

Federal Republic of Somalia



Ministry of Fisheries and Blue Economy

SOMALI SUSTAINABLE FISHERIES DEVELOPMENT PROJECT- [BADMAAL PROJECT]

PROJECT ID: P178032

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

CONSTRUCTION OF FISH LANDING FACILITY AT JAZEERA SOUTHWEST STATE OF SOMALIA

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ACRONYMS AND ABBREVIATIONS

ARAP	Abbreviated Resettlement Action Plan
CBO	Community-based organization
CHS	Community Health and safety
CoC	Code of Conduct
CPF	Country Partnership Framework
CSO	Civil Society Organization
DG	Director General
E&S	Environment and Social
EHS	Environmental Health and Safety
EHSGs	Environmental Health and Safety Guidelines
EHSMP	Environmental Health and Safety Management Plan
ESMP	Environmental and Social Management Plan
ESCP	Environment and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
EU	European Union
FCV	Fragility, Conflict & Violence
FGS	Federal Government of Somalia
FMS	Federal Member State
FRS	Federal Republic of Somalia
GBV	Gender-based Violence
GDP	Gross Development Product
GFF	Global Financing Facility
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
GIS	Geographic Information System
GRM	Grievance Redress Mechanism
GRC	Grievance Redress Committee
IA	Implementing Agency
IDA	International Development Association
IDPs	Internally displaced persons
IP	Implementing Partner
IPF	Investment Project Financing
IPV	Intimate partner violence
IUU	Illegal, Unreported and Unregulated
IVAs	Independent Verification Agents
LMP	Labour Management Procedures

M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MFBE	Ministry of Fisheries and Blue Economy
MoLSA	Ministry of Labour and Social Affairs
NGO	Non-governmental Organization
OHS	Occupation health and safety
OHS	Occupation health and safety
OP	Operational Policy
PAPs	Project affected persons
PDO	Project Development Objective
PPE	Personal Protective Equipment
PFM	Public Financial Management
PLWDs	People living with disabilities
PIU	Project Implementation Unit
PMU	Project Management Unit (FGS level)
POM	Project operational manual
PWDs	Persons living with disabilities
RAP	Resettlement Action Plan
RPF	Resettlement Planning Framework
SDG	Sustainable Development Goal
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEAH	Sexual Exploitation, Abuse, and Harassment
SMF	Security Management Framework
SMP	Security Management Plan
SEP	Stakeholder Engagement Plan
SOPs	Standard Operating Procedures
SSFDP	Somali Sustainable Fisheries Development Project
TA	Technical Assistance
ToR	Terms of Reference
TPM	Third Party Monitoring Agent
WB	World Bank
WBG	World Bank Group
WHO	World Health Organization
WM	Waste Management

EXECUTIVE SUMMARY

The Somalia Sustainable Fisheries Development Project (SSFDP/Badmaal Project), financed by the World Bank, aims to strengthen sustainable fisheries management, improve fisheries-related infrastructure, and enhance the livelihoods of coastal communities across selected Federal Member States in Somalia. The project supports climate-resilient fisheries infrastructure, fisheries value chain development, institutional capacity strengthening, and improved fisheries governance and management systems to promote sustainable and inclusive growth of the fisheries sector. The proposed project aims to construct a fish landing facility in Jazeera, Southwest State of Somalia, designed for fish landing, unloading, weighing, sorting by species and size, rinsing, icing, boxing, auctioning, temporary chilled storage and onward transportation. The facility is not designed for bulk fish processing. Fish will remain whole throughout handling, and no gutting, filleting, canning or other fish-processing activities will be undertaken. The proposed construction of the Jazeera Fish landing is implemented under Component 1 of the Badmaal Project, specifically Subcomponent 1.1 on Climate-Resilient Fisheries Infrastructure. The activity supports the development of small-scale fisheries infrastructure aimed at improving fish handling, storage, and market access, while reducing post-harvest losses and strengthening the livelihoods of coastal fishing communities. Jazeera is a key coastal town located approximately 20 km southwest of Mogadishu in the Lower Shabelle region. It is known for its vibrant fishing activity and pristine beaches.

X The project area is located in Jazeera, a coastal fishing community in Southwest State of Somalia, approximately 20 km southwest of Mogadishu along the Indian Ocean coastline. The area is characterized by active artisanal fishing activities, coastal settlements, and fisheries-related trade, with local communities largely dependent on marine resources and small-scale fisheries for their livelihood.

Environmental and Social Benefits: The subproject is expected to bring positive Environmental and Social Benefits. Environmentally, the project will enhance sustainable fisheries management, reduce post-harvest losses, and promote climate-resilient practices. It will also incorporate proper waste management systems. Domestic wastewater from hygiene facilities will be managed separately through septic tanks and, where feasible, percolation fields or bowser emptying. Fish rinse-water from handling and hose-down areas will consist primarily of seawater containing minor quantities of fish scales, fish oil and occasional residues from damaged fish, and will pass through solids basket filters and passive oil separation before discharge through the drainage/soakaway system to minimize pollution and safeguard coastal ecosystems. Socially, the project will improve food safety and hygiene, create employment opportunities, and strengthen the livelihoods of local communities, particularly women and youth involved in the fisheries value chain. Overall, the initiative will contribute to inclusive, resilient, and environmentally responsible coastal development.

The activities associated with the construction and operation of the Jazeera Fish Landing Facility will likely generate site-specific risks and impacts. Construction risks are primarily associated with civil works, while operational risks relate to fish landing and handling activities, including unloading, weighing, sorting, rinsing, icing, boxing, auctioning, chilled storage, rinse-water and drainage management, solid waste and fish residue management, odor control, marine pollution prevention, water use efficiency, occupational health and safety, seafood hygiene, community health and safety, and emergency preparedness. Risks include occupational health and safety of workers, both during the construction and operational phases; community health and safety risks; risks associated with labor rights and

management, e.g child labor or forced labor; labor influx and associated risks, such as GBV/SEAH, and pollution prevention associated with facility operation.

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social risks and impacts of the Project associated with preconstruction, construction and operational activities are either avoided, minimized, mitigated and monitored. It aims to identify, characterize and manage the potential risks and impacts during the construction and operation of fish landing in Jazeera. ESMP lists the project-specific risks and impacts, and mitigation measures, lays out institutional arrangements for implementing and monitoring the risk mitigation measures, and proposes monitoring indicators for measurement and monitoring of E&S performance. It further includes a description of the Project Grievance Redress Mechanism (GRM), which will remain functional throughout construction and operation, and reiterates stakeholder consultations that have been conducted in the lead up to the project design.

Because the facility is limited to fish landing and handling and does not undertake fish processing, it will not generate high-strength industrial wastewater requiring biological treatment. Fish rinse-water will consist primarily of seawater used for rinsing whole fish and cleaning handling areas. The drainage system incorporates solids basket filters and passive oil separation to remove gross solids before discharge. Routine inspection and maintenance of the drainage infrastructure will be undertaken to prevent pollution of the receiving marine environment.

The Ministry of Fisheries and Blue Economy (MFBE), through the Project Management Unit (PMU), will provide overall environmental and social oversight and ensure compliance with the World Bank Environmental and Social Framework (ESF). At the state level, the Southwest State Project Implementation Unit (PIU) will coordinate and monitor implementation of the ESMP, including stakeholder engagement, grievance management, and compliance with Environmental and Social (E&S) risk mitigation measures. The contractor will be responsible for implementing all construction activities and the mitigation measures specified in this ESMP through a Contractor's ESMP (C-ESMP). A Supervision Consultant will be engaged to oversee day-to-day construction activities and supervise construction-phase ESMP implementation and compliance. Following commissioning, operational ESMP implementation will be the responsibility of the Facility Operator under the oversight of the Southwest State MFBE/PIU and MFBE/PMU.

1.0 INTRODUCTION

1.1 Project background

The Badmaal Project supported by the World Bank, aims to promote sustainable fisheries management, improve the livelihoods of coastal communities, and develop the institutional capacity of the Ministry of Fisheries and Blue Economy of Somalia. The construction of a Fisheries landing and Wholesale Auction Facility at Jazeera is a key component of the project. The proposed facility will improve fish landing, unloading, weighing, sorting by species and size, rinsing, icing, boxing, temporary chilled storage, wholesale auction and onward transportation. Fish will remain whole throughout handling, and no gutting, filleting, canning or other bulk fish-processing activities will be undertaken. This Environmental and Social Management Plan (ESMP) outlines the strategies, responsibilities, and actions needed to minimize the environmental and social risks and potential negative impacts of the pre-construction, construction and operational activities and ensure compliance with the relevant Environmental and Social Standards (ESSs) of the World Bank and the national environmental and worker health and safety regulations.

The project aims to support improvement of fisheries' contribution to the national economy, food security and livelihoods of coastal communities. The project focuses on two key result areas:

- Increased capacity of government and communities to govern and manage fisheries,
- The development of infrastructure and associated value-chains and reduction of post-harvest losses.

1.2 Project development objective and components

Project Development Objective is to improve the capacity of targeted communities and authorities to benefit from and effectively manage selected fisheries.

Table 1: Project components and sub-components

Component	Subcomponent	Key activities
1. Increasing the Capacity of Dependent Communities to Benefit from Sustainable Marine Fisheries	<i>1.1 Climate-resilient fisheries infrastructure</i>	support the identification and investment planning of climate resilient, and gender informed small-scale fishing infrastructure at 10 sites based on needs analyses and in consultation with selected communities and stakeholders. This component will also support, at selected sites, constructing base infrastructure, including processing facilities and technologies to enable private sector investment in facilities (e.g., cold store) and equipment (e.g. ice plant).
	<i>1.2. Improving fishing, handling, processing, and marketing techniques to enhance quality and value-addition</i>	This sub-component will support screening, assessment, and formulation of climate resilient, and gender informed improvement plans for up to 6 small-scale fishing fish value chains at selected infrastructure sites (Comp 1.1), capacity building, training, and advice (technical and business) based on needs assessments, strengthening or establishing sector organizations, including for women (cooperatives, association), and promoting women into leadership roles through capacity building and mentoring, and support transition to climate and/or gender informed fishing and processing practices including safety at sea and labor conditions,

Component	Subcomponent	Key activities
		new technologies and equipment with training, and provision of advisory services.
2. Strengthening Marine Fisheries Governance and Management	<i>2.1 Laying a foundation for effective, transparent, and equitable fisheries resource governance and management</i>	Aims to help Somalia achieve effective fisheries governance and provide technical assistance and operational support to the FMDC as well as legal and technical support to enable FMS to develop harmonized legal and regulatory frameworks for fisheries management. Building on this, ecosystem-based, climate-informed and gender-sensitive management plans will be developed for selected fisheries shared among FMS and the FGS.
	2.2 Developing a comprehensive Monitoring Control and Surveillance (MCS) system to fight IUU fishing in Somali waters	Investment in developing a comprehensive Monitoring Control and Surveillance (MCS) system to respond to IUU fishing in Somali waters, which includes support to develop and implement a National Plan of Action to fight IUU fishing and to upgrade Fisheries Monitoring Centers with equipment, services, technical assistance and training.
	<i>2.3 Fisheries Statistics and Stock Assessment</i>	This subcomponent will support development, deployment and institutionalize tools and systems to generate, analyse and disseminate information essential for effective fisheries management but tailored to Somalia's current level of capacity with the potential to become more sophisticated over time.
	<i>2.4 Strategic studies on fisheries development and blue economy</i>	The project will finance analytical and strategic studies for long term development of the fisheries sector in the changing fisheries environment and the broader blue economy in Somalia.
3. Project Management, Monitoring and Evaluation		Funds under this component will be used to provide equipment, technical assistance, training, and incremental operating costs to the Ministry of Fisheries and Blue Economy (MFBE) to strengthen its capacity to manage, implement, and monitor project activities.

1.3 Purpose of the ESMP

This ESMP lists the key elements of an Environmental and Social Management Plan (ESMP) capturing the Environmental and Social (E&S) risks and impacts and associated mitigation measures that need to be considered at minimum in the context of pre-construction, construction and operational activities of the Jazeera Fisheries Landing and wholesale auction facility. The purpose of the management plan is to provide a consolidated summary of all the Environmental and Social (E&S) commitments relevant for the pre-construction, construction, commissioning and operational phase of the project, including Occupational Health & Safety (OHS) fish rinse-water and drainage management, marine pollution prevention, seafood hygiene, community health and safety, stakeholder engagement, grievance management, and waste management. The measures focus on environmental aspects such as air emissions, environmental contamination, resource efficiency, solid waste management, odor control, drainage management and protection of the adjacent coastal and marine environment, and social aspects such as communication with local stakeholders, labour management, seafood hygiene, community health and safety, GBV/SEA/SH prevention, grievance management and safety of workers and communities. This ESMP lists the project-specific risks and impacts and mitigation measures, lays out the institutional arrangements for the implementing and monitoring of the risk mitigation measures, and proposes monitoring indicators for

measurement and monitoring of E&S performance throughout the pre-construction, construction and operational phases.

This ESMP has been updated to address both construction and operational environmental and social risks associated with the proposed Jazeera Fisheries Landing and Wholesale Auction Facility. It establishes mitigation measures, monitoring requirements, institutional responsibilities and reporting arrangements consistent with the World Bank Environmental and Social Framework (ESF), the Badmaal Environmental and Social Management Framework (ESMF), and Good International Industry Practice (GIIP).

The objective of this ESMP is therefore to provide management actions to avoid, minimize, mitigate and monitor adverse environmental and social risks and impacts in consistence with national or regional framework and relevant WB's ESF, applicable Environmental and Social Standards (ESSs), the Badmaal ESMF, & the WBG General EHSGs. This ESMP was prepared in accordance with the World Bank Environmental and Social Framework (ESF), applicable Environmental and Social Standards (ESSs), and the Badmaal Project Environmental and Social Management Framework (ESMF). The methodology included review of the project design, applicable national laws and regulations, and relevant project instruments, including the ESMF, SEP, and LMP. In line with ESS1 requirements, the preparation process also involved site visits, environmental and social screening, stakeholder consultations, and identification of potential environmental and social risks and impacts associated with the proposed Jazeera Fish landing to inform the development of appropriate mitigation and monitoring measures.

The Badmaal ESMF provided the overarching project-level framework for screening and preparation of this ESMP. Following approval, this ESMP shall serve as the primary site-specific instrument for managing and monitoring environmental and social risks and impacts associated with the Jazeera Fisheries Landing and Wholesale Auction Facility throughout pre-construction, construction, commissioning and operation.

