Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 10/03/2019 | Report No: ESRSA00285
### BASIC INFORMATION

#### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
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<tbody>
<tr>
<td>Somalia</td>
<td>AFRICA</td>
<td>P170922</td>
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<table>
<thead>
<tr>
<th>Project Name</th>
<th>Somalia Urban Resilience Project Phase II</th>
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<tr>
<td>Practice Area (Lead)</td>
<td>Financing Instrument</td>
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<td>Urban, Resilience and Land</td>
<td>Investment Project Financing</td>
</tr>
<tr>
<td>Borrower(s)</td>
<td>Implementing Agency(ies)</td>
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<td>Estimated Appraisal Date</td>
<td>10/7/2019</td>
</tr>
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<td>Estimated Board Date</td>
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**Proposed Development Objective(s)**

To strengthen public service delivery capacity of local governments and increase access to urban infrastructure and services in selected areas.

<table>
<thead>
<tr>
<th>Financing (in USD Million)</th>
<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
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#### B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

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

The SURP II uses country Public Financial Management (PFM) systems to strengthen municipal governance and deliver infrastructure and services through subnational government systems. SURP II will aim to strengthen the resilience of cities by building the capacity of municipalities, financing investments in priority urban infrastructure or services, and providing short-term income generation opportunities particularly for the urban poor and IDPs through labor-intensive works. SURP II builds on the ongoing SURP (P163857), the Somali Urban Investment Planning Project (SUIPP) (P150374) and the SUIPP Additional Financing (P166591).

#### D. Environmental and Social Overview
D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

1. Project locations: SURP II will target four strategically important municipalities (BRA/Mogadishu, Garowe, Kismayo and Baidoa) from political, economic, security and vulnerability perspectives. Mogadishu (estimated population: 1.4 million) is the capital of the federal government and an important financial and trade hub, endowed with the most extensive urban infrastructure in the country. Garowe (estimated population: 70,000), the state capital of Puntland, is situated in the north east of Somalia. Garowe serves as the trading center for livestock for the local market. Kismayo (estimated population: 500,000) is the third largest city in Somalia and the capital of Jubaland State. The city is located on the coast of the Indian Ocean near the mouth of the Juba River approximately 500km southwest of Mogadishu. The port city is of not only regional but also national strategic significance as it lies halfway between Mogadishu and the Kenyan border. Baidoa (estimated population: 150,000) is a strategic town in south-central Somalia and the interim capital of South West State (SWS) of Somalia. It is situated approximately 250km west of Mogadishu. Baidoa, also home to vibrant markets and large internally displaced persons (IDP) populations, emerges as an important hub for trade and place for refuge for people displaced due to multiple causes. The project will also engage two additional cities in the States of Galmudug and Hirshabelle but the exact cities to be targeted are still to be determined.

2. Salient characteristics of project areas: Physical environment in project areas and locations in the key municipalities is broadly characterized by a strong existing anthropogenic imprint typical for intra-urban areas, including transport infrastructure, residences, shops, workshops, drainage systems and highly altered biodiversity and land cover. By project design, it is also likely that settlements of IDPs, returnee refugees and other vulnerable groups are present near some of subproject areas.

3. Likely infrastructure investments: While the exact infrastructure investments in individual subprojects will be determined during project implementation, priority investments are likely to be (i) upgrading/rehabilitation of existing primary and secondary urban roads and bridges; (ii) drainage; (iii) pedestrian walkways; and (iv) streetlighting. All project activities will pertain to the footprint of pre-existing infrastructure, which has deteriorated or been destroyed due to war or neglect.

4. Selection process of subprojects: Municipalities have been undergoing a priority-setting process with city-wide technical assessment and participatory decision-making process using the following criteria: (a) critical investments that fill the existing urban infrastructure gaps; (b) strategic investments that contribute to urban resilience; (c) inclusiveness of vulnerable groups; (d) maximizing development impact; (e) coordination/complementarity with ongoing projects; (f) labor intensiveness to provide short term income generation opportunities; (g) sustainability of infrastructure; and (h) government visibility. The set of potential interventions will be also examined from engineering (such as road condition and traffic volume) and environmental and social perspectives (the ESMF will include a screening process to exclude project activities with significant environmental and social impacts). The selection will be further constrained by what is feasible in the evolving fragile country context.

5. Linkage to the previous projects: The SUIPP (P150374) supported the establishment and training of Project Implementation Units (PIUs), preparation of technical studies and safeguard instruments in Mogadishu, Garowe and Hargeisa while the ongoing SUIPP Additional Financing (P166591) (US$ 3 million) is providing this same support in Kismayo and Baidoa. The SURP (P163857) (US$ 9 million) is financing secondary roads and drainage investments in Mogadishu and Garowe. SURP II will support preparatory activities currently covered under SUIPP to any new cities.
that are added to the project as well support for infrastructure investments to cities currently covered under SURP and SUIPP.

