal authorities.
- Get agreement from all residents and users of the land and relevant departments on the use of land.
- Ascertain land ownership and claims and ensure all resettlement issues are resolved prior to the start of relevant support.
- Ensure that the affected parties have access to functional GRM.
- Where possible ensure that the lease agreement is notarized by the public notary
- Ensure both landowners and affected communities are aware of their HLP rights and responsibilities under signed lease agreements.
- Ensure that there are functional well-trained community fora with capacity on dispute resolution to resolve any land disputes and emerging cases.
- In cases, where the land disputes arise (e.g., landowners issue eviction threats or breach of lease agreement), NRC will work with local authorities and community dispute resolution committees to resolve the cases.

#### 4.4. Security Risk Management

18. **Security risks in CERC activities.** While security risks in some IDP sites to be supported by CERC activities are considered significant, the project will take appropriate and proportionate security

measures to minimize the potential risk to workers. As proposed in the above ESMP table, key security measures will include security protection by public security personnel (such as by district police); restrictions on work hours where security risks are higher (such as night time); and measures to maintain low profile of the site and workers (such as the minimum use of sign boards). While security measures to be arranged by public security personnel to address external security risks (such as terrorism and armed insurgency) will be determined by relevant security authorities in each municipality, the CERC will address internal security risks associated with the deployment of such security personnel on the community and project workers in line with ESS4 (Community Health and Safety) and the WB Good Practice Note “Assessing and Managing the Risks and Impacts of the Use of Security Personnel” (such as the awareness raising and training of security officers on the principles of proportionality in the use of force and GBV risks.). The CERC IPs will consist of an UN agency and international NGOs, who are already operating under the current security environments with their respective security risk management systems. The consistency with the relevant requirements of security risk management under the ESF will be confirmed and additional measures will be applied (including the coverage of their contractors and service providers and relevant project workers), where necessary.

## 5. Environmental & Social Screening Process

19. Following the activation of the CERC, the IOM and relevant IPs will take the following E&S steps. Relevant PIUs and the PCU will provide necessary support to them throughout the entire process:

**Step 1: E&S Screening.** In conjunction with relevant technical studies (hydrological and topographical surveys) and detailed designs to be prepared for each IDP site, the proposed activities will be screened with the positive list and excluded activities to screen out activities with significant E&S risks and impact (including economic and physical displacement). The screening form included in SURP II ESMF (Annex 2) can be utilized for this purpose. Key E&S risks will be identified at this stage.

**Step 2: Preparation of the ESMP.** Based on the results from Step 1, IOM and relevant IPs will prepare an ESMP for each IDP site (or for each district in Mogadishu) that will cover the relevant CERC activities. Relevant inclusive stakeholder consultations will be conducted, which will inform the ESMP. The following table presents the ESMPs to be prepared for each site with specific **CERC activities involving civil works** and responsible IPs. To facilitate expedited project preparation necessary for emergency situations, the ESMP will cover all relevant ESSs in one document (integrating SEP and LMP provisions) and in a brief and focused manner. The IOM and IPs will aim to prepare one ESMP for each site. However, depending on the project designing process and timelines for different CERC activities, the ESMPs may be prepared and new activities added in a phased manner (for example, the first phase focuses on HLP activities while the second phase on WASH). Other **CERC activities not involving civil works** (which are not indicated in the following table) will directly apply the relevant E&S measures specified in the ESMF (such as activities for institutional capacity building (activity 3.1), provision of health care services (activities 2.1 and 2.2) and legal support for HLP (activity 3.5)). While such CERC activities will not prepare site-specific ESMPs, they will be implemented, monitored and reported on as per Step 4 below.

Table 10 ESMP Process

City	ESMP for IDP Site / Urban Centre	Activities to be covered in the ESMP	Responsible IPs
Garowe	<ul style="list-style-type: none"> <li>ESMP for Aramale site (formal resettlement site)</li> </ul>	<ul style="list-style-type: none"> <li>WASH by IOM (borehole, piping network, water distribution point, transitional latrines)</li> <li>HLP by NRC (land development, compaction of existing access road, drainage, temporary housing, streetlighting)</li> </ul>	IOM with support of NRC
Baidoa	<ul style="list-style-type: none"> <li>ESMP for Barwaqo extension (formal resettlement site)</li> </ul>	<ul style="list-style-type: none"> <li>WASH by IOM (borehole, piping network, water distribution point, transitional latrines)</li> <li>HLP by IOM (land development, drainage, temporary housing, streetlighting)</li> </ul>	IOM
	<ul style="list-style-type: none"> <li>ESMP for ADC IDP site (Isha)</li> </ul>	<ul style="list-style-type: none"> <li>WASH by IOM (borehole, piping network, water distribution point, transitional latrines)</li> </ul>	IOM
BRA/ Mogadishu	<ul style="list-style-type: none"> <li>ESMP for Daynille District (Zone 4 &amp; 5)</li> </ul>	<ul style="list-style-type: none"> <li>WASH by IOM (borehole, piping network, water distribution point, transitional latrines)</li> <li>Health by CWV (minor expansion of Weydow health center)</li> </ul>	IOM with support of CWV
	<ul style="list-style-type: none"> <li>ESMP for Kahda District (Garasbaley sub-district)</li> </ul>	<ul style="list-style-type: none"> <li>WASH by IOM (borehole, piping network, water distribution point, transitional latrines)</li> </ul>	IOM

**Step 3: Review, clearance and disclosure.** The ESMP will be reviewed by PIU/PCU and cleared by WB for disclosure. For swift implementation of CERC activities under emergency situation, the WB internal review and clearance process will be streamlined wherever possible in collaboration with the WB.

**Step 4: Implementation and Monitoring and Reporting.** The approved ESMPs will be implemented according to the agreed implementation arrangement (see Section 9). IOM and relevant IPs will be responsible for the implementation of the ESMPs on the ground and report the outcome to PIC/PCU and WB as specified in this ESMF. Where civil work contractors are engaged, the ESMPs will be integrated with relevant procurement documents. IOM and relevant IPs will also follow the emergency reporting requirement for significant incidents and accidents (see Section 8).

**Step 5: Completion and Evaluation.** Once the CERC subproject has been completed, the IOM and relevant IPs will evaluate the results before closing the outcome agreement. Any pending issues and/or grievance must be addressed before the subprojects are considered fully completed. PCU will submit the completion report describing the E&S compliance and performance to the WB.

**Step 6: Management of E&S risks during operation stage.** While the last 6 months of CERC activities will focus on operation and maintenance, more detailed E&S measures to address the operational phase

(such as maintenance of WASH facilities and management of IDP sites) will be considered and implemented in collaboration with the government and relevant implementing partners. Given the type of operation phase activities (e.g., operation of health care facilities, provision of potable water and waste-water disposal, operation of housing, etc.), the potential EHS risks and impacts during operation phase will be appropriately managed, which will include preparation and implementation of operational phase E&S approach and institutional arrangement (e.g., responsibilities, budgets, capacity, monitoring, etc.).

## 6. Labor Management Procedures

20. The Labor Management Procedures (LMP) for SURP II (updated in April 2022) is applicable to CERC activities. This section summarizes key labor requirements of the LMP, highlighting key labor risk mitigations and responsible institutions relevant to CERC activities.

21. **Labor use under CERC activities.** The labor use of the CERC activities is similar to the parent project, which includes ‘**direct workers**’ (e.g. PIU and PCU staff), skilled and unskilled ‘**contracted workers**’ (e.g. engaged by construction companies), ‘**primary supply workers**’ (e.g. engaged for provision of construction materials) and **government civil servants** (e.g. federal, state and municipal, including police officers). The key additional project workers under CERC activities include the following. The workforce is required for the duration of relevant CERC activities, focusing on the first 12 months:

- **Contracted workers:** (i) the permanent and program staff of IOM and its consortium IPs (NRC, CWW and GREDO), who will fully or partially support the CERC activities; (ii) workers engaged by their contractors and service providers (e.g. construction companies for civil works, health care professionals, lawyers and paralegals to support HLP); and (iii) IDP community members, who will be engaged by IOM and some IPs to support relevant CERC activities under ‘cash for work’ program (who will be paid approx. US\$20 per day).
- **Community workers:** Local IDP community members will support other IDP families who will receive building materials and labor cost (US\$ 300) from IOM in setting up transitional shelters with ‘owner driven transitional shelter approach’.
- **Primary supply workers:** Workers engaged by primary suppliers who provide goods and materials essential for CERC activities on an ongoing basis (e.g. construction materials, building materials for shelters, materials for WASH, medical supplies).

Below is the overview of anticipated project workers in CERC activities. The number of project workers provided is indicative. More detailed number will become available during project implementation.