2 PROJECT DESCRIPTION

The Badmaal Project in Jazeera aims to strengthen the local fisheries sector by improving infrastructure, enhancing market access, and supporting effective fisheries management. The project includes the construction of fish landing facilities to improve operational efficiency, promote hygiene standards, and contribute to sustainable fisheries development.

The project will include the development of fish landing and handling facilities to provide a structured space for fish handling, including weighing, rinsing, sorting by size and species, packing with ice into standardized fish boxes for auction sales in an air-conditioned environment. The fish will remain whole (not gutted or filleted) throughout the entire process. Given the current lack of proper landing facilities, fishers manually transport their catch from boats, posing safety and efficiency challenges.

To enhance fish storage, the project will establish chill room, thus ensuring a steady supply of high-quality fish, reducing post-harvest losses, and supporting trade. Additionally, an ice production plant will be built to meet the cooling and preservation needs of fishers and traders.

Water supply systems will be established through installation of freshwater and seawater systems, elevated header tanks, for both portable and seawater, and borehole systems with pumping infrastructure for the seawater system. Plumbing networks will distribute seawater to workstations, potable water too and hygiene facilities. Sanitation infrastructure for the hygiene facilities will include septic tanks and where possible, percolation fields; otherwise, the septic tank will be emptied by bowser. The rinse and hose-down water (seawater) will be managed via filtration (of any fish scales and fish oil) and occasional residues from damaged fish. This rinse water will pass through solids basket filters and passive oil separation before discharge through the approved drainage arrangement, and soakaway systems.

The facility is not designed for bulk fish processing. Fish will remain whole throughout handling, and no gutting, filleting, canning or other fish-processing activities will be undertaken. Fish will be unloaded, weighed, sorted by species and size, rinsed, packed with ice in standardized fish boxes, auctioned, temporarily stored in chilled rooms, and transported onward to main markets.

Because the facility is limited to fish landing and handling and does not undertake fish processing, high-strength industrial wastewater requiring biological treatment will not be required. Fish rinse water will consist primarily of seawater with minor quantities of fish scales, fish oil and occasional residues from damaged fish. The drainage system incorporates solids basket filters and passive oil separation to remove gross solids before discharge. Routine inspections and maintenance will ensure effective operation and prevent pollution of the receiving marine environment.

The fish handling and auction areas will be finished with seamless epoxy flooring and appropriate drainage to support daily cleaning, prevent absorption of fish oils into concrete surfaces, reduce odor generation, improve hygiene, and minimize slip hazards. Routine housekeeping, rapid removal of fish residues, covered waste storage and pest control will be applied during operation.

Specialized equipment installation will include chilled storage (chill rooms for fish on ice), ice production units (solar ice plant), weighing equipment, and fish handling tables designed to

ensure hygienic operations by keeping fish handling off the floor. The entire handling area and auction hall will be paved in seamless epoxy flooring to avoid fish oils from impregnating concrete surfaces, reduce odor generation, improve hygiene and enable effective hose-down using seawater. By establishing these facilities, the Badmaal Project at Jazeera aims to increase food security, create employment opportunities, and promote sustainable fisheries management, ultimately strengthening the socio-economic well-being of coastal communities.

Location of the site.

Jazeera (Jaziira) is a coastal town in the Lower Shabelle region of Southwest State of Somalia, located approximately 20 km southwest of Mogadishu. The area is known for its pristine beaches, active fishing activities and local fisheries trade. Bordered by the Indian Ocean to the east, Jazeera serves as an important coastal location supporting artisanal fisheries and related economic activities. Its proximity to Mogadishu enhances access to markets and services, contributing to local economic development.



Figure 1: Location Map of Proposed Jazeera Fish Landing Facility

The project site (Latitude: 1.949936° N Longitude: 45.179211° E) is characterized by mixed land uses, with nearby settlements, commercial enterprises, and institutional facilities. The area experiences a semi-arid climate, with seasonal variations in temperature and precipitation. The hydrology of the region is influenced by both groundwater and surface water sources, necessitating sustainable water resource management strategies.

The location was selected based on feasibility studies and urban planning considerations, ensuring minimal disruption to existing land uses while maximizing social and economic benefits. The surrounding infrastructure includes road networks, power supply lines, and health facilities that will support project implementation and operations.



Figure 2: Site Plan for Proposed Jazeera Fish landing

The designated project site measures 20m x 60m and is communally owned. The local community, through the Office of the Commissioner of the Jaziira Local Authority, has officially confirmed the donation of the land for the project's implementation. (see annex : land ownership letter)

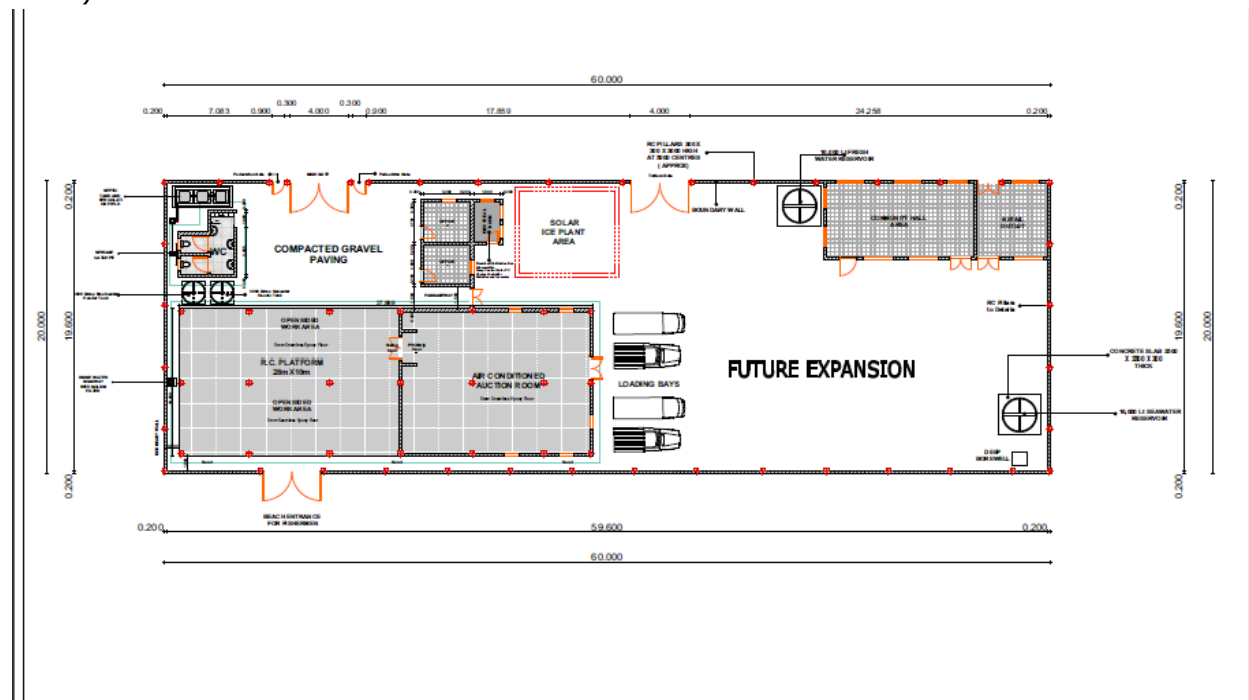


Figure 3: Jazeera Site Plan.

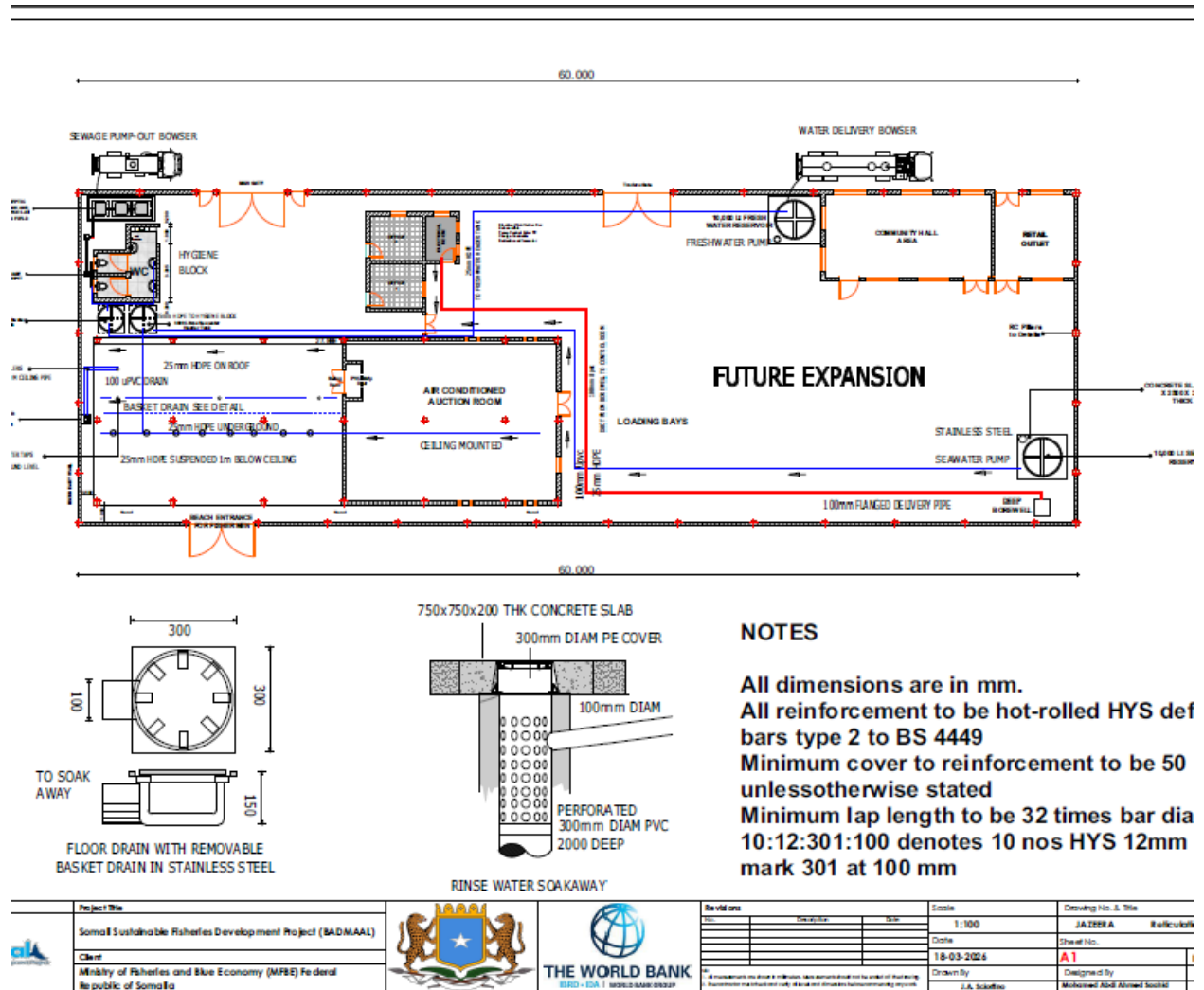


Figure 4; Jazeera Ground Floor Plan

2.1 Project Activities

To achieve the stated objectives, the project is structured to enhance the functionality of the landing while simultaneously strengthening and establishing fisheries' support and management systems. The scope of the project includes the construction of the following key facilities:

- i. Fish Landing, Handling and Work Area-Reinforced concrete platform for unloading, weighing sorting by species and size, washing, boxing and icing and preparing fish for market distribution via auction. Fish will remain whole throughout handling, and no gutting, filleting, canning or other bulk fish-processing activities will be undertaken.
- ii. Auction Room-Designated facility for fish auctioning, price setting, and organized

- trade.
- iii. Chill Room (Cold storage of fish on ice)-Temperature-controlled storage for preserving fish quality prior to sale or transport.
 - iv. Loading Bays and Circulation Areas-Areas for vehicle access, loading/offloading, and internal movement within the facility.
 - v. Solar Ice Plant-Solar-powered ice production unit for fish preservation during handling and transport.
 - vi. Water Supply System-Integrated freshwater (for the hygiene facility only) and seawater system (for fish rinsing and hose down only) including borehole, storage tanks, and distribution network.
 - vii. Hygiene and Sanitary Facilities-Dedicated male and female toilet blocks, handwashing stations to ensure worker hygiene and compliance with public health standards.
 - viii. Two separate wastewater management systems – Septic tank for the hygiene facility running on potable water and a filtration system for the rinsing and hose down areas running on seawater.
 - ix. Administrative and Office Facilities-Office spaces for facility management, coordination, and record-keeping of fisheries operations.
 - x. Electrical and Energy System (Solar PV)-Solar photovoltaic system including panels, batteries, inverter, and distribution units to provide sustainable energy for facility operations
 - xi. Perimeter Wall and Access Control-Construction of boundary walls, main gates, pedestrian gates, and beach access gates to control entry, ensure security, and manage facility operations.

3 POLICY, LEGISLATIVE AND INSTITUTIONAL FRAMEWORKS

The Jazeera fish landing and handling facility subproject is guided by a combination of national legal frameworks and international standards, particularly the World Bank Environmental and Social Framework (ESF). The project will comply with all applicable Somali laws, regulations, and policies, as well as relevant Environmental and Social Standards (ESSs) throughout the pre-construction, construction and operational phases.

The ESMP has been prepared in accordance with the Badmaal Environmental and Social Management Framework (ESMF) and applies the mitigation hierarchy to identify, avoid, minimize, mitigate and monitor environmental and social risks associated with both construction activities and operation of the fisheries landing facility. Operational risks addressed under this ESMP include pollution prevention, fish rinse-water and drainage management, solid waste management, water and energy efficiency, occupational health and safety, community health and safety, stakeholder engagement and grievance management.

The Environmental and Social Management Plan (ESMP) draws from the Badmaal Environmental and Social Management Framework (ESMF) (Policy, Legislative and Institutional Frameworks section) to ensure that all legal, regulatory, and institutional requirements are addressed in the project's environmental and social risk management. The subproject will be implemented in line with national requirements and ESF principles to ensure that environmental and social risks are identified, avoided, minimized, mitigated, and monitored throughout the project lifecycle.

3.1 Somalia national laws, policies, and legislations

The Jazeera fish landing and handling facility subproject is governed by a combination of national legal frameworks and international standards, particularly the World Bank Environmental and Social Framework (ESF). The project will comply with all applicable Somali laws and regulations, as well as relevant Environmental and Social Standards (ESSs), to ensure that environmental and social risks are adequately managed throughout the project lifecycle.