6. Other projects by various development partners: The ongoing SURP and the proposed SURP II build on other ongoing projects supported by various development partners. UN-Habitat’s work on urban planning and strategic spatial planning in Mogadishu, Kismayo and Baidoa, along with Denmark-financed Kismayo urban development master plan provide useful city level information on existing land use, housing and IDPs. UN agencies’ Joint Program on Local Governance (JPLG) is helping to develop Local Government Laws and establishing democratically elected District Councils. UNDP’s Rule of Law Program has established paralegal aid and alternative dispute resolution mechanisms involving informal leadership and local NGOs in major cities of Somalia. USAID financed Transition Initiatives for Stabilization (TIS+) supports quick impact stabilization activities at district and community levels. In Mogadishu, TIS+ has set up district-level community institutions, used by the SUIPP in carrying out consultations on priority roads. TIS+ has also supported the rehabilitation of secondary roads in Mogadishu. BRA/community representatives ensured there is no overlap between the SUIPP/SURP and TIS+ investments. Lastly, while SURP II may collaborate with, but not be dependent on, these interventions supported by other donors, none of them are considered “associated facilities”, as defined by ESS1.

7. Lessons learned from SURP on environmental and social risk management: While the civil works for the first subprojects under SURP have just started (Simad Road in Hamar-Jajab District (about 350m) in Mogadishu and Jilib Road (about 1.8km) in Garowe), the preliminary lessons learned under SURP include: the need for continuous capacity building and awareness raising of key stakeholders (including the PIU, Contractors and the community) on environmental and social issues; the need for better management of community grievances; the challenges associated with land scarcity and physical displacement (in particular in Mogadishu); and management of security risks. The lessons learned in SURP will help improve the management of environmental and social risks under SURP II.

D. 2. Borrower’s Institutional Capacity

1. At the municipality level, the proposed SURP II will build on the engagement developed through the SUIPP and SURP. Through these earlier projects, Project Implementation Units (PIUs) have been set up in Mogadishu and Garowe and are currently being established in Kismayo and Baidoa. These PIUs are staffed with a Project Coordinator, Finance Specialist, Procurement Specialist, Environment/Social Safeguard Specialist, Community Engagement Officer(s), Engineer and Monitoring and Evaluation Specialist. All positions were competitively recruited. The PIUs located in municipalities will have project management responsibility, coordinating overall project implementation, ensuring the timely availability of fund transfer to contractors, managing relevant safeguard instruments including continuous community engagement and grievance redress, monitoring and evaluation. These staff are being provided intensive capacity building and on-the-job support, including in environmental and social safeguards, by Bank staff and engineering and supervision consultants. Key areas for capacity support include (i) the World Bank ESF in general; (ii) occupational and community Health and Safety (OHS) issues (such as OHS measures in construction and traffic safety); (iii) preparation of ES instruments (ESMP, RAP, SEP and LMP); (iv) Gender-Based Violence (GBV); and (v) grievance redress. Municipal engineers will be coupled with PIU staff in order to engage in peer-to-peer learning. Once the cities in Galmudug and Hirshabelle are selected, PIUs will be set up in these cities as well.

2. SURP II will also support the establishment of a Project Coordination Unit (PCU) at the federal level, at the federal Ministry of Public Works. The PCU would be responsible for providing oversight of the project, liaising with the Ministry of Finance/EAFS and supporting project monitoring. The PCU will include at a minimum a Project
Coordinator, a Procurement Specialist, a Financial Management Specialist, an Environmental/Social Safeguards Specialist, a GBV/Gender Specialist and other technical specialists as deemed relevant.

3. Building on the arrangement under the SUIPP and SURP, the PIUs will be supported by an engineering and supervision consultant who will be responsible for monitoring the contractors of the civil works as well as monitoring adherence to the safeguard instruments.

4. The PIUs will also be supported by a third-party monitoring agent contracted by the Bank. The third-party monitor (TPM) will provide quality assurance of the supervision carried out by the engineering supervision consultant and conduct spot checks on both the engineering quality of civil works and adherence to the safeguard instruments. The project will explore the possibility of including the monitoring of key GBV measures, either (i) within the contract of the main TPM for the project provided they have appropriate technical capacity/expertise or (ii) in the country portfolio-wide TPM on GBV (See ESS4 Section below for more details on GBV mitigation).

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

A. Environmental and Social Risk Classification (ESRC)  

**Environmental Risk Rating**  
High

The impact of the civil works is expected to be small-scale, localized and reversible. Engineering capacity of the client is relatively strong with regards to construction of small-scale civil works. The client’s ability to apply World Bank environmental and social standard is limited, as this is the first ESF being implemented in Somalia. Although the Mogadishu and Garowe PIUs have good experience applying the previous Bank safeguards, this is the first World Bank infrastructure project in South-West State (Baidoa) and Jubbaland (Kismayo). There is also dearth of appropriate environmental and social safeguard legislation or policies at all levels of government in Somalia. Lastly, the country risks are extensive due to political and security considerations and systemic constraints on the ability of the World Bank to more robustly supervise environmental and social risk management. Hence, the overall environmental risk rating is Substantial.

**Social Risk Rating**  
High

While the potential risks and impacts of the project’s physical intervention broadly meet the criteria for "Substantial Risk" as set out in the Environmental and Social Directive for IFP, some key social risks of the project are high (including risks related to the security, GBV and the forced displacement of IDPs that are rampant in some municipalities. See below for more details). Considering these social risks, the ESRC of the project is High.

