

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 WARSHEIKH HIRSHABELLE STATE OF SOMALIA

August 2026

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ACRONYMS AND ABBREVIATIONS

CoC	Code of Conduct
DG	Director General
E&S	Environment and Social
EHS	Environmental Health and Safety
EHSGs	Environmental Health and Safety Guidelines
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
FCV	Fragility, Conflict & Violence
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-based Violence
GFF	Global Financing Facility
GIIP	Good International Industry Practice
GRM /C	Grievance Redress Mechanism /Committee
IDA	International Development Association
IDPs	Internally displaced persons
IP	Implementing Partner
LMP	Labour Management Procedures
MDAs	Ministries, Departments and Agencies
MFBE	Ministry of Fisheries and Blue Economy
OHS	Occupation health and safety
PAPs	Project affected persons
PDO	Project Development Objective
PPE	Personal Protective Equipment
PLWDs	People living with disabilities
PIU	Project Implementation Unit (FMS level)
PMU	Project Management Unit (FGS level)
POM	Project operational manual
RAP	Resettlement Action Plan
RPF	Resettlement Planning Framework
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SMF	Security Management Framework
SMP	Security Management Plan
SEP	Stakeholder Engagement Plan
SSFDP	Somali Sustainable Fisheries Development Project
WB	World Bank
WM	Waste Management

EXECUTIVE SUMMARY

The Somalia Sustainable Fisheries Development Project (SSFDP/Badmaal Project), financed by the World Bank, aims to improve the sustainable management of selected fisheries and enhance the capacity of targeted coastal communities to benefit from fisheries production through investments in climate-resilient fisheries infrastructure, fisheries value chain development, institutional capacity strengthening, and improved fisheries governance and management systems. The proposed activities under this ESMP form part of the project's broader objective of supporting sustainable and inclusive growth of the fisheries sector by improving fisheries-related infrastructure and operational services, enhancing livelihoods and market access for coastal communities, strengthening resilience, and promoting environmentally and socially sustainable fisheries management in line with the World Bank Environmental and Social Framework (ESF) and the project Environmental and Social Management Framework (ESMF).

The BADMAAL Fish Market Business Plan presents a comprehensive strategy for revitalizing the fisheries sector in Warsheikh, Somalia, by addressing the structural and operational bottlenecks that have long constrained its growth. The proposed sub-project involves constructing fish landing facility in Warsheikh, Hirshabelle State of Somalia, to improve fish landing, handling, sorting, rinsing, icing, auctioning, chilled storage and onward market distribution. 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.

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social (E&S) 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 in the Warsheikh fisheries landing facility. The ESMP lists the project-specific risks and impacts and mitigation measures, institutional arrangements for implementing and monitoring the risk mitigation measures and proposes monitoring indicators for measurement and monitoring of E&S performance. The activities associated with the construction and operation of the Warsheikh fisheries landing facility will likely generate site-specific E&S risks and impacts. During construction, these include management of excavated material and construction wastes, occupational health and safety risks, dust, noise and vibration, traffic and community health and safety risk, risks associated with labor rights and management, e.g. child labor or forced labor, labor influx and associated risks such as GBV/SEAH, addressing these risks is crucial to minimizing adverse impacts during construction and operation. During operation, key risks include rinse-water management, fish scales and occasional residues from damaged fish, solid waste management, odor control, water use efficiency, seafood hygiene, cold-room safety, slips and falls from wet surfaces, vector and pest control, community nuisance, and prevention of pollution to the adjacent coastal and marine environment.

This ESMP lays out the specific risks and impacts anticipated for the project, lays out the respective mitigation measures, and lists monitoring responsibilities. It shows who will monitor its implementation and when, and what the budget implications for both mitigation measures and monitoring activities during both construction and operation. It further includes a description of the Badmaal Grievance Redress Mechanism (GRM), which will be available for complaints raised by impacted communities and will stay functional throughout the construction and operation and reiterates stakeholder consultations that have been conducted in the lead up to the project design. Workers will be able to raise their grievances through a dedicated mechanism.

1.0 INTRODUCTION

1.1. Project background

The Badmaal is a World Bank supported project that, 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 (MFBE). The construction of a modern Fisheries landing and wholesale auction facility at Warsheikh is a key component of the project. 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 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 proposed facility will improve fish landing, unloading, weighing, sorting by species and size, rinsing, icing, auctioning, temporary chilled storage, and onward transportation to regional markets. Fish will remain whole throughout handling, and no gutting, filleting, canning, or other bulk fish-processing activities will be undertaken.

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

- 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	1.1 Climate-resilient fisheries infrastructure	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

Component	Subcomponent	Key activities
		capacity building and mentoring, and support transition to climate and/or gender informed fishing and processing practices including safety at sea and labor conditions, 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

The objective of this ESMP is therefore to provide management measures to avoid, minimize, mitigate and monitor environmental and social risks and impacts in accordance with national regulatory framework, the World Bank Environmental and Social Framework (ESF), and relevant WB's ESSs & WBG General Environmental, Health and Safety Guidelines (EHSGs). The objective of this ESMP is to identify and manage the environmental and social (E&S) risks, as well as the potential positive and negative impacts, associated with the construction and operation of the proposed Warsheikh fisheries landing facility. It aims to provide management

actions to mitigate adverse impacts in line with the national regulatory framework, relevant World Bank Environmental and Social Standards (ESSs), and the World Bank Group's General Environmental, Health and Safety Guidelines (EHSGs). The ESMP also outlines the specific roles and responsibilities of the MFBE-PMU and the contractor, detailing measures to reduce negative impacts and enhance positive outcomes. It also ensures the active engagement of key stakeholders throughout implementation. This document consolidates all relevant E&S commitments for both construction and operational phases, including Occupational Health and Safety (OHS). It addresses construction-related risks as well as operational risks associated with landing activities, including rins-water management, solid waste management, pollution, seafood hygiene, water use efficiency, occupational health and safety, community health and safety, and protection of the adjacent coastal and marine environment. Furthermore, the ESMP identifies subproject-specific risks and mitigation measures, outlines institutional arrangements for implementation and monitoring, and provides indicators to track E&S performance.

The Badmaal ESMF established the project-level framework used to screen and assess the Warsheikh subproject. This ESMP translates that framework into site-specific measures and, following approval, this ESMP shall serve as the primary site-specific instrument for managing environmental and social risks and impacts associated with the Warsheikh Facility throughout implementation and operation.

2.0 PROJECT DESCRIPTION

Warsheikh is an administrative center and coastal town in the Warsheikh District, located in the southeastern Middle Shabelle region of Hirshabelle State, Somalia. It is bordered by the Banadir region to the south and Adale District to the north. Situated approximately 70 km north of Mogadishu along the coast, Warsheikh has historically served as a hub for trade and learning in the region.

The project involves the development of fish handling facilities aimed at improving operational efficiency, enhancing hygiene standards, and supporting sustainable fisheries management. It will provide a well-organized environment for fish handling, weighing, rinsing, sorting, icing, auctioning, chilled storage and marketing, addressing current gaps in infrastructure.

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.

To improve safety and efficiency, the project will introduce proper landing and handling arrangements, reducing the need for manual transportation of fish from boats. This will streamline operations and minimize risks faced by fishers during offloading.

Fish handling and temporary chilled storage capacity will be strengthened through hygienic fish handling areas, auction space, chill rooms and ice supply facilities. These facilities will help maintain fish quality, reduce post-harvest losses, and support reliable market supply. An ice production system, including a solar-powered ice plant, will be established to meet the preservation needs of both fishers and traders.

Water supply infrastructure will be developed using a combination of freshwater and seawater storage tanks, elevated header tanks, and borehole systems with pumping units. Potable water will be used for hygiene and sanitation facilities, while seawater will be used for rinsing whole fish and washing down the fish handling and auction areas. A comprehensive plumbing network will ensure water access across handling areas, washing stations, and sanitation facilities. Sanitation systems will be designed to effectively manage wastewater, incorporating septic tanks, percolation areas for the hygiene facility wastewater and filtration and soak away system for the seawater from the rinse and hose down areas. Domestic wastewater from toilets and hygiene facilities will be managed separately through septic tanks and associated sanitation infrastructure. Rinse water from fish handling and cleaning activities will consist mainly of seawater containing minor quantities of fish scales, 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.