Table 11 Project Workers

Type of project workers	Characteristics of project workers	Indicative number of workers	Applicable labor management procedures
<b>Contracted workers</b> 1. <b>IOM and its consortium IPs (NRC,</b>	<ul style="list-style-type: none"> <li>• Staff and consultants of IOM and its consortium IPs, who will fully or partially support the CERC activities.</li> <li>• Their characteristics vary,</li> </ul>	<ul style="list-style-type: none"> <li>• IOM: approx. 40</li> <li>• NRC: approx.50</li> <li>• CWW: approx. 20</li> <li>• GREDO: approx.30</li> </ul>	The existing labor requirements of UN agency and international NGOs, the SURP II

<b>CWW and GREDO)</b>	including International/national positions and permanent/program staff. <ul style="list-style-type: none"> <li>• They are based in country (Baidoa, Garowe, Mogadishu) or Nairobi.</li> </ul>		LMP and national labor code, whichever is more stringent.
<b>Contracted workers</b> 2. <b>Construction companies and service providers</b>	<ul style="list-style-type: none"> <li>• <b>WASH:</b> construction for WASH facilities engaged by IOM.</li> <li>• <b>Health:</b> health care workers engaged by GREDO and CWW</li> <li>• <b>HLP:</b> construction for IDP site clearance and development, legal firms and individual law professionals for tenure security support.</li> </ul>	<ul style="list-style-type: none"> <li>• Contractors and service providers will be selected during implementation stage.</li> </ul>	All relevant requirements of the SURP II LMP, as summarized in this section.
<b>Contracted workers</b> 3. <b>IDP workers under ‘cash for work’</b>	<ul style="list-style-type: none"> <li>• IDP workers engaged by IOM and IPs under ‘cash for work’ program.</li> </ul>	<ul style="list-style-type: none"> <li>• Equivalent to 200 jobs for 12 months (50,000 person days works).</li> </ul>	
<b>Community workers</b>	<ul style="list-style-type: none"> <li>• Local IDP community members supporting other IDP families who will receive building materials and labor cost (US\$ 300) from IOM in setting up transitional shelters.</li> </ul>	<ul style="list-style-type: none"> <li>• 1800 for temporary shelters in Garowe</li> <li>• 1500 temporary shelters in Baidoa</li> <li>• A few IDP members may help setup each housing.</li> </ul>	As specified in the below subsection on community workers.
<b>Primary supply workers</b>	<ul style="list-style-type: none"> <li>• Workers engaged by primary suppliers (e.g. construction materials, building materials for shelters, materials for WASH, medical supplies).</li> </ul>	<ul style="list-style-type: none"> <li>• Primary suppliers will be selected during implementation stage.</li> </ul>	Child/forced labor and serious OHS risks, as specified in below subsection on primary supply workers).

22. **Key labor risks and mitigations.** Key labor risks under the CERC are similar to those listed in the SURP-II LMP, except where the LMP specifically defines risks in relation to road construction. The CERC also includes risks of OHS, child labor, labor disputes, GBV/SEA/SH risks, discrimination and exclusion of vulnerable groups, and security risks. Labor influx risks and impacts are less expected under the CERC, since most works will be implemented by local workers and community workers, with only some skilled workers deployed from outside. The summary of the policies and procedures to address such key labor risks is presented in the table below.

Table 12 Key labor risks

Key labor risks	Policies to address risks	Procedures to back up the policy
<b>1. OHS risks</b>	<ul style="list-style-type: none"> <li>• Abide by OHS requirements as set out in Labor Code (Articles 101-104), ESS2 (including WBG EHSGs both general and Health Care Facilities), the SURP II LMP and the CERC ESMF.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop and implement an approved Contractor ESMP, including OHS Management Plan.</li> <li>• Select legitimate and reliable contractor through screening OHS records.</li> <li>• Address adequately OHS risks with non-compliance remedies in procurement documents.</li> <li>• Require the contractor to engage qualified ESHS staffing</li> <li>• Enhance workplace OHS awareness and training.</li> <li>• Conduct routine monitoring and reporting.</li> <li>• Implement COVID-19 mitigation measures as provided in Bank and FGS guidelines</li> <li>• Raise awareness on STDs/HIV</li> </ul>
<b>2. Child labor</b>	<ul style="list-style-type: none"> <li>• Set the minimum age of project workers eligible for any type for work (including construction work) at 15 years.</li> </ul>	<ul style="list-style-type: none"> <li>• Include minimum age in procurement documents.</li> <li>• Raise awareness on child protection with contractors and in the communities.</li> <li>• Maintain labor registry of all contracted workers with age verification.</li> <li>• Develop remedial procedures to deal with child labor incidents.</li> </ul>
<b>3. Labor influx</b>	<ul style="list-style-type: none"> <li>• Minimize labor influx through tapping the local workforce.</li> <li>• Minimize labor-related risks on the community through the code of conduct, including GBV.</li> </ul>	<ul style="list-style-type: none"> <li>• Require the contractor to preferentially engage unskilled local workforce from the local communities.</li> <li>• Make all contracted workers sign code of conduct, including prevention of GBV.</li> <li>• Conduct induction and toolbox talks outlining expected conduct and local community values.</li> <li>• Introduce disciplinary measures for violations and misbehaviors.</li> </ul>
<b>4. Labor disputes</b>	<ul style="list-style-type: none"> <li>• Respect the national Labor Code and promptly address workplace grievances to minimize the risk of labor disputes.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide workers with contracts with fair terms and conditions.</li> <li>• Have grievance mechanisms in place to promptly address workplace concerns.</li> <li>• Respect the national Labor Code on workers' right of labor unions and freedom of association.</li> </ul>
<b>5. GBV/SEA/SH</b>	<ul style="list-style-type: none"> <li>• Implement SEA/SH prevention and response</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct awareness raising</li> <li>• Enforce signing of code of conduct by all project workers.</li> <li>• Train GRC GBV focal point on handling related complaints and also on GBV service providers referral mechanism</li> <li>• Require the contractor to address potential sexual exploitation or harassment in recruitment</li> </ul>

Key labor risks	Policies to address risks	Procedures to back up the policy
		or retention of skilled or unskilled female workers.
<b>6. Discrimination and exclusion of vulnerable or disadvantaged groups</b>	<ul style="list-style-type: none"> <li>Promote no discrimination and equal opportunity with respect to any aspects of the employment relationship.</li> </ul>	<ul style="list-style-type: none"> <li>Require the contractor to employ vulnerable groups as part of unskilled workforce.</li> <li>Provide maternity leave and nursing breaks where relevant.</li> <li>Arrange sufficient and suitable toilet and washing facilities, separate for men and women workers.</li> </ul>
<b>7. Security risks</b>	<ul style="list-style-type: none"> <li>Take appropriate and proportionate security measures to minimize the potential risk to the workers.</li> </ul>	<ul style="list-style-type: none"> <li>Security protection to be determined by security authorities to address external security risks (such as terrorism and armed insurgency).</li> <li>Address internal security risks associated with the deployment of security personnel on the community and project workers in line with the WB Good Practice Note “Assessing and Managing the Risks and Impacts of the Use of Security Personnel”.</li> </ul>

23. **Minimum age for project workers.** While the CERC activities will engage IDP community members as project workers to provide them with short-term employment opportunities and support their livelihood, the following policies and procedures will be applied to manage the risk of child labor.

- Hazardous work:** The national Labour Code (Article 93) provides that it shall be unlawful to employ children under the age of 15 years. The Code (Article 94) sets certain age limit on hazardous work, providing that the minimum age for employment on underground work in quarries or mines shall be 18 years. Similarly, ESS2 (para 19) sets out further conditions on the minimum age, stating that a child over the minimum age and under the age of 18 will not be employed or engaged in connection with the Bank-financed project in a manner that is likely to hazardous or interfere with the child’s education or be harmful to the child’s health or physical, mental and any other relevant development. Considering these national and WB requirements, **the minimum age for hazardous work under CERC activities is set at 18** (for example, construction work and health care work).
- Non-hazardous work:** The national Labour Code as well as ESS2 allow persons under 18 and over 15 to be engage if the work is non-hazardous and does not interfere with the child’s education and not harmful to the child’s development (for example, administrative work, site cleaning or rubbish removal). Considering this, the minimum age of project workers for such (non-hazardous) work is set at 15. As per ESS2, the IPs will conduct an appropriate risk assessment to see if particular risks exist for engaging workers under 18 and over 15 prior to engagement of such workers, which will be followed by regular monitoring of health, working conditions, hours of work and availability of functional GRM for them.
- Age verification protocol:** In order to prevent engagement of under-aged labor, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance, and it will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced. The

contractor is required to maintain labor registry of all contracted workers with age information. Verification of the age shall be undertaken prior to the engagement of labor and be documented. Below is indicative age verification means that could be used in Somalia context where official ID system is broadly unavailable: Check the birthday on official documents such as birth certificate, national ID or other credible records, where available; Obtain written confirmation from the medical practitioner; Obtain written and signed declaration from the worker and his/her parents or guardian; or Inquire with the local community leader, community action group or with other credible community sources.