The overall social risk rating is High, taking into account the following key aspects of the project:

1. Overall risks of the project’s physical intervention: The scale and nature of the physical intervention of the project and its environmental and social impacts may be moderate and the location may not be in such a highly sensitive area. They are mostly temporary, predictable and/or reversible. Mitigatory and/or compensatory measures may be designed more readily and be more reliable than those of High Risk Projects. However, some key social risks and impacts on the community and project workers may be significant, including those related to the security, GBV and the forced displacement of IDPs that are rampant in some municipalities.
2. Key social risks and impacts include: physical and economic displacement; potential labor risks including OHS risks, child labor and labor influx, and risk of sexual exploitation and abuse (SEA), sexual harassment (SH) and other forms of gender-based violence (GBV); potential exclusion of disadvantaged and vulnerable groups from project benefits; and security risks associated with terrorist attacks for stakeholders including project workers and the community.

3. Contextual social conflict risks. In addition to the existing security risks associated with terrorism, there are concerns that the adverse social impacts of the Project may give rise to a limited degree of social conflict, harm or risks to human security. This includes social tension associated with dispute over any possible resettlement or compensation measures and dissatisfaction of districts that have not been chosen for the subproject location.

4. GBV Risks. An assessment of GBV risks conducted for SURP II as per WB Good Practice Note on Addressing GBV indicates that GBV risks are High. The assessment indicates significant risks both in terms of the existing country context—as related to high rates of varying forms of GBV, inequitable gender norms and beliefs, and the continuing context of conflict and insecurity—and specific project-related risks that include humanitarian and high poverty areas, proximity to the community including women and girls, limited accessibility for supervision and monitoring and specific stakeholder concerns raised over GBV (See ESS2 and ESS4 Sections below for mitigation measures).

5. Limited borrower capacity. The Project is being developed in a legal or regulatory environment where there is uncertainty or lack of clarity as to jurisdiction of competing agencies, and where the legislation or regulations do not adequately address the risks and impacts of complex projects, or changes to applicable legislation are being made, or enforcement is weak. The past experience of the Borrower and the implementing agencies is limited in some respects, and their track record regarding ES issues suggests some concerns which can be readily addressed through implementation support.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

1. Expected environmental and social benefits: The project will have environmental benefits, including (i) improved ambient air quality due to reduced traffic congestion, fuel consumption and dust entrainment through better roads, resulting in better health outcomes for residents of the four cities; (ii) reduced vehicle wear and accident hazards; (iii) improved pedestrian traffic safety because of construction of pedestrian sidewalks complemented by better road surface quality and solar-powered street lights and road signage; and (iv) reduced road flooding and reduced roadside erosion through drainage improvement. The social benefits of the project include: (i) improved community accessibility to schools, health care centers, and other livelihood activities through better roads; (ii) improved security and safety through improved walkways and night-time street lighting; (iii) employment opportunities for the community through construction and maintenance of the municipal infrastructure; and (iv) positive economic impact on livelihoods and the businesses through cost savings on commuting, better accessibility to municipal service points and improved security.
2. Anticipated environmental risks and impacts: Because of the nature and relatively moderate scale of the works in urban environment under the project, the environmental impacts in the construction phase will be minor, temporary, and confined to the area immediately surrounding the construction. Further, because of the scale of proposed investments within each municipality, cumulative effects of the project are likely to be insignificant. Anticipated environmental risks and impacts include: (i) localized environmental risks, (ii) community and worker’s health and safety risks associated with construction/rehabilitation work. These risks include the normal impacts of civil works (i.e. dust, noise, erosion, surface water sedimentation, traffic interruptions, temporarily impeded pedestrian access, pollution from construction wastes), as well as waste from worker campsites (where established). While the project will also support the rehabilitation of a few existing bridges, the civil work may have potentially adverse impacts on river water quality and ecosystem, waterway traffic interruption and safety. These impacts are short-term and moderate scale, which can be prevented or mitigated with standard operating procedures and good construction management practices. While some municipalities may contain some land with inherent environmental sensitivity, sensitive areas will be excluded through the subproject selection process. Environmental risks and impacts anticipated in the operational and maintenance phase, such as the traffic safety and waste management (including gutter clearance), will be addressed through appropriate speed calming measures and other relevant mitigations. The project will also support O&M activities of the municipal governments and the communities through the TA.

3. Anticipated key social risks and impacts include: (i) land acquisition and physical and economic displacement (see ESS5 Section below); (ii) labor risks including OHS risks, child labor, labor influx, sexual exploitation and abuse, sexual harassment, and other forms of gender-based violence (GBV) that may occur in recruitment or retention of skilled or unskilled female workers (see also ESS2 and ESS4 Sections below); (iii) potential exclusion of disadvantaged and vulnerable groups from project benefits; and (iv) potential risks of increased social tension in the community (for example, dispute over resettlement or dissatisfaction of districts that have not been chosen for the subproject location); and (v) security risks of terrorist attacks for stakeholders including project workers and the community. These risks will be mitigated through preparation and implementation of resettlement action plans (RAP) and labor management procedures (LMP); adoption of mitigation measures proposed in WB Good Practice Notes on labor influx and GBV (such as tapping of local workforce, use of code of conduct, collaboration with local communities and GBV-related service providers); inclusion of disadvantaged and vulnerable groups in project activities/benefits including provision of project-related job opportunities; effective stakeholder engagement including inclusive and transparent consultation process and functional GRM; and measures to minimize security risks (such as protection of project workers by security authorities. See also Section B.3 below on security risks).