- **Constitution**

The Provisional Constitution of the Federal Republic of Somalia provides the overarching legal framework for environmental protection, natural resource management, labour rights, social inclusion, stakeholder consultations, and protection against discrimination and GBV/SEA/SH related risks.

Article 25 guarantees every person the right to an environment that is not harmful to health and well-being and protects citizens from pollution and hazardous materials. Article 45 requires the protection, conservation, and sustainable management of the environment and natural resources. Articles 43 and 44 provide principles for equitable and sustainable land and natural resource use.

Article 24 provides for fair labour relations and specifically protects workers, particularly women, from sexual abuse, segregation, and discrimination in the workplace. These constitutional provisions are relevant to labour management, stakeholder engagement, occupational health and safety, SEA/SH prevention, social inclusion, and community health and safety under the project.

- **Acts of Parliament**

Environmental Protection and Management Act, 2024

The Environmental Protection and Management Act, 2024 is the principal environmental legislation governing environmental management in Somalia and became effective on 24 February 2024. The Act establishes requirements for environmental protection, pollution prevention, environmental and social impact assessment, environmental monitoring, waste management, and sustainable natural resource management.

The Act promotes the precautionary principle, and the polluter pays principle and requires projects likely to generate environmental and social risks to undertake environmental and social assessment and implement mitigation measures. The project's ESMP will ensure full compliance with the Act's requirements during construction and operation.

- **Somali Labour Code (Law No. 36 of 2024)**

The Somali Labour Code (Law No. 36 of 2024) provides the current legal framework for labour and employment relations in Somalia and is aligned with international labour principles and World Bank ESS2 requirements.

The law requires written employment contracts specifying the nature and duration of work, working hours, remuneration, and termination procedures. It further requires employers to provide safe and healthy working conditions, including provision of adequate PPE, safe workplaces, clean drinking water, sanitation facilities, and measures to prevent occupational risks.

- **Subsidiary Legislations**

Environmental and Social Impact Assessment and Audit Regulations (ESIA), 2024

The Environmental and Social Impact Assessment and Audit Regulations (ESIA), 2024 have been approved by the Federal Government of Somalia and are currently in use to guide environmental and social assessment processes for development projects in Somalia. The Regulations operationalize the Environmental Protection and Management Act, 2024 and establish procedures for environmental and social screening, impact assessment, stakeholder consultation, disclosure, environmental approval, monitoring, and environmental audits.

The Regulations require projects likely to generate environmental and social risks and impacts to undertake environmental and social assessment prior to implementation and to implement approved mitigation and monitoring measures throughout the project lifecycle.

- **Approved Policies**

National Environmental Policy (2020)

The National Environmental Policy, approved by the Somali Cabinet on 13 February 2020, aims to improve environmental quality and promote sustainable development through sound environmental governance and sustainable natural resource management.

The policy promotes conservation of natural resources, environmental governance, pollution prevention, climate resilience, and multi-stakeholder participation and partnerships. The ESMP aligns with the policy through incorporation of pollution prevention, waste management, occupational health and safety, stakeholder engagement, and environmental monitoring measures.

Somalia National Gender Policy (2016)

The Somalia National Gender Policy promotes gender equality and includes strategies to eliminate harmful practices such as FGM/C, child marriage, and gender-based violence (GBV).

In line with the Policy and World Bank ESS2 and ESS4 requirements, the project incorporates SEA/SH mitigation measures, including workers' Codes of Conduct, awareness programs, confidential grievance mechanisms, and referral pathways for GBV/SEA/SH survivors.

Solid Waste Management Framework

Solid waste generated during construction and operation of the Jazeera Fish landing facility will be segregated, temporarily stored, transported, and disposed of at designated disposal sites approved by the relevant Southwest State and local authorities. The project will apply Good International Industry Practice (GIIP) and the World Bank Group General Environmental, Health and Safety (EHS) Guidelines to minimize pollution and public health risks associated with construction and operational waste management.

Southwest State of Somalia

Currently has limited standalone environmental legislation and enforcement mechanisms specific to environmental and social risk management. Accordingly, implementation of the Jazeera Fish landing facility subproject will be guided by the applicable Federal legal framework, including the Environmental Protection and Management Act, 2024, the Environmental and Social Impact Assessment and Audit Regulations (ESIA), 2024, and the World Bank Environmental and Social Framework (ESF), which together constitute the primary framework for environmental and social risk management and compliance within Southwest State.

3.2 World Bank Environmental and Social Standards (ESS)

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

This standard is fundamental for all project activities and requires assessment and management of potential environmental and social risks and impacts through implementation of site-specific mitigation measures. For the construction and operation of the Jazeera Fish landing, ESS1 requires implementation of this ESMP to address potential risks related to site preparation, construction activities, occupational and community health and safety, wastewater generation, traffic management, noise, dust emissions, and operational hygiene and sanitation measures associated with fish handling and market operations. In accordance with ESS1, this ESMP applies throughout the pre-construction, construction and operational phases and includes mitigation, monitoring, institutional responsibilities and reporting arrangements for operational risks associated with fisheries landing and wholesale auction activities.

ESS2-Labour and Working Conditions: ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. This standard ensures safe and fair labour practices, including working conditions, worker health and safety, and a separate grievance redress mechanism (GRM) for workers. The construction and operation of the Jazeera Fish landing facility will require compliance

with ESS2 to protect workers from occupational hazards associated with excavation works, construction equipment, electrical installations, fish handling operations, manual lifting, sanitation risks, and exposure to dust, noise, wastewater, and hazardous materials. The project will implement occupational health and safety measures, workers' Codes of Conduct, SEA/SH awareness measures, and worker grievance management procedures. During operation, ESS2 requirements will apply to facility workers, including occupational health and safety, PPE, safe manual handling, cold-room safety, worker training, Codes of Conduct, SEA/SH prevention and worker grievance mechanisms.

ESS3-Resource Efficiency and Pollution Prevention and Management: ESS3 is relevant to the management of pollution risks and promotion of sustainable resource use during construction and operation of the fish landing and handling. Potential impacts include dust emissions, noise, solid waste generation, wastewater discharge, fuel and oil spills, and inefficient use of water and energy resources. The subproject will implement pollution prevention and control measures, waste segregation and disposal procedures, wastewater management measures, and resource efficiency practices in line with Good International Industry Practice (GIIP) and the World Bank Group Environmental, Health and Safety (EHS) Guidelines.

Operational ESS3 measures include separate management of domestic wastewater and fish rinse-water, solids basket filtration, passive oil separation, drainage maintenance, solid waste management, odor control, marine pollution prevention, water-use efficiency and energy efficiency.

ESS4-Community Health and Safety: ESS4 Focuses on protecting the health and safety of nearby communities from risks and impacts associated with project activities. For the Jazeera Fish landing facility subproject, ESS4 is relevant to management of risks associated with construction traffic, public access to construction areas, dust, noise, waste generation, wastewater discharge, sanitation conditions, occupational accidents affecting nearby communities, and SEA/SH risks associated with labour influx. Mitigation measures will include fencing of active work areas, safety signage, traffic management measures, controlled site access, workers' Codes of Conduct, SEA/SH awareness programs, and continuous stakeholder engagement with surrounding communities and fish market users. Operational ESS4 measures include seafood hygiene, contamination prevention, vector and pest control, traffic management, access control, emergency preparedness and response, and prevention of nuisance impacts to nearby communities

ESS8-Cultural Heritage: ESS8 seeks to protect tangible and intangible cultural heritage. ESS8 may be relevant to the Jazeera landing facility sub-project if there is a chance find during excavation and construction works. The subproject will implement a Chance Finds Procedure consistent with national requirements and the World Bank ESF to ensure protection and appropriate management of any discovered cultural heritage resources.

ESS10-Stakeholder Engagement and Information Disclosure: ESS10 emphasizes meaningful stakeholder engagement, information disclosure, and accessible grievance mechanisms throughout the project lifecycle. For the Jazeera Fish landing and handling facility subproject, ESS10 requires continuous engagement with local communities, fish traders, fishermen, market users, nearby residents, Southwest State authorities, and other relevant stakeholders regarding project activities, construction schedules, anticipated risks and impacts, mitigation measures, employment opportunities, and grievance management procedures. The project will maintain an accessible Grievance Redress Mechanism (GRM) to

receive and address community concerns throughout implementation of the subproject. Stakeholder engagement and the Project GRM will remain operational throughout both construction and operation to address concerns related to facility access, waste, odor, drainage, traffic, safety, worker conduct and environmental pollution

3.3 Legal gap analysis

The activities as proposed in Somali Sustainable Fisheries Development Project, will need to comply with both existing Somali laws and regulations and World Bank Environment and Social Standards. This sub-section compares the national public sector environmental management rules, regulations, and standards to World Bank's Standards. The main objective of this assessment is to strengthen the effective implementation of the ESMP at Federal and State levels in Somalia by identifying and addressing existing gaps. The table below summarizes a comparison focusing on the World Bank policies relevant to the project and gaps identified in existing Somali laws and regulations. All gap-filling measures proposed will be adopted for this Project.

Table 2: Legal gaps analysis

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
ESS1 ("Assessment and Management of Environmental and Social Risks and Impacts")				
Environmental and social assessment, screening and management instruments and protocols.	The World Bank ESF requires application of environmental and social assessment instruments proportionate to project risks and impacts, including ESMFs, ESMPs, SEPs, LMPs, SEA/SH Action Plans, RAPs, EIAs, and environmental and social screening procedures for subprojects.	The Environmental Protection and Management Act, 2024 has been approved and enacted at the Federal level. The Environmental and Social Impact Assessment and Audit Regulations (ESIA), 2024 are also in place to guide environmental and social screening, assessment, and environmental approval processes. However, environmental and social assessment procedures and institutional enforcement mechanisms remain limited across most Federal Member States, including Southwest State of Somalia. Formal E&S screening systems, institutional responsibilities, and implementation capacity	Environmental and social assessment and screening procedures remain weak at the Federal Member State level, including limited institutional capacity, unclear operational screening procedures, and limited enforcement systems for environmental compliance and monitoring.	World Bank standards to apply

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
		remain under development at State level.		
Institutional arrangements.	Requirement by the Bank for specific description of institutional arrangement and implementation schedule for monitoring and mitigation measures.	The mandate of the MFBE as the project implementing partner. The Ministry of Environment and Climate Change, to be responsible for oversight of environmental matters.	MFBE has capacity for technical implementation of project interventions but will require extensive support in management of environmental and social risks. The Ministry of Environment and Climate Change is not at present directly responsible for coordinating institutional responses under this ESMP, and the institutional information is not available, and its remit is unknown, as is its technical capacities.	MFBE-based PMU to work with the respective ministries and agencies responsible for management of E&S matters as the focal points for administration of this ESMP. Contractors responsible for implementation of E&S risk management, overseen and supported by E&S specialists based at the MFBE FMS and FGS levels.
ESS2 ("Labour and Working Conditions")				
Management of different types of project workers.	The Bank puts emphasis on the identification and characterization of different types of workers (project workers, direct workers, contracted workers, community workers, primary supply workers) to manage different types of labor risks.	The Somali Labour Code (Law No. 36 of 2024) provides the primary legal framework governing labour and working conditions in Somalia, including employment terms, workers' rights, wages, occupational health and safety (OHS), grievance management, and labour administration. The law applies to all employers, contractors,	The Labour Code is broadly consistent with ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.	World Bank standards to apply

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
		subcontractors, and project workers engaged under the Somalia Sustainable Fisheries Project in line with ESS2 requirements. In addition, Article 14 of the Provisional Constitution of the Federal Republic of Somalia prohibits slavery, servitude, trafficking, and forced labour for any purpose, consistent with the requirements of ESS2.		
Labour standards.	Several provisions are made under ESS2 to safeguard project workers, promote safety at work and ensure that they have a viable means of communicating grievances and receiving redress. ESS2 also recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth.	The Somali Labour Code (Law No. 36 of 2024) provides the current legal framework governing labour relations, employment conditions, occupational health and safety, workers' rights, written employment contracts, working hours, remuneration, and grievance management.	While the legal framework for labour management has significantly improved following enactment of the Somali Labour Code (Law No. 36 of 2024), implementation and enforcement capacity remain limited, particularly at the Federal Member State level, including occupational health and safety monitoring, labour inspections, and enforcement of SEA/SH prevention measures.	World Bank standards to apply.
ESS3 ("Resource Efficiency and Pollution Prevention and Management")				
Pollution prevention and	This ESS requires the	There are no known	There are no supporting	ESMP to guide the

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
management.	Borrower to undertake a health and safety risk assessment of potential for pollution generation at supported fisheries facilities, which may affect communities, workers and the environment.	national waste management standards or regulations to manage pollution. There are also no known designated landfills for medical wastes by municipalities. No guidelines nationally known to support operation of incinerators. No known national statutes in support of periodic environmental audits. No national pollution standards known at the time of developing this ESMP.	legislative frameworks for pollution prevention and management of wastes.	Borrower on pollution prevention and management. ESMP will be prepared for all the Sub- projects, implemented and monitored. World Bank standards to apply
Management of hazardous wastes.	The bank requires the Somalia to undertake specific measures to manage both hazardous and non-hazardous wastes. Specific emphasis is given in this ESS with respect to transportation and disposal, obtain chain of custody documentation to the final destination. Approved disposal sites are required for this ESS.	There is no known national legislation or policies on management of hazardous wastes in Somalia.	There are no approved hazardous waste disposal sites in Somalia.	ESMP for sub-projects to guide the Borrower on the management of both hazardous and non-hazardous wastes. World Bank standards to apply
ESS4 ("Community Health and Safety")				
Health of community	The ESS envisages that	The Somali Penal Code of	The Somali Penal Code	World Bank standards to

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
members.	the project will put measures in place to anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances. Further, it provides for the avoidance or minimization of community exposure to project-related traffic and road safety risks, diseases and hazardous materials.	1962. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust omitted with violence' are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401. Article 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Article 33 provides that when a superior officer orders the commission of an offence both the perpetrator and his superior will be liable.	of 1962 fails to protect survivors and prosecute perpetrators for GBV/SEAH crimes. The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and GBV/SEAH. Furthermore, in practice it has been documented that women complaining about a rape may find themselves trapped by the Article 426 prohibition against adultery that makes no exception for the case of rape. In practice provisions under Art 39(i) offer little more than theoretical protection.	apply.
Security personnel.	ESS 4 postulates that when the Borrower retains security personnel to safeguard workers and property it will assess risks posed by these security arrangements to those within and outside the project site.	District police will likely provide security services in the implementation of the project. The civil servants in Somalia are governed by Provisional Constitutions and Civil Service Law (Law Number 11). However, there are no	There are no security guidelines for MFBE staff or contractors. While the security protocols guiding their deployment and use of force are broadly unknown, the project will coordinate with the	World Bank standards to apply