- **Responsible remedial measures.** In case a project worker who does not satisfy the age limit is identified working on the project (i.e., over 18 years old for hazardous work; and over 15 years for nonhazardous work), the employer (contractor, subcontractor or primary supplier) shall be required to terminate the engagement of such a project worker in a responsible manner. Indicative responsible approach may include:

- 1) Offer a project employment to a member of the family who satisfies the age limit in exchange of keeping the under-aged worker away from work.
- 2) If a family member who satisfies the age limit is not available, require the employer (using the contractual penalty provisions) to continue the wage payment to the underage worker without engaging in work for an agreed period.
- 3) If the worker is over 15 years old and under 18, consider transferring the worker to an alternative position that is not hazardous and does not interfere his/her education (subject to prior risk assessment and regular monitoring).

24. **Terms and conditions for IOM and IPs' own staff and consultants.** The terms and conditions for direct staff and consultants of IOM and international IPs will be governed by their own labor standards, ESS2 and the national labor code, whichever is more stringent.

25. **Terms and conditions for contracted workers engaged by IOM and IPs' contractors and service providers as well as IDP workers engaged under 'cash for work' program.** Labour Code of Somalia presented in Section III (Overview of Labor Legislation) is the guiding legislation on employment terms and conditions for contracted workers. Below are key components of the terms and conditions that should be applied to contracted workers under these categories.

- **Provision of written individual contract of employment.** A written individual contract of employment shall be provided to workers that specify the following: (a) name of workers; (b) address, occupation, age and sex of workers; (c) employer's name and address; (d) nature and duration of contract; (e) hours and place of work; (f) remuneration payable to the worker; (g) procedure for suspension or termination of contract. Depending on the origin of the employer and the employee, employment terms and conditions will be communicated in a language that is understandable to both parties. In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
- **For 'cash for work',** all the beneficiaries will sign an MOU/CFW agreement with the IP, witnessed by the CDC representative. The MOU will stipulate the scope of work, output per day, working hours, daily CFW rate, conflict resolution among others. This MOU will formalize NRC's engagement of the CFW beneficiaries in the rehabilitation of the selected projects.

- **Notice for termination of contract.** Either of the contracting parties may terminate a contract of employment by giving written notice as under: (a) not less than ten days in the case of manual workers; or (b) not less than 30 days in the case of non-manual workers. No notice needs to be given in case the duration of contract does not exceed one month.
- **Minimum Wages.** While the mechanism to set the official minimum wage by the presidential decree (Labour Code, Article 72) is not currently functioning, the market rate is available for each job type in different locality. The fair market rate will be identified and applied for SURP-II and the AF project workers. For '**Cash for work**', in recognition that CfW primarily aims to provide instant, temporary jobs for unskilled labour while rehabilitating community facilities and basic community services, skilled labour is also needed to lead, technically supervise, and ensure the quality of work being done. This means that skilled labour should not receive the minimum wage that the unskilled CfW beneficiaries receive, but rather a fair rate for their daily work. However, at minimum, the minimum wages have to be paid. There is an added benefit when unskilled labourers gaining vocational skills by apprenticeship when they are teamed up with skilled labourers. However, setting wages for CFW projects should take into account: beneficiary needs (i.e. what is the wage intended to cover), objective of the program, wage standards in the project location based on prevailing market rate or government set rate, other NGOs or local actors conducting CFW projects in the same intervention area/cluster recommended rate.
- **Hours of Work.** The normal hour of work of a project worker shall not exceed 8 hours a day or 48 hours a week. Hours worked in excess of the normal hours of work shall not exceed 12 hours a week and shall entitle a worker to a proportionate increase in remuneration. Working hours for the '**cash for work**' activities are defined as 6-8 hours per day.
- **Rest per week.** Every worker shall be entitled to one day's rest each week, which should normally fall on Friday. It shall consist of at least 24 consecutive hours each week. Workers shall also be entitled to a rest day on public holidays recognized as such by the State.
- **Annual leave.** Workers shall be entitled to 15 days' leave with pay for every year of continuous service. An entitlement to leave with pay shall normally be acquired after a full year of continuous service.
- **Maternity leave.** A female worker shall be entitled, on presentation of a medical certificate indicating the expected date of her confinement, to 14 weeks' maternity leave with half pay, of which at least six weeks shall be taken after her confinement, provided that she has been employed by the employer for at least six months without any interruption on her part except for properly certified illness.
- **Nursing breaks.** A female worker who is nursing her own child shall be entitled, for a maximum of a year after the date of birth of the child, to two daily breaks of one hour each. The breaks shall be counted as working hours and remunerated accordingly.
- **Deductions from remuneration.** No deductions other than those prescribed by the Code or regulations made hereunder or any other law or collective labour agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and

evidenced in writing. The contractor shall not demand or accept from workers any cash payments or presents of any kind in return for admitting them to employment or for any other reasons connected with the terms and conditions of employment.

- **Death benefit.** In case of death of a worker during his contract of employment, the employer shall pay to his heirs an amount not less than 15 days' remuneration as death benefit for funeral services.
- **Medical treatment of injured and sick workers.** It shall be the duty of the employer to arrange at his own expense for the conveyance to the nearest hospital of any injured or sick worker who can be so conveyed and who cannot be treated on the spot with the means available.
- **Collective Agreements.** A collective agreement is an agreement relating to terms and conditions of work concluded between the representatives of one or more trade unions, on the one hand, and the representatives of one or more employers, on the other hand. Where collective agreements exist between the employer and project workers, such agreements will be applied, where relevant.

26. **Grievance Redress Mechanisms for Project Workers.** While a general GRM will be established for general stakeholders (see Section 7), a separate grievance mechanism will be established for project workers as required in ESS2. Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers. Different ways in which workers can submit their grievances should be allowed, such as submissions in person, by phone, text message, mail and email. The grievance raised should be recorded and acknowledged within one day. While the timeframe for redress will depend on the nature of the grievance, health and safety concerns in work environment or any other urgent issues should be addressed immediately. Where the grievance cannot be addressed within a reasonable timeframe, the aggrieved worker should be informed appropriately, so that the worker can consider proceeding to the national appeal process. The mechanism will also allow for anonymous complaints to be raised and addressed. Individuals who submit their comments or grievances may request that their name be kept confidential.

- **IOM and IPs' own staff and consultants.** Considering the limited number of project workers in this category, the project will have a simplified but effective grievance system. IOMs and IPs will hold periodic team meetings to discuss any workplace concerns. The grievance raised by workers will be recorded with the actions taken by each agency. The summary of grievance cases will be reported to the PIU/PCU and World Bank as part of the regular report. Where the aggrieved direct worker wishes to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the worker may raise the issue with the PIU/PCU or responsible municipal authorities, where relevant. Where the IOM and IPs have an existing grievance system (such as those in the UN system), their workers should use such mechanism.
- **Contracted workers engaged by IOM and IPs' contractors and service providers as well as IDP workers engaged under 'cash for work' program.** The project site manager and the ESHS officer (or any other appropriate officers such as E&S focal points) of the contractor and service provider (or IOM and IPs in case of cash for work program) will hold a daily team meeting with all present contracted workers at site at the end of the daily work to discuss

any workplace grievances. The grievance raised will be recorded with the actions taken by the contractor and service provider (or IOM and IPs in case of cash for work program). The summary of grievance cases will be reported as part of periodic report. Where appropriate and available, the contracted workers should be allowed to utilize an existing grievance mechanism within the contractor or service provider (or IOM and IPs in case of cash for work program). Where the aggrieved workers wish to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise their issue with the PIU/PCU and/or the municipality. The contracted workers will be informed of the grievance mechanism at the induction session prior to the commencement of work. The contact information of the PIU/PCU and/or the municipality will be shared with contracted workers.

- **National appeal process.** As per the national Labour Code (Article 134), any individual labour dispute can be submitted by any of the parties to the competent district labour inspector for conciliation, where such labour inspector is available. The inspector is mandated to attempt to settle the dispute within 14 days of its submission.
- **Grievances related to Gender Based Violence (GBV).** See the subsection on GRM under Stakeholder Engagement Section.