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 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.

The project will also include installation of essential operational equipment such as chilled storage units, ice-making systems, weighing scales, and hygienic fish handling tables to support safe and efficient landing, auction and distribution operations.

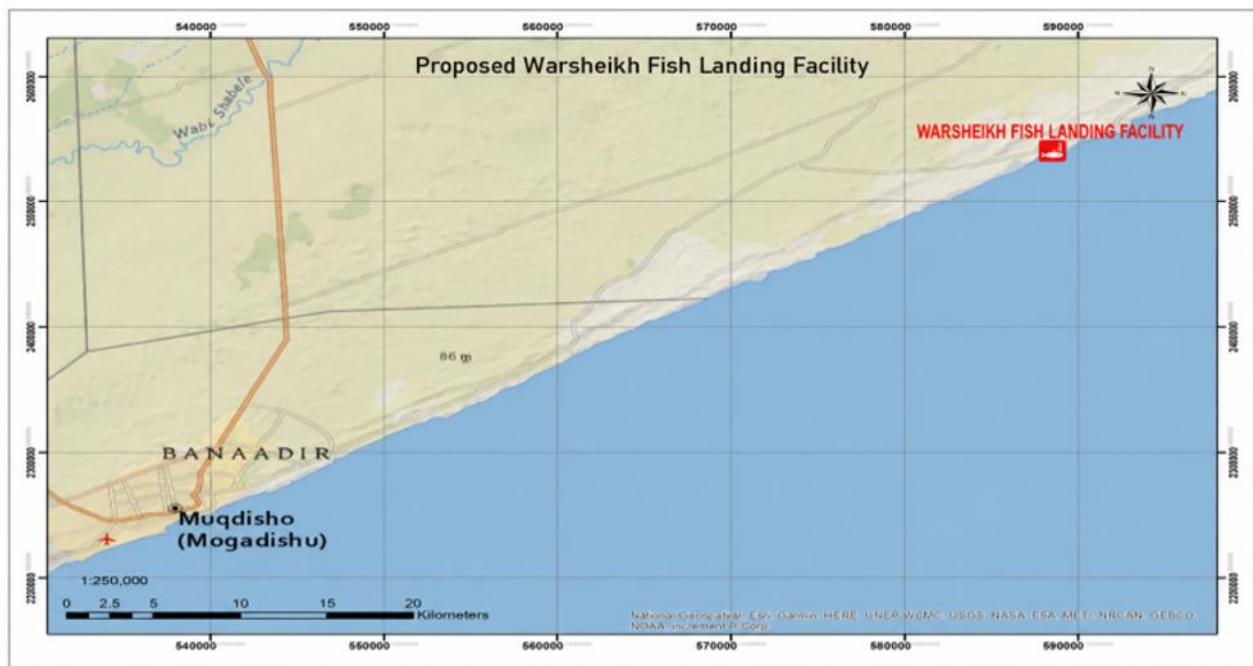


Figure 1: Location Map of Proposed Warsheikh Fish Landing Facility

The town falls under the jurisdiction of the Middle Shabelle region, whose capital is Jowhar, and is primarily inhabited by various Hawiye sub-clans, including the Abgaal, Hawadle, and Murusade. Minority communities or coastal artisan groups, such as the Musa Diriye and Bajuni, also reside in the area in smaller numbers, traditionally engaged in fishing and trade.

With its strategic coastal location and rich historical background, Warsheikh holds significant potential for development, particularly in the fisheries sector and broader community-based initiatives.



Figure 2: Site aerial view for Proposed Warsheikh Fish Landing Facility

The designated project site (Latitude 2.297389° and Longitude 45.796034°), measuring 35m by 45m, is publicly owned (refer to Annex 5: Land Ownership). The land has been officially allocated for the project by the Government, as confirmed through a formal endorsement by the Office of the Mayor, Warsheikh District Council.

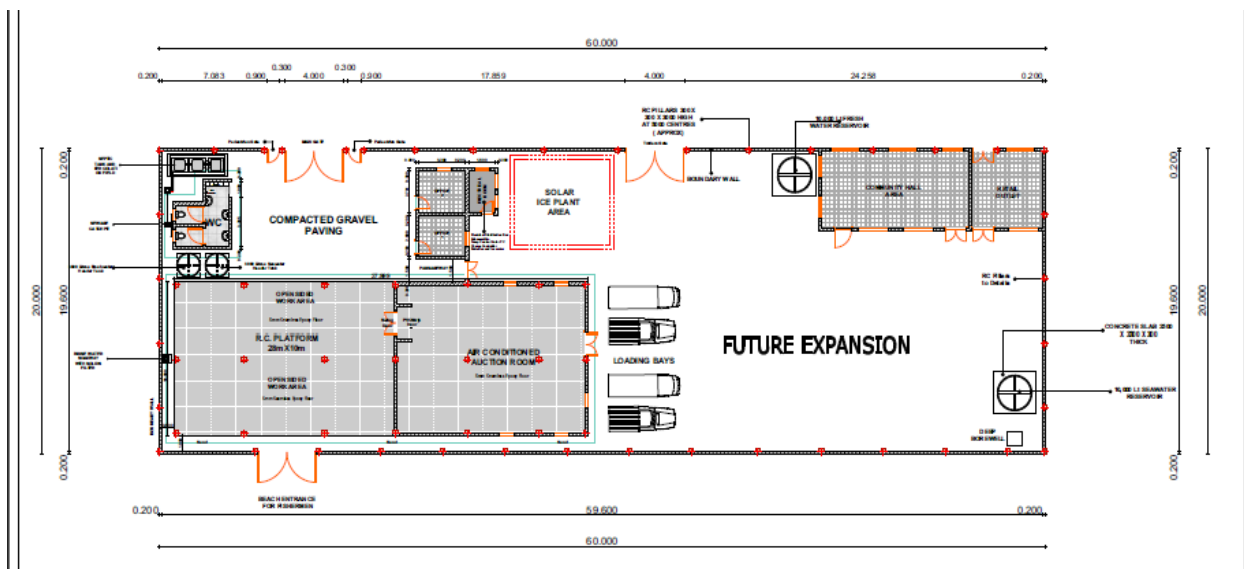


Figure 3: Warsheikh Site Plan

According to the table of "Building area per occupant" from the *Building Design and Materials* series (edited by the Architectural Institute of Japan), the required floor area per person is 7-12 m² in a workplace or factory and 2-3 m² at retail premises. The 8.0 m x 6.0 m sorting area, including the weighing area, yields an effective floor space of roughly 30 m².

With the assumption of 4 staff, the work area comes to approximately 7.5 m² per person, a valid value according to the standards. The area for bulk purchasers to preview and select their items for purchase is 35–44 m². At a projected count of 16 bulk purchasers, this floor area comes to 2.1–2.9 m² per person, which is in the valid range for wholesale premises. Furthermore, accounting for a 3.0-m wide unloading area for the carts and space for ice supply/refrigeration flow lines brings the projected required scale of the fish handling/sales area to 120–136.5 m².