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
	The Borrower will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. Borrowers must undertake Security Risk Assessments (SRA) and prepare Security Management Plans (SMP) to identify and mitigate risks to project workers and assets as well as community.	security protocols Guiding their deployment, and there is possibility of violence meted out on civilians or workers or even the possibility of rent- seeking.	law enforcement authorities in each municipality to manage associate risks.	
Universal access.	The ESS4 is emphatic on the right to access to services, especially on the concept of "universal access."	The service charter of the Ministry of Fisheries and Blue Economy is silent on the issue of "universal access."	The concept of universal access is not widely acknowledged in the FGS policies.	World Bank standards to apply.
ESS6 ("Biodiversity Conservation and Sustainable Management of Living Natural Resources")				
Ecosystem restoration.	In accordance with the mitigation hierarchy provided in ESS1 and with the requirements of this ESS, Borrower is required to ensure that biodiversity expertise is utilized to develop and implement a Biodiversity Management Plan.	Somalia has developed National Biodiversity Strategy and Action Plan (NBSAP), which calls for action to be taken to manage the 40+ identified biodiversity hotspots.	However, no draft management plan is provided in Somalia's NBSAP.	World Bank standards to apply
ESS10 ("Stakeholder engagement and information disclosure")				

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
Meaningful engagement of stakeholders in the project activities from planning to implementation levels and Grievance mechanism.	The World Bank anticipates that the project will establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. Further, the project will promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them. The project affected persons should be provided with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.	The Provisional Constitution of the Federal Republic of Somalia, Article 32 stipulates that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information.	The law on the right of access to information currently only exists as a draft.	World Bank standards to apply.
Public consultations.	The Bank requires the Borrower (in this case, Somalia) to initiate consultations with project- affected persons and other interested parties including CSOs.	Procedures for public consultations not explicitly stated in Somali legislation.	Procedures for public consultations not explicitly stated.	The project's approved Stakeholder Engagement Plan (SEP) will guide stakeholder engagement, public consultation, information disclosure, and grievance management throughout project implementation.

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
				Stakeholder consultations have been conducted at the Federal Government and Federal Member State–Southwest State levels, and additional consultations will continue at community level, including consultations by contractors during implementation of site-specific ESMP measures, consistent with ESS10 requirements.

4 BASELINE INFORMATION

4.1 Physical Environment

Topography: The Jazeera site is characterized by a relatively flat terrain with gentle undulations. The area lies within the coastal plains of Mogadishu, with an elevation that slightly varies due to natural and human-induced modifications. The topography influences drainage patterns, with water generally flowing towards the Indian Ocean. The region is prone to occasional flooding, especially during heavy rainfall periods, which necessitates proper drainage planning for the project.

Geology and Soil: The soils in the project area are primarily sandy and loamy, typical of coastal regions. These soils have moderate to low fertility and are prone to erosion, especially in exposed areas. The sandy nature of the soil affects its water retention capacity, making irrigation and water management crucial for vegetation sustainability. During construction, appropriate soil stabilization measures will be necessary to prevent erosion and maintain soil integrity.

Climate and Metrology: Jazeera (Jaziira), like much of southern Somalia, experiences a hot semi-arid climate (BSH) with the following key characteristics:

- **High Temperatures:** Temperatures remain warm throughout the year, typically ranging between 25°C and 35°C (77°F – 95°F).
- **Seasonal Rainfall:** The area has two main rainy seasons—Gu (April to June) and Deyr (October to December)—with annual precipitation averaging 300–500 mm.
- **Dry Periods:** Extended dry seasons occur during Jilaal (January to March) and Hagaa (July to September), bringing hot and dry conditions.
- **Coastal Influence:** Proximity to the Indian Ocean moderates temperatures slightly, with sea breezes helping to reduce extreme heat.
- **Humidity Levels:** The coastal location results in moderate to high humidity, especially during the warmer months.
- **Overall,** Jazeera has a warm and dry climate with periodic rainfall, making it suitable for fishing, small-scale agriculture, and tourism.

Biological Environment: The Jazeera site has a relatively sparse natural vegetation cover, dominated by coastal shrubs, scattered acacia trees, and grass patches. The area has undergone significant anthropogenic activities, including settlements and small-scale agriculture, which have altered the natural ecosystem. Wildlife presence is minimal, with occasional sightings of small mammals, birds, and reptiles. There are no designated conservation areas within the immediate vicinity of the project site. However, the proximity to the coastline necessitates measures to protect marine and coastal biodiversity.

4.2 Socio-economic Environment

Population and Demography: The population around the Jazeera site consists of both permanent residents and transient populations, including traders, construction workers, and informal settlers. The dominant age group falls within the 15–45 years bracket, indicating a youthful and economically active population. Household sizes vary, with an average of 5–7 persons per household. The influx of people seeking employment opportunities could increase demand for services, including housing, water, and health facilities.

Economic Activities: Somalia's economy has experienced steady growth in recent years, with GDP increasing from 2.4% in 2022 to 2.8% in 2023, according to the African Development Bank's Somalia Economic Outlook 2024. This growth has been driven primarily by the

recovery of the agricultural sector following prolonged drought, alongside expansion in services, household consumption, and investment. Despite these positive trends, the economy remains heavily dependent on agriculture and livestock, with unprocessed livestock products accounting for 76% of total exports in 2022.

Jazeera's Economic Landscape: Jazeera's economy is largely dependent on fishing, small-scale farming, tourism, and trade, supported by its coastal location and proximity to Mogadishu.

Fishing: Local fishermen supply seafood to nearby markets, contributing to livelihoods. However, the sector faces challenges such as outdated fishing techniques and inadequate storage facilities, limiting its full potential.

Small-Scale Agriculture and Livestock: Farming and livestock keeping provide food and income, although reliance on rain-fed agriculture and limited market access pose constraints.

Tourism: Jazeera's pristine beaches and natural beauty have attracted growing tourism, supporting local businesses such as hotels, restaurants, and transport services. Despite its potential, infrastructure gaps and security concerns hinder sector growth.

Gender-based Violence (GBV): Somalia is a patriarchal society with firmly entrenched gender roles that often subjugate women and girls. GBV is pervasive, particularly female genital mutilation/cutting (FGM/C), early marriage and psychological abuse. GBV is rampant in Jazeera and the most affected are young girls and women from IDP camps who are vulnerable to rape and other forms of sexual abuse. After decades of war and conflict in the country, women, girls and children have been displaced. They remain vulnerable to gender-based violence due to high insecurity in the camps, limited access to justice and lack of protection from the clans. In Jazeera many gender-based violence cases go unreported, and perpetrators go unpunished.

Infrastructural Facilities

Road Network: The Jazeera site is accessible via a network of roads, including paved and unpaved routes. The primary access roads are in good condition but may require periodic maintenance, especially during the rainy season. Road expansion and improvement may be necessary to accommodate increased traffic due to construction activities.

Water Supply: Water supply in the area primarily relies on boreholes, wells, and water trucking services. The availability and quality of water vary, with some communities facing periodic shortages. The project will need a sustainable water management plan to ensure minimal strain on local water resources.

Electricity and Energy: Electricity supply is provided by private utility companies, with some households and businesses using generators and solar panels as alternative sources. The demand for electricity is expected to increase with the development of new infrastructure. Energy efficiency measures will be integrated into the project to reduce environmental impact.

Waste Management: Solid waste management in the project area is largely informal, with waste disposal methods including open dumping and burning. There is a need for improved waste management systems to handle construction and operational waste. The project will incorporate waste minimization, and proper disposal strategies to reduce environmental pollution.

Social Services and Community Well-Being

Health Facilities: The project area is served by several health centers, clinics, and pharmacies. However, access to advanced medical care remains limited, requiring residents to travel to central Mogadishu for specialized services. The influx of construction workers may increase demand for healthcare services, necessitating measures such as on-site first aid and emergency response planning.

Education and Skills Development: The Jazeera area has several primary and secondary schools, with some vocational training centers providing skills development opportunities. The project could enhance local capacity by offering technical training programs and employing skilled and semi-skilled workers from the local population.

Security and Safety: Mogadishu has faced security challenges in the past, necessitating robust safety measures for project implementation. The presence of law enforcement agencies and community policing initiatives contributes to maintaining stability in the area. The project will adhere to strict security protocols to safeguard workers, equipment, and community members.

Cultural and Heritage Considerations: The Jazeera site does not have officially recognized cultural heritage sites within its immediate vicinity. However, any potential cultural artifacts discovered during excavation will be reported and managed in accordance with national heritage protection guidelines. The project will also respect local customs and traditions through community engagement initiatives.

5 ANTICIPATED ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

Construction and operation of the Fish Landing Facility at Jazeera, may involve environmental and social risks and potential impacts during both construction and operational phases. These risks must be identified, assessed, mitigated and monitored to ensure the sustainability and safety of the project for workers, facility users, neighbouring communities and the adjacent coastal and marine environment. Consistent with applicable national legislation, the World Bank Environmental and Social Framework (ESF), the relevant Environmental and Social Standards, (ESS) and Good International Industry Practice (GIIP), the anticipated environmental and social risks and impacts shall be managed through the mitigation, monitoring, reporting and institutional measures set out in this ESMP. The facility is designed as a fisheries landing and wholesale auction facility and not as a fish processing plant. Fish will remain whole throughout handling, and no gutting, filleting, canning or other bulk fish-processing activities will be undertaken. Therefore, operational risks are associated with fish landing, unloading, weighing, sorting, rinsing, icing, boxing, chilled storage, auctioning, fish rinse-water management, solid waste management, occupational health and safety, community health and safety, seafood hygiene and prevention of pollution to the adjacent marine environment.

5.1 Environmental Risks and Potential Negative Impacts during Construction and Operation

5.1.1 Construction Phase Environmental Risks

- **Air Pollution and Dust:** Construction will produce dust and particulate matter, potentially affecting air quality and public health. Mitigation includes dust control measures and PPE for workers.
- **Noise and excessive vibration:** Heavy machinery will generate noise, disturbing nearby communities. Mitigation includes limiting working hours (8.00 a.m-5.00 p.m) and using noise-reducing equipment.
- **Waste generation and Management:** Construction and demolition will produce significant waste, including hazardous materials. A waste management plan is essential to ensure proper disposal and recycling.
- **Contamination of soil and water by hazardous Waste:** Construction activities could lead to runoff and contamination of local water sources. Erosion control and safe handling of materials can minimize risks.
- **Impact on biodiversity and aquatic life:** The surface run off from the construction site drains into the sea and this may affect aquatic life. Implementation of ESMP and minimizing land disturbance are key mitigation strategies.

5.1.2 Operational Phase Environmental Risks

- **Fish rinse-water and wastewater management:** The facility is designed for fish landing and handling only and does not include fish processing. Fish will remain whole throughout handling. Fish rinse-water will consist primarily of seawater used for rinsing whole fish and cleaning the handling and auction areas and may contain minor quantities of fish scales, fish oil and occasional tissue from damaged fish. Fish rinse-water will pass through solids basket filters and passive oil separation before discharge through the approved drainage system, while domestic wastewater from hygiene facilities will be managed separately.
- **Marine pollution prevention:** Given the facility's coastal location, poorly managed drainage or accidental discharge of fish residues could affect marine water quality. Because the facility does not undertake fish processing, the pollution load is expected

to be low. Routine drainage maintenance, filtration of fish solids and oils, and good housekeeping will minimize potential impacts on the receiving marine environment.

- Solid waste and odor management: Operational activities may generate fish scales, occasional damaged fish, packaging materials and municipal waste. Poor waste management may result in odor, pest attraction and nuisance to neighbouring communities.
- Water and energy resource use: Potable water will be used primarily for hygiene and sanitation, while seawater will be used for fish rinsing and cleaning of fish handling areas. Efficient operation and routine maintenance will minimize unnecessary water and energy consumption.
- Seafood hygiene and environmental sanitation: Poor hygiene or inadequate cleaning of fish handling areas may affect seafood quality and environmental sanitation. Routine cleaning, proper icing, hygienic handling practices and pest control will minimize these risks.
- Limited capacity to manage and monitor E&S risks

5.2 Social Risks during Construction and Operation

5.2.1 Construction Phase Social Risks

- Traffic incidents, accidents and disruptions
- OHS risks to workers- Increased occupational accidents and incidents, including injuries and illnesses caused by construction-related hazards, (e.g. handling of construction equipment; stepping on or using sharp objects; excavation risks, slips and trips, and spills or leakage of hazardous materials.
- Risks to community Health and safety such as traffic incidents and accidents, unauthorized access to construction areas, dust, noise and spread of communicable diseases, etc.
- Occupational Health and Safety: Workers may face health and safety risks. Ensuring proper training, availability and use of Personal Protective Equipment (PPE) and monitoring of compliance, access to, first aid and emergency protocols will address these concerns.
- Community Disruption: Construction may disrupt daily life, causing social tensions. Clear communication, stakeholder engagement and grievance mechanisms can help manage these impacts.
- Impacts on Vulnerable Groups: Vulnerable groups, such as women and children, may be disproportionately affected.
- Gender-based violence
- Security related incidents: Threats and attacks from Al-Shabaab and clan conflicts.
- Labour Risks, potential risks include child labour and forced labour, discrimination, poor working conditions and inadequate worker grievance management.
- Increased incidences of communicable diseases like tuberculosis, malaria, diarrhoeal diseases, Covid19, HIV/AIDS etc. due to labour influx and of worker-community interaction.

5.2.2 Operational Phase Social, OHS and Community Health Risks

- Occupational health and safety: Workers may be exposed to slips on wet surfaces, manual handling injuries, cold-room hazards and minor cuts during fish handling. PPE, safe work procedures, housekeeping, OHS training and emergency preparedness will be implemented.
- Seafood hygiene: Poor hygiene or handling practices may affect fish quality and public health. Routine cleaning, handwashing facilities, proper icing, chilled storage and hygiene inspections will be maintained.

- Community health and safety: Operational activities may create risks related to traffic, waste, odor, public access and emergencies. Traffic management, waste management, housekeeping, access control and emergency response procedures will be implemented.
- Labour and grievance management: Operational workers will be provided with safe working conditions, PPE, training, Codes of Conduct and access to a worker grievance mechanism. The Project GRM will remain operational to receive and address community complaints throughout facility operation.

