

REPUBLIC OF SOMALILAND



Ministry of Agriculture Development

Somaliland-Food Systems Resilience Project (SL-FSRP)

ESMP for the Rehabilitation of Borame Cereals Market for the Ministry of Agricultural Development (MoAD)

Project ID: P177816

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Acronyms

ESMP	Environmental and Social Management Plan
EHSGs	Environment, Health and Safety Guidelines
ESF	Environmental and Social Framework of the WB
ESMF	Environmental and Social Management Framework
ESSs	Environmental and Social Standards
GRM	Grievance Redress Mechanism
SL-FSRP	Somaliland Food Systems Resilience Project
MoAD	Ministry of Agriculture Development
GBV	Gender-based Violence
PIM	Project Implementation Manual
LMP	Labor Management Procedures
SEP	Stakeholders Engagement Plan
WB	The World Bank
SL-FSRP	Somaliland Food Systems Resilience Project
PDO	Project Development Objective
CERC	Contingency Emergency Response Component
OHS	Occupational Health and Safety
PCU	Project Coordination Unit
VDC	Village Development Committee
ESIA	Environmental and Social Impact Assessment
SOP	Standard Operating Procedures
SEAH	Sexual Exploitation, Abuse and Harassment
PPE	Personal Protective Equipment
EHS	Environmental Health and Safety
CoC	Code of Conduct

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Executive Summary

The Somaliland Food Systems Resilience Project (SL-FSRP), financed by the World Bank, aims to strengthen the resilience of food systems and enhance Somaliland's preparedness for food insecurity. The project seeks to improve agricultural and livestock productivity, promote sustainable management of natural resources, and build institutional and community capacity to respond to climate and environmental challenges. Through its six components, the SL-FSRP supports resilient agricultural production, improved natural resource management, stronger market access, and enhanced institutional infrastructure to deliver effective and sustainable services.

The Government of Somaliland (GoSL), through the Ministry of Agriculture Development (MoAD), has opted to invest in the rehabilitation of the Borame Cereal Market in Awdal Region, under the Somaliland Food Systems Resilience Project (SL-FSRP). The Borame Cereal Market is a public mini-market that was opened in 1994 by Borame Local Municipality. This market focuses mainly on the sale of cereals including sorghum, maize, cowpea and other grains and it's the end market of produce from Borame and its neighboring villages and widely from Awdal region and even cereals brought from the neighboring country, Ethiopia.

The rehabilitation aims to improve the existing cereal market infrastructure and create a safer, more functional, hygienic, and accessible environment for cereal traders, farmers, consumers, and other market users. The investment is expected to strengthen the marketing and distribution of locally produced cereals, improve market access for farmers and traders, reduce post-harvest and market-related losses, and contribute to improved agricultural value chains and food security.

This ESMP was prepared in line with Somaliland's environmental regulations and the World Bank's Environmental and Social Standards (ESS), particularly ESS1, which emphasizes the identification and management of environmental and social risks. The preparation process involved environmental and social screening of the proposed rehabilitation of the Borame Cereal Market, conducted by the SL-FSRP Environmental and Social Safeguards Team, followed by stakeholder consultations undertaken between 24th to 26th July 2026 in Borame. The consultations involved relevant stakeholders, including representatives of the Ministry of Agriculture Development (MoAD), Ministry of Environment and Climate Change (MoECC), Borame local municipality, cereal traders and vendors, market users, and other relevant neighboring communities. The consultation aimed to identify potential risks, discuss mitigation measures, and raise awareness on the project's grievance redress mechanism (GRM) and gender-based violence (GBV) prevention procedures. The consultation process also provided an opportunity to discuss the proposed rehabilitation activities and ensure that stakeholders' concerns and recommendations are considered in the design and implementation of the market rehabilitation works.

The Borame Cereal Market is an existing market facility located within the urban area of Borame City. The proposed site for rehabilitation of the market is situated within an urban area that is relatively densely built-up part of the city characterized by commercial activities, shops, roads and other urban facilities. The market is easily accessible through the existing road network that crosses the city, which allows traders, farmers, customers, and vehicles carrying agricultural products to reach the market.