## 27. Contractor management

- Selection of Contractors. The IOM and IPs shall make reasonable efforts to ascertain that the contractor or service provider who will engage contracted workers is legitimate and reliable entities and able to comply with the relevant requirements under the LMP. Such requirements shall be included in the procurement documents. As part of the process to select the contractors or service providers who will engage contracted workers, the IOM and IPs may review the following information:
  - Business licenses, registrations, permits, and approvals
  - Public records, for example, corporate registers and public documents relating to violations of applicable labor law; accident and fatality records and notifications to authorities; labor-related litigations Documents relating to the contractor's labor management system and OHS system (e.g., HR manuals, safety program); ESHS personnel and their qualification
  - Previous contracts with contractors and suppliers (showing inclusion of provisions and terms reflecting requirements on labor and working conditions).
- Contractual Provisions and Non-Compliance Remedies. The IOM and IPs shall incorporate the relevant labor management requirements into contractual agreements with the contractor or service provider, together with appropriate non-compliance remedies (such as the provision on withholding 10 % of payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; removal of personnel from the works; or forfeiting the ESHS performance security.). In the case of subcontracting, the IOM and IPs will require the contractor or service provider to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.
- Performance Monitoring. The IOM and IPs shall establish resources and procedures for managing and monitoring the performance of the contractor in relation to the CERC ESMF.

The IOM and IPs will ensure that the contract with the contractor or service provider explicitly set out their monitoring responsibility for the contractor's performance on labor and working conditions on a daily basis. The monitoring may include, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by the contractor or service provider. Contractors or service providers' labor management records and reports that should be reviewed would typically include the following:

- Representative samples of employment contracts and signed code of conduct;
- Grievances received from the community and workers and their resolution;
- Reports relating to fatalities and incidents and implementation of corrective actions;
- Records relating to incidents of non-compliance with national Labour Code and the provisions of
- the LMP; and
- Records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

28. **Community Workers.** Local IDP community members may support beneficiaries IDPs who will receive building materials (US\$ 700 in kind) and labor cost (US\$ 300 in cash) from IOM in setting up transitional shelters with 'owner driven transitional shelter approach' (HLP activity 3.4). 1800 temporary shelters in Garowe and 1500 temporary shelters in Baidoa will be supported under this program. This type of informal community workforce is categorized under 'community workers' under ESS2 (para 34) where only relevant and appropriate labor requirements are applied. Potential labor risks associated with community workers will include (i) forced labor; (ii) child labor; (iii) minor accidents and injuries; (iv) inappropriate working conditions (such as non-payment of wages); and (v) GBV risks. To address these risks, the IOM and IPs will ensure that the following measures are taken (relevant measures have been already taken by some IPs, as indicated below):

- Community workers are engaged only on a voluntary basis (IPs already have arrangements in place).
- The age of community workers should be over 18 as the work entails construction (IOM and CWW already have arrangements in place).
- The OHS training, PPEs and first aid kit are made available to community workers (IOM already has arrangements in place, while other IPs will make arrangements).
- Appropriate wages are paid in timely manner to community workers (IPs already have arrangements in place).
- GBV risk mitigations are taken for all stakeholders involved in this arrangement (beneficiaries, community workers, and project management staff) (IPs already have arrangements in place).
- GRM is available for community workers (IPs already have arrangements in place).

Community health workers working with **CWW** will get incentive as per the national rate and they will be accountable to community health committee from the respective employers. There will be an MoU between CWW and Community Health Committee in the respective IDP settlements. The age of the community health workers will above 18 years. Furthermore, awareness and sensitization session will be held for these activities and for other stakeholders involved in the project implementation to avert risks of GBV and related issues.

29. **Primary Supply Workers.** When sourcing goods and materials essential for CERC activities from primary suppliers, the contractor will require such suppliers to identify the risk of (i) child

labor/force labor and (ii) serious safety risks in producing the goods and materials. The IOM and IPs will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment and any other relevant due diligence (such as the review of license for quarries). Where appropriate, the contractor will be required to include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers. If child labor/forced labor and/or serious safety incidents are identified in relation to primary supply workers, the IOM and IPs will require the primary supplier to take appropriate steps to remedy them. Such mitigation measures will be monitored periodically to ascertain their effectiveness. Where the mitigation measures are found to be ineffective, the IOM and IPs will, within reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements.

## 7. Stakeholder Engagement

30. The Stakeholder Engagement Framework (SEF) for SURP II (updated in April 2022) is applicable to CERC activities. This section summarizes key stakeholder engagement activities specific to CERC activities.
31. **Stakeholder identification.** As per the SURP II SEF, key stakeholders in CERC activities include the following:
  - **Project affected parties:** Beneficiary IDPs who will benefit from WASH, health and HLP services; other community members (IDPs or non-IDPs) who will be subject to potential E&S risks induced by CERC activities.
  - **Other interested parties:** Community/Clan leaders/members, religious leaders, landowners, municipalities of Garowe and Baidoa, BRA/Mogadishu, federal and state ministries, Project implementing institutions (IOM, NRC, CWW, Gredo), other UN/bilateral donors, international/national NGOs, private sector (water and power utilities), contractors (such as construction companies) and service providers (health care professionals, lawyers and paralegals) engaged in CERC activities.
  - **Disadvantaged/vulnerable groups:** IDPs in general, but in particular those with disabilities, female-headed households, widows, elderly, orphans, illiterate persons, minority clans, persons living with severe illness.
32. **Previous stakeholder engagement by IOM and IPs:** While CERC activities are being designed under emergency situations, consultations dedicated for CERC stakeholders will be conducted as soon as CERC activation is approved. Below is a brief summary of inclusive stakeholder engagement activities that IOM and IPs have been undertaking under their existing similar operations:
  - **IOM:** The IOM WASH team has been hiring and training a qualified hygiene promoter for every 500 households in its response sites. The hygiene promoters have been conducting weekly or monthly (depending on geographical coverage and access) door-to-door consultations and KAP surveys on service delivery gaps, especially in regards to hygiene promotion-related activities. Thus far, this has been the most effective feedback mechanism at household-level since the respondents' inputs are anonymous and the hygiene promoters freely interact with the beneficiary on daily basis. Engagement of the government is key in program implementation in Somalia. Both the local authority and the Ministry of Water

representative, represent the beneficiary community and collect independent information through various community meetings. The information and feedbacks are directly shared with IOM for action. IOM has designed and facilitated Community Based Planning (CBP) processes in line with the Wadajir Framework on Local Governance in Somalia. The approach ensures community participation in all stages of a programme leading to strengthened local ownership for durable solutions interventions that address migration and displacement crises. CBP is a voluntary, bottom up and people centered planning process that addresses social, economic, technological and environmental concerns of the local communities through joint community profiling, situational analysis, resource envelope disclosure, vision development, strategy formulation, activity planning, disaster proofing the identified projects and setting up of local monitoring and evaluation systems. The process entails the involvement of grassroots people together with local authorities and service support institutions in the planning process to identify, prioritize and operationalize local development agenda. CBP can also be defined as a vision and resource-based planning process which empowers different socio-economic groups in a community to actively participate (in defining and implementing) and make informed decisions on development interventions that are relevant to them. The process is linked to district level planning to enable communities to identify relevant and priority projects to be supported by the different resource envelopes. This form of participatory planning builds capabilities of communities to own, control and manage their own development processes with support of local stakeholders, government and other civil society actors. CBP is clearly a departure from top-down planning, which do not promote active citizenship and tend to undermine productive interactions between local government structures, communities, support organizations and potential investors. The principles of CBP can also be found in many IOM policies and frameworks. The Migration Crisis Operational Framework (MCOF) lists participation and empowerment as key operating approaches for the Organization. The AAP Framework strongly emphasizes the inclusion of affected populations and communities in programme processes and decision making.

- **NRC**: The beneficiary targeting strategy appreciates that community-managed beneficiary selection quite often results in deliberate exclusion of the most vulnerable due to reasons ranging from bias against minority clans and lack of knowledge of conditions of IDPs to lack of recognition of gender issues. Communities will be mobilized and sensitized to ensure that the beneficiary selection does not exacerbate existing conflicts/tensions, while making sure that marginalized groups, including both minority clans and people with disabilities, are targeted without pre-condition. As a humanitarian organization, NRC will ensure that its operations does not, in any shape or form, compromise beneficiaries' capacity to protect themselves and others or consequently expose them to risks. Consequently, HLP activities will be complemented by community-based dispute resolution mechanisms for cases that need to follow customary procedures. Community leaders will be front line for the discussion and decision-making. NRC also will support existing community structures to expand local dispute resolution capacities by providing technical support on dispute resolution techniques. In the relocation process, adequate consultations with the target households, community leaders, landlords and local municipality will take place prior to any relocation.
- **CWW** has a long presence in the selected areas and has a long working relationship with communities and the local authorities. It has been engaging local communities in

community-based planning processes, leading to Community Action Plans that are inclusive of marginalized groups, involving communities in all stages of programming, from design to implementation and thereby also providing communities a voice before local authorities, ensuring their voices and needs are taken account of.

