



# Environmental and Social Review Summary

## Concept Stage

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

Date Prepared/Updated: 04/23/2019 | Report No: ESRSC00444



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Somalia	AFRICA	P170221	
Project Name	Somalia Urban Resilience Project Phase II		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
«PRACTICEAREA»	Investment Project Financing	6/10/2019	9/30/2019
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Benadir Regional Administration/Mogadishu Municipality, Baidoa Municipality/South West State, Kismayo Municipality/Jubbaland, Garowe Municipality		

Proposed Development Objective(s)

To strengthen public service delivery capacity at the municipal level and support the reconstruction of key urban infrastructure in targeted areas.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>110.00</b>

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

No

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

The 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, supporting the development of forward-looking urban planning,

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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.

#### D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social] Key municipalities are BRA/Mogadishu, Garowe, Kismayo, and Baidoa Municipality. Mogadishu (est. pop.1.4M) 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 (est. pop 70,000), the state capital of Puntland, which is situated in the north east of Somalia. Garowe serves as the trading center for livestock for the local market. Kismayo (est. pop 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 is a strategic town in south-central Somalia and is the interim capital of South West State (SWS) of Somalia. It is situated approximately 250km west of Mogadishu. Baidoa (est. pop 150,000), 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. While the exact infrastructure investments in some individual subprojects will be determined during implementation, priority investments are likely to be (i) upgrading/rehabilitation of limited segments of existing primary and secondary urban roads and one existing minor bridge; (ii) corresponding drainage systems; (iii) sidewalks 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. Municipalities have undergone a priority-setting process which effectively narrow preferred interventions. The set of potential interventions will be further constrained by what is feasible in an evolving country context (the ESMF will have a negative/exclusion list to exclude project activities with significant environmental and social impacts). While more details on municipality-specific information will be identified during project preparation, the 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. It is also likely that settlements of IDPs, returnee refugees and other vulnerable groups are present near some of subproject areas. The ongoing SURP (with its ESMF and RPF) 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 provides useful city level information on existing land use, housing, IDPs, infrastructure and service delivery; urban plans to guide city growth; and infrastructure/service requirements. UN agencies' Joint Program on Local Governance (JPLG) is helping to develop Local Government Laws at the FMS level and establishing representative District Councils. UNDP's Rule of Law Program has established paralegal aid and alternative dispute resolution mechanisms involving informal leadership and local non-governmental organizations (NGOs) in major cities of Somalia, anchored under Ministry of Justice. 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, none of these projects supported by other development partners are "associated facilities", as defined by ESS1.

#### D. 2. Borrower's Institutional Capacity

At the State Project Implementation Unit (PIU) level, the proposed SURP II will build on the engagement developed through the SUIPP and SURP. Through these earlier projects, 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 Specialists, Engineers and Monitoring and Evaluation Specialists. 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, implementing the relevant safeguard instruments and ensuring continuous community outreach and consultation, monitoring and evaluating program implementation and impacts, developing and managing the grievance redress mechanism (GRM) and reporting results to various stakeholders. 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. Municipal engineers will be coupled with PIU staff in order to engage in peer-to-peer learning. 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 federal Ministry of Public Works PCU will include a minimum a Project Coordinator, a Financial Management Specialist, an Environmental Safeguards Specialist, and a Social Safeguards Specialist and other technical specialists as deemed relevant. Building on the arrangement under the SUIPP and SURP , the PIUs will be supported by a contracted engineering consultant who will be responsible for monitoring the contractors of the civil works as well as monitoring adherence to the safeguard instruments. The PIUs will also be supported by a third-party/monitoring agent contracted by the Bank or the PIU. The third-party monitor will provide quality assurance of the supervision carried out by the engineering supervision consultant and carry out spot checks on both the engineering quality of the civil works and adherence to the safeguard instrument.

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

### A. Environmental and Social Risk Classification (ESRC)

Substantial

#### Environmental Risk Rating

Substantial

The impact of the civil works is expected to be small-scale, localized and reversible. Engineering capacity of the client is 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 and Jubbaland. Lastly, the country risks are extensive due to political and security considerations; the ability for the World Bank to supervise environmental and social risk management is limited. Hence the overall environmental risk rating is Substantial.

#### Social Risk Rating

Substantial

In light of the criteria set out in the Environmental and Social Directive for IPF, the ESRC of the project is proposed to be Substantial Risk, taking into account the following key aspects of the project:

Overall risks of the project's physical intervention. The environmental and social scale and impact of the project may be moderate and the location may not be in such a highly sensitive area, while some risks and impacts may be significant. 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. Key social risks and impacts include: physical and economic displacement; potential risks associated with labor influx including sexual harassment,



exploitation, and abuse, and other forms of gender-based violence (GBV); and potential exclusion of disadvantaged and vulnerable groups from project benefits.

Contextual social conflict risks. 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 resettlement and dissatisfaction of districts that have not been chosen for the subproject location.