4. Disadvantaged and vulnerable groups: The disadvantaged and vulnerable groups relevant to the project include IDPs, returned refugees, female-headed households, orphans, persons with disabilities, elderly, illiterate community members, minority clans and other poor households. Female workers and female community members are also considered a distinct vulnerable group given the GBV risks (see also ESS 4 Section below on GBV risks and mitigation measures). The selection criteria of subprojects include inclusiveness of IDPs, returned refugees, female and other vulnerable groups in project benefits, including employment opportunities. Such groups will be included in the stakeholder engagement process and also provided special assistance in the resettlement process.

5. Environmental and social instruments: Since the details of individual subprojects will be determined during project implementation stage, the environmental and social management frameworks have been prepared. The Environmental and Social Management Framework (ESMF) and the Resettlement Policy Framework (RPF) prepared...
under SURP/SUIPP with WB safeguards policies (OPs/BPs) have been updated and consulted upon with stakeholders in compliance with the ESF, together with the newly prepared Stakeholder Engagement Framework (SEF) and Labor Management Procedures (LMP). These frameworks and the Somali translation were disclosed in country and on the WB website (See ESS10 Section below for more details on stakeholder engagement). Consistent with these frameworks, subproject-specific environmental and social instruments (such as ESMP, RAP, SEP and LMP (integrated or stand-alone)) will be prepared, reviewed and disclosed during project implementation. The WBG Environmental, Health, and Safety Guidelines (EHSG) will be also applied to individual subprojects, as relevant. Relevant provisions of subproject-specific instruments will be incorporated into procurement documents and compensation/assistance measures implemented before the start of civil work of each subproject. Key environmental and social commitments of the borrower have been included in the ESCP.

6. Safeguards approach to technical assistance (TA) component. While the proposed TA under Component 2 (Displacement; O&M of Urban Infrastructure; and Urban Governance and Services) will not fund any infrastructure investment, the application of the results of such TA activities, such as policy advice, analytics and training events for government authorities, may have adverse environmental and social implications. To address such concerns, the Environmental and Social Commitment Plan (ESCP) includes a commitment of the borrower to ensure that all TA and capacity building activities conducted under the Project shall only be undertaken pursuant to terms of reference reviewed and approved by the Bank. Such terms of reference shall ensure that the TA takes into account, and calls for application of relevant provisions of ESSs and the borrower’s own laws relating to the environmental and social aspects.

ESS10 Stakeholder Engagement and Information Disclosure

1. Key stakeholders include project-affected communities, host communities, federal, state and municipal authorities, religious and local leaders, civil society organizations (CSOs), and other development partners. As discussed in ESS1 section, the potential disadvantaged and vulnerable groups for SURP II stakeholder engagement process includes: (1) IDPs, refugees and returnees; (2) poor households (such as female headed, widows, elderly, orphans, persons living with severe illness); (3) persons with disabilities; (4) illiterate community members; and (5) minority clans. SURP II will take differentiated measures to include such groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, simply written materials or graphics or provision of free municipal transport.

2. Stakeholder engagement program: In line with the SEF, SURP II will apply phased stakeholder engagement strategies at different project stages which will cover the life of the project: (1) project preparation stage; (2) pre-construction and construction stage; and (3) post construction/maintenance stage. While some municipalities have security concerns in holding high-profile public consultations that involve a wide range of stakeholders, stakeholder engagement in such municipalities will focus on low-profile focus groups meetings and individual interviews with stakeholders.

3. During project preparation, public consultations were conducted on draft environmental and social frameworks of the project (ESMF, RPF, SEF and LMP) in all municipalities from April to August 2019, involving a broad range of
stakeholders, including potential project-affected persons and vulnerable/marginalized groups. The final frameworks and its Somali translation were disclosed on October 3, 2019, both in country and on WB website. Subproject-specific instruments will be prepared and disclosed during the project implementation.

4. Grievance redress mechanism (GRM): Building on the experience under SURP, SURP II will have a three-tier grievance system covering the district, municipal and federal levels. The project GRM will include representatives of project-affected parties and local communities as part of grievance redress committees. The grievance log will be maintained and its functionality will be closely monitored by the respective PIU and the engineering and supervision consultant. Information about the mechanism will be disseminated among local communities and allow anonymous complaints to be raised and addressed.

5. Treatment of GBV cases in GRM: The GRM will arrange a different and sensitive approach to GBV related cases to avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal. SURP II will look to conduct training and awareness raising events for the PIU, engineering and supervision consultants and the community during project implementation, related both to reporting as well as on ethical and survivor-centered management of GBV cases should they arise.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

1. Labor use on the project: While the exact labor use (including the number of project workers, their characteristics and timing of workforce mobilization) is to be determined during the implementation of each subproject, the project workers engaged or employed will include direct workers (such as consultants hired in PIUs, PCU and the engineering and supervision consultants); contracted workers (such as skilled permanent staff of the primary contractor (construction company), skilled workers engaged by sub-contractors (such as heavy machine operators), and unskilled community members engaged by the contractor (such as host community members and IDPs including female workers); and primary supply workers (such as workers to produce essential construction materials such as aggregates and concrete blocks on an ongoing basis for the project.). Other stakeholders working in connection with the project include government civil servants (such as federal, state and municipal officers and district police officers). The civil servants will remain subject to the terms and conditions of their existing public sector employment. More details are provided in the LMP.