- **GREDO** already has an established community response mechanism (CRM) through which in-person feedback and complaints can be delivered, as well as a toll free phone number. At the same time, communities and key stakeholders such as community groups, elders and religious leaders, local and regional government representatives, as the ultimate owners of their own information, have been involved in every phase of monitoring and evaluation and feedback of this project. This mechanism has allowed for past stakeholder engagements. Under the CERC, GREDO will continue to apply participatory methods to collect feedback from beneficiary communities during project period in order to make project implementation more effective. The participatory methodologies that will be applied will also include focus group discussions, stakeholder meetings and DAC forum meetings. The feedback collected will provide quantitative gender-disaggregated data as well as qualitative data that will feed into activity reports and will be used to improve project performance.

**33. Stakeholder engagement programs for CERC:** During the preparation phase of CERC activities, the project team of IOM and IPs will conduct inclusive stakeholder engagement in all project sites. Stakeholder consultations will also allow community members and other stakeholders to assess and identify additional risks and impacts, as well as risk mitigation measures. As per the SURP II SEF, inclusive consultations will be conducted during all phases of CERC activities for 18 months (preparation, construction/operation and maintenance phases). The lessons learned under SURP II on community engagement will be taken into account.<sup>12</sup> All stakeholder engagements will follow the guidelines provided by the World Health Organization (WHO), the Ministry of Health of the Federal Republic of Somalia (FRS) and the WB to mitigate the risk of COVID-19 transmission during stakeholder engagement activities.

**34. Proposed strategy to incorporate the view of vulnerable groups.** All views expressed by stakeholders will be carefully noted, documented in the consultation summary and considered, including those of disadvantaged or vulnerable groups. To support this, such groups will be identified during project preparation and appropriate measures will be considered through close consultation with such groups and support groups in order to incorporate their views into the project. Like under the SURP II, IOM and IPs will provide vulnerable groups with appropriate incentives and accommodation, such as accessible venues and transport and sitting allowance, to participate in stakeholder consultations to be carried out in culturally appropriate manner. Vulnerable community members will also be provided with the opportunity to express their views privately, such as in separate focus group discussions or phone interviews for female stakeholders

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<sup>12</sup> The SURP II SEF (updated in April 2022) highlights the lessons learned on community engagement: (i) the concept of “inclusive stakeholder engagement” is not common for the communities in the country. Stakeholder engagement activities arranged by the project can be used as entry points to broaden stakeholder mapping and outreach; (ii) the need for awareness-raising and authorities’ buy-in on WB standards; (iii) better management of community expectations; (iv) continuous feedback to the community on key decisions; and (v) management and consideration of “consultation fatigue” where a series of consultations without timely start of projects create the frustration and resentment of the communities.

and other vulnerable IDP members. Easy-to-understand, non-technical language and materials will be used during the consultations with illiterate stakeholders.

35. **Disclosure:** Meaningful stakeholder engagement depends on timely, accessible, and comprehensible information. All relevant documents, including this ESMF and site-specific E&S instruments, will be fully disclosed in local language in areas accessible to project-affected parties and on the website of IOM, IPs and WB. Formats to provide information may include presentation printouts, non-technical summaries, project leaflets, and pamphlets, depending on stakeholder needs.
36. **GRM.** The GRM for CERC activities will build upon the CFRM developed under Danwadaag and the GRM established for the SURP-II. It should be culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. It will not prevent access to judicial or administrative remedies. IDPs and host communities will be informed about the grievance process in the course of community engagement activities. The summary of registered grievances and actions is also made public. Handling of grievances is discreet, objective, sensitive and responsive to the needs and concerns of the beneficiaries. The mechanism will also allow for anonymous complaints to be raised and addressed. The aggrieved person also has the option to resort to the formal judicial system. Individuals who submit their comments or grievances may request that their name be kept confidential. Specific uptake channels will be provided following the CERC activation.
37. In general, the SURP-II GRM is already in place in all the municipalities where CERC activities will be implemented. While the locations of CERC activities may be different from SURP II's main activities, the existing GRM will be adjusted to include CERC beneficiaries and stakeholders. There are generally two options for the GRM: Option 1 is to adjust the existing Tier 1 GRM (see below); Option 2 is to use IP GRM systems, based on a gap-filling checklist (see Annex 3).
38. The current Project GRM consists of a three-tier grievance system.
- **Site-level GRM (Tier 1 GRM):** A grievance redress committee (GRC) established in each SURP-II project site consists of representatives from women and youth groups, elders, religious leaders, representatives from the PAPs, and representatives of the municipality. The mechanism takes into consideration the existing local practices. The site-level GRM will be attended by the contractor and service provider where relevant, and supported by IOM and IPs, as well as PIUs/PCU as appropriate.
  - **Municipality-level GRM (Tier 2 GRM):** The municipal-level GRM already exists under the SURP-II and will be made available for the CERC activities as well. It will address unsolved grievances at the site-level GRM. The municipal-level GRC is comprised of the representatives of each municipality, the PIU, IOM and IPs, and the representatives of the aggrieved persons/communities.
  - **Federal-level GRM (Tier 3 GRM):** The exiting federal-level GRM will address unsolved grievances at the municipality level, which may require higher-level solution or common issues across municipalities participating in CERC activities. The federal-level GRC is formed by the Project Coordination Unit (PCU) at the Ministry of Public Work, representatives of relevant municipalities, and other relevant federal ministries and agencies.

39. **Grievance Management Process.** The project team will aim to address grievances with the following steps and indicative timelines:

Table 12 Steps and timelines for grievance redress

Number	Steps to Address Grievance	Indicative Timeline	Responsibility
1.	Receive, register and acknowledge complaint in writing	Within 1 day	IDP site-specific GRC supported by IOM and relevant IPs
2.	Screen and establish the basis of the grievance; where the complaint cannot be accepted (e.g. complaints that are not related to the project, the reason for the rejection should be clearly explained to the complainant	Within 3 days	IDP site-specific GRC supported by IOM and relevant IPs
3.	GRC to consider ways to address the complaint	Within 3 days	IDP site-specific GRC supported by IOM and relevant IPs
4.	Implement the case resolution or the unsatisfied complainant can seek redress through the appeals process	Within 3 days	IDP site-specific GRC/ Municipal GRC/Federal GRC in case of appeal
5.	Document the grievance and actions taken and submit the report to PIU/PCU	Within 3 days	IDP site-specific GRC supported by IOM and relevant IPs
6.	Elevation of the case to a national judiciary system, if complainant wishes to do so	anytime	IDP site-specific GRC supported by IOM and relevant IPs

Figure 4 GRM organigram



40. **Use of existing GRM by IOM and IPs.** As most IPs have been implementing activities in the respective areas already, they do have in-house GRMs in place. They exist in all three CERC locations. IOM and its consortium have been applying an ‘Accountability to Affected Persons (AAP)’ mechanism. The AAP is based on a) participation, b) complaints and feedback mechanism (CFM), and c) Information sharing and transparency. AAP contains GRM, but also the involvement of the community in the design and implementation of activities and feeding back information and

learning to the communities. In sites where the Global Camp Coordination and Camp Management Cluster (CCCM) is operational, the CCCM partners have a robust system of for gathering complaints and feedback from the assisted populations. Where the use of the existing GRM under SURP II is not optimum (in particular Tier-1 GRM), the CERC will allow the continuation of IPs' GRMs as Tier 1 mechanism (see above), as long as the IP GRM is in compliance with the key SURP-II GRM features. For this purpose, a GRM checklist is presented in Annex 3. The checklist will be applied for each IP GRM – by the IOM and the respective IP – to assess the compliance level of the IP GRM prior to commencement of works. In case of gaps in the IP GRM, measures to fill these gaps will be taken.