The overall area of the market to be rehabilitated is approximately **378m² (21m x18m)**. The internal layout has been designed to provide designated trading spaces, storage facilities, small passages, and sanitation facilities. The rehabilitation will improve the organization and functionality of the market while facilitating safe movement of traders, customers, and goods within the facility.

The proposed rehabilitation includes the following main components and supporting structures:

- Improvement and rehabilitation of the existing roof,
- Improvement and partitions for individual selling areas (each trader will be allocated 2.5m x 1.5m trading space). Around 40 partitioned trading spaces will be established
- Building of three toilets
- Building of three storage rooms (warehouses) for storage of cereals; and the general re-organization of the market layout to improve market functioning.

The rehabilitation of the Borame Cereal Market is expected to generate significant positive impacts by improving the existing market infrastructure and providing more organized environment for cereal traders, farmers, customers, and other market users. On the other hand, there are adverse risks and impacts associated with the rehabilitation work. These risks include construction waste generation, dust, noise and vibration, occupational health and safety risks to workers, community health and safety risks, temporary disruption of market activities and access, and risks associated with the handling and disposal of construction materials and waste. Other potential risks include those associated with labor rights and management, e.g. child labor and/or forced labor and sexual exploitation and abuse/sexual harassment due to increase in labor in the project site. Since the rehabilitation will take place within an existing and active market, particular attention will be required to ensure the safety of traders, customers, nearby businesses, pedestrians, and other market users during the rehabilitation works.

To ensure the above E&S and GBV-related impacts are properly mitigated and managed, the necessary measures will be put in place. For instance, the dust generated during rehabilitation will be managed by employing dust suppression techniques such as regular water spraying over debris and work areas, which helps reduce dust dispersion while all workers will be provided with appropriate PPE, including masks, to protect them from inhaling harmful particulates. Noise and excessive vibrations from construction activities present another risk to nearby local businesses and pedestrians. This will be mitigated by using well-maintained equipment with low noise emissions. Other Occupational Health and Safety (OHS) issues will be managed by ensuring all workers undergo safety training covering best practices and emergency response procedures.

Waste management during rehabilitation is another major consideration, as the process generates a substantial amount of solid waste and will involve demolition of some structures. This will be managed through establishing waste collection and management procedures and tools needed to prevent pollution and environmental contamination. Where feasible, materials such as bricks and metals will be sorted for reuse or recycling, minimizing the overall waste footprint of the project. Other impacts related to child labor, and Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH) will be mitigated by raising awareness and establishing necessary GRM system for workers, nearby residents and users of the facility.

Since the works will take place within an existing and active market in a built-up urban area, the rehabilitation area will be properly fenced and secured during the construction period to prevent unauthorized access and protect people, pedestrians, children, and other members of the public from construction-related hazards. Appropriate warning signs will be installed around the work area, and safe access routes will be maintained for market users and neighboring businesses.

Following the detailed E&S screening of the proposed sub-project, as per process described in the project's approved ESMF, the sub-project fits into a 'Moderate Risk' category, as per the levels defined in the ESMF. The project team believes that an Environmental and Social Management Plan (ESMP) would best guide risk management for the sub-project.

Based on the nature, scale and location of the rehabilitation works, the following World Bank Environmental and Social Standards (ESS) are applicable to this project:

- ESS1 – Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 – Labor and Working Conditions
- ESS3 – Resource Efficiency and Pollution Prevention and Management
- ESS4 – Community Health and Safety
- ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS8: Cultural Heritage (Chance finds during excavation/demolition)
- ESS10: Stakeholder Engagement and Information Disclosure

This ESMP lists the project-specific risks/impacts and mitigation measures, lays out institutional arrangements for implementing and monitoring the mitigation measures and proposes monitoring indicators for measurement of E&S performance. It shows what must be done, by whom, when, and to what standard; and shows who will monitor its implementation and when and what the budget implications for mitigation measures and monitoring activities are.

Finally, the successful contractor will be required to prepare a site-specific C-ESMP and other necessary sub-plans based on this ESMP. The C-ESMP will be reviewed and cleared up by the SL-FSRP PCU Environmental and Social Specialists, in coordination with the MoAD Project Engineer/focal person, before mobilization and commencement of physical works. No civil work will start until the C-ESMP is approved and required site controls are in place.