2. Potential labor risks and mitigations: Potential risks related to labor and working conditions include (1) OHS risks (such as moving equipment and heavy machines, noise, vibration, welding, chemical hazard, working environment temperature, working at height and safety and hygiene in worker camps); (2) child labor; (3) labor influx; (4) labor disputes over terms and conditions of employment; (5) discrimination and exclusion of vulnerable/disadvantaged groups; and (6) security risks (workers exposure to attacks). SURP II will address these labor risks as follows in line with the LMP:

   (1) OHS risks: pursuant to the relevant provisions of the national Labour Code, ESS2 (including EHSGs), the SURP II ESMP and WB standard procurement documents, the contractor is required to manage all construction sites in
such a way that the workers and the community are properly protected against possible OHS risks. Key elements of OHS measures should include (a) identification of potential hazards to workers; (b) provision of preventive and protective measures; (c) training of workers and maintenance of training records; (d) documentation and reporting of occupational accidents and incidents; (e) emergency preparedness; and (f) remedies for occupational injuries and fatalities.

(2) Child labor: To prevent engagement of under-aged labor, all contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance. The contractor 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. The proposed age verification means include: (a) check the birth date on official documents such as birth certificate, national ID or other credible records, where available; (b) obtain written confirmation from the medical practitioner; (c) obtain written and signed declaration from the worker and his/her parents or guardian; or (d) inquire with the local community leader, community action group or with other credible community sources.

(3) Labor influx: With the limited scale of work under SURP II and the availability of labor supply in the project municipalities, a large scale of labor influx is not expected. Under SURP I subprojects, no labor camps have been established. Nevertheless, to minimize the labor influx, SURP II will contractually require the contractor to preferentially recruit unskilled labor from the local communities and nearby areas. All contracted workers will be required to sign the code of conduct prior to the commencement of work, which includes a provision to address the risk of Gender Based Violence (GBV). Relevant trainings will be provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values.

(4) Labor disputes over terms and conditions of employment: To avoid labor disputes, fair terms and conditions will be applied for project workers in SURP II consistent with national Labour Code. SURP II will also have grievance mechanisms for project workers (direct workers and contracted workers) in place to promptly address their workplace grievances. Further, SURP II will respect the workers’ right of labor unions and freedom of association, as set out in the national Labour Code.

(5) Discrimination and exclusion of vulnerable/disadvantaged groups: The employment of project workers under SURP II 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. To address the risk of exclusion of vulnerable groups (such as women, IDPs and persons with disabilities) from employment opportunities, SURP II will require the contractor to employ such groups as part of their unskilled workforce. The contractor will be also required to comply with the national Labour Code on gender equality in the work place, which will include provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate for men and women workers. Provisions will be also put in place to enable safety in the workplace to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers supported under the project.

(6) Security risks: Considering significant security risks in some parts of the project municipalities of SURP II, the project will take appropriate and proportionate security measures to minimize the potential risk to the workers. Key security measures will include security protection by public security personnel (such as by district police) to prevent
terrorist attacks; restrictions on work hours where security risks are higher (such as night time); and measures to maintain low profile of the site and workers.

3. Risk management tools and monitoring and reporting: The LMP has been prepared and relevant mitigation measures to address such risks will be incorporated into procurement documents. The contractor will report to PIU and the engineering and supervision consultants on the status of implementation of ESHS measures on a monthly basis. The PIU and the engineering and supervision consultants will closely monitor the contractor/subcontractor on labor and OHS performance and report to the Bank on a quarterly basis.

4. Incidents and accidents notification: The ESCP includes a commitment of the borrower to promptly notify any incident or accident related the project with a significant adverse effect on the environment, the affected communities, the public or workers. The Borrower shall provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it.

ESS3 Resource Efficiency and Pollution Prevention and Management

As discussed in ESS1 Section, because of the nature and relatively moderate scale of the works, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction. These risks related to ESS3 include the normal impacts of civil works (i.e. dust vortexes, noise pollution, soil erosion, surface water sedimentation, pollution from construction wastes and water use), as well as waste from worker campsites. To address these short-term impacts, the ESMF includes standard operating procedures and good construction management practices, include those proposed in WB Environmental and Health Safety Guidelines (EHSGs). This includes the following provisions set out in the ESMF of the predecessor project ESMP, as follows: all vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be bundled in order to contain spillage. All waste containers, litter, overburden and any other waste generated during the construction shall be collected and disposed of at designated disposal sites in line with any existing applicable government waste management regulations. All drainage and effluent from storage areas, workshops and camp sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations. Used oil from the maintenance of heavy vehicles and other construction machinery shall be collected and disposed of appropriately at designated sites or be re-used, recycled or sold for re-use locally. Entry of stormwater runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution. Construction waste shall not be left in stockpiles along the infrastructure such as road, but removed and reused or disposed of on a daily basis. If disposal sites for clean spoil are necessary, they shall be located in areas approved by the SE, of low land use value and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low-lying areas and should be compacted and planted with species indigenous to the locality.

ESS4 Community Health and Safety

As discussed in the ESS1 Section, because of the nature and relatively moderate scale of the works under the project, the community health and safety impacts will be minor, temporary, and confined to the area immediately surrounding the construction. Anticipated risks and impacts include (ii) community health and safety risks associated
with construction/rehabilitation work, such as traffic safety, community exposure to diseases, hazardous materials and emergency preparedness. To address these short-term impacts, the ESMF includes standard operating procedures and good construction management practices, include those proposed in WB EHSGs.