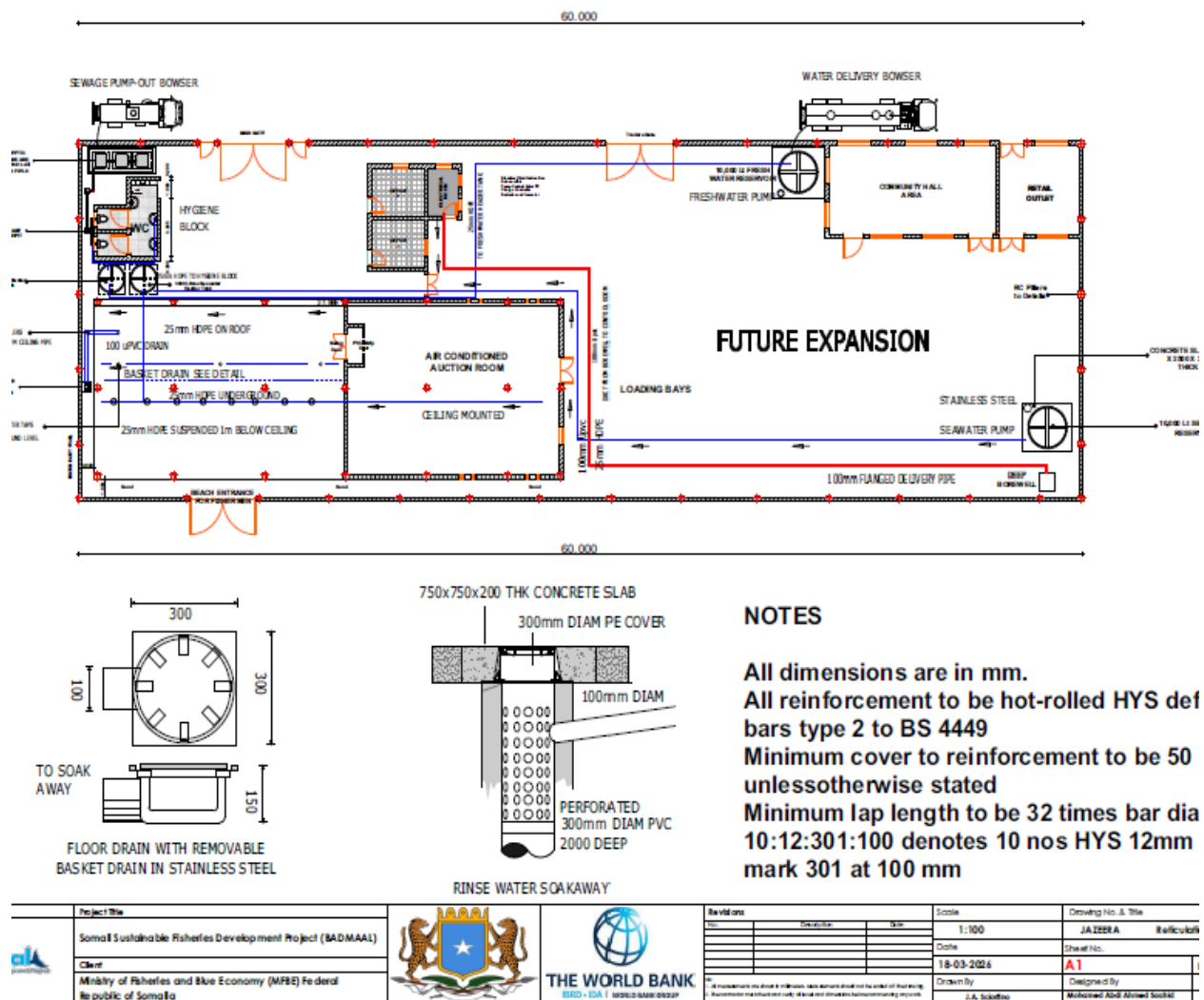


Figure 4: Warsheikh Ground Floor Plan

2.1 Project Activities

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

- Fish Handling and Work Area-Reinforced concrete platform for unloading, weighing

- ii. sorting, washing, boxing, icing and preparing fish for market distribution via auction.
- iii. Auction Room-Designated facility for fish auctioning, price setting, and organized trade.
- iv. Chill Room (chilled storage of fish on ice)-Temperature-controlled storage for preserving fish quality prior to sale or transport.
- v. Loading Bays and Circulation Areas-Areas for vehicle access, loading/offloading, and internal movement within the facility.
- vi. Solar Ice Plant-Solar-powered ice production unit for fish preservation during handling and transport.
- vii. 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.
- viii. Hygiene and Sanitary Facilities-Dedicated male and female toilet blocks, handwashing stations to ensure worker hygiene and compliance with public health standards.
- ix. 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.
- x. Administrative and Office Facilities-Office spaces for facility management, coordination, and record-keeping of fisheries operations.
- xi. Electrical and Energy System (Solar PV)-Solar photovoltaic system including panels, batteries, inverter, and distribution units to provide sustainable energy for facility operations
- xii. 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.

3.0 POLICY, LEGISLATION FRAMEWORKS

Warsheikh Fishery landing 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 the operation of the fisheries landing facility. Operational environmental and social risks addressed under this ESMP include pollution prevention, wastewater and solid waste management, resource efficiency, occupational health and safety, community health and safety, stakeholder engagement, grievance management, and protection of the adjacent coastal and marine environment.

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

- **Policy, Legal and Institutional Frameworks.** The project is required to comply with laws of Somalia relevant to the project, including the National Environment Policy and the newly developed Federal the Environmental Protection and Management Act became effective as of February 24, 2024. Development partners are supporting the country in the preparation of subsidiary Environmental and Social Impact Regulations that would give effect to the Act.
- **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.

The Act requires projects to implement appropriate pollution prevention and environmental management measures throughout their operational life. Accordingly, this ESMP incorporates measures for wastewater management, drainage controls, solid waste management, pollution prevention, marine environmental protection and environmental monitoring appropriate to the operation of the fisheries landing facility.

- **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 Warsheikh 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 Warsheikh 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, requiring, 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 Warsheikh Fish Landing Facility, ESS1 requires implementation of this ESMP to address potential risks related to site preparation, construction activities, occupational and community health and safety, waste management, wastewater generation, traffic management, noise, dust emissions, and operational hygiene and sanitation measures associated with fish handling and market operations.

ESS2 – Labour and Working Conditions: 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 Warsheikh 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.

ESS3 – Resource Efficiency and Pollution Prevention and Management: ESS3 is relevant to managing pollution and ensuring resource efficiency, during construction and operation of the fish landing facility. Potential impacts include dust emissions, noise, solid waste generation, fish waste, 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.

ESS4 – Community Health and Safety: Focused on protecting the health and safety of nearby communities, from risks and impacts associated with project activities. For the Warsheikh 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.

ESS8 – Cultural Heritage: ESS8 seeks to protect tangible and intangible cultural heritage. ESS8 may be relevant to this sub-project if there is a chance find during excavation works.

ESS10 – Stakeholder Engagement and Information Disclosure: ESS10 emphasizes meaningful stakeholder engagement, information disclosure, and accessible grievance mechanisms throughout the project lifecycle. For the Warsheikh Fish Landing 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.

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 risks and impacts assessment, screening and management instruments and protocols.	Range of instruments to satisfy the Bank include ESMFs, SEPs, LMPs, SEAH/SH RAPs, EIAs, regional or sectoral EIAs, ESMPs, etc.	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	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.	WB standards will be applicable.

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
		implementation capacity remain under development at State level.		
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, 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.	The Labour Code is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.	ESMP and the Labour Management Procedures (LMP) to guide the borrower, including LMP prepared by project contractors. WB standards will be applicable.
Promotes workers' working conditions, including contracts, payments, GRM etc.	Several provisions made under ESS2 to safeguard project workers, promote safety at work and ensure that they have a viable means of communicating grievances and	The Somali Labour Code (Law No. 36 of 2024) provides the current legal framework governing labour relations, employment conditions, occupational health and	While the legal framework for labour management has significantly improved following enactment of the Somali Labour Code	The Project will fully comply with WB ESS 2. This is set out in the LMP. The Project will not allow any forced and child labor. It will hold all contractors

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
	receiving redress. ESS2 also recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth.	safety, workers' rights, written employment contracts, working hours, remuneration, and grievance management.	(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.	liable to the implementation of the LMP. The PMU will have overall responsibility to monitor the implementation of the LMP and will hold all contractors liable to the implementation of the LMP including subproject Labour Management Plans as part of the contractors ESMPs. The Project will fully comply with WB ESS 2, including setting up the workplace GMs.
ESS3 ("Resource Efficiency and Pollution Prevention and Management")				
Pollution prevention and management.	This ESS requires the 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.	There are no known 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.	There are no supporting legislative frameworks for pollution prevention and management of wastes.	WB standards will be applicable.

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
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. It is also worth noting that there are persistent reports claiming that Somalia has been used as a dumping ground for hazardous waste starting about the early 1990s and continuing through the civil war there.	There are no approved hazardous waste disposal sites in Somalia.	WB standards will be applicable.
ESS4 ("Community Health and Safety")				
Health of community members.	The ESS envisages that 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.	The Somali Penal Code of 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	The Somali Penal Code 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	WB standards will be applicable.