Section 1: Introduction

1.1. Project Background

The Food Systems Resilience Program (FSRP) is part of an initiative by the World Bank to provide a comprehensive framework to intervene at both the national and regional levels. This Multi-phase Programmatic Approach (MPA) aims to tackle the underlying structural challenges of food insecurity and reduce beneficiaries' vulnerability to unpredictable climate, crisis, and conflict events.

The World Bank is supporting the Government of Somaliland with the Food Systems Resilience Project to increase the resilience of food systems and improve Somaliland's preparedness for food insecurity in the project's target areas. The project will directly benefit an estimated 65,000 small farmers, agro-pastoralists, and nomadic pastoralists, at least 30 percent of whom will be women in eight districts.

The Project Development Objective (PDO) for FSRP will be **'to increase the resilience of food systems and Somaliland's preparedness for food insecurity in project target areas'**. Progress toward the PDO will be measured using five PDO indicators and intermediate indicators. All relevant indicators will be disaggregated by gender (men and women) and age (youth and adult).

The project has six components as follows:

Component 1: (Re-) Building Resilient Agricultural Production Capacity: Strengthening the foundations of resilient agricultural production by building the capacity of Somaliland's crop and livestock research institutions, its seed and breeding systems, and its extension and advisory services to better cater to small farmers on a large scale. It has the following sub-components:

- 1.1 Crop and Livestock Research, Extension, and Seed Systems*
- 1.2 Community Engagement and Technology Transfer*
- 1.3 Digital Agriculture and Rangeland Solutions and Data Systems*

Component 2. Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes: This component aims to enhance water availability for crop and livestock value chains and support rangeland rejuvenation and management by restoring degraded rangelands. It has the following sub-components:

- 2.1 Water Availability for Crops and Livestock*
- 2.2 Rangeland Management*

Component 3. Getting to Market: Strengthen the agriculture and livestock sector's market orientation, helping it cater to both domestic and regional markets. It will do this by supporting existing and new farmer producer organizations (FPOs) and agrifood enterprises, the development and upgrading of market infrastructure and export-oriented testing and certification capacity, and rural producers' access to savings and credit services. It has the following sub-components:

- 3.1 Farmer Producer Organizations and Agrifood Enterprises*

3.2 Market Infrastructure and Enterprise Development

3.3 Access to Finance

Component 4. Promoting a Greater Focus on Food Systems Resilience in Policymaking: This component will build food systems resilience at the national and regional levels by focusing on building the capacity of public institutions and identifying relevant policy reform opportunities within the implementing three ministries. In the crops, livestock and environment sectors it will: (a) build the capacity of government institutions; and (b) carry out comprehensive assessments of agrifood policies. It has the following sub-components:

- 4.1 Institutional Infrastructure and Capacity Development for the Crops Sector*
- 4.2 Institutional Infrastructure and Capacity Development for the Livestock Sector*
- 4.3 Institutional Infrastructure and Capacity Development for Rangelands Management*

Component 5. Contingent Emergency Response: This component will finance eligible expenditures in the event of an emergency precipitated by a disaster. The activation of CERC, at the request of the government, will allow funds to be disbursed rapidly to reduce damage to productive infrastructure, ensure business continuity, and speed up recovery.

Component 6. Project Management: This subcomponent will help establishing and strengthening project coordination and management structures within in line with the agreed upon project implementation arrangements. It has the following sub-components:

- 6.1 Project Coordination and Management*
- 6.2 Monitoring and Evaluation*

1.2. Rationale of the Planned Sub-project

The Ministry of Agriculture Development (MoAD) is one of the key implementing ministries of the Somaliland Food Systems Resilience Project (SL-FSRP), particularly in implementing activities aimed at improving agricultural production, market access, food security, and the resilience of farming communities. As part of these efforts, the rehabilitation of the existing Borame Cereal Market is an important investment intended to improve cereal marketing infrastructure and provide functioning trading environment for farmers, cereal traders, vendors, customers, and other market users.