6 ENVIRONMENT AND SOCIAL MANAGEMENT PLAN

This Environmental and Social Management Plan (ESMP) *is the primary site-specific instrument for managing the environmental and social risks and impacts of the Jazeera Fisheries Landing and Wholesale Auction Facility throughout pre-construction, construction, commissioning and operation. It establishes the applicable mitigation, monitoring, reporting, institutional and budget requirements and shall be incorporated into the relevant contract documents, the Contractor's ESMP and the facility's operation and maintenance arrangements.*

Note 1: *The cost of the implementation of the environment and social management plan is estimated at 3% of the average cost of the works and will be included in the overall project cost.*

Table 3: Environment and Social Management Plan

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
ESSS1 Assessment and Management of Environmental and Social Risks and Impacts					
All Phases					
Risk of poor implementation of the respective mitigation and monitoring measures against the negative impacts identified in this ESMP	- Provide capacity-building opportunities to the E&S teams working on the subprojects on understanding and implementing assessment and management requirements of the WB's ESF and WBG's EHSGs. - Provide Health & Safety (H&S) Training for the construction workforce (including sub-contractors, temporary workers, and drivers). - Raise awareness of the workforce regarding the implementation of the ESMP tailored to the subproject scope, through	- No. and % of planned ESF/OHS training delivered % of workers inducted before deployment, by sex/role. - No. of toolbox/ESMP sessions and participants. % of training actions closed on time.	- At the beginning of construction activity, and monthly - During operation of the subprojects (monthly)	PMU/ Contractor	

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	toolbox talks and other platforms.				
ESS2: Labor and Working Conditions					
Risk of labor and working conditions of all the workers don't comply with WB and Somali legislation – including OHS risks	- Implement and monitor the Badmaal LMP - Listing of all staff and titles, new hires, and departure - Site visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector, or auditor name	% of registered workers with contracts and OHS induction. - No. of labor/OHS inspections and non-conformities; % closed on time. - No./rate of injuries, illnesses and near misses. % of required reports submitted on time.	Monthly	- Contractor to implement - PMU/PIU to monitor	Incl in contractor staff costs
Labor disputes over terms and conditions of employment, including delayed/insufficient payments.	- Implement the Badmaal LMP. - Ensure contracts have provisions to comply with the national labor laws requirements including penalties for non-compliance. - Ensure fair terms and employment conditions consistent with national Labor Code in contracts, including for contract duration, wages, rests, leaves, insurances, and termination. - Develop and operationalize grievance redress mechanisms (GRMs) for	% of workers with LMP-compliant contracts. % of workers paid correctly and on time. - No. of worker grievances and % resolved on time. - No. of employment /conduct sessions and participants.	Before commencement of contract and throughout implementation	- Implementation by Contractors - Monitoring by PMU/PIU civil engineer - Monitoring by relevant labor inspectorates	

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	project workers (direct workers and contracted workers) to promptly address their workplace grievance including against delayed/insufficient payments. Relevant trainings provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values, customs, and traditions.				
Risks of child labour and forced labour	- Set-up of a workers' GRM to ensure their voices / complaints are heard - Contractor to maintain staff records, ID copies. - Minimum age to be set at 18\ - Regular monitoring inspections	% of workers age-verified as ≥ 18. - No. of child / forced-labor cases or grievances. - No. of labor-register spot checks. % of remedial actions closed on time.	Throughout project implementation	Contractor	Incl in contractor staff costs
Operation Phase					
Operational Occupational Health and Safety	Provide appropriate PPE, implement safe manual handling procedures, maintain clean, non-slip work areas, provide OHS induction and refresher training, maintain emergency preparedness,	% of workers correctly using PPE (target: 100%). % of workers completed OHS training. - No. of incidents, lost-time injuries and near misses.	Daily supervision; monthly audit and reporting.	Facility Operator	To be included in Facility O&M Budget

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	first aid and incident reporting procedures.	• % of OHS inspections/actions completed on time.			
ESS3 Resource Efficiency and Pollution Prevention and Management					
Impacts from generation of solid waste, construction waste, fish waste and wastewater	- Segregate waste at source and provide designated waste collection areas. - Ensure disposal of generated solid waste at designated and authorized disposal sites consistent with local requirements and WBG EHSGs. - Implement proper fish waste and wastewater management measures. - Prohibit dumping of waste into the marine environment.	- Waste generated, reused/recycled and disposed of, by stream (kg/t/month). % of waste transfers with authorized disposal records. - No. of unauthorized dumping/marine-disposal incidents - No. of waste grievances and % resolved on time.	Monthly	Contractor	Inc in Contractor budget
Risk of excessive noise and vibration affecting workers and nearby communities	- Notify the public of any activities that may be perceived as noisy and intrusive prior to starting. - Establish a GRM for the public to contact the engineers-in-charge (i.e., provide telephone number, email, etc.) and the procedures to handle complaints. - Provide hearing protection gears for use by workers when exposed to noise levels above 85 dB(A).	- Noise levels (dB(A)) and no. of limit exceedances (target: 0). % of workers using hearing protection above 85 dB(A) - No. of noise/vibration grievances and % resolved on time. % of corrective actions closed on time. - No. of OHS incidents. - No. of equipment with vibration dampening pads or devices.	Monthly	- Contractor to implement. - PMU/PIU E&S team to monitor	Incl in contractor staff costs

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	• Ensure that noise and excessive vibration from construction activities are within permissible levels as per the provisions of WBG EHSs: this includes among others adhering to permissible noise and vibration level • Use modern construction equipment, which produces less noise; and • Use of noise shielding screens and the operation of such machinery restricted to when required	• No. of trainings for industrial vehicle operators conducted			
Risk of air pollution by dust generated during construction, and emissions from construction equipment and vehicles	• Construction sites, diversions and materials handling sites to be water-sprayed on dry and windy days to contain dust. • Construction equipment and trucks shall be regularly maintained in good operating conditions to reduce exhaust emissions. • Haulage trucks to be covered or the aggregates sprayed with water before loading. • Encouraging reduction in engine idling during on- and off-loading activities.	• No. of dust/ emission non-compliances and % corrected on time. • % of vehicles/ equipment with current maintenance records. • % of exposed workers correctly using PPE. • No. of dust complaints and % resolved on time.	Monthly	• Contractor to implement. • PMU/PIU E&S team to monitor	Incl contractor staff costs

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	• Cordon off construction sites to minimize dust migration to nearby facilities by wind. • Restrict access to construction and allow only authorized personnel. • Staff working in dust-generating activities e.g. site preparation, excavation, concrete mixing, and stone dressing shall be provided with Personal Protective Equipment (PPE) • The use of PPE shall be monitored and enforced; and • Prohibit open burning solid waste				
Soil and water pollution	• Sewage systems and wastewater treatment plants must be designed to prevent them from the intrusion of saline water to ensure the systems are properly functional, and its effluent always meets national regulations before discharging into water bodies. • Open stockpiles of onsite construction materials should be covered with	• No. of erosion, wastewater and spill/leak incidents. • No. of inspections identifying leaks, erosion or environmental releases. • % of vehicles/equipment with current maintenance records.	Monthly	• Contractor to implement. • PMU/PIU E&S team to monitor	Incl in contractor staff costs

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	tarpaulin or similar fabric during rainy season. • Prevention of the washing away of construction materials, soil, silt or debris into any drainage system. • All machinery and equipment be regularly maintained and serviced to avoid leak oils. • Maintenance and servicing of heavy vehicles, machinery and equipment must be carried out in a designated area (protected service bays). • Implementation of erosion and sediment control measures such as silt fences, where applicable and where resources permit. • Pre-treatment for wastewater from the office building before re-use or release into the environment.	• % of actions closed and incidents reported on time.			
Risks of contamination of soil and water by hazardous waste	• Empty paint cans stored in closed drums or isolated area from soil and water at CONTRACTOR store, then handling as recycled metal scrap. • Store fuel and oil away from subproject site and	• % of hazardous-material containers labelled, with SDS and containment. • % of applicable areas with spill kits and eyewash facilities.	Monthly	• Contractor	Incl in contractor staff costs

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	heat at a well-ventilated area and provide suitable fire extinguishers • Store any chemicals and hazardous waste at designated areas, insulated from the ground • Carry a spill prevention kit • Ensure trained personnel handle hazardous chemicals and wastes.	• % of relevant personnel trained in hazardous-material handling. • No. of spills/improper-disposal incidents and % closed.			
Risk of poor sanitation facilities and sanitation conditions at work site	• Provide proper water closet toilet facilities at all long term (> 1 month) work sites. • Do not allow water to run out at toilets. • Maintain all toilets in clean and sanitary condition. • Provide proper earth pit latrines at all work sites where work will be undertaken for periods of up to one month. • Fill the latrines once they become full and when site work is complete. • Do not allow site workers to defecate in the open anywhere on the site or in its vicinity.	• No. of functional toilets and C-ESMP-compliant worker-to-toilet ratio. • % of sanitation checks meeting required standards (target: 100%). • No. of open-defecation cases and sanitation grievances (target: 0). • No. of sanitation toolbox talks and % of workers reached.	Monthly	• Contractor	4,000 USD

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	Add the use of sanitation arrangements in toolbox talks				
Operation Phase					
Fish Rinse-Water and Drainage Management	No fish processing shall be undertaken. Fish rinse-water shall pass through solids basket filters and passive oil separation before discharge. Maintain drainage systems and inspect regularly to prevent marine pollution.	% of drain, filter and oil-separator checks completed (target: 100%). - No. of blockages, overflows or pollution observations. % of corrective/maintenance actions closed on time. - No. of samples and % meeting BOD₅, COD and TSS limits.	Quarterly reporting weekly and after rainfall; targeted testing where inspections, incidents or complaints indicate potential pollution.	Facility Operator under PIU/PMU oversight	To be included in Facility O&M Budget including contingency for targeted laboratory testing where required.
Marine Pollution risk	Prevent discharge of fish residues, oils, litter or contaminated runoff into the sea; inspect outlets and maintain drainage infrastructure.	- No. of residue, oil, litter or contaminated-discharge observations. - No. of marine-pollution incidents/complaints and % closed on time. % of scheduled outlet/shoreline inspections documented. % of corrective actions closed on time.	Weekly inspection, Quarterly monitoring	Facility Operator, Local municipality	Included in operational budget

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
Solid waste management	Segregate fish residues and municipal waste, use covered containers, remove waste daily, dispose through approved municipal arrangements.	- Quantity of fish/municipal waste removed daily. % of operating days with approved waste removal. - No. of days with accumulated/uncontained waste, leaks or pests. % of waste transfers documented.	Daily; Monthly verification	Facility Operator, Local municipality	Included in operational budget
Odour and housekeeping	Clean fish handling and auction areas daily; remove fish residues promptly; maintain seamless epoxy flooring; implement routine housekeeping and pest control.	% of operating days with completed cleaning logs. - No. of persistent odor, residue or pest observations. - No. of housekeeping complaints and % resolved on time. % of monthly inspections rated satisfactory.	Daily; Monthly inspection	Facility Operator	Included in operational budget
Stormwater and runoff management	Maintain drainage channels; prevent contaminated runoff entering the marine environment; inspect drainage after rainfall.	% of scheduled/ post-rainfall drainage inspections completed. - No. of unresolved drain defects/runoff cases. % of drainage actions closed on time. - No. and status of stormwater complaints/incidents.	Weekly; After rainfall	Facility Operator	Included in operational budget
Water and Energy Efficiency	Monitor water consumption; repair leaks promptly; use seawater for	Monthly water/energy use (m³/kWh) per tonne of fish.	Monthly	Facility Operator	To be included in Facility O&M Budget

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	fish rinsing and hose-down where designed; maintain solar PV system, chill room and ice plant to improve resource efficiency.	- No. of water leaks and average repair time. % of scheduled facility-system maintenance completed. % of downtime due to water /energy-system failures.			
ESS4 Community Health and Safety					
Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors by project workers	- Implementation and monitoring of GBV / SEA Action Plan. - GBV awareness sessions for community. - GBV awareness sessions for workers. - Engage a dedicated specialist to support oversight and management of these risks. - Workers to sign COC	% of workers signing CoC and trained before deployment. - No. of SEA/SH sessions and participants, by sex/age. % of SEA/SH Action Plan activities completed on time. - Functional confidential reporting/referral pathway. - No. of allegations referred using survivor-centred protocols.	Monthly	• PMU/Contractor	Incl in PMU staff and travel costs Contractor
Risk of exposure of community members to physical hazards on project sites.	- Undertake safety precautions to address safety hazards for the nearby community. - Sensitize the local community on the activity of type project and inform	# of sensitization measures for communities.	Monthly	• Contractor	Inc in Contractor budget

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	them about construction risks and the restricted access to the site • Restrict access to construction site through signage. • Remove hazardous conditions on construction sites that cannot be controlled effectively with site access restrictions, such as covering openings to small, confined spaces, ensuring means of escape for larger openings. • Lock storage of hazardous material	• % of perimeter/ access points secured and signs installed. • No. of uncovered openings/unsecured hazardous stores. • No. of unauthorized entries and community incidents/near misses. • No. of community sessions and % of actions closed on time.			
Exclusion of the vulnerable in employment opportunities, elite capture and selection bias	• Awareness raising of all project implementers, contractors and primary suppliers on the requirements and implementation of the inclusion plan. • Promote inclusion of disadvantaged and vulnerable groups in consultations and access to project benefits. • Promote diversity in recruitment including all disadvantaged and vulnerable groups, PWDs and women. There may be	• No. and % of vulnerable workers, by sex, disability and displacement status. • % of planned inclusion measures implemented. • No. of vulnerable representatives consulted/accessing benefits. • No. of exclusion/bias grievances and % resolved on time.	Monthly	• PMU/Contractor	Inc in Contractor budget

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	a need to put quotas for gender and PWDs.				
Risk of traffic and road safety	Safety/warning signage, safety barrier around the construction site, and safe driving practices (see WBG EHS Guidelines on Traffic Safety)	% of traffic signs/barriers installed and serviceable. - No. of traffic incidents/near misses. % of drivers licensed, inducted and compliant. - No. of traffic complaints and % resolved on time.	Monthly	Contractor	Inc in Contractor budget
Security risks from Al-Shabaab attacks, clan conflict, theft, civil unrest, and unauthorized site access during construction and operation	- Prepare and implement Security Management Plan (SMP) and Security Activity Plan. - Conduct regular security risk assessments. - Coordinate with local authorities and security agencies. - Restrict unauthorized access through fencing and security personnel. - Conduct worker security awareness training. - Ensure security personnel comply with CoC and ESS4 requirements	- SMP and Security Plan available. - Number of security incidents reported and addressed. - Security trainings conducted. - Functional access control measures onsite. - Approved SRA/ SMP and local Activity Security Plan. % of security/ access measures implemented.	Before mobilization Monthly and after significant incidents or security-context changes.	PMU/Contractor	Included in project cost