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
		officer orders the commission of an offence both the perpetrator and his superior will be liable.	exception for the case of rape. In practice provisions under Art 39(i) offer little more than theoretical protection.	
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. 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.	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 security protocols Guiding their deployment, and there is possibility of violence meted out on civilians or workers or even the possibility of rent- seeking.	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 law enforcement authorities in each municipality to manage associate risks.	WB standards will be applicable.
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.	WB standards will be applicable.

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
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.	WB standards will be applicable.
ESS10 (Stakeholder engagement and information disclosure")				
Meaningful engagement of stakeholders in the project activities from planning to implementation levels. Prompt and timely disclosure of project information and access to accessible and efficient GRM system.	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.	WB standards will be applicable.

4.0 BASELINE INFORMATION

4.1 Physical Environment

Topography: The Warsheikh project site features a relatively flat terrain with gentle undulations, characteristic of Somalia's coastal plains. The elevation varies slightly due to natural factors and human activities. The area's topography influences drainage patterns, with water generally flowing towards the Indian Ocean. Warsheikh experiences occasional flooding, especially during heavy rains, making proper drainage systems essential for the project's sustainability.

Geology and Soil: The soil composition in Warsheikh is predominantly sandy and loamy, which is common in coastal regions. These soils exhibit moderate to low fertility and are highly susceptible to erosion, particularly in exposed areas. The sandy texture affects water retention, making irrigation and efficient water management critical for vegetation and infrastructure stability. During construction, appropriate soil stabilization and erosion control measures will be implemented to maintain soil integrity.

Climate and Metrology: Warsheikh, located in Somalia, experiences a hot and arid climate with the following characteristics:

- **Temperature:** Generally high throughout the year, with average temperatures ranging from 25°C to 35°C (77°F to 95°F).
- **Rainfall:** Low and irregular, with two rainy seasons (Gu: April–June and Deyr: October–December), and two dry seasons (Jilaal: December–March and Hagaa: July–September).
- **Humidity:** Moderate to high due to its coastal location along the Indian Ocean.
- **Winds:** Influenced by seasonal monsoon winds, bringing occasional coastal breezes that provide some relief from the heat.
- **Droughts:** Common due to limited and unpredictable rainfall.

Biological Environment: Warsheikh has sparse vegetation, mainly comprising coastal shrubs, acacia trees, and patches of grass. Human activities such as fishing, small-scale farming, and settlements have significantly altered the natural ecosystem. Wildlife presence is minimal, with occasional sightings of small mammals, birds, and reptiles. Though there are no designated conservation areas in the immediate vicinity, proximity to the Indian Ocean necessitates environmental conservation efforts to protect marine life and coastal biodiversity.

4.2 Socio-economic Environment

Population and Demography: The Warsheikh area is home to a mix of permanent residents and transient populations, including traders, construction workers, and fishermen. The dominant age group is 15–45 years, indicating a youthful, economically active population. Household sizes range from 5 to 7 people per household. An influx of job seekers, attracted by employment opportunities in the project, may increase demand for housing, water, and healthcare services.

Economic Activities: According to the African Development Bank's Somalia Economic Outlook 2024, Somalia's GDP grew from 2.4% in 2022 to 2.8% in 2023, driven by recovery in agriculture, expansion in services, and increased investment. The economy remains heavily reliant on livestock and agriculture, with livestock exports accounting for 76% of total exports in 2022.

Warsheikh's Economic Landscape: Warsheikh's economy is primarily dependent on fishing, small-scale agriculture, trade, and tourism, benefiting from its coastal location and proximity to Mogadishu.

Fishing: Local fishermen provide seafood to local and regional markets, but the sector is hindered by outdated fishing methods, inadequate storage facilities, and limited market access.

Agriculture and Livestock: Small-scale farming and livestock keeping provide food security and income, though dependence on rain-fed agriculture and limited infrastructure restrict growth.

Tourism: Warsheikh's beaches and natural scenery have attracted growing tourism activities, supporting local businesses such as hotels, restaurants, and transport services. However, infrastructure gaps and security concerns limit the sector's full potential.

Infrastructural Facilities

Road Network: Warsheikh is accessible via paved and unpaved roads, with the main routes connecting it to Mogadishu and other coastal towns. While the primary access roads are functional, they require periodic maintenance, especially during the rainy seasons. Road improvements will be necessary to support increased traffic during and after project implementation.

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, recycling, 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 Warsheikh 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: Warsheikh 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.

5.0 ANTICIPATED ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

In accordance with the World Bank Environmental and Social Framework (ESF), this ESMP assesses environmental and social risks and impacts associated with both the construction and operational phases of the proposed Warsheikh Fisheries Landing Facility. Construction-related risks are generally temporary, localized and manageable through standard mitigation measures. Operational risks relate to routine fisheries landing activities, including fish unloading, weighing, sorting, rinsing, icing, auctioning, chilled storage, waste management, occupational health and safety, community health and safety, and protection of the adjacent coastal and marine environment.

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. Therefore, the operational risk assessment focuses on rinse-water management, fish residues, odor control, drainage, pollution prevention, hygiene, worker safety, community health and marine protection rather than high-strength industrial fish-processing effluent.

The construction and operation of the Warsheikh Fisheries Landing and Wholesale Auction Facility may involve environmental and social risks and potential impacts during both the construction and operational phases. The anticipated risks and impacts are summarized below and will be managed through the mitigation, monitoring and institutional measures set out in this ESMP.

The construction and operation of the Warsheikh Fisheries landing facility may involve environmental and social risks and potential impacts during both the construction and operation phases. The anticipated risks and impacts are summarized below and will be managed through the mitigation, monitoring and institutional measures set out in this ESMP:

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, solar panel wastes. 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 runs 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

During operation, the following environmental risks may occur:

- The facility is designed for fish landing and handling only and will not undertake fish processing activities such as gutting, filleting or canning. Consequently, operational wastewater will consist primarily of seawater used for rinsing whole fish and cleaning

the handling and auction areas. This rinse water may contain minor quantities of fish scales, fish oil and occasional residues from damaged fish. The drainage system incorporates solids basket filters and passive oil separation prior to discharge through the approved drainage arrangement. Routine inspection and maintenance of the drainage system will prevent blockages and minimize potential pollution of the adjacent marine environment.

- Marine pollution risk: Poor drainage or runoff control could affect coastal water quality. Drainage controls, solids filters, oil separation, housekeeping and routine inspections will be required.
- Solid waste and fish residue management: Fish residues, packaging and municipal waste may cause odor, pests and health risks if not segregated, covered, collected and disposed of promptly.
- Odor and nuisance: Poor cleaning or delayed waste removal may generate nuisance odors affecting workers, traders and nearby communities.
- Water use efficiency: Water will be used for rinsing, cleaning and hygiene. Efficient use of potable water and seawater should be monitored to reduce waste.
- Stormwater and runoff: Stormwater may become contaminated if it contacts fish residues or waste areas. Clean and contaminated flows should be separated and drainage maintained.
- Energy use and cold storage: Chill rooms, ice plant and lighting will require energy. Solar PV will support energy efficiency and climate-resilient operation.

5.2.1 Social Risks

- 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; spills and leakage of hazardous materials as a result increased labour etc.)
- Risks to community Health and safety such as traffic incidents and accidents, 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 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-sensitive policies and inclusive consultation processes are essential.
- Security related incidents: Threats and attacks from Al-Shabaab and clan conflicts.
- Labour, particularly child/forced labour related to potential risks.
- Increased incidences of communicable diseases like tuberculosis, malaria, diarrhea, Covid19, HIV/AIDS etc. due to an influx of workers at construction sites.

5.2.2 Operational Phase Social, OHS and Community Health Risk

- Occupational health and safety: Operational workers may face slip, manual handling, cold-room, minor injury and cleaning-related risks. These will be managed through PPE, hygiene procedures, safe work practices, training, housekeeping, incident reporting and emergency preparedness.