Considering the fragile and conflict-affected environments in some parts of the project municipalities, public security personnel (such as district police) may be deployed for the protection of project sites and project workers. The project will address risks on the community and project workers associated with the deployment of such security personnel in accordance with ESS4 and the WB Good Practice Note on “Assessing and Managing the Risks and Impacts of the Use of Security Personnel” (such as the training/awareness-raising of security officers on the principles of proportionality in the use of force).

Incidence of GBV in Somalia is a significant contextual and project-related challenge. Assessment of project-related risks of sexual exploitation and abuse (SEA), sexual harassment and other forms of GBV has been conducted during project preparation as per WB Good Practice Note on Addressing GBV. This assessment indicates that the GBV risks of the project are high. Given such risks and the context of pervasive insecurity, the project will adopt a robust and comprehensive approach to address potential GBV risks. Relevant mitigation measures to address these risks will be articulated in relevant environmental and social instruments, which include: (a) integrating Codes of Conduct with SEA/GBV-related protections; (b) community consultations and sensitization activities to raise awareness of potential risks; (c) hiring of GBV experts for the project implementation and monitoring (such as in the PCU, engineering and supervision consultant and third party monitoring agent); (d) mapping activities to identify potential service providers in project affected areas; (e) development of a GBV Action Plan prior to the commencement of civil works under subprojects; and (f) establishment of GRM with procedures and channels to enable safe, confidential and ethical reporting of GBV incidents. Given security risks and potential risks of sexual harassment in recruitment and retention of skilled and unskilled female workers, additional measures to address workplace sexual harassment and to assure safety of female workers hired under the project will be also identified. GBV sensitization activities, in line with global guidelines on ethical engagement, should be integrated into the Stakeholder Engagement Plan. Mechanisms to enable monitoring of GBV risk management through Third Party Monitoring will be established. The project will establish partnerships and enable financing with identified GBV service providers. The project will also include provision of capacity building and training of relevant stakeholders, including contractors and project workers, in additional to capacity building for government partners. GBV risks will be monitored throughout project implementation through regular re-assessment, particularly as new project locations are determined, and through regular monitoring activities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

1. Legal and Institutional framework on land and resettlement: With the Constitution yet to be finalized and the federal system still being negotiated, the Somali national laws are still being developed and at the moment there are many parts which are going through the parliamentary processes, including land related matters such as resettlement. While the different levels of government (at federal, state and municipal levels) have developed some legislation that address land issues or reverted to laws that exist prior to the collapse of the Somali Democratic Republic, such legal and regulatory frameworks are still nascent. Considering this, the Bank's ESS5 will take precedence over any applicable national, state and municipal laws and regulations for land acquisition and resettlement for the project (see more details in the RPF). The absence of legislative authority could also lead to
delay in managing resettlement issues. This will be addressed with the close capacity support through the establishment of the municipal level PIU, federal level PCU, the supervision consultant and the third party monitor.

2. Management of resettlement impact. The resettlement impacts of each subproject are likely to be moderate due to the limited size and nature of the individual physical works. The physical displacement will be minimized and duly compensated. The economic displacement will largely relate to mobile vendors or temporary impact during the construction, which will be also minimized. As discussed in ESS1 Section, the RPFs prepared in compliance with OP4.12 for SUIPP/SURP has been updated to reflect the ESS5 and disclosed before appraisal. Subproject-specific RAPs will be prepared and compensation/assistance measures implemented before the start of civil work of each subproject.

3. TA activities: As discussed under ESS1 section, component 2 (Institutional Strengthening and Analytics) will support various Technical Assistance including one related to displacement and durable solutions by exploring alternative means for security of tenure as well as livelihood opportunities for the displaced. While further details of this TA are evolving and will be finalized during the project implementation, the ESCP will include a commitment of the borrower to ensure that all TA and capacity building activities conducted under the Project shall only be undertaken pursuant to terms of reference reviewed and approved by the Bank. Such terms of reference shall ensure that the TA takes into account, and calls for application of comply with relevant provisions of ESS5 (and any other relevant ESSs) and the borrower’s own laws relating to land acquisition, restriction on land use and involuntary resettlement.

4. Risks of forced displacement of IDPs by the government: Forced displacement of IDPs, who fled from drought and violence and have settled on idle private or public lands in Somali cities, is rampant especially in urban centers such as Mogadishu where land is scarce and land values are high. Between January and July 2018, over 204,000 people were evicted without any prior notice or due process. While project-related economic and physical displacement will be managed through ESS5, there are risks that the project might inadvertently involve areas where such forced displacement of IDPs have been conducted. To avoid such risks, if forced displacement were conducted in the right of way (ROW) of project roads (or any other project-financed infrastructure) before board approval of SURP II and after March 31, 2019 (which is the official start date of SURP civil work), relevant ESS5 requirements will be applied retroactively. If such requirements cannot be satisfied retroactively, the Bank will not support such roads (or any other infrastructure). This commitment has been included in the ESCP. The details to address such risks are included in the RPF.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The impact (whether singular or cumulative) of small-scale municipal rehabilitation and infrastructure improvement on sensitive areas will be minor. While a few locations in a few municipalities may contain some land with inherent environmental sensitivity relevant to ESS6, the subproject screening process in the ESMF excludes such sensitive areas. The ESMF also includes specific measures to avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas. It should be also noted that, due to evolving fragile country contexts, the availability of relevant environmental and social baseline data is limited, including current listing of known natural habitats or sensitive areas. For Kismayo, the primary potential impact will be impacts on drainage as well as construction material waste disposal, which will be covered in engineering design and in the ESMF. Site selection will include an analysis of the immediate area in terms of population, buildings, slope,
nearby wadis/seasonal water flows, and will exclude those which may be adjacent to areas with environmental sensitivities. While the project may also support the rehabilitation of a few existing bridges, the ESMF includes mitigation measures to address potentially adverse impacts on river ecosystem, such as surface water hydrology through compaction of soils, increase in impermeable surfaces, and flow regimes of ephemeral rivers (water velocity, depth, depositional patterns, and channel morphology).