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
		- No. of security incidents managed and % of personnel trained per plans. % of security personnel with signed CoC.			
Risk of spread of communicable diseases (Sexually Transmitted Diseases SIIIs, HIV/AIDS, COVID-19 etc..) between workers and the community	- Community awareness sessions on communicable diseases. - Provide hand washing stations for workers. - Ensure usage of latrines by workers – through toolbox talks. - Implement COVID-19 protection measures, including: - Contractor to ensure workers have access to face masks and sanitizers. - Regular sensitization on COVID 19 to ensure workers observe the social distancing, especially when in the community and public places.	% or workers with access to face masks and sanitizer. - No. of disease-awareness sessions and participants. % of workers with hygiene facilities/protective materials. - No. of work- cases referred. % of disease-control actions closed on time.	Monthly	Contractor	Inc in Contractor budget
Operation Phase					
Seafood hygiene and food safety risk	Maintain hygienic fish handling; provide handwashing facilities;	% of operating days with hygiene checks	Daily, Monthly	Facility Operator	Included in operational budge

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	clean fish boxes and work surfaces; maintain chilled storage; implement pest control.	and functional handwashing. • % of chill-room readings within range. • No. of pest/hygiene non-conformities and % closed on time. • No. and status of food-safety complaints/incidents.			
Community health and safety	• Implement traffic management during loading and unloading; control public access; maintain waste collection; implement emergency preparedness; maintain facility cleanliness	• No. of community safety/traffic incidents and near misses. • % of traffic/ access and emergency-equipment checks completed. • No. of community complaints and % resolved on time. • % of community-safety actions closed on time.	Quarterly review	Facility Operator; Local Municipality	Included in project cost
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Risk of pollution and degradation of coastal and marine environment from wastewater, fish waste and construction runoff	• Prevent discharge of untreated wastewater and waste into marine environment. • Conduct regular site inspections and worker awareness on environmental protection.	• No. of wastewater, waste, oil or sediment releases. • % of coastal /drainage/wastewater inspections completed.	Monthly	Contractor	Inc in Contractor budget

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
	- Implement erosion and sediment control measures. - Segregate and dispose waste at approved disposal sites. - Prohibit dumping of waste into coastal areas. - Maintain proper drainage and stormwater management.	% of waste transfers with approved disposal records. - No. of marine-pollution cases and % of actions closed on time.			
ESS8: Cultural Heritage					
Risk of chance finds during excavation and earthworks	- Implement Chance Finds Procedure. - Stop works immediately if cultural resources are encountered. - Notify relevant authorities and resume works only after clearance.	- Chance find procedures available and covered in induction. - No. of chance finds and % managed per procedure. - No. of related non-compliances.	Before earthworks and continuously during excavation; immediately upon a chance find.	Contractor	Inc in Contractor budget
ESS10: Stakeholder Engagement and Information Disclosure					
Risks of poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm	- Implementation and monitoring of GRM. - Implementation of Project SEP.	- No. and % of SEP activities completed. - No. of participants, by sex, age, vulnerability and location. - No. of grievances, % resolved on time and average resolution time. - No. of social-harm issues and % of	Monthly	PMU	Included in project cost

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
		actions closed on time.			
Risks of lack of information on access to GRM leads to lack of accountability	Implement SEP and create awareness of GRM	- No. of GM awareness sessions/materials and participants, by sex/stakeholder group. % of stakeholders identifying a GM channel. % of GM channels tested and functional. - No. of grievances and % resolved on time.	at the beginning of activity and throughout implementation	PMU/PIU	Included in MPU/PIU staff costs
Lack of information disclosure leads to lack of transparency and suspicions of mismanagement of the sub project	- Conduct in-depth community engagement, providing information on the sub project - Implement SEP	# of community engagement sessions held - No. of disclosure/engagement sessions and participants, by sex/stakeholder group. - No. of project updates/documents disclosed. - No. of information requests and % answered on time. - No. of transparency grievances and % resolved on time.	Quarterly	PMU	PMU budget for stakeholder engagement
Operation Phase					

ESS Risks and Impacts	Mitigation Measures	Monitoring Indicators	Monitoring Frequency	Responsible Party	Budget
Operational Stakeholder Engagement and GRM	Maintain stakeholder engagement and the Project GRM throughout operation to receive and address complaints relating to facility operations.	- No. of engagement activities and participants, by sex, vulnerability and location. - No. of grievances, % resolved on time and average resolution time. - No. of engagement actions and % closed on time.	Quarterly	Facility Operator / Southwest State PIU / MFBE PMU	To be included in Facility O&M Budget

7 INSTITUTIONAL IMPLEMENTATION ARRANGEMENTS AND RESPONSIBILITIES

7.1 Government Institutions

The Ministry of Fisheries and Blue Economy

The MFBE through the PMU is responsible for the overall implementation of the project. The PMU will be contracting a construction company directly to implement construction works. The construction company will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP.

The MFBE/PMU and Southwest State PIU shall use this ESMP as the primary site-specific instrument for supervision and compliance monitoring. They shall ensure that its requirements are incorporated into the Contractor's obligations and facility operation and maintenance arrangements, implemented by the responsible parties, and monitored and reported in accordance with the ESCP.

Following commissioning of the facility, implementation of the operational requirements of this ESMP shall become the responsibility of the Facility Operator under the oversight of the Southwest State MFBE/PIU and MFBE/PMU. The Facility Operator shall implement the operational mitigation measures, monitoring requirements and reporting obligations specified in this ESMP.

Below is the list of Government institutions involved in the road rehabilitation works implementation, with their respective roles and interests.

Table 4 Institutional partners' responsibilities

Project Management Unit - PMU	The application of mitigation measures required under this ESMP is the responsibility of the PMU. However, since actual construction works will be carried out by the private entity/contractor, the PMU will ensure that implementation of the ESMP is incorporated in the Request for Proposals (RfPs) and the costs are integrated in the Bill of Quantities (BoQs), and subsequently in the legal agreement between the construction company and the PMU. The PMU is responsible for instructing, observing and monitoring its contractors against the ESMP provisions. The PMU should make sure that corrective actions are applied by the contractors, when necessary. Within the PMU, the Environmental Safeguards Specialist and the Social Development Specialist will be responsible for the monitoring of the implementation of the ESMP, including reporting duties. The PMU can undertake monitoring itself if deemed necessary. The PMU will request for any violations to be corrected by the Constructor and monitor the actions and undertakings in correcting violations. The PMU has further deployed a Third-Party Monitor (TPM), which monitors E&S mitigation measures across the project components (If necessary).
Project Implementation Unit - PIU	The PIU's Environmental & Social Safeguards focal persons will monitor the implementation of risk mitigation measures by the construction company. The monitoring will be supported by PMU/PIU Engineers. Environmental and social monitoring reports will be prepared by the PIU's and submitted to the PIU every month throughout the project duration.
Supervision Consultant E&S Safeguard Specialists:	The Supervision Firm shall deploy qualified, site-specific Environmental and Social (E&S) Safeguard Specialists to monitor and ensure that all construction activities are implemented in full compliance with the approved contract-specific Environmental and Social instruments, including the Contractor's ESMP (C-ESMP), and the World Bank Environmental and Social Standards (ESSs). The Specialists will oversee adherence to occupational health and safety (OHS) requirements, social safeguards, and site-specific mitigation measures, and shall provide regular E&S inspection reports to the PMU E&S team.

7.2 Contractor

The contractor is responsible for complying with requirements for all field activities covered by this ESMP, the contractor is also responsible to ensure that all its sub-contractors follow the ESMP and other ESF instruments that apply to this sub project. The contractor will have contractual clauses specifying compliance with the mitigation measures listed in the ESMP and in the WBG's EHS Guidelines, in addition to national requirements and to indicate measures taken in cases of non-compliance. The contractor is also responsible for the actions of any subcontractors they may engage. Sub-contractors also have to comply with all E&S Standards as laid out in this ESMP. Contractor's responsibilities include:

- Ensuring that all operations comply with the ESSs and mitigation measures laid out in this ESMP, for which the contractor is responsible and will develop a Construction ESMP (C-ESMP).
- Ensuring that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- The Contractor shall comply with the incident and accident notification and reporting requirements specified in this ESMP. All severe incidents shall be reported to the PMU within 24 hours of becoming aware of the incident, enabling the PMU to notify the World Bank within the timeframe specified in the ESCP.
- Monitoring the C-ESMP implementation, against the monitoring indicators laid out in the ESMP Table.
- Organizing and participating in Community Consultative Meetings with an approach to adaptive sub-project management as necessary.
- Identifying additional significant matters pertaining to environmental and social compliance.
- Liaise with PMU on the need for corrective action in the event of unexpected environmental or social issues emerging during operations.
- Communicating with all staff regarding E&S compliance requirements and other matters of importance.
- Identifying additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Preparing reports on all aspects of E&S compliance.
- Maintaining lists of all workers, including their age and gender.
- Maintaining and adequately operating a workers' GRM.
- Prepare and implement an OHS Plan and provide related and frequent training to all workers.
- Ensure signing of the code of conduct by every worker, covering issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.
- Implementing the Security Management Plan (SMP).

The contractor is obliged to implement this ESMP through the Contractor's Environmental and Social Management Plan (C-ESMP) during the construction phase, with all mitigation measures assigned under the Contract. **E&S Risk Management or Environmental Health and Safety (EHS) Specialists:** The contractor will deploy an E&S and OHS Specialists to ensure operationalization of this ESMP and adequate implementation of the C-ESMP, including monitoring, supervision and reporting on mitigation measures. The key tasks of the Specialist are to;

- Ensure PPE for workers is available and workers are trained in its use and comply with it

- Provide OHS training to all workers, based on the OHS Plan
- Ensure health and safety of all workers at the construction site
- If necessary, stop the works to ensure safety
- Maintain records of accidents and incidents and ensure appropriate reporting of incidents to the PMU/PIU.
- Ensure waste management procedures are followed closely
- Ensure availability of water and sanitation facilities for all workers at site and at the campsite
- Conduct toolbox talks for workers
- Train all workers in the CoC and ensure that CoC is signed by every worker
- Liaise closely with the supervision consultant and PMU on training workers on GBV issues, as well as community awareness on GBV
- Maintain workers' lists indicating age and gender
- Liaise closely with the PMU/PIU on the implementation of Project GRM
- Maintain records of workers' GRM

7.2.1 Facility Operator (Operation Phase)

- Following commissioning, the Facility Operator shall implement the operational-phase mitigation and monitoring and reporting measures set out in this ESMP. The facility shall be operated in accordance with this ESMP, applicable national requirements, World Bank ESF and relevant Environmental and Social Standards. under the oversight of the Southwest State PIU and MFBE/PMU. These requirements shall be incorporated into the facility's operation and maintenance procedures and the Facility Operator's contractual or management arrangements. Key responsibilities include:Implementing operational environmental and social mitigation measures.
- maintaining fish rinse-water drainage systems, solids filters and passive oil separation units.
- Implementing solid waste management, housekeeping and odor control measures.
- Maintaining seafood hygiene, sanitation and facility cleanliness.
- Implementing occupational health and safety requirements, including PPE, worker training and emergency preparedness.
- Maintaining stakeholder engagement and the Project Grievance Redress Mechanism (GRM).
- Conducting routine environmental and social monitoring and maintaining operational records.
- Reporting environmental and social performance to the Southwest State PIU and MFBE PMU.

7.3 Reporting on ESMP Compliance

The PMU will prepare periodic monitoring reports, including input from the contractor and on the status of implementation of this ESMP. The reports will be submitted to the World Bank for their review and feedback as part of the PMU's general Quarterly report to the Bank. Details of these reports and their content are given in the Table below.

Table 5: ESMP Monitoring and Compliance Reports

No	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
1	ESHS Monitoring Report to Engineering and Supervision Consultant	Compliance status of the subproject with the E&S mitigation and monitoring measures. The report shall cover: • Environmental incidents. • Health and safety incidents. • Identification of child and forced labor. • Health and safety supervision • Usage of PPEs by workers • Highlights of inspections • Training conducted, and workers participated • workers' and community grievances submitted and their response status.	Monthly	Contractor
2	ESMP Monitoring Report to WB	Compliance status of overall subproject with ESMP requirements	Quarterly	PMU
3	Incident Reports	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to prevent and address future recurrence of a similar event	Initial Notification report for severe incidents within 24 hours. Detailed Investigation Report within ten days	PMU (contractor/PIU to PMU)
4	Operational ESMP Monitoring Report	Compliance with operational ESMP measures, including but not limited to fish rinse-water and drainage management, solid waste, odor control, marine pollution prevention, water and energy use, OHS, seafood hygiene, community health and safety, GRM, incidents and corrective actions.	Quarterly	Facility Operator to SW PIU and MFBE PMU

7.4 Capacity Building and Training

The implementation of this ESMP and the C-ESMP is highly dependent on the capacity and awareness of the contractors' staff, the surrounding community and the stakeholders concerned. Training workshops are required to increase the awareness of all individuals concerned with the subproject and to train and follow up with the workers who are specifically involved in the site operation.

On-site workers should receive appropriate training to undertake the duties of implementing the necessary mitigation measures. The training workshops shall be undertaken prior to commencement of construction activities. The recipients of the training are all construction workers. The training courses are to be included in the budget of the contractor. The training for the workers should cover at least the following issues:

- Occupational and public health and safety.
- E&S mitigation measures need to be applied.
- GBV/SEA/SH prevention
- Prevention, addressing, and reporting of accidents and preparation and implementation of emergency plans
- Roll-out of GRM among workers and communities
- Appropriate segregation, transportation, and final disposal of solid waste.