Limited borrower capacity. The Project is being developed in a legal or regulatory environment where there is uncertainty or conflict 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:***

Expected environmental and social benefits: The project will have environmental benefits, including (i) improved air quality due to reduced traffic congestion, fuel consumption and dust entrainment through better roads; (ii) reduced vehicle and accident hazards; (iii) improved pedestrian traffic safety because of better road quality and solar-powered street lights and 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 street lights; (iii) employment opportunities for the community through construction and maintenance of the municipal infrastructure; and (iv) positive economic impact on livelihood and the businesses through better accessibility and improved security. 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 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). These short-term impacts 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. Anticipated key social risks and impacts include: (i) land acquisition and physical and economic displacement (see ESS5 Section below); (ii) potential risks associated with labor influx including sexual harassment, exploitation, and abuse, and other forms of gender-based violence (GBV) (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). These risks will be mitigated through preparation and implementation of resettlement action plans; 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; and effective stakeholder engagement including inclusive and transparent consultation process and functional GRM. 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 and other poor households. 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. Environmental and social instruments: While the details of some individual subprojects will be determined during the project implementation stage, the ESMF and the Resettlement Policy Framework (RPF), including generic TORs for Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs), are being prepared and disclosed for each municipality under SURP/SUIPP in compliance with OP/BP by independent consultants, who are not involved in engineering design. These ESMFs and RPFs will be updated to reflect the ESF and disclosed before appraisal, including moving the documentation from Bank safeguards (OPs/BPs) to standards (ESF) language. The ESMF will include a Stakeholder Engagement Framework for each of BRA/Mogadishu, Garowe, Kismaayo, and Baidoa, as well as Labor Management Procedures. The ESMF will refer to the World Bank's Environmental, Health, and Safety Guidelines (EHSG) as relevant. Where the details of individual subprojects are known during project preparation, subproject-specific ESMPs and RAPs will be prepared before appraisal. Relevant provisions of ESMPs and RAPs will be incorporated into procurement documents and compensation/assistance measures implemented before the start of civil work of each subproject.

**Areas where reliance on the Borrower's E&S Framework may be considered:**

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

**ESS10 Stakeholder Engagement and Information Disclosure**

Key stakeholders include project-affected communities, local residents, religious leaders, district peace committees, civil society organizations (CSOs), other development partners, and state and municipal authorities, including the Benadir Regional Administration (BRA) in case of Mogadishu. Consultations will be held to update/prepare environmental and social instruments in each municipality, including disadvantaged and vulnerable groups as described in ESS1 Section. The stakeholder engagement framework/plan will be prepared as part of the ESMF/ESMP, including the GRM. All environmental and social instruments will be disclosed in compliance with ESF and ES Directive.

**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**

While the exact quantitative information is to be determined during the implementation of each subproject, the project workers engaged or employed will include direct workers (for example, consultants hired in PIUs, such as



environment and social specialists); contracted workers (for example, skilled and non-skilled construction workers engaged by contractors of each subproject); community workers (for example, community members such as IDPs or female workers engaged in road maintenance work); and primary supply workers (for example, workers engaged for essential construction materials to be purchased on an ongoing basis, as defined in ESS2.) Project-related government civil servant are those who will support the project in each municipality or in the Ministry of Public Work. Potential risks related to labor and working conditions, such as labor influx (see also ESS1 Section), child labor, forced labor, work-related discrimination and OHS risks, will be assessed and addressed through the preparation and implementation of labor management procedures (LMP). Key OHS risks for the project relate to the construction and rehabilitation work, such as moving equipment, noise, vibration, welding, chemical hazard, working environment temperature, working at height and safety and hygiene in worker camps (where established). The LMP will be prepared as part of ESMF/ESMP of each municipality, and relevant mitigation measures to address such risks will be incorporated into procurement documents. The LMP will also include a well-functioning and easily accessible grievance mechanism for project workers.

### **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, noise, 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/ESMP will include 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 and any other waste generated during the construction shall be collected and disposed of at designated disposal sites in line with 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 maintenance shall be collected and disposed of appropriately at designated sites or be re-used or sold for re-use locally. Entry of 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/ESMP will include standard operating procedures and good construction management practices, include those proposed in WB EHSGs. To address potential risks associated with the security personnel to be hired by contractors, the ESMF/ESMP will include mitigation measures in compliance with ESS4 where applicable. Incidence of GBV in Somalia is a significant contextual challenge. Assessment of project-related sexual exploitation and abuse (SEA)/GBV will be conducted during project preparation. Given the assessment of GBV risks under the first phase of SURP, and given the context of pervasive insecurity, it is advised that the project adopt a robust approach to address potential GBV risks. Relevant mitigation measures to address these risks (e.g., integrating Codes of Conduct with SEA/GBV-related protections, community consultations and sensitization activities to raise awareness of potential risks, mapping activities to identify potential service providers in project affected areas, development of a GBV Action Plan and establishment of GRM with procedures and channels to enable safe, confidential and ethical reporting of GBV incidents) will be identified in alignment with assessed risk and will be articulated in the ESMF/ESMP and all related safeguard instruments, in line with the WB GBV Good Practice Note. GBV sensitization activities, in line with global guidelines on ethical engagement, should be integrated into the Stakeholder Engagement Plan. Additional considerations may include elaboration of provisions for Third Party Monitoring and establishing formal contractual arrangements with identified service providers. The project will also look to include provision of capacity building and training of relevant stakeholders including contractors and project workers, in addition to capacity building for government partners. GBV risks should be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement. An escalation clause on GBV risk should be integrated into the Environmental and Social Commitment Plan (ESCP ) should level of risk change during project implementation.