- Seafood hygiene and contamination prevention: Poor handling, cleaning, storage or delayed icing may affect seafood quality and public health. Controls will include handwashing, clean fish boxes, daily wash-down, pest control and proper chilled storage.
- Community health and safety: Operations may create risks from traffic, pedestrian-vehicle interaction, odor, waste accumulation, pests and emergencies. These will be managed through access control, traffic management, housekeeping, waste collection, pest control and emergency response.
- Labour and working conditions: Operational workers will be managed in line with ESS2, including clear working arrangements, PPE, training, Codes of Conduct, worker GRM, non-discrimination, and prevention of child labour, forced labour and SEA/SH.
- Community complaints and GRM: Odor, waste, traffic, access or safety issues may generate complaints. The project GRM will remain functional during operation, including confidential channels for SEA/SH-related concerns.
- The anticipated environmental and social risks are expected to be site-specific, manageable and reversible if the mitigation measures in this ESMP are fully implemented. The operational risks are not those of an industrial fish-processing facility, but of a fisheries landing and wholesale auction facility where fish remain whole. The ESMP therefore includes proportionate measures for rinse-water management, solid waste management, odor control, water use efficiency, OHS, seafood hygiene, community health and safety, marine pollution prevention, monitoring and institutional accountability throughout construction and operation.

6.0 ENVIRONMENT AND SOCIAL MANAGEMENT PLAN

The measures presented in this section constitute the site-specific E&S requirements for the Warsheikh Facility. They define the mitigation measures, monitoring indicators, responsibilities, reporting arrangements and resources applicable throughout pre-construction, construction, commissioning and operation.

The ESMP establishes mitigation measures, monitoring indicators, implementation responsibilities, monitoring frequency and reporting requirements for each identified environmental and social risk. The mitigation hierarchy has been applied throughout the ESMP, with emphasis on pollution prevention, occupational health and safety, community health and safety, stakeholder engagement and protection of the surrounding coastal and marine environment.

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 2: Environment and Social Management Plan

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
Construction Phase					
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts					
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 to the construction workforce (including sub-contractors, temporary workers, and drivers). • Raise awareness to the workforce regarding the	PMU/ PIU and Contractor.	• Number of ESF/OHS sessions • Number and % of personnel trained • % of planned inspections completed • % of corrective actions closed within the agreed timeframe.	At the beginning of construction and Monthly thereafter.	Included in PMU/PIU and Contractor implementation costs.

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	implementation of the ESMP tailored to the subproject scope, through toolbox talks and other platforms.				
Operation Phase					
Operational environmental and social risks are not adequately managed during facility operation.	Implement the ESMP, assign responsibilities for implementation, monitoring and reporting; undertake routine environmental and social inspections; implement corrective actions where required.	Facility Operator, Hirshabelle PIU, MFBE-PMU	• % of scheduled inspections completed • Number of operational E&S nonconformities • % of corrective actions closed by the due date • % of monitoring reports submitted on time.	Quarterly reporting	Included in operational budget
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 LMP • Listing of all staff and titles, new hires and departure • Site visited and records reviewed, major findings, and actions taken by contractor, engineers, or others, including authorities—to include date, inspector or auditor name	• Contractor	• % of workers with compliant contracts • PPE compliance rate • Number of OHS incidents and near misses • % of planned inspections completed • % of corrective actions closed.	Monthly	Incl in contractor staff costs
Labor disputes over terms and conditions of employment, including delayed/insufficient payments.	• Implement SEHCDP LMP. • Ensure contracts have provisions to comply with the national labor laws requirements including penalties for non-compliance. • Ensure fair terms and employment conditions	• Implementation by Contractors • Monitoring by PMU/PIU civil engineer • Monitoring by relevant labor inspectorates	• % of workers with signed contracts • % of workers that signed COCs • % receiving wages on time • Number of labor grievances	Before commencement of contract and throughout implementation	Incl in contractor staff costs

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	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 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.		• % resolved within LMP timelines • Number of worker-GRM sessions.		
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	• Contractor	• % of payments made on time • # of workers' grievances filed # of GRM cases filed • # of child and forced labor reported. •	Throughout project implementation	Incl contractor staff costs

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
Risk of Insecurity of all project workers	• PMU to prepare District Security Risk Assessment • PMU to prepare Security Management plan (SMP) • Contractor to prepare local Activity Security Plan. • Implementation of SMP and local Activity Security Plan	• PMU and Contractor	• Security Risk Assessment, and Security Management Plan approved before mobilization. • Local Activity Security Plan approved before commencement • % of planned security measures implemented and verified • Number of security incidents reported, investigated and closed, and number and percentage of security personnel trained	Prior to commencement of activity	Costs for security risk implementation
Operation Phase					
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, first aid and incident reporting procedures.	• Facility Operator	• # of OHS related incidents • % of workers completing OHS induction/refresher training • % of workers observed using task-specific PPE correctly (target: 100%). • # of regular safety training provided • % of OHS inspections, equipment checks and corrective actions completed on time (target: 100%).	Daily supervision; Monthly audit	Included in operational budget
ESS3: Resource Efficiency and Pollution Prevention and Management					

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
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.	• Contractor	• Waste generated, reused/recycled and disposed of (kg/t/month). • % of authorized waste transfers documented (target: 100%). • No. of unauthorized dumping/marine disposal incidents (target: 0). • No. of waste grievances and % resolved on time (target: 100%).	Monthly	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). • Ensure that noise and excessive vibration from construction activities are within permissible levels	• Contractor to implement. • PMU/PIU E&S team to monitor	• % of workers observed wearing hearing protection in areas above 85 dB(A) (target: 100%). • No of noise/vibration grievances and percentage resolved within the GM timeframe (target 100%). • % of noise/vibration corrective actions closed by the agreed due date (target: 100%). • # of equipment with vibration dampening pads or devices • # of trainings for industrial vehicle operators conducted	Monthly	Incl in contractor staff costs

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	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.				
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 should be regularly maintained in good operating condition 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. • Cordon off construction sites to minimize dust	• Contractor to implement. • PMU/PIU E&S team to monitor	• No. of dust/emission non-compliances and % corrected on time (target: 100%). • % of vehicles/equipment with current service records (target: 100%). • % of exposed workers correctly using required PPE (target: 100%). • No. of air-quality grievances and % resolved on time; particulate results, if triggered.	• Monthly	Incl in contractor staff costs

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	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, stone dressing shall be provided with Personal Protective Equipment (PPE) • The use of PPE shall be monitored and enforced; and • Prohibit open burning solid wastes				
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 tarpaulin or similar fabric during rainy season.	• Contractor to implement. • PMU/PIU E&S team to monitor	• No. of sediment releases, discharges and spills/leaks (target: 0). • # of waste bins available at construction sites • No. of inspections identifying leaks, erosion or environmental discharge. • % of vehicles/equipment with current maintenance records (target: 100%).	• Monthly	Incl in contractor staff costs

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	- 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 corrective actions closed and incidents reported on time (target: 100%).		
Risks of contamination of soil and water	Empty paint cans stored in closed drums or isolated area from soil and water at CONTRACTOR store, then handling as recycled metal scrap.	Contractor	% of hazardous-material containers correctly labelled, with SDS and containment (target: 100%). % of applicable areas with spill kits and eyewash facilities	Monthly	Incl in contractor staff costs

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	- Store fuel and oil away from subproject site and 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 waste bins available at construction sites - No. and % of hazardous-material handlers trained (target: 100%). - No. of spills/improper disposal incidents and % closed on time		
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 in once they become full and when site work is complete. - Do not allow site workers to defecate in the open	Contractor	- No. of functional toilets and compliant worker-to-toilet ratio. % of sanitation checks confirming adequate water, soap and cleanliness (target: 100%). - No. of open-defecation cases and sanitation grievances (target: 0). - No. of sanitation toolbox talks and % of workers reached.	Monthly	4,000 USD

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	anywhere on the site or in its vicinity. Add the use of sanitation arrangements in toolbox talks				
	Operational Phase				
Excessive use of water and energy resources as well as mismanagement of waste generation and disposal	- Ensure septic tank is properly designed and installed to prevent hazards to public health - Ensure septic tank is well maintained to allow effective operation. - Ensure it is installed in areas with sufficient soil percolation for the wastewater load rate. - Ensure it is installed in areas of stable soils that are nearly level, well drained and permeable, with enough separation between the drain field and the groundwater table or other receiving waters	Hirshabelle State MFBE Facility Operator	- Monthly water/energy use and intensity per tonne of fish handled. % of septic/drainage checks completed (target: 100%). - No. of wastewater leaks/overflows and downtime (target: 0). - Waste collected and % documented (target: 100%).	Throughout operational phase	Included in operational and maintenance cost
Rinse-water and drainage management risk	Operate dedicated rinse-water drainage; maintain solids basket filters and passive oil separators; inspect and clean drainage systems; prevent untreated discharge.	Facility Operator under PMU/PIU oversight	% of drain, filter and oil-separator checks completed (target: 100%). - No. of blockages, overflows or pollution observations (target: 0).	Daily; Monthly after rainfall; targeted testing where inspections, incidents or complaints indicate	Included in operational budget including contingency for targeted laboratory testing where required.