The Borame Cereal Market is a public market established by the Borame Local Municipality in 1994. The market primarily serves as a trading center for cereals and grains, including sorghum, maize, cowpea, and other locally traded crops. It provides an important market outlet for agricultural produce from Borame and surrounding villages, as well as other parts of the Awdal Region. The market also receives cereals supplied from neighboring Ethiopia, making it an important center for the collection, sale, and distribution of cereals in the area.

The Borame Cereal Market plays an important role in marketing, and trading cereals and other agricultural products in Borame and surrounding areas. The rehabilitation of the market is expected to support better market access for farmers and traders, reduce losses and damage to agricultural products, improve working conditions for traders, and strengthen local agricultural trade and livelihoods in Borame and the wider Awdal Region.

Accordingly, from 24th to 26th July, a field assessment was carried out at Borame cereal market. The purpose of the visit was to conduct an E&S screening of the proposed rehabilitation work of the market, identify all potential environmental and social risks, and obtain stakeholder agreement on the rehabilitation of the market. The team then gathered the necessary information to develop an appropriate plan to manage and reduce any negative impacts from the rehabilitation work. The data was collected through observation and consultations with the local stakeholders held from 24th-26th July. The minutes of that meeting including summary of their feedback are attached as **annex 2**

1.3. Objective and Scope of the ESMP

This ESMP has been developed to identify, characterize and manage potential environmental and social risks and impacts that can arise during the rehabilitation of the Borame Cereal Market. The objective of this ESMP is to provide management strategies and actions to mitigate adverse risks and impacts in consistence with national legal and policy frameworks, relevant WB Environmental and Social Standards (ESSs) and the Environmental, Health and Safety Guidelines (EHSGs).

The ESMP also shows how Somaliland will mobilize organizational capacity and resources to implement these measures. The ESMP will also guide the contractor and the site supervisor on managing adverse environmental and social impacts and monitor implementation of mitigation measures during construction phase through formulation of C-ESMP from the main ESMP, in accordance with ESS1 and project ESMF.

The scope of this ESMP is to identify proportionate impacts/risks and outline specific mitigation, monitoring, and institutional measures to manage environmental and social risks associated with the rehabilitation of the market.

1.4 ESMP Approach and Methodology

This Environmental and Social Management Plan (ESMP) was prepared based on World Bank Environmental and Social Standards (ESS) and the project Environmental and Social Commitment Plan (ESCP). The approach involved identifying the scope of work (rehabilitation of market) which clearly stipulates the nature and magnitude of anticipated environmental and social risk and impacts. The risks were determined during environmental and social screening process.

All the adverse negative risks and impacts anticipated during sub-project components, and rehabilitation were clearly and adequately mapped out without forgetting the anticipated positive impacts associated with sub project. Risk mitigation hierarchy was adopted as a standard operating procedure in managing the risks and impacts anticipated.

The approach involved stakeholders' consultation meeting participated by representatives of the Ministry of Agriculture Development (MoAD), Ministry of Environment and Climate Change (MoECC), Borame local municipality, market traders and vendors, market users, and other relevant neighboring communities per the stakeholder engagement process described in the project's approved Stakeholder Engagement Plan (SEP), and best international practice of increasing project acceptability, project transparency and project ownership.

This ESMP attempts to cover typical core mitigation approaches to civil works with small and localized impacts. It is accepted that this format provides the key elements of an Environmental and Social Management Plan (ESMP) to meet World Bank ESS1. The intention of this ESMP is that it would be applicable as guidelines for the contractors and constitute an integral part of bidding documents for contractors carrying out civil works under Bank-financed projects: This ESMP has the following sections:

This ESMP includes a descriptive section that characterizes the project, provides E&S baseline, specifies institutional and regulatory aspects, describes technical project content, outlines any urgent need for capacity building and briefly characterizes the public consultation process.

There are sections that represents the actual environmental and social management plan to implement the measures and actions that follow from activities and typologies triggered under previous sections. For each triggered activity or typology, it contains a list of concrete, practical, actionable measures that the contractor needs to implement/consider during the works implementation. These measures can be easily checked, verified, and reported by e.g., the supervising Engineer. It also included a simple monitoring plan to enable the Contractor, the Ministry of Agriculture Development (MoAD) and the World Bank specialists to monitor implementation of environmental management and protection measures and detect deviations and shortcomings in a timely manner.