This will be achieved by small workshops conducted in the induction phase for the workers. The induction training will include familiarization with the workers' GRM, Project GRM, CoC, GBV/SEA/SH, HIV/AIDS prevention, and another toolbox talks as mentioned above in the ESMP. During the construction phase, refresher training will be held. While some training will be provided by the contractor,

Next to the training of workers, communities at the site will receive awareness raising sessions on the following topics:

- Community grievance redress mechanism (GRM)
- GBV and SEA/SH prevention and response plan

Next to the training of workers, communities at the site will receive awareness raising sessions on the following topics:

- heighten awareness of environmental and social risks and impacts and mitigation measures including training on (not exhaustive):
- Communicable diseases/HIV-AIDS/STI/GBV awareness and prevention
- Community grievance redress mechanism

In addition, continuous E&S training has to be provided to the contractor staff as well as to the PIUs, in all E&S aspects of the Project.

Operational Phase Training

Following commissioning, training shall be provided to facility personnel covering:

- Operational OHS and emergency preparedness.
- Safe manual handling.
- Seafood hygiene and sanitation.
- Fish rinse-water and drainage management.
- Waste segregation and housekeeping.
- Marine pollution prevention.
- Stakeholder engagement and Project GM.
- SEA/SH awareness and Codes of Conduct.

Training records shall be maintained by the Facility Operator and monitored by the Southwest State PIU and MFBE/PMU.

8 IMPLEMENTATION BUDGET

The budget below covers ESMP implementation during the construction phase. Operational environmental and social management measures identified in this ESMP shall be implemented by the Facility Operator following commissioning and financed through the facility's Operation and Maintenance (O&M) budget.

Table 6: Estimated Implementation Budget

	Required Resources	Costs in USD
PMU – Monitoring of ESMP		
1.	Human Resources: 1 Environmental, 1 Social Safeguards Specialist	PMU staff costs
2.	1 GBV Specialist (GBV training and GRM)	PMU staff costs
3.	1 Security Specialist/Advisor	PMU staff costs
5.	1 GRM Operator (GRM awareness)	PMU staff costs
6.	Logistics / Travel	PMU travel budget
Grievance Redress Mechanism hotline		
7.	Hotline and other mechanisms	PMU GRM budget
8.	GBV/SEAH reporting mechanisms	PMU staff costs
Implementation of Risk Mitigation Measures Contractor		
9.	Human Resources 1 EHS Specialist	contractor
10.	Cost of PPE	contractor
11.	Cost of all OHS measures and other Training	contractor
13.	Construction Waste Disposal	contractor
14.	Safety Signages	contractor
15.	Community engagement	contractor
16.	Latrines	contractor

9 STAKEHOLDER CONSULTATION

The preparation of the ESMP and of the project selection and design was highly dependent on stakeholder consultations, conducted as per the Somali Sustainable Fisheries Development Project (SSFDP) Stakeholder Engagement Plan (SEP).

Stakeholder engagement, one of the basic principles of environmental and social risk management, is one of the most important tools for the implementation of the ESMP and C-ESMP. It provides a better understanding of the conditions in the subproject area and the concerns of stakeholders. It is also essential to ensure the effectiveness of the mitigation measures developed under the ESMP. The preparation of the ESMP and of the project selection and design was highly dependent on stakeholder consultations, conducted as per the Badmaal Stakeholder Engagement Plan (SEP) by considering the following basic objectives:

- Identification of stakeholders directly or indirectly affected by the subproject or interested in it
- Identification and planning of stakeholder engagement activities that will start at the preparation and planning stages of the subproject and continue during the construction and operation phases
- Determining the frequency of stakeholder engagement activities, information sharing and degree of participation, content of consultation activities
- Establishing a Grievance Redress Mechanism (GRM) that will provide an open communication channel for stakeholders at every stage of the subproject
- Addressing concerns and expectations communicated by stakeholders in the SEP, ESMP and subproject decision-making and planning stages.

The list of stakeholders determined within the scope of the SEP, which can be updated as the subproject progresses, is presented in this report.

Table 7: Project stakeholders consulted

Stakeholder Groups	Project Stakeholders
Public institutions and organizations	• Ministry of Fisheries, Director General (DG), and senior officials who provide strategic direction and oversight. •
Local administrations and institutions	District police officer
Interest groups; local businesses, and others	Fishermen, Fishing Association members, Youth Groups, Women Groups.

9.1 Stakeholder Engagement Activities

9.1.1 Engagement with Fishing community at Jazeera

As part of the stakeholder engagement process, community consultations were conducted on 28 January 2025 to ensure transparency, inclusivity, and local ownership of the proposed fish landing and handling facility development in Jazeera. These consultations aimed to gather input, concerns, and recommendations from key stakeholders, particularly those directly reliant on the fisheries sector.

Participants included representatives from the Ministry of Fisheries and Blue Economy, fishing cooperatives, residents, environmental and social specialists, civil society organizations, and project developers and contractors.

Two structured consultation meetings were held in January 2025 to present the project scope, discuss potential impacts, and receive feedback. Key discussion points included:

- Community expectations and priorities related to fisheries infrastructure.
- Potential environmental risks and proposed mitigation measures.
- Anticipated socio-economic benefits, including employment, value addition, and improved market access.
- Measures to minimize environmental disruption and support sustainable fishing practices.

The fishing community and cooperatives played a central role in the discussions, reflecting their critical importance to the local economy and food security. Participants expressed strong appreciation for the initiative and welcomed the project, noting its potential to enhance livelihoods, improve working conditions, and support the long-term sustainability of the fisheries sector.

Additionally, following the initial design review, the project design was refined and reduced through structured stakeholder and community engagement in line with the Stakeholder Engagement Plan (SEP) and World Bank ESS10. Consultations with local communities, relevant authorities, and key stakeholders ensured that the revised design was well understood, socially acceptable, and responsive to local needs. The design was subsequently presented, discussed, and validated by stakeholders and the community, strengthening transparency, enhancing ownership, and minimizing potential environmental and social risks.

Stakeholder engagement shall continue throughout both construction and operation. Prior to commencement of facility operations, the Facility Operator, in coordination with the Southwest State PIU and MFBE/PMU, shall conduct awareness and training sessions with fishers, traders, facility users and neighbouring communities on facility operating procedures, seafood hygiene, waste management, drainage management, traffic/access arrangements, emergency preparedness and the Project GRM. Feedback received during operation shall be documented and used to improve facility management and environmental and social performance.



Figure 6: Consultations in Jazeera with Local Government and Communities



Figure 7: Jazeera fish landing and handling facility design validation session

10 GRIEVANCE REDRESS MECHANISM (GRM)

One of the main requirements of the ESMP is to implement an effective mechanism to record and share environmental and social issues. The basic principles of effective communication methods with the Grievance Redress Mechanism (GRM) in question, as part of stakeholder engagement, are as follows:

- Accurate recording and protection of all information obtained during the implementation of the C-ESMP
- Sharing information about the progress and monitoring of the subproject with stakeholders and all interest groups, evaluating the information for the preparation of periodic reports.
- Appoint a member of staff responsible for public relations, handling of internal and external complaints, recording oral complaints and filling in relevant forms.
- Sharing information on the functioning of the GRM with affected communities as part of stakeholder engagement activities.

The project's grievance mechanism and the rights of affected communities to receive information about the Project and to convey their complaints / thoughts form the core of stakeholder engagement process and GRM. PIU will ensure the establishment of a local grievance mechanism, by the Construction Contractor, to deal with complaints in a timely and effective manner.

The GRM shall enable stakeholders to communicate directly with PIU, but a separate system will be established for the project in which the stakeholders can receive their responses locally and communicate their complaints. This local grievance system will be established within the body of project PIU, implemented and followed by both Project PIU and Contractors during construction, operation and decommissioning/closure phases, which will be more easily accessible for stakeholders and will encourage them to voice their complaints.

Recording and follow up of grievances (including environmental issues) will be the primary responsibilities of the PIU. The PIU will have personnel assigned for the grievance management process both on site and at Headquarters. PIU Social Specialist will be primarily responsible for grievance management as well as Contractors' social staff. Project PIU will regulate the contractual agreements with Contractor to ensure that they have a Social specialist on site who will be responsible for recording and follow up of grievances on site office. These assigned staff will follow the GRM established to record and resolve all complaints from the stakeholders and follow up corrective actions taken. Contact information will be provided via the Project website, through public information meetings, consultation meetings and Project brochures to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for stakeholders to vocalize their grievances formally include:

- Face to face (Stakeholders can voice their grievance to assigned personnel of Contractor and/or at site office)
- Complaint registers form (Stakeholders can fill the forms that will be distributed to them in advance to voice their grievances)
- Telephone (Stakeholders can call) to request to speak to contact person
- Email (Grievances can be sent)

Grievances related to BADMAAL subprojects in Mogadishu will be submitted through grievance redress channel details that are shown below. Anonymous grievances will be allowed to be raised and addressed.

Email address:	grm.badmaal@gmail.com
Free hotline number (s):	2498

10.1 Procedure

The following is the outline of the grievance process to be followed (the structure is illustrated in Figure 5):

- Receive, register and acknowledge complaint (see Annex 4) for a Grievance Registration Form Template.
- Screen and establish the basis of grievance (e.g. nuisance complaint may be rejected but the reason for the rejection should be clearly explained to the complainant);
- A Grievance Redress Committee (GRC) hears and resolves the complaint.
- Implement the case resolution or the unsatisfied complainant can seek redress at a formal court of justice.
- Elevation of the case to a formal court if complainant is not satisfied with the GRC resolution; and
- Document the experience for future reference.

To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, GBV and SEA/SH grievances shall be handled at a designated focal point to ensure the safety of survivors and enable survivor-centered care. The sexual exploitation and abuse and sexual harassment prevention and response plan (SEA/SH PRP)¹ for the SSFDP subprojects provides details for managing associated risks.

The Project Grievance Redress Mechanism (GRM) shall remain operational throughout the construction and operational phases of the facility. During operation, grievances relating to waste management, drainage, odors, traffic, community health and safety, worker conduct and environmental performance shall be received, recorded, investigated and resolved in accordance with the Project GRM procedures. Confidential channels shall remain available for complaints related to GBV/SEA/SH

¹ <https://mfbe.gov.so/wp-content/uploads/2024/10/Somalia-fisheries-project-SEAH-PRP-August-2024.pdf>

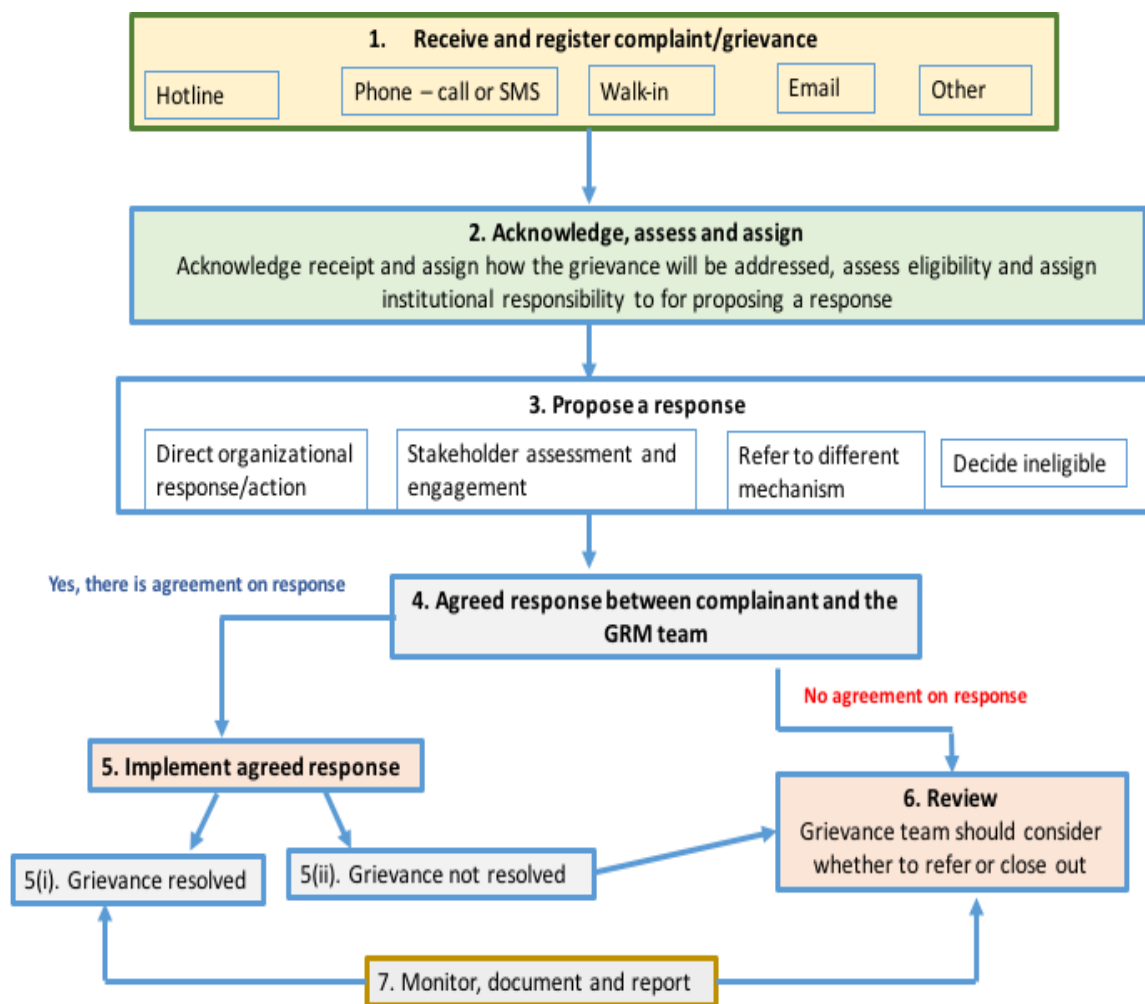


Figure 5: GRM Flowchart

10.2 Disclosure Program

Multiple channels will be used for information disclosure for subproject activities. These include: (i) disclosure of all relevant documents in the MFBE websites and through the WB website. Translated copies of the E&S risk management instruments summary will be also made available; (ii) publication of posters and public notification in the site accessible to local communities, relevant organizations and other stakeholders; and (iii) stakeholder workshops. Printed copies of the E&S risk management instruments will be made accessible for the general public at PMU office.

Annex 1. Environment & Social Screening for Jazeera Fish landing and handling facility construction.