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
			- No. of corrective actions and % closed on time (target: 100%). - No. of samples and % meeting BOD₅, COD and TSS limits (target: 100%).	potential pollution; quarterly reporting.	
Marine Pollution risk	Prevent discharge of fish residues, oils, litter or contaminated runoff into the sea; inspect outlets and maintain drainage infrastructure.	Facility Operator, Local municipality	- No. of fish residue, oil, litter or contaminated-discharge observations (target: 0%). - No. of marine-pollution incidents/complaints and % closed on time % of outlet/shoreline inspections documented % of corrective actions closed on time (target: 100%).	Weekly inspection; Quarterly monitoring	Included in operational budget
Solid waste management	Segregate fish residues and municipal waste, use covered containers, remove waste daily, dispose through approved municipal arrangements.	Facility Operator, Local municipality	- Quantity of fish/municipal waste generated and removed daily. % of operating days with approved waste removal (target: 100%). - No. of days with accumulated/uncontained waste, leaks or pests (target: 0). % of waste transfers documented	Daily; Monthly verification	Included in operational budget
Odour and housekeeping	Clean fish handling and auction areas daily; remove fish residues promptly; maintain seamless epoxy flooring; implement routine	Facility Operator	% of operating days with completed cleaning logs - No. of odor, fish-residue or pest observations (target: 0). - No. of housekeeping complaints and %	Daily, Monthly inspection	Included in operational budget

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	housekeeping and pest control.		resolved on time (target: 100%). • % of housekeeping inspections rated satisfactory (target: 100%).		
Stormwater and runoff management	• Maintain drainage channels; prevent contaminated runoff entering the marine environment; inspect drainage after rainfall.	Facility Operator	• % of scheduled/post-rainfall drainage inspections completed (target: 100%). • No. of unresolved blocked/damaged drains or contaminated-runoff cases. • % of corrective maintenance completed on time. • No. and status of stormwater complaints/incidents.	• Weekly; After rainfall	Included in operational budget
Solar panel disposal	• Store damaged solar panels and batteries in designated secure areas. • Ensure disposal or recycling through approved and authorized waste handlers. • Prevent open dumping or burning of solar components • Conduct routine inspection and maintenance of solar systems to minimize waste generation.	• Hirshabelle MFBE. • Facility Operator. • PMU to monitor.	• No. of damaged solar components securely stored. • % of components transferred to approved handlers with records. • No. of improper disposal or burning cases (target: 0). • % of solar-system inspections/maintenance completed.	• Throughout operational phase	Included in operational and maintenance cost
ESS4: Community Health and Safety					
Risk of increased GBV/SEAH cases and risks of sexual exploitation and	• Implementation and monitoring of GBV / SEAH Action Plan.	• Implementation by the Contractor	• # of GBV/SEAH complaints from the community received and addressed	Monthly	Incl in PMU staff and travel costs Contractor

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
abuse or sexual harassment, such as requests for sexual favors as a result of labor influx or condition to employment/project benefits	• Organization of GBV/SEAH awareness sessions for adjacent community. • Organization of GBV/SEAH awareness sessions for workers. Engage a dedicated specialist to support oversight and management of these risks. • Workers to sign the CoC and Contractors to enforce them efficiently. • Mobilizing workforce from the local market to the extent possible, given that local workers don't need to be accommodated in workcamps. • Ensure availability and ease of access to GRM, which is equipped with specials response and referral pathways for GBV/SEAH cases.	• Monitoring by PMU/PIU GBV specialist	• % of GBV/SEA/SH Action Plan implemented on time • # of GBV/SEAH awareness sessions to the community • # of GBV/SEAH education/ awareness sessions to the project workers • # of specialists engagement • % of workers that have signed CoC and trained before deployment (target: 100%). • Functional referral and confidential reporting channels. • No. of SEA/SH allegations referred using survivor-centred protocols (aggregate only).		
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 them about construction risks and the restricted access to the site • Restrict access to construction site through signage.	Contractor	• % of perimeter/access points secured and required signs installed. • No. of uncovered openings/unsecured hazardous stores (target: 0). • No. of unauthorized entries and community incidents/near misses. • No. of community sessions/participants and % of actions closed on time.	At commencement of activity	Inc Contractor budget in

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	- 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				
Risk of spread of communicable diseases (SIIs , HIV/AIDS, COVID-19 etc..) between workers and the community	- Provide induction and periodic community/worker awareness on communicable-disease prevention and available referral services. - Maintain adequate water, sanitation, handwashing facilities and hygiene supplies at the worksite. - Apply risk-based prevention, notification and referral procedures consistent with current national/public-health guidance.	Contractor	- No. of disease-awareness sessions and participants. % of workers with hygiene facilities/ protective materials. - No. of work-related transmission clusters and cases referred. % of disease-control actions closed on time.	Monthly	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 risk security assessments. - Coordinate with local authorities and security agencies.	PMU/Contractor	- Approved and current SMP/Activity Security Plan (target: Yes). - No. of security reviews and % of measures implemented. - No. of security incidents/breaches and % closed per plans. % of workers/security personnel trained and	Before mobilization and Monthly	Included in project cost

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
	- Restrict unauthorized access through fencing and security personnel. - Conduct worker security awareness training. - Ensure security personnel comply with CoC and ESS4 requirements		- security personnel signing CoC (target: 100%). % of required access-control posts functional.		
Operation Phase					
Seafood hygiene and food safety risk	Maintain hygienic fish handling; provide handwashing facilities; clean fish boxes and work surfaces; maintain chilled storage; implement pest control.	Facility Operator	% of operating days with hygiene checks and functional handwashing facilities (target: 100%). % of chill-room readings within range and no. of excursions addressed (target: 100%). - No. of hygiene/pest non-conformities and % closed on time (target: 100%). - No. and status of food-safety complaints/contamination incidents.	Daily, Monthly	Included in operational budge
Community health and safety	Implement traffic management during loading and unloading; control public access; maintain waste collection; implement emergency preparedness; maintain facility cleanliness	Facility Operator; Local Municipality	- No. of community/traffic incidents and near misses. % of traffic/access-control and emergency-equipment inspections completed. - No. of community complaints and % resolved on time. % of community-safety actions closed on time.	Quarterly review	Included in project cost

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
ESS10: Stakeholder Engagement and Information Disclosure					
Preparation and Operational Phase					
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.	PMU	- No. and % of SEP activities completed. - No. of participants, disaggregated by sex, age, disability/vulnerability and location. - No. of grievances by channel, % resolved on time and average resolution time.	Monthly	Included in project cost
Risks of lack of information on access to GRM leads to lack of accountability	Implement SEP and create awareness of GRM	PMU/PIU	- No. of GM awareness sessions/materials and participants, by sex/stakeholder group. % of stakeholders identifying at least one GM channel. - No. of functional GM channels. - No. of grievances and % acknowledged/resolved on time.	at the beginning of activity and throughout implementation	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	PMU	- No. of disclosure/engagement sessions and participants, by sex/stakeholder group. - No. of project updates/documents disclosed, with dates. - No. of information requests and % answered on time. - No. of transparency/mismanagement	Quarterly	PMU budget for stakeholder engagement