1.4 Expected Outcome of the ESMP Implementation

The successful implementation of this Environmental and Social Management Plan (ESMP) is expected to ensure that potential environmental and social risks and impacts are effectively identified, managed, monitored, and mitigated. The expected outcomes include:

- a) Improved environmental and social performance and compliance with applicable requirements and standards.
- b) Minimized occupational and community health and safety risks through appropriate preventive and mitigation measures.
- c) Improved waste management, sanitation, pollution prevention, and efficient use of resources.

- d) Reduced adverse impacts on communities, livelihoods, and vulnerable groups, while promoting inclusion and accessibility.
- e) Enhanced stakeholder engagement, information disclosure, and participation throughout project implementation.
- f) Effective management of grievances through accessible and functional grievance redress mechanisms.
- g) Improved protection of biodiversity, natural resources, and cultural heritage, where applicable.
- h) Effective prevention and management of GBV/SEA/SH risks and promotion of safe and respectful environments.
- i) Continuous monitoring, reporting, and improvement of environmental and social performance, including timely implementation of corrective actions where required.

Section 2. General Description of the Sub-Project

2.1. Introduction

The Borame Cereal Market is an existing market within the urban area of Borame and serves as an important trading place for cereals and other agricultural commodities. Its location within Borame makes it an important facility for supporting the marketing and distribution of agricultural products, improving farmers' access to markets, and contributing to local livelihoods and economic activities in Borame and the wider Awdal Region.

2.2 Description of the Sub-project

The rehabilitation of the Borame Cereal market is intended to improve the condition and functionality of the existing market and create a safer, cleaner, and better-organized trading environment for cereal traders, customers, and other market users. The overall area of the market to be rehabilitated is approximately **378m² (21m x18m)**. Based on the proposed design, market rehabilitation will include the following main components:

- **Improvement and rehabilitation of the roof:** The existing market roof is old and in poor condition and doesn't provide adequate protection to traders and cereals from rain, direct sunlight, and other weather conditions.
- **Improvement and partitioning of individual selling areas:** Under the rehabilitation, the trading area will be reorganized and divided into approximately 40 partitioned trading spaces, with each trader allocating an area of approximately **2.5 m × 1.5 m**. This will provide traders with clearly defined selling spaces and improve the overall organization of the market.
- **Construction of three storage rooms (warehouses):** The rehabilitation will therefore include the construction of three storage rooms to provide safer and more organized storage of cereals and other agricultural products.
- **Construction of sanitation facilities (toilets):** A total of six separate toilet facilities will be constructed to improve sanitation and hygiene conditions within the market. Three toilets will be designated for women and three for men, providing gender-separated sanitation facilities for traders, customers, and other market users.
- **Reorganization of the market layout:** The existing internal market layout is not well organized. The rehabilitation will reorganize the market layout to provide clearly defined trading spaces, warehouses, sanitation facilities, and internal passages.

In addition, rehabilitation design and construction will ensure that it will be climate-resilient, and roofing and fixings are suitable for local rainfall and wind conditions, and that roof drainage and site drainage do not create ponding, flooding, erosion or unsafe discharge around trading and storage areas. Drainage outlets should be kept clear and safely connected to the existing drainage arrangements, where available.

In line with the World Bank and Somaliland's National Environmental Regulations, an Environmental and Social (E&S) screening is required prior to the commencement of civil works to identify, mitigate, and manage any potential environmental and social risks and impacts associated with the rehabilitation activities.

In summary, the works are expected to involve removal of damaged parts of the market, small-scale roof repair/replacement, masonry/partition works, toilet and storage-room construction, finishing, installation and waste removal using normal light construction tools and equipment.

2.3 Location of the Sub-project

The sub-project (cereal market) is located in Borame city, which is the capital of Awdal region, in the western part of Somaliland. It is an existing public market located and is owned and managed by Borame Local Municipality. The market was established in 1994 and primarily serves as a trading centre for cereals and other agricultural produce, including sorghum, maize, cowpea, and other grains. It serves traders, producers, and consumers from Borame and surrounding villages in the Awdal Region, as well as handling agricultural produce originating from other areas, including neighbouring Ethiopia.