41. **Grievances related to Gender Based Violence (GBV).** To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the grievance mechanism shall have a different and sensitive approach to GBV cases. As in the case of SURP-II, the GRCs to be established (or utilized if already exist) for CERC activities will have a female member trained in dealing with GBV grievances. The member will be supported by GBV specialists/focal points engaged by IOM and other IPs. The female community engagement officers in the PIUs in Garowe, Baidoa and Mogadishu will also coordinate with those responsible for the implementation of the SURP II's SEA/SH Prevention and Response Action Plan, who are also experienced in dealing with GBV issues. The PCU has a GBV specialist who will also closely work with GBV specialists/focal points of IOM and other IPs. Where a case is reported, actions taken will ensure confidentiality, safety and survivor-centered care for survivors. Any survivors reporting through the GRM, should be offered immediate referral to appropriate service providers based on their preference and with informed consent, such as medical and psychological support, emergency accommodation, and any other necessary services. In SURP-II, appropriate GBV service providers mapping has been conducted and working relationships established. In some of the cities, in the case of rape, the victims are required to go through the general hospital. For both SURP-II and the CERC activities this process will be carried with assistance from GBV service providers. The GBV service providers are expected to refer project related survivors of GBV to the project GRM according to their wishes. Data on GBV cases should not be collected through the grievance mechanism unless operators have been trained on the empathetic, non-judgmental and confidential collection of these complaints. Project workers will also have the right to lodge complaints related to SEA/SH through the GRM, with any supervisor at any level, with the IP in the case of a sub-contractor, or directly with the PCU (GBV Specialist). Only the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, can be collected and reported with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered. The preference of the survivor will be recorded and the case will be considered closed. Recorded GBV/SEA/SH cases should be reported to the World Bank project team within 24 hours.
42. **Additional SEA/SH mitigations by IOM and IPs.** All implementing partners will implement the above measures in their respective activities in collaboration with the PCU's GBV specialist. **IOM** will recruit an additional GBV Specialist consultant for the implementation of the CERC. IOM will identify and seek to address GBV through deliberative dialogue sessions that will be facilitated during community-based planning to ensure that the safety, dignity, well-being and equitable access to services, especially women and girls, is prioritized, integrated and coordinated across all partners. This will create safe spaces for: (a) mitigating risks: by mitigating the risk of GBV in activity planning and doing no harm; (b) supporting survivors: by facilitating access to survivor-centered, multisectoral services; and (c) addressing the root causes: by contributing towards progressively transforming the conditions that perpetuate GBV. **GREDO** will implement early identification and

referrals of GBV cases through trained Community health workers. It will further mainstream support to GBV survivors and other GBV referral responders while also conducting community sensitization and awareness on GBV prevention, SEA and SH. **NRC** will, through community paralegals and monitors deployed in the target locations identify GBV cases and refer them to appropriate service providers. NRC is also a lead implementing partner of the Protection Return Monitoring Network and can make referrals for emergency protection assistance. **CWW** health and mobile clinics will provide counselling and referral services of case identified at CWW-supported health facilities. Community health workers and health facility midwives will raise awareness around GBV matters and sensitize community members on early referrals to the respective facilities.

## 8. Monitoring and Reporting

43. The PCU and the PIUs will conduct monitoring of the CERC activities, including environmental and social risk mitigation measures and compliance with this CERC-ESMF. The PIUs will conduct field monitoring in their respective areas on an ongoing basis, based on indicators detailed in the respective ESMPs. The PIUs will report monitoring observations and results to the PCU. In cases of non-compliance, the PIUs will require the IPs to take corrective measures to bring activities back to compliance. Frequency of monitoring visits for specific indicators will also be detailed in the ESMPs.
44. IOM and IPs will prepare periodic monitoring reports, including inputs from the Contractor and the PIUs, on the status of implementation of the CERC-ESMF and site-specific E&S instruments. The reports will be submitted to the World Bank for its review and feedback as part of the PCU’s general reporting to the Bank. Details of these reports and their content are given in the Table below.

*Table 13 E&S Monitoring and Compliance Report*

#	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
1	E&S Progress Reports	Compliance status of the Project with the environmental and social mitigation and monitoring measures. The report should cover all key requirements of the CERC ESMF and site-specific E&S instruments.	Quarterly	IOM and IPs to PCU
2	E&S Progress Reports	Compliance status of the Project with the environmental and social mitigation and monitoring measures. The report should cover all key requirements of the ESMP.	Monthly	Contractors to IPs
3	E&S Monitoring Report	E&S Updates	Informal meeting / monthly	IOM/IPs to PCU
4	E&S Progress Report	Compliance status of overall Project with E&S requirements	Quarterly	PCU to WB

#	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
5	Incident Reports	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event	Initial investigation report for severe incidents within 24 hours. Detailed Investigation Report within ten days	Contractor/ Service provider/ IOM/IPs with support of PIUs/PCU

## 9. Project Coordination and Implementation Arrangements

45. **Overall institutional arrangement:** The proposed CERC activities will be implemented under the overarching umbrella of the SURP-II institutional arrangements. The SURP-II PCU, embedded in the Ministry of Public Works Reconstruction and Housing (MoPW) at the federal level, has the overall responsibility for the monitoring and supervision of all CERC activities, including environmental and social risk management. The established PIUs in Mogadishu, Baidoa and Garowe will support the day-to-day supervision and monitoring of the CERC activities, including compliance with the CERC ESMF and site-specific E&S instruments. Given the need to coordinate with relevant stakeholders engaged in drought response and durable solutions activities, the PCU and the PIUs will also coordinate with the MoHADM and Durable Solutions Units within the FMS, and the SURP-II FMS inter-ministerial committee can be leveraged for coordination between ministries to ensure adequate knowledge sharing for a multi-sectoral response at the interface between humanitarian and durable solutions interventions.
46. **Output agreement with IOM and IPs:** The CERC will be embedded in the above existing SURP-II structure, but activities will be implemented by IOM, which in turn will sub-contract its consortium partners (IPs). The PCU will sign an output agreement with IOM, in partnership with the IPs, to implement CERC activities. IPs are the NRC, CWW, Gredo, and other local partners, as required by the project. All of them are international or local NGOs. IOM and IPs will all implement directly and through the sub-contracting of construction companies where necessary. Implementation will include collaborations with private sector (primarily in water). The health sector is largely funded by international donors, and to a lesser extent private sector, across Somalia. Interventions will therefore work closely with the Ministry of Health (MOH) and efforts will be made to coordinate with system strengthening projects such as the World Bank Improving Healthcare Services in Somalia Project, known as “Damal Caafimaad” and incorporate capacity strengthening of the MOH for oversight.
47. **E&S Safeguards Responsibilities**
- **PIUs:** The BRA, Garowe and Baidoa PIUs will have overall responsibility for the E&S safeguards due diligence, and compliance monitoring of the CERC activities. All the PIUs includes one E&S Safeguards Specialists who will be responsible for daily monitoring of E&S safeguards compliance supported by Community Engagement Officers. They will review site-specific E&S

instruments prepared by IOM and IPs before submitting them to the World Bank for clearance. They will further monitor that the CERC project design, specifications and budget adequately reflect the recommendations of the E&S instruments. Based on the IOM and IPs reporting, they will prepare regular monthly/quarterly/semi-annual progress reports for the Bank; and develop, organize and deliver appropriate E&S safeguards training for IOM and IPs, and other contractors, local government/community representatives and others involved in the project implementation.

- **PCU:** The PCU's roles and responsibilities will include provision of capacity building support to the PIUs as needed, quality assurance of E&S instruments and spot checks on E&S safeguards implementation and monitoring. The PCU is staffed with an E&S Specialist and a GBV Specialist to provide such support. The PCU is also responsible for compilation of E&S reporting and preparation of the Quarterly E&S progress report to the World Bank.
- **IOM and IPs** will be responsible for:
  - Take the lead in the preparation and implementation of E&S instruments for CERC activities for the government;
  - Manage the contractors and service providers on implementation of the E&S instruments, including review and approval of contractor-ESMPs, as advised by PIUs;
  - Manage IDP workers (engaged under "cash for work" arrangement and "owner-driven transition shelter" approach) including on EHS responsibilities.
  - Liaise with various Government agencies on E&S matters;
  - Continuously interact with key stakeholders including IDPs, relevant NGOs and host community groups;
  - Establish dialogue with the affected communities and ensure that the E&S concerns and suggestions are incorporated and implemented in the activities;
  - Ensure the performance of the project in terms of E&S safeguards;
  - Ensure the respective IP E&S staff will act as counterparts to the E&S and GBV Specialists embedded in the respective PIUs and PCU;
  - Provide quarterly updates on E&S measures and incidents to the respective PIU and the PCU, provide informal monthly updates to the PIUs/PCU;
  - Report on severe incidents within 24 hours to the PIU with copy to the World Bank.
- **The Contractor** will be responsible for:
  - Employ or appoint qualified environmental, social, occupational health and safety expert(s) to manage ESHS issues.
  - Prepare and implement their labor management procedure (Contractor's LMP) and Contractor's ESMP (including OHS provisions) which will apply to the contracted workers who work on the projects. These procedures and plans will be submitted to the IOM and IPs for review and approval before the contractor is allowed to mobilize to the field.
  - Supervise their subcontractors to ensure adherence to the LMP, ESMP and C-ESMP.
  - Maintain records of recruitment and employment of contracted workers (including subcontractors) with age verification to avoid child labor.
  - Provide induction and regular training to contracted workers on environmental, social and occupational health and safety issues, including training to workers exposed to specific risks associated with their work.
  - Require the primary supplier to identify and address risks of child labor, forced labor and serious safety issues for primary supply workers.