Environmental and social (E&S) risks and impacts.	Mitigation Measures	Responsible party	Monitoring and Performance indicators	Monitoring Frequency	Budget
			grievances and % resolved on time.		
Operation Phase					
Operational Stakeholder Engagement and GRM	Maintain stakeholder engagement and the Project GRM throughout operation to receive and address complaints relating to facility operations.	Facility Operator / Hirshabelle State PIU/ MFBE PMU	- 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	To be included in Facility O&M Budget

7.0 INSTITUTIONAL IMPLEMENTATION ARRANGEMENTS AND RESPONSIBILITIES

7.1 The Ministry of Fisheries and Blue Economy

The application of mitigation measures required under this ESMP is the sole responsibility of the PMU. However, since actual construction works will be carried out by the private entity, the PMU will ensure that implementation of this ESMP is incorporated in the Request for Proposals (RfP) and the costs are integrated into the contract and subsequently in the legal agreement between the construction company and the PMU. The PMU is responsible for instructing, observe and monitoring its contractors against the ESMP provisions. The PMU should make sure that corrective actions are applied by the contractors, when necessary. PMU Environment and Social Specialists are responsible for managing the E&S risks of the project and responsible for monitoring the implementation of this ESMP.

Following completion and commissioning of the facility, the MFBE/PMU, supported by the Hirshabelle MFBE/PIU, shall oversee compliance with the operational provisions of this ESMP. Oversight shall include reviewing monitoring records, verifying corrective actions, following up on grievances and reporting significant E&S matters in accordance with the ESCP. 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.
- Immediately notify the MFBE/PMU, and no later than 24 hours after becoming aware, of any Project-related incident or accident that has or may have a significant adverse effect. The PMU shall notify the World Bank within 48 hours of learning of the incident and provide subsequent reports as required under the ESCP. Setting up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
- 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 MFBE/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 risk 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 supervision consultant and MFBE/PMU
- 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 supervision consultant and MFBE/PMU on the implementation of Project GRM
- Maintain records of workers' GRM

7.2.1 Facility Operator-Operational Phase

Following commissioning, the Facility Operator will be responsible for implementing the operational-phase mitigation and monitoring measures included in this ESMP. The Facility Operator shall integrate the operational controls specified in this ESMP into the routine management of the Warsheikh Facility. The required mitigation, monitoring, maintenance and reporting measures shall be implemented under the oversight of the Hirshabelle MFBE/PIU and MFBE/PMU, consistent with applicable national requirements, the ESCP and relevant ESSs.

The Facility Operator's responsibilities shall include:

- Maintaining fish rinse-water drainage, solids basket filters and passive oil separation systems.
- Operate and maintain the fish rinse-water drainage system, including solids basket filters and passive oil separation, and ensure routine inspection and maintenance to prevent pollution of the adjacent marine environment.
- Ensuring domestic wastewater and fish rinse water are managed separately.
- Implementing daily cleaning, housekeeping, odor control and pest control.

- Managing fish residues, municipal waste and other operational wastes through covered containers and approved disposal arrangements.
- Preventing discharge of fish residues, oils, litter or contaminated runoff into the marine environment.
- Maintaining seafood hygiene, handwashing facilities, clean fish boxes, chilled storage and safe handling practices.
- Providing PPE and implementing operational OHS procedures, including safe manual handling, cold-room safety, first aid, incident reporting and emergency preparedness.
- Maintaining worker records, Codes of Conduct, worker GRM and SEA/SH prevention measures.
- Maintaining the operational GRM for community complaints, including confidential SEA/SH reporting channels.
- Preparing periodic operational E&S monitoring reports for submission to the Hirshabelle PIU and MFBE/PMU.

7.2 Reporting on ESMP Compliance

MFBE/PMU will prepare periodic monitoring reports, including input from the contractor and PIU, on the status of implementation of this ESMP. The reports will be submitted to the MFBE/PMU for its 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 3: 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 grievances submitted and their response status.	Weekly	Contractor
2	ESMP Monitoring Report WB	Compliance status of overall subproject with ESMP requirements	Quarterly	PMU
3.	Incidents 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 investigation report for severe incidents within 24 hours. Detailed Investigation Report within ten days	PMU (contractor/PIU to PMU)

No.	Title of the Report	Contents of the Report	Frequency of Report Preparation	Report to be prepared by
	Operational ESMP Monitoring Report	Compliance with operational ESMP measures, including rinse-water and drainage management, drainage system performance and maintenance, solids basket filter and passive oil separator maintenance, solid waste, odor control, marine pollution prevention, water use, OHS, seafood hygiene, community health and safety, grievances, incidents and corrective actions.	Quarterly	Facility Operator, submitted to Hirshabelle PIU and MFBE/PMU

7.3 Capacity Building and Training

The implementation of this ESMP and C-ESMP is highly dependent on the existing available 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 trainings 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 other toolbox talks as mentioned above in the ESMP. During the construction phase, refresher trainings will be held. While some training will be provided by the contractor.

Before commissioning, operational staff and facility management shall receive training on the operational ESMP, including rinse-water and drainage management, waste segregation, odor control, seafood hygiene, OHS, cold-room safety, emergency preparedness, incident reporting, GRM, worker GRM, Codes of Conduct and SEA/SH prevention. Refresher training shall be provided periodically during operation and whenever new staff are engaged.

8.0 IMPLEMENTATION BUDGET

The ESMP implementation budget provides an estimate of the costs associated with implementing the environmental and social mitigation, monitoring, training and reporting measures identified in this ESMP. Construction-phase costs shall be incorporated into the Contractor's contract and implemented through the Contractor's ESMP (C-ESMP). Operational environmental and social management measures shall be implemented by the Facility Operator and financed through the facility's Operation and Maintenance (O&M) budget following commissioning.

Table 4: 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
4.	1 Stakeholder Consultation Specialist	PMU staff costs
5.	1 GRM Officer/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
17.	Security	Contractor

9.0 STAKEHOLDER CONSULTATIONS

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 5: Project stakeholders consulted

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

Prior to commencement of operations, the Facility Operator shall undertake community awareness and stakeholder engagement activities to communicate facility operating procedures, environmental and social mitigation measures, grievance redress arrangements, community health and safety measures, hygiene requirements and emergency response procedures.

Details of the project's approach to stakeholder engagement, the methods applied, and the stakeholder engagement activities that have been done and planned to be carried out so far are discussed below in section.

9.1 Stakeholder Engagement Activities

Community consultations were conducted on January 24, 2025, in line with the Stakeholder Engagement Plan (SEP) and World Bank Environmental and Social Standard 10 (ESS10), ensuring an inclusive, participatory, and transparent process. The consultations engaged a broad range of stakeholders, including:

- Officials from the Ministry of Fisheries and Blue Economy
- Local fishing communities and neighboring residents
- Women, youth, and community elders

- Fisherfolk and fishing cooperatives
- Civil society organizations
- Environmental and social specialists
- Project developers and contractors

The consultations provided a platform for stakeholders to discuss the proposed project and its anticipated environmental and social impacts. Key outcomes included:

- Strong community support, with stakeholders welcoming the initiative
- Recognition of the project as the first of its kind in Warsheikh
- Appreciation of the planned investment and its potential to improve the fisheries sector and local livelihoods
- Community expectations regarding project scope, design, and implementation
- Identification of potential environmental risks and proposed mitigation measures
- Anticipated socio-economic benefits, including employment opportunities
- Emphasis on minimizing disruption to fishing activities and the local environment

Following the design review, the project scope was refined and the updated design was subsequently presented and validated by stakeholders and community representatives, with positive feedback reflecting broad acceptance and support. During the validation, stakeholders also emphasized the need to expedite the procurement process and commence project works promptly. This process strengthened transparency, enhanced stakeholder ownership, and contributed to minimizing potential environmental and social risks.

Stakeholder engagement shall continue throughout the operational life of the facility. Feedback received through routine consultations, stakeholder meetings and the Project GRM shall be used to improve environmental and social performance, strengthen community relations and support adaptive management in accordance with the World Bank Environmental and Social Framework (ESF), the Badmaal SEP and applicable national legislation.