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

ESS7 is not relevant to the project, as the people in the project area are not considered as Indigenous Peoples as defined under ESS7.

ESS8 Cultural Heritage

There is the potential for chance find of cultural or archeological significance during construction and the existence of some historic buildings around the secondary road investments that could potentially be impacted from the construction. The ESMF has been updated to comply with ESS8 in which risks associated with intangible cultural heritage (such as disruption to religious/cultural festivity in the community by civil work) will be additionally assessed and mitigated through stakeholder consultations. Subproject specific ESMPs will address these issues through the inclusion of chance find procedures and site-specific mitigation measures.

ESS9 Financial Intermediaries

ESS9 is not relevant, as the project does not involve any financial intermediaries.

B.3 Other Relevant Project Risks

1. Security risks: With Al-Shabaab still in control of parts of the country and their attacks frequently targeting government and other strategic infrastructure and persons in urban areas including project municipalities of SURP II, the security risks for the project workers and stakeholders (such as participants to public consultations) are significant. This situation also poses insecurity for Bank staff and limits access to project sites, making the project monitoring difficult. The security situation may prevent or delay the civil works and achievement of project objectives. The project will need to develop clear guidelines for addressing insecurity and possibly suspending the civil works. 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 project will address internal security risks associated with the deployment of such security personnel on the community and project workers in accordance with ESS4 and the WB Good Practice Note on “Assessing and Managing the Risks and Impacts of the Use of Security Personnel”. Following a security risk assessment by each municipality, relevant security management measures will be included in subproject-specific ES instruments and the Project Implementation Manual (PIM) (such as code of conduct, incident reporting, grievance redress and training/awareness-raising of security officers on the principles of proportionality in the use of force). The World Bank’s supervision and oversight of civil works will be supported through a third-party monitoring agent.
2. Risks of forced displacement of IDPs by the government: As discussed under ESS5 section, forced displacement of IDPs is rampant especially in urban centers such as Mogadishu. While project-related economic and physical displacement will be managed through ESS5, there are risks that the project might inadvertently involve areas where such forced displacement of IDPs have been conducted. To avoid such risks, if forced displacement were conducted in the right of way (ROW) of project roads (or any other project-financed infrastructure) before board approval of SURP II and after March 31, 2019 (which is the official start date of SURP civil work), relevant ESS5 requirements will be applied retroactively. If such requirements cannot be satisfied retroactively, the Bank will not support such roads. This commitment has been included in the ESCP. The details to address such risks are included in the RPF.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

OP 7.50 is not applicable. Small-scale drainage works will be constructed in Kismaayo, where the combined Juba/Shabelle drainage system meets the Somali Sea. No impacts on international waterways will occur per OP 7.50 guidelines.

OP 7.60 Projects in Disputed Areas

No

There are no disputed areas within the geographical areas (cities of Mogadishu, Garowe, Kismaayo, and Baidoa) of this project.

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

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td></td>
</tr>
<tr>
<td>REGULAR REPORTING: Prepare and submit regular monitoring reports on the implementation of the ESCP and ES instruments.</td>
<td>10/2024</td>
</tr>
<tr>
<td>TIMELINE: Quarterly throughout the project implementation</td>
<td></td>
</tr>
<tr>
<td>INCIDENTS AND ACCIDENTS NOTIFICATION: Promptly notify any incident or accident related or having an impact on the Project with a significant adverse effect on the environment, the affected communities, the public or workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate.</td>
<td>10/2024</td>
</tr>
<tr>
<td>TIMELINE: Within 48 hours after taking notice of accident/incident.</td>
<td></td>
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<tr>
<td>ORGANIZATIONAL STRUCTURE:</td>
<td></td>
</tr>
<tr>
<td>• PIU of each Municipality: Establish and maintain at least one full-time environmental/social safeguards specialist and other relevant specialists</td>
<td></td>
</tr>
<tr>
<td>• Federal level PCU: Establish and maintain at least one full-time environmental/social safeguards specialist, one full-time GBV/Gender specialist and other relevant specialists.</td>
<td>03/2020</td>
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</tbody>
</table>
**TIMELINE:**
- PIU: Prior to project effectiveness
- PCU: Six months after project effectiveness

**ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT PLAN:** Consistent with the Project’s ESMF and relevant ESSs, prepare environmental and social management plan (ESMP) for subprojects. Disclose and implement the ESMP following the clearance by the Association.

**TIMELINE:** Disclosure of the ESMP following the clearance by the Bank and incorporation of relevant provisions of ESMPs into procurement documents (including in the form of contractor’s ESMP) prior to commencement of civil work.

10/2024

**EXPANSION TO OTHER MUNICIPALITIES:** If the project is expanded to cover other municipalities at any future time, the safeguards documents of SURP II (ESMF, RPF, SEF and LMP) will need to undergo revision, review and clearance by the Association and redisclosure.