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

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 will be 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. Component 3 (Institutional Strengthening) 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. Other TA components may include Operations and Maintenance (O&M) of urban infrastructure and services and subnational infrastructure and service delivery. While further details of this TA will be determined during the project preparation, the commitment to the compliance of this TA with ESS5 and any other relevant ESSs (such as ESS2 and ESS4 on community and occupational health and safety in O&M and ESS10 on stakeholder engagement in service delivery) will be included as part of the ESCP.

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

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/ESMP will exclude such sensitive areas. The ESMF/ESMP will also include specific measures to avoid or minimize negative impact on critical or protected areas if the subproject





screening process does not otherwise exclude these areas. The impact (whether singular or cumulative) of small-scale municipal rehabilitation and infrastructure improvement on sensitive areas will be minor. It should be also noted that, due to evolving 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.

#### **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 will be 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**

Security risks: There are areas in Mogadishu, Garowe, Kismayo and Baidoa that remain in conflict which affects access to locations and insecurity for staff, making monitoring difficult. Moreover, 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. These will be outlined in the Project Implementation Manual (PIM). The World Bank’s supervision and oversight of civil works will be supported through a third-party monitoring agent. Risks of forced eviction of IDPs by the government: While project-related economic and physical displacement will be managed through ESS5, there are risks that the government will resort to forced evictions of IDPs outside the project area or after project closure. To help mitigate such risks, the TA under Component 3 will focus on (i) strengthening the capacity of local governments in preventing, mitigating and managing future resettlement; (ii) collaborating with other development partners engaged in durable solutions programs to map out all the informal settlers (including both newly arrived IDPs as well as protracted informal settlers without security of tenure) in the project target areas; and (iii) exploring alternative means of providing more tenure security to informal settlers. The exact activities to be supported under this TA will continue to be explored with the government and other development partners during project preparation. Expansion to other types of infrastructure: If the list of



proposed investments is changed at any future time (e.g. expanded to other types of construction such as water and sanitation, large-scale investments and landfills), the risk ratings as well as the safeguards documents would need to undergo revision, review, and redisclosure.

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

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

No

**Financing Partners**

While the project will be partly funded by Somalia Multi-Partner Fund (with the funding from European Union and Germany/KfW), such partners have agreed that the ESF will apply to the project. Thus, no “common approach” is considered in a manner that is defined in ESF (in which financing partners agree on an approach to ES assessment and management that is different from the ESF).

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

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

The ESMF and RPF from the predecessor project will be updated, especially to reflect the changes moving from the safeguards (OPs/BPs) to standards (ESF) approach. The client will also need to obtain clearance from the Bank and disclose the ESMF (including Labor Management Procedures (LMP) and Stakeholder Engagement Framework (SEF)), as well as the RPF for each municipality, before appraisal.

Where the details of individual subprojects are known during project preparation, subproject-specific ESMPs (including subproject-specific Stakeholder Engagement Plans (SEPs)) and RAPs will be prepared and disclosed before appraisal.

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

Subproject-specific ESMPs and RAPs, including measures to address GBV risks, will be prepared during project implementation where the details of such subprojects are unknown during project preparation. Relevant provisions will be incorporated into procurement documents and compensation/assistance measures implemented before the start of civil works of each subproject.

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Component 3 (Institutional Strengthening - Technical Assistance on displacement and durable solutions; O&M of urban infrastructure and services; and subnational infrastructure and service delivery) will comply with ESS5 and any other relevant ESSs (such as ESS2 and ESS4 on community and occupational health and safety in O&M and ESS10 on stakeholder engagement in service delivery) throughout the implementation of this component.

Expansion to other types of infrastructure. If the list of proposed investments is changed at any future time, the risk ratings as well as the safeguards documents will need to undergo revision, review, and redisclosure.

Reporting including accidents and incidents notification, as required in the ESCP template.

**C. Timing**

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

30-May-2019

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: Ministry of Finance

**Implementing Agency(ies)**

Implementing Agency: Benadir Regional Administration/Mogadishu Municipality

Implementing Agency: Baidoa Municipality/South West State

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Implementing Agency: Kismayo Municipality/Jubbaland

Implementing Agency: Garowe Municipality

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s): Makiko Watanabe, Zishan Faiza Karim  
Safeguards Advisor ESSA Nathalie S. Munzberg (SAESSA) Cleared on 23-Apr-2019 at 17:09:45  
Practice Manager null on