Figure 6: Consultations in Warsheikh with Local Government and Communities



Figure 7: Warsheikh fish landing design validation session

10.0 GRIEVANCE REDRESS MECHANISM (GRM)

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is 'to provide project- affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances. This Project GRM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SSFDP provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the SSFDP.

The GM shall remain operational throughout both the construction and operational phases of the Warsheikh fish landing Facility. During operation, complaints related to waste management, drainage, fish rinse-water management, odor, hygiene, occupational health and safety, community health and safety, traffic, access, worker conduct and potential environmental pollution shall be received, recorded, investigated and resolved through the established GRM procedures.

The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

Recording and follow up of grievances (including environmental issues) will be the primary responsibilities of the PMU. The PMU will have personnel assigned for the grievance management process both on site and at Headquarters. PMU Social Specialist will be primarily responsible for grievance management as well as Contractors' social staff. Project PMU 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. 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 8):

- Receive, register and acknowledge complaint for a Grievance
- 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.

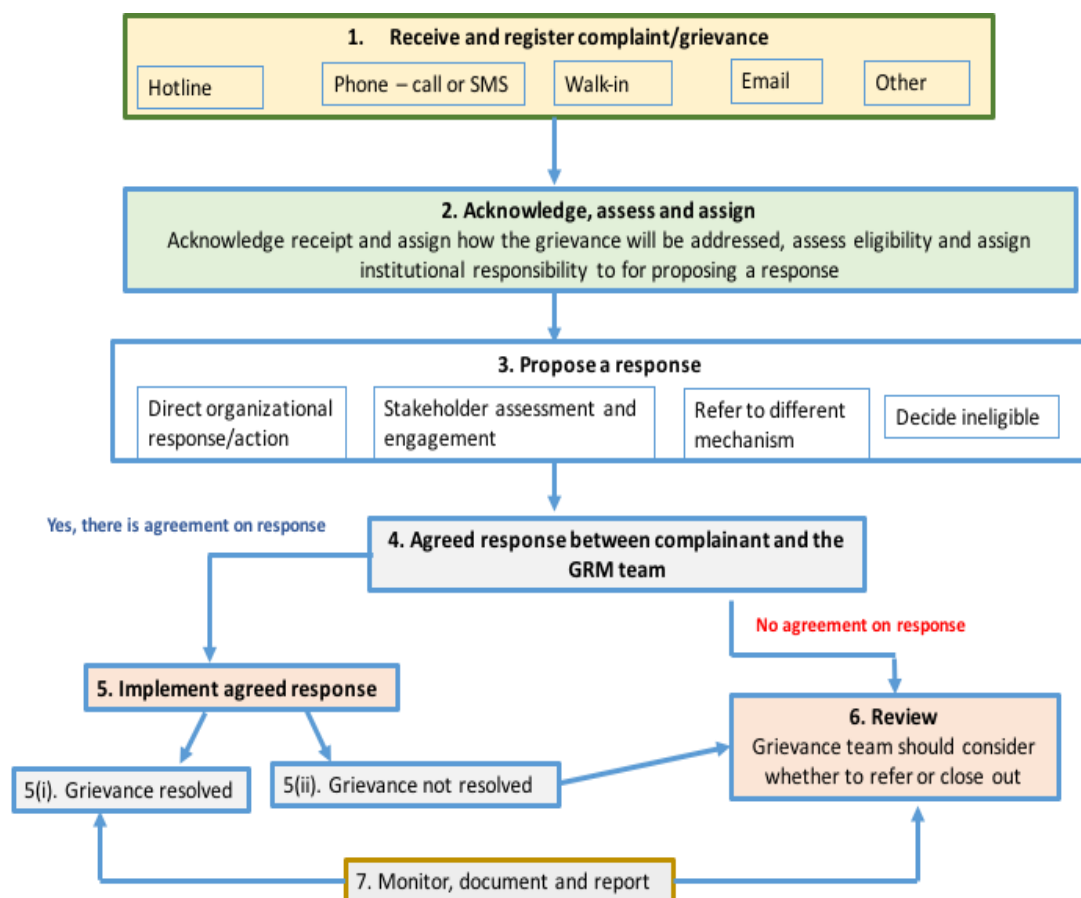


Figure 8: GRM Flowchart

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

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 Warsheikh Fish Landing 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	14 th January 2025
Activity/Sub-project title	Construction of Fish Landing Facility in Warsheikh
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)	Warsheikh
New/Rehabilitation project	Warsheikh is located in the southeastern Middle Shabelle region of Hirshabelle State.
Objective of the screening process	i. To assess the suitability of the proposed site for Construction of Modern Fish Landing Facility at Warsheikh. 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 Facility at Warsheikh.
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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?		✓		World Bank Environment and Social Standards	
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 the activity 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
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 results 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 Moderate Risk/Minor Impact: Some potential negative impacts identified, requiring an Environmental and Social Management Plan (ESMP) Monitoring Recommendations: Suggestions for ongoing monitoring and		Summary of Screening Result Justification The screening process identified some potential negative impacts of moderate risk with minor overall effects, necessitating the development of an Environmental and Social 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

	reporting to ensure effective mitigation during project implementation.	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 behaviour 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 behaviour (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 favours, for instance, making promises or favourable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.

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.

With regard to children under the age of 18:

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

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

JAMHUURIYADA FEDERAALKA SOOMAALIYA

DOWLAD GOBOLEEDKA HIRSHABEELLE

GOLAHA DEEGAANKA DEGMADA WARSHEEKH

XAFISKA DUQA DEGMADA



FEDERAL REPUBLIC OF SOMALIA

HIRSHABELLE STATE

WARSHEIKH DISTRICT Council

OFFICE OF THE MAYOR

جمهورية الصومال الفيدرالية

الدولة هر شيبيلي

مجلس منطقة ورشيك

مكتب العمدة

Ref: GDW/XGD/070/24

Date: 16/07/2024

Ku: Wasaaradda kalluumeysiga iyo kheyraadka Badda- Hirshabelle

OG: Maamulka Gobolka Shabeelaha dhexe

OG: Wasaaradda Howlaha Guud iyo Guryeynta - Hirshabelle

OG: Wasaaradda Arrimaha Gudaha iyo Dowladaha Hoose - Hirshabelle

OG: Mashruuca Badmaal - Wasaaradda Kalluumeysiga DFS

UJEEDDO: CADDAYN BIXIN DHUL DANGUUD

Ka dib Codsiga ka yimid Wasaaradda Kalluumeysiga iyo Kheyraadka Badda Dowlad goboleedka Hirshabelle, Maamulka Degmada Warsheikh wuxuu halkaan ka caddaynayaa in uu bixiyay dhul danguud ah oo cabirkiisu yahay **35*44** oo ku yaala xaafadda Sheikh Cabdi ***** (**45.79587719° 45.79610812°**) ee degmada Warsheikh, Dhulka ayaa waxaa lag dhisi doonaa **Suuq Kalluumeysi (Fish Market) iyo Kayd Qaboojiye (Cold Storage)** iyo Garaash doonyaha lagu sameeyo (**workshop repair**) joo loogu talagalay horumarinta Kalluumeysiga iyo Kalluumeysada dadka deegaanka degmada Warsheikh isla markaana uu taageeraayo **Mashruuca Badmaal – SSFD p178032**

Haddaba, waxaa halkaan ku caddaynayaa in maamulka uu bixiyay dhulkaas danta guud ah maadaama ay jirto baahi weyn oo loo qabay in laga hirgaliyo Suuq Kalluumeysi iyo Kayd Qaboojiye si loo hormariyo Kalluumeysiga degmada iyo shaqo abuurka dhallinyarada iyo dumarka degmada Warsheikh ee Gobolka Shabeelaha Dhexe.

Sidoo kale dhulka waxaa lagu bixiyey si waafaqsan nidaamka iyo xeerarka u yaala Dowlad Goboleedka Hirshabelle gaar ahaan Gobolka Shabeellada Dhexe – Degmada Warsheikh.

Md: Maxamed Xasan Mataan

Guddoomiyaha Golaha Deegaanka ahna Duqa Degmada Warsheikh



WARSHEIKH DISTRICT COUNCIL

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