- Develop and implement the grievance mechanism for contracted workers, including ensuring that grievances received from their contracted workers are resolved promptly, and report the status of grievances and resolutions.
  - Ensure that all contractor and subcontractor workers understand and sign the Code of Conduct prior to the commencement of works, take all other measures to address risks of sexual exploitation and abuse (SEA/SH) as specified in the contractor's LMP/ESMP and supervise compliance with such measures.
  - Report to IOM and IPs on labor and occupational health and safety performance.
- **Government:** The respective municipalities and their associated government ministries, departments and agencies will be incorporated into the implementing of the CERC. Their roles and responsibilities are:
    - Provide overall leadership during public consultation meetings with critical stakeholders, in order to gain their support/cooperation/consensus in established policy direction; and
    - Ensure that IOM and IPs comply with all relevant environmental laws and policies.

48. **IOM and IP E&S Staffing Plan:** IOM will recruit an Environmental Impact and Safeguards Specialist to oversee all E&S related tasks of the project. The staff will be based in Nairobi. This Specialist will oversee E&S mitigation measures for all consortium activities, including supervision of the IPs to ensure compliance with the E&S instruments. In addition, IOM will recruit an E&S safeguards consultant for field travel and direct project monitoring; communications and information management officers to conduct stakeholder engagement. IOM and IPs will further recruit consultants to prepare, implement and report on required E&S instruments. IOM will further recruit other specialist consultants, as necessary, such as a GBV Specialists, Community Engagement Specialists and a Security Risk Management Specialist. All partners will nominate one focal point for E&S matters, who in particular will prepare, implement and report on the respective E&S instruments. These E&S focal points will further work closely with their counterparts in the respective PIUs. The focal points will be assigned for the following sites:

- i. Barwaaqo North extension (IOM CCCM lead)
- ii. Armale (NRC lead)
- iii. ADC Site (GREDO lead)
- iv. Daynille (IOM WASH lead)
- v. Kahda (CWW lead)

49. **Capacity building:** IOM and the IPs, which will be implementing the CERC activities, have not previously implemented a project under the World Bank's ESF. However, IOM policies determine aspects, such as strong engagements with local communities and grievance redress systems in project implementation, and IOM had strong guidelines on ESHS for contractors. IOM will build on its ongoing Accountability to Affected People framework. IOM and IPs will further ensure that the above listed E&S staff is recruited and that new recruits are familiar with the WB's ESS and can ensure compliance with all instruments. In collaboration with PCU/PIUs and World Bank, relevant capacity building activities will be organized for such E&S staff and focal points as soon as CERC is activated. IOM will sub-contract the IPs, and sub-contracts will include E&S requirements.

## 10. Estimated Costs of CERC-ESMF

50. **Estimated Costs of CERC-ESMF.** Below is the estimated costs for the implementation of the CERC-ESMF. More detailed final costs will be determined following the CERC activation.

Table 14 Estimated Costs for CERC-ESMF Implementation

	<b>Required Resources</b>	<b>USD</b>
<b>PIUs/PCU – Monitoring of the CERC-ESMF</b>		
	Human Resources:	
	PCU E&S Safeguards Specialist	Incl. in PCU staff costs
	PCU GBV Specialist	Incl. in PCU staff costs
	3 PIUs x E&S Safeguards Specialist	Incl. in PIU staff costs
	3 PIUs x Community Engagement Officers	Incl. in PIU staff costs
<b>IOM and IPs – E&amp;S Implementation Staffing</b>		
	Human Resources:	
	IOM Human Resources	72,000
	IOM Safeguards Specialist	18,000
	Other IPs	TBD
<b>Logistics and Travel</b>		
	Logistics / Travel for monitoring and supervision	20,000
<b>Grievance Redress Mechanism hotline (implemented by IOM/IPs)</b>		
	Hotline and other channels/mechanisms	15,000
<b>Stakeholder Consultations and Capacity Building</b>		
	Stakeholder Consultations IOM	38,000
	Other IPs	45,000
<b>Implementation of Risk Mitigation Measures IOM/IPs</b>		
	E&S Risk Mitigation Measures for each activity	200,000
	Preparation of E&S instruments (ESMPs)	50,000
	<b>TOTAL</b>	<b>458,000</b>

## ANNEX 1: Details on CERC Activities

This annex presents the planned activities under the CERC in detail, including the lead IPs and the geographical locations of each activity. Further details of CERC activities are subject to adjustment, which will be determined following the CERC activation.

Table 15 Detailed Activity Description

### Outcome 1: Enhanced WASH services for newly drought displaced IDPs - IOM led in all locations

Activities	Baidoa	Garowe	Mog
<p><u>Activity 1.1:</u> Construction of boreholes (40m<sup>3</sup> water storage tanks, installation of solar system, genset, submersible pump and rooms for generator and guards).</p> <p><i>Output 1.1.1.</i> Preparation of 7 hydrogeological studies</p> <p><u>Output 1.1.2</u> <i>Output 1.1.2.1: 1 functional borehole completed in Garowe</i> <i>Output 1.1.2.2: 2 functional boreholes completed in Baidoa</i> <i>Output 1.1.2.3: 4 functional boreholes completed in BRA, Daynille (Zone 4&amp;5)</i></p>	IOM	IOM	IOM
<p><u>Activity 1.2.:</u> Installation of piping networks<sup>13</sup> from the water sources to the distribution points in the three cities (in Garowe from the Puntland Water Development Agency (PWDA) water system)</p> <p><u>Output 1.2.</u> <i>2000m piping network to PWDA piping network in Garowe</i> <i>2500m piping network in Baidoa</i> <i>3000m piping network in BRA</i></p>	IOM	IOM	IOM
<p><u>Activity 1.3.:</u> Construction of water distribution points (kiosks)<sup>14</sup></p> <p><u>Output 1.3:</u></p>	IOM	IOM	IOM

<sup>13</sup> Based on our estimations this is the necessary length of piping to connect the new IDP site in Garowe / targeted sites in Baidoa and BRA to water sources. This will be updated based on assessment during the project start-up phase.

<sup>14</sup> Distribution points estimated based on anticipated site plan. This will be reassessed and confirmed in initial phase of the project.

<p>50 distribution points constructed in Garowe (36 HH per distribution point)</p> <p>50 distribution points constructed in Baidoa (30 HH per distribution point).</p> <p>80 distribution points constructed in BRA (30 HH per distribution point)</p>			
<p><u>Activity 1.4.:</u> Construction of transitional/permanent twin latrines (including gender-disaggregated and lockable latrines) – one twin latrine per two HH</p> <p><u>Output 1.4:</u>  Garowe: 1000 twin latrines  Baidoa: 850 twin latrines  Mogadishu: 600 twin latrines.</p>	<u>IOM</u>	<u>IOM</u>	<u>IOM</u>
<p><u>Activity 1.5.:</u> Operation and maintenance of WASH infrastructure (with hand over to community O&amp;M groups at the end of project).</p> <p><u>Output 1.5.1.</u>  - O&amp;M of all constructed boreholes for lifespan of project  -Training and handover to local O&amp;M groups based on bi-lateral agreement with government</p> <p><u>Output 1.5.2.</u>  1 borehole in Garowe;  2 boreholes Baidoa;  4 boreholes Mogadishu, Daynille (Zone 4&amp;5)</p>	<u>IOM</u>	<u>IOM</u>	<u>IOM</u>

**Outcome 2: Enhanced basic health service delivery for newly drought displaced IDPs**

<u>Activities</u>	Baidoa	Garowe	Mog
<p><u>Activity 2.1.:</u> Support health care provision through community level, mobile, and fixed health care facilities</p> <p><u>Output 2.1:</u>  Running of 2 mobile health clinics and 3 fixed health clinics<sup>15</sup></p>	<u>GREDO</u>		<u>CWW</u>
<p><u>Activity 2.2.:</u> Train and support community health workers (CHWs) and health staff in targeted health</p>	<u>GREDO</u>		<u>CWW</u>

<sup>15</sup> 45,000 beneficiaries in Mogadishu through 2 mobile health clinics and 1 fixed health centres.  
20,000 beneficiaries in Baidoa through 2 fixed health centres.