**TIMELINE:** Upon request for such expansion from the new municipality.

10/2024

**TECHNICAL ASSISTANCE ACTIVITIES CONSISTENT WITH THE ESF:** The TA to be provided under the Project on “Displacement”, “O&M of Urban Infrastructure” and “urban Governance and Services” shall be undertaken pursuant to terms of reference reviewed and approved by the Association. Such terms of reference shall ensure that the TA takes into account, and calls for application of relevant provisions of ESSs and the borrower’s own laws.

**TIMELINE:** Prior to commencement of each TA activity.

10/2024

**CONTRACTORS MONTHLY REPORT:** As per the Association’s request, provide the contractor’s monthly monitoring reports submitted to the PIU.

**TIMELINE:** Immediately upon request by the Association.

10/2024

**MANAGEMENT OF CONTRACTORS:** Ascertain that the contractors are legitimate/reliable entities. Incorporate the relevant aspects of the ESCP, ESMP and the LMP, into the ESHS specifications of the procurement documents with contractors, together with non-compliance remedies. Monitor their performance to ensure that the contractors comply with the ESHS specifications under LMP.

**TIMELINE:** Prior to the preparation of procurement documents. Supervise contractors throughout project implementation.

10/2024

**ESS 10 Stakeholder Engagement and Information Disclosure**

**STAKEHOLDER ENGAGEMENT PLAN (SEP):** Consistent with the SEF and ESS10, prepare, disclose and implement the Stakeholder Engagement Plan (SEP) for each subproject, including the project grievance mechanism (GRM).

10/2024
### The World Bank
#### Somalia Urban Resilience Project Phase II (P170922)

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<table>
<thead>
<tr>
<th>TIMELINE: Prior to start of civil work</th>
<th>ESS 2 Labor and Working Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>LABOR MANAGEMENT PROCEDURES (LMP): Consistent with the LMP and ESS2, develop and implement labor management procedures for each subproject to address labor risks.</td>
<td>10/2024</td>
</tr>
<tr>
<td>TIMELINE: Prior to commencement of civil work.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>ESS 3 Resource Efficiency and Pollution Prevention and Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relevant provisions on ESS3 are addressed in the Project’s ESMF, which will be included in subproject-specific ESMPs.</td>
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</table>

<table>
<thead>
<tr>
<th>ESS 4 Community Health and Safety</th>
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<tbody>
<tr>
<td>GBV AND SEA RISKS: Develop and implement measures and actions to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) as a stand-alone GBV Action Plan to be included in ESMP.</td>
</tr>
<tr>
<td>TIMELINE: see ESMP in ESS1</td>
</tr>
<tr>
<td>Relevant provisions on ESS4 are addressed in the Project’s ESMF, which will be included in subproject-specific ESMPs</td>
</tr>
<tr>
<td>TIMELINE: see ESMP in ESS1</td>
</tr>
<tr>
<td>SECURITY PERSONNEL In line with ESS4 and WB Good Practice Note, conduct/develop a security risk assessment with security management plan to be incorporated in subproject-specific ES instruments (such as ESMP/LMP).</td>
</tr>
<tr>
<td>TIMELINE: see ESMP/LMP in ESS1/2</td>
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<tr>
<th>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</th>
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<tbody>
<tr>
<td>RESETTLEMENT ACTION PLAN (RAP): Consistent with the RPF and ESS5, develop and implement the resettlement action plan (RAPs) for each subproject, including grievance mechanism.</td>
</tr>
<tr>
<td>TIMELINE: Implementation of the RAP prior to commencement of civil work.</td>
</tr>
<tr>
<td>FORCED DISPLACEMENT PRIOR TO PROJECT APPROVAL: If forced displacement are conducted in the ROW of project roads before board approval of SURP II and after March 31 2019, relevant ESS5 requirements will be applied retroactively.</td>
</tr>
</tbody>
</table>
TIMELINE: Census

| ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources |
| Relevant provisions on ESS6 are addressed in the Project’s ESMF, which will be included in subproject-specific ESMPs. | 10/2024 |
| ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities |
| ESS 8 Cultural Heritage |
| Relevant provisions on ESS8 are addressed in the Project’s ESMF, which will be included in subproject-specific ESMPs. | 10/2024 |
| ESS 9 Financial Intermediaries |

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

*Is this project being prepared for use of Borrower Framework?*  
No

*Areas where “Use of Borrower Framework” is being considered:*

The project will apply the World Bank ESF, and not rely on the Borrower’s E&S framework.

### IV. CONTACT POINTS

**World Bank**

<table>
<thead>
<tr>
<th>Contact:</th>
<th>Makiko Watanabe</th>
<th>Title:</th>
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<tbody>
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</table>

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<th>Sr Urban Spec.</th>
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</thead>
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<td>Email:</td>
<td><a href="mailto:zkarim@worldbank.org">zkarim@worldbank.org</a></td>
</tr>
</tbody>
</table>

**Borrower/Client/Recipient**

**Implementing Agency(ies)**

### V. FOR MORE INFORMATION CONTACT
### VI. APPROVAL

**Task Team Leader(s):**  
Makiko Watanabe, Zishan Faiza Karim

**Practice Manager (ENR/Social):**  
Robin Mearns Cleared on 03-Oct-2019 at 17:02:7 EDT

**Safeguards Advisor ESSA:**  