Environmental and Social Screening for the Somali Sustainable Fisheries Development Project

Environmental and Social Screening for the Somali Sustainable Fisheries Development Project	
SECTION A: General Sub-Project Information	
Date of screening	15 th January 2025
Activity/Sub-project title	Construction of fish landing and handling facility in Jazeera
Activity/Sub-project component	Component 1: Increasing the Capacity of Dependent Communities to Benefit from Sustainable Marine Fisheries
Proposed activity duration	6 months
ES Screening Team Leader and Contact Details	Marian Abdulle- Social Development Specialist- marian.ssfdp@gmail.com
ES Screening Team Member	
Name of Executing Agent	N/A
Site/Activity location (include GPS coordinates)	Jazeera
New/Rehabilitation project	Jazeera (Jaziira) is a coastal town in the Lower Shabelle region of Somalia, located approximately 20 km southwest of Mogadishu
Objective of the screening process	i. To assess the suitability of the proposed site for Construction of Modern Fish landing and handling facility at Jazeera ii. To determine the potential E&S risks and impacts and proposed mitigation measures for the proposed sub-project. iii. To determine the risk classification and E&S instrument to be prepared and implemented. iv. Ensure the mitigation measures identified in the matrix are translated to detailed mitigation measures in the environmental and social management plans for the sub-project. v. Ensure the completed E&S screening outcome is integrated
E&S Framework and Overall Project Risk Classification	Moderate Risk

Project Description. Briefly describe the project activities	This sub project is for the construction of the proposed Modern Fish landing and handling facility at Jazeera.
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Potential Environmental/Social Risks Impacts of Activities					
Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering the magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	UNK	If these risks ('yes') are present, refer to:	Remarks
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where the project is undertaken?		✓			
Is there a risk of a lack of monitoring of project activities?		✓		ESMP and C-ESMP	
Are there existing land uses on or around the location e.g. industry, commerce, recreation, which could be affected by the proposed project activities?		✓		ESMP	
Are there any plans for future land uses on or around the location which could be affected by the proposed project activities during the operational phase		✓		ESMP	
Is there a risk that the activity will cause population influx from neighboring areas?		✓		LMP	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?		✓		Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM) for the project	
ESS 2: Labor and Working Conditions					
Is the project likely to provide local employment opportunities, including employment opportunities for women?	✓			Labor Management Procedures	
Does activities has the potential to cause labor risks / ESS2 non-compliance risks (child and forced labor)?	✓			Labor Management Procedures (LMP); GRM	

Does the activity include a construction component?	✓			LMP, C-ESMP Occupational Health and Safety Management Plan (OHSMP)	
Will the project potentially involve an influx of workers to the project location?		✓		Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for project Workers?		✓		LMP	
Will there be any potential risk of OHS accidents during the construction, and operation phase of the project which could affect human health and the environment?	✓			OHSMP: risks of OHS accidents including but not limited slip and falls, confined spaces and struck by objects.	
Is there a risk of delayed payment of workers?	✓			LMP, GRM implementation	
Is there a risk that workers are underpaid?		✓		LMP implementation	
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the construction or operation of the project use natural resources such as land, water, sand, materials or energy, especially any resources which are non-renewable or in short supply?		✓		C-ESMP; ESMP	
Will the project involve use, storage, transport, handling or production of substances or materials that could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?		✓		ESMP, GRM, OHSMP, SEP	
Will the activity result in the production of solid waste (directly by the project or by the workforce) during construction, operation, or decommissioning?	✓			ESMP to address its management	
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceuticals, industrial chemicals, ozone depleting substances)		✓			
Will the activity result in generation of dust and noise?	✓			C-ESMP	

Will the activity result in soil erosion?		✓		C-ESMP	
Will the activity produce effluents (waste water)?	✓			C-ESMP	
Are there nearby portable water sources that need to be protected?		✓		ESMP	
Will the activity result in siltation and/or contamination of the water body?		✓		C-ESMP	
Will the activity result in increased levels of vibration from construction machinery?		✓		C-ESMP	
Will the project release pollutants or any other hazardous, toxic, or noxious substance to the air? (e.g. significant greenhouse gas emissions, dust emissions)		✓		C-ESMP OHSMP	
Will the activity disturb any fauna and flora?		✓		C-ESMP	
Will the activity result in irrigation water with high Total Dissolved Solids (TDS) with more than 1,500 ppm?		✓		C-ESMP Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g., discharges, leaking, leaching, boreholes, etc.)		✓		C-ESMP;	
Will the project require use of chemicals? (e.g., fertilizers, pesticides, paints, etc.)	✓			Operational ESMP, Emergency Response Plans	Paints
				ESMP	
Is there any risk of accidental spill or leakage of material?		✓		ESMP	
ESS 4: Community Health and Safety					
Will the project interfere with the normal health and safety of the public?		✓		ESMP, C-ESMP	
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?		✓		GRM	
Is there a risk of communal drinking water pollution through hazardous waste?		✓		ESMP, (OHSMP and WMP)	

Is there a risk of increased GBV cases due to labor influx?		✓		GRM, LMP SEAH PRP	
Is there a risk of spread of communal diseases due to labor influx?		✓		LMP, GRM, C-ESMP	
Is there a security risk to the community triggered by project activities?		✓		LMP	
Will the project interfere with the normal health and safety of the worker, employee or public?		✓		ESMP, OHSP	
Does the activity have the potential to upset community dynamics during the construction and operation phase?		✓		SEP; GRM	
Will the activity expose community members to physical hazards on the project site?		✓		C-ESMP; OHSMP	
Will the activity pose traffic and road safety concerns?		✓		C-ESMP	
Is there a possibility that the activity contaminates open wells?		✓		ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants		✓		Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)		✓		ESMP, GRM, RPF	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?		✓		ESMP, GRM, RPF	.
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?		✓		SEP, LMP, RPF	
Will the activity lead to disputes over land ownership?		✓		ESMP, GRM, RPF	
Will the activity lead to blocked access to the site by people in the area?		✓		ESMP, GRM and RPF	
Will the activity require acquisition of land or physical buildings or infrastructure?		✓		RPF	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					

Will the project be located within, or near environmentally sensitive areas or areas of high ecological value?		✓		ESMP	
Will the project require the conversion of land use of significant areas of land?		✓		ESMP	
Can the project cause disruption of wildlife migratory routes		✓		ESMP	
Will the project affect fragile, protected, or endangered ecosystems or species? (e.g., natural forests, wetlands, estuarine, coral reefs, mangroves, endemic species, endangered species etc.).		✓		ESMP	
Can the project impact ecosystems upon which communities rely for food, water, fibers, or other basic needs, including cultural and spiritual needs?		✓		ESMP	
Are the needs of the project likely to exceed the capacity of existing water supply, sanitation systems, transport, or other infrastructure		✓		ESMMP	
Will the project involve extraction, diversion or containment of surface or groundwater?		✓		ESMP	
Will the activity impact sensitive areas?		✓		ESMP	
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?		✓		ESMP	
Is there a risk that the activity causes loss of precious ecological assets?		✓		ESMP	
ESS 8: Cultural Heritage					
Will the project be located in or close to a site of natural or cultural value?		✓		ESMP	
Is the project site known to have the potential for the presence of cultural and natural heritage remains?		✓			
ESS 10: Stakeholder Engagement and Information Disclosure					
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?		✓		Stakeholder Engagement Plan (SEP)	

Is there a historical exclusion of disabled persons in the area?	✓		Stakeholder Engagement Plan (SEP)	
Is there a lack of community consultations by the government generally?	✓		Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regards to the activity?	✓		Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?	✓		SEP; GRM	

SUMMARY OF THE E&S SCREENING PROCESS

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact Environment Risks - the activity result in generation of dust and noise - during construction there is activity that result in the production of solid waste Social Risks - there is a risk that exclusion of beneficiaries leads to grievances	Individual Risk/ Impact Rating	Mitigation - use dust suppression techniques such as water spraying and dust control products during construction activities. Social Risk mitigation: - engage in participatory planning processes that include stakeholders from all affected groups, ensuring their voices are heard.
Is Additional Environmental and social Assessment Necessary?	E&S Screening Result/Out come		Summary of Screening Result Justification
	Moderate Risk/Minor Impact: Some potential negative impacts identified, requiring an Environmental and Social Management Plan (ESMP) Monitoring Recommendations: Suggestions for ongoing monitoring and		The screening process identified some potential negative impacts of moderate risk with minor overall effects, necessitating the development of an Environmental and Social

	reporting to ensure effective mitigation during project implementation.	Management Plan (ESMP) to manage these risks effectively. The ESMP will outline and oversee the implementation of necessary mitigation measures. To ensure these measures are working as intended and to address any emerging issues, ongoing monitoring and reporting are recommended. Establishing a robust monitoring framework will enable the project team to track progress, evaluate the effectiveness of mitigation strategies, and make any needed adjustments to the ESMP, thereby promoting both environmental and social sustainability throughout the project lifecycle.
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Annex 2: Code of Conduct for Workers:

The following Code of Conduct (COC) must be read and understood by all workers engaged

I acknowledge that adhering to the provisions as detailed in this Code of Conduct (CoC) and following any of the Project's Environmental, Social or Health (ESH) or Occupation Health and Safety (OHS) provisions is mandatory.

The Client considers that failure to follow the CoC, EHS or OHS standards - constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment.

I agree that while working on the Project I will:

Attend and actively participate in any induction or training required for OHS or sexual exploitation and abuse (SEA) or sexual harassment (SH), as requested by my employer.

Not drinking alcohol or use narcotics or other substances which can impair faculties and potentially cause incidents, before or during work activities.

Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior (e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.).

Not engage in sexual favors, for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviors.

Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

Unless there is full consent by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this CoC.

Report to my manager any suspected or actual GBV or VAC (Violence against Children) by a fellow worker, whether employed by my company or not, or any breaches of this CoC.

Regarding children under the age of 18:

Wherever possible, ensure that another adult is present when working in proximity to children.

Not to invite unaccompanied children unrelated to my family into my home, or the works site unless they are at immediate risk of injury or in physical danger.

Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.

Refrain from physical punishment or discipline of children.

Refrain from hiring children for domestic or other labour below the minimum age of 18, Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank's Environmental and Social Framework on child labour and minimum age.

Sanctions

I understand that if I breach this CoC, my employer will take disciplinary action which could include:

Informal warning.

Formal warning.

Additional Training.

Loss of up to one week's salary.

Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.

Termination of employment.

Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental and social provisions within the CoC are met; that I will adhere to any additional OHS and EHS management detailed by the Project or the World Bank. I do hereby acknowledge that I have read the CoC, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to COC and OHS issues. I understand that any action inconsistent with this COC or failure to act mandated by this COC may result in disciplinary action and may affect my ongoing employment.

Signature:

Date:

Location:

Annex 3: Chance Find Procedures

This procedure was developed in accordance with the World Bank's ESS8 (to protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage. To promote the equitable sharing of benefits from the cultural heritage).

This procedure is included as a standard provision in the implementation of Public Works contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). All implementers / contractors will be required to observe this procedure as documented hereafter.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the PIU and the World Bank in order to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

Stop construction activities;

Delineate the discovered site area;

Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the authority responsible takes over;

Notify the responsible foreman/archaeologist, who in turn should notify the PIU and the World Bank and local authorities (within less than 24 hours);

The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values;

Decision on how to handle the findings will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;

Implementation of the decision concerning the management of the findings;

Construction work can resume only when permission is given from the respective authorities, PIU and World Bank, after the decision concerning the safeguard of the heritage is fully executed;

In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings, works and protections

Annex 4 -Sample Photos: Stakeholders consultation meeting



Annex 5: Document - ownership of Land

DOWLADDA KOONFUR GALBEED EE SOOMAALIYA MAAMULKA DEEGAANKA JAZIIRA EE GOBOLKA SHABEELAHA HOOSE XAFIISKA GUDOOMIYAHA		ولاية جنوب غرب الصومال إدارة المحلية جزيرة في اقليم شبيلي السفلي مكتب الوالي
SOUTHWEST STATE OF SOMALIA JAZIIRA LOCAL AUTHORITY ADMINISTRATION OF LOWER SHABELE REGION OFFICE OF THE COMMISSIONER		
REF: XG/MDJ/GSHH/010/G3/23		Date: 04/12/2023
Ku: Wasaaradda Kalluumeysiga iyo Kheyraadka Badda- Koonfur Galbeed OG: Gudoomiye kuxigeenada Deegaanka Jaziira OG: Waaxda Dhulka Degmada Afgooye OG: Gudoomiyaha Degmada Afgooye OG: Gudoomiyaha Gobolka Shabeelaha Hoose OG: Wasaaradda Howlaha Guud iyo Guryeynta - Koonfur Galbeed OG: Wasaaradda Arrimaha Gudaha iyo Dowladaha Hoose - Koonfur Galbeed		
<u>UJEEDDO: CADDAYN BIXIN DHUL DANGUUD</u>		
Kadib Codsii ka yimid Wasaaradda Kalluumeysiga iyo Kheyraadka Badda ee Dowlad goboleedka Koonfur Galbeed wuxuu Maamulka Deegaanka Jaziira halkaan ku caddaynayaa in uu bixiyay dhul danguud ah oo cabirkiiisu yahay 20x60M² (N 1°57'0.10170 E 45°10'45.70340 N 1°56'59.41110 E 45°10'45.54120 N 1°57'0.17280 E 45°10'44.22580 N 1°57'59.60860 E 45°10'44.41380) kuna yaala xeebta Deeganka Jaziira, Dhulkan oo laga dhisi doono Suuq Kalluumeysi (Fish Market) Kayd Qaboojiye (Cold Storage) iyo Goob doomaha lagu dayactiro (Boat repairing workshop) oo loogu talagalay horumarinta Kalluumeysiga iyo Kalluumeysatada deegaanka Jaziira isla markaana uu taageeraayo Mashruuca Badmaal – SSFDP. Haddaba, waxaa halkaan ku caddaynaynaa in maamulka uu bixiyay dhulkaas danta guud ah maadaama ay jirto baahi weyn oo loo qabo in la hirgeliyo Suuq Kalluumeysi, Kayd Qaboojiye iyo goob doomaha lagu dayactiro si loo hormariyo Kalluumeysiga Deegaanka iyo shaqo abuurka dhallinyarada iyo dumarka Deeganka Jaziira ee Gobolka Shabeelaha Hoose. Sidoo kale dhulka waxaa lagu bixiyey si waafaqsan nidaamka iyo xeerarka u yaala Dowlad Goboleedka Koonfur Galbeed gaar ahaan Gobolka Sheebeellada Hoose – Deegaanka Jaziira.		
ALLAA – MAHADLEH		
Mudane: Cabdullaahi Maxamuud Nuur (Assad) Gudoomiyaha Deegaanka Jaziira ee Gobolka Shabeelaha Hoose		 
COMMISSIONER OFFICE : Contact : +252-615586290 / +252-613994408 E-mail: mdjaziira@gmail.com		