<p>clinics on preventive measures, screening, and basic curative care</p> <p><u>Output 2.2.1.</u> Provision of training to 18 Community Health workers in Baidoa and 30 in Mogadishu.</p> <p><u>Output 2.2.2.</u> Provision of stipends to 18 Community Health workers in Baidoa and 30 in Mogadishu.</p>			
<p><u>Activity 2.3. Equipping &amp; rehabilitation of mobile and fixed health clinics</u></p> <p><u>Output 2.3.1</u> 2 mobile clinics<sup>16</sup> (Kahda and Daynille districts) equipped with medical supplies<sup>17</sup> for outpatient consultation services</p> <p><u>Output 2.3.2.</u> 1 fixed Weydow health center (Daynille district) rehabilitated and equipped with medical supplies for outpatient consultation services</p>			<u>CWW</u>

**Outcome 3 Relocation site development and mitigation of forced evictions for new drought displaced populations**

<u>Activities</u>	<u>Baidoa</u>	<u>Garowe</u>	<u>Mog</u>
<p><u>Activity 3.1.:</u> Preparation of HLP capacity needs assessments of local authorities. Based on the outcomes of the assessments, provision of technical support to local authorities to strengthen HLP drought response, including forced evictions.</p> <p><u>Output 3.1:</u> <u>3 HLP Capacity Needs Assessments for Armale (Garowe), Barwago (Baidoa) and Daynille and Kahda (Mogadishu).</u></p> <p><u>Output 3.2.</u> <u>Provision of 3 advisers for technical support</u></p>	<u>NRC</u>	<u>NRC</u>	<u>NRC</u>

<sup>16</sup> Due to additional influx of IDPs to Baidoa and Mogadishu, there is a need to scale up service delivery through flexible outreach clinics.

<sup>17</sup> Including personal protective equipment (PPE), Diagnostic equipment, scales, cleaning equipment & supplies, dressings & sterile materials

<p><u>Activity 3.2</u> undertake topographical survey, environmental impact assessment, site planning, land development, provision of basic services such as drainage network</p> <p><u>Output 3.2.1.</u> Preparation of 2 topographical surveys for Armale (Garowe) and Barwago (Baidoa).</p> <p><u>Output 3.2.2.</u> Preparation of stakeholder-endorsed site plans</p> <p><u>Output 3.2.2.</u> Land clearance, rehabilitation of access road, and drainage construction through cash for work where feasible in Armale, Garowe and Barwago, Baidoa</p>	<p><u>IOM</u></p>	<p><u>NRC (IOM for WASH components)</u></p>	
<p><u>Activity 3.3</u> support the beneficiary selection and relocation to the government sites; ensure provision of information on HLP rights and awareness of established community feedback mechanism for accountability.</p> <p><u>Output 3.3.1.</u> Preparation and provision of essential information in Armale, Garowe, Barwago, Baidoa,</p>	<p><u>IOM</u></p>	<p><u>NRC</u></p>	
<p><u>Activity 3.4:</u> Support establishment of housing for new IDPs</p> <p><u>Output 3.4.1</u> Cadastral surveys undertaken and Individual plots demarked</p> <p><u>Output 3.4.2.</u> Garowe: 1000 incremental housing units developed Baidoa 1150 incremental housing units developed</p> <p><u>Output 3.4.3</u> Garowe: 1000 households in Armale and 1150 households in Barwago relocated to government sites in safety and in dignity</p>	<p><u>IOM</u></p>	<p><u>NRC</u></p>	
<p><u>Activity 3.5</u> provide legal support to secure individual land titles and other tenure documents,</p>	<p><u>NRC</u></p>	<p><u>NRC</u></p>	<p><u>NRC</u></p>

<p>including prevention of forced evictions through support to negotiations with landlords and local authorities and targeted legal aid and training of people in eviction prone sites with newly drought displaced IDPs to resolve land related disputes, and promoting social cohesion.</p> <p><u>Output 3.5.1</u> 2150 land title deeds issued for Armale, Garowe (1000) and Barwaqo (1150)</p> <p><u>Output 3.5.2</u> 23 community-based paralegals and caseworkers trained and deployed in Armale, Garowe, Barwaqo, ADC zone, Kahda and Daynille</p>			
<p><u>Activity 3.6.:</u> Installation of solar streetlights</p> <p><u>Output 3.6</u> <i>Safe and sustainable lighting provision</i> Garowe: 50; Baidoa 75 (1 per 20 HH)</p>	<u>IOM</u>	<u>NRC</u>	
<p><u>Activity 3.7</u> facilitating the signing of a written longer-term lease agreement between the private landowners and IDPs, witnessed by the BRA in exchange for provision of HLP, water supply and small infrastructure such as solar lights on those private lands.</p> <p><u>Output 3.7</u> Facilitation of lease agreements between IDP leaders and landowners / representatives and witnessed by government</p> <p><u>Output 3.7.1</u> Baidoa: 1200 HH facilitated lease agreements for Baidoa ADC Zone 7, Mogadishu: 3500 HH facilitated lease agreements for Daynille and Kahda</p>	<u>NRC</u>		<u>NRC</u>

## ANNEX 2: Details on Consortium Partners

**IOM** has a strong CCCM, WASH and Shelter track record with teams currently working throughout southern and central Somalia. This includes technical engineering staff who are familiar with the local context and have completed large scale site planning, WASH, Shelter, and other development works in coordination with local communities and authorities. As such IOM will directly implement core components of the project activities inclusive of national cluster management, site development, relocations, WASH and SNFI in designated areas.

To support localization efforts, IOM will also contract a local agency, giving them the resources, materials, and skillset to implement a robust CCCM response in north BRA. Seasoned IOM CCCM staff will work closely with them in training, capacity, building, and monitoring of their performance, including regular review, reports, and lessons learned workshops. The proposed partnership would be inclusive of a contract and regular line-level financial reporting and evaluation.

**Concern** will utilize its expertise in the BRA, in Kahda and Daynille district, partnering with Youthlink, to provide health services. Concern is a member of both Health and Nutrition clusters. The implementation modality will be to establish mobile clinics and a fixed facility in the highly density IDP locations in Kahda and Daynille districts. Experienced Health and Nutrition staff, based in BRA, will oversee the project implementation while a technical project team will oversee the day-to-day activities at the health facilities.

**NRC** will implement this project through the offices in BRA, Baidoa and Garowe. NRC thus operates a decentralized system where relevant technical and support personnel spend time in field locations. Each area office employs a team of Shelter related development staff including engineers who are tasked with implementing activities in the sector across the regions. This project will benefit from the regular technical guidance provided by the Somalia based Durable solutions project manager and programme coordinator, shelter, and Information, Counselling and Legal Assistance (ICLA) specialists. NRC will opt for their proven community driven approach for shelter construction, where community members will construct their shelters themselves.

**GREDO** has implemented health services in Somalia over the last seven years, in Baidoa. The intervention will be integrated and closely coordinated with local government counterparts in South West State. The project will complement GREDO's ongoing health projects in Baidoa. Health staff present in Baidoa will ensure that health services are delivered in Baidoa.

## Annex 3: General GRM Checklist for Implementing Partners

The below general GRM Checklist assesses the grievance redress mechanisms of IOM and its partners against the key features of the SURP—II GRM. This way compliance of the IP GRMS with the SURP-II GRM can be identified. In the case of gaps, measures will be taken to rectify those. The checklist will be applied by IOM and the respective IP with support of the PIUs/PCU. If the IP's GRM is assessed compliant with gap-filling measures, the IP may continue to use its own GRM. Key features for the GRM for workers and GBV/SEA/SH grievances are provided in sections 6 and 7, respectively.

Name of Implementing Partner:				
Date:				
Name of Respondent:				
No.	Criteria	Yes	No	Comment/ Explanation and Gap-filling measures
<b>General GRM</b>				
1.	Does the IP have clear, formal, and transparent internal mechanisms and rules for addressing grievances?			
2.	Does IP staff responsible for grievance redress have the authority to take or demand remedial action?			
3.	Are IP staff responsible for grievance redress obliged to take action on all grievances?			
4.	Are beneficiaries allowed to lodge grievances anonymously without fear of retaliation?			
5.	Are beneficiaries aware of their right to file a grievance and of the grievance redress process in general?			
6.	Do clear mechanisms of communication exist for potential users of the GRM on the existence and processes of the GRM?			
7.	Does communication material exist for the general public (what kind of material is it? How is it disseminated)?			
8.	Are there internal processes in place to record, track, and monitor the grievances and the action taken?			
9.	Does the GRM provide timely feedback (written or otherwise) to the aggrieved party on actions taken?			
10.	Is a system in place to keep complainants informed with status updates?			
11.	Is there an appeals process in place that GRM users can access if they are not satisfied with how their grievance has been resolved?			
12.	Do multiple grievance uptake channels and locations exist?			
13.	Are grievance uptake channels accessible for all stakeholders including vulnerable groups (such as women, persons with disabilities, illiterate persons)?			
14.	Is there a fixed service standard for grievance resolution?			
15.	Do clear grievance processing guidelines exist?			
16.	Does the GRM contain the typical GRM value chain (Uptake, sort and process, acknowledge and follow-up; verify, investigate and act; monitor and evaluate; provide feedback)			
17.	Does a process for periodic evaluation of the GRM logs/data exist that informs proactive actions to stem complaints and grievances?			