The market is located within an existing built-up commercial area of Borame City, with surrounding roads and other public and commercial facilities. All proposed activities will be undertaken within the existing market site and its premises. As the facility and the land are owned by the government under the Borame local municipality, thus there is no land acquisition anticipated.

The market is located at the following GPS:

Latitude: 9.93700295° N

Longitude: 43.18268496° E

2.4 Sub-Project Activities

The proposed sub-project will involve a series of activities covering the design, construction phases and operation phase. These activities include technical and environmental and social assessments, stakeholder engagement, preparation of detailed designs, site preparation, construction and rehabilitation works, installation of utilities and equipment, and associated external works. The key activities anticipated under each phase are summarized below.

Design Phase: The design phase included the following activities:

- Technical engineering assessments, i.e. the site assessments, structural integrity assessments, geotechnical studies, and surveying
- Environmental and social screening and impact assessments.
- Preparation of technical assessment reports to inform the design review process and tender documents.

- Stakeholder mapping and Engagement
- Design of a layout plan preparation
- Detailed Design (architectural, civil, structural, mechanical & electrical) of rehabilitation Works.

Construction Phase: this phase will mainly include the following activities:

Preliminary Work:

- Preparation and implementation of C-ESMP
- Preparation and implementation of E&S Specific sub-plans i.e. Waste management plan, Stakeholders engagement plan, incident management plan, emergency response and awareness plan, local labor management plan etc
- Preparation of temporary trading space for market traders and users
- Approval of method statement of the works.
- Clearing up of the site.
- Establishing controlled work areas - this includes erecting barriers or enclosures around the work area to prevent unauthorized access
- Removal of damaged structures with low structural integrity
- Disposal of the material from the clearance to the disposal site.
- Levelling the ground in preparation for the new construction.
- Equipment and furniture procurement

Construction Work:

- Excavation works for a new foundation.
- Backfilling.
- Foundation works for the construction/rehabilitation
- Structural works (construction of storage room and toilets, reinforced concrete foundations; ground beams and slab on grade; reinforced concrete columns and walls for storage rooms and toilets; steel roof reinforced by steel columns etc.)
- Entrance doors and windows; complete with all accessories
- Installation of two steel elevated tanks for water storage
- Electrical and low current system
- Equipment and furniture Installation
- Site structural components related to the external works, including water tanks and septic tanks, generator block, maintenance block, waste disposal block, guards room block, internal roads and paving and storm water drainage channels.
- Renovation to replace the roof for the market.
- Ventilation and usage of suitable doors and windows

During the construction phase, the work will begin with the removal of the damaged existing structures. Dump trucks will haul unwanted debris to a designated disposal site outside the city. Materials that are still in good condition will be sorted and reused where possible. Before the work starts, the contractor will install a temporary perimeter fence to improve site safety, limit disruption to the surrounding area, and protect nearby residents, traders, and passers-by from construction hazards.

The rehabilitation work does not require heavy machinery. It will use standard equipment such as concrete mixers and welding machines, along with hand tools for masonry, carpentry, and finishing work. Since Borama's climate is moderate compared with coastal areas, no special heat-related adjustments to working hours are needed, and the contractor will follow standard eight working hours per day starting from 7:00 AM to 4:00 PM. The total period for the rehabilitation and construction is expected to be 4 months.

Outdated structures with structural integrity issues will be removed to pave way for renovation and space for set-up on state-of-the-art market facility. The materials for renovation and construction will be provided by the contractor. These materials shall preferably be procured locally unless this proves a challenge; the material can be sourced from other towns. Procuring local materials is although highly recommended as it will spur the economic growth of the project area while also reducing the carbon footprint related to the project implementation.

Furthermore, the sub-project will engage local personnel for rehabilitation work of the market facility. These local laborers will be coming from within the local community and therefore there will be no need for the establishment of a workers' campsite. The engineers and supervisors will likely be from the city and will not require accommodation.

Operation Phase: The operational phase activities will include:

- Management of the market, including allocation and use of designated trading and storage spaces.
- Handling, storage and trading of cereals and other agricultural produce within the designated market areas.
- Regular cleaning and maintenance of trading spaces, warehouses, toilets, handwashing facilities, drainage systems and other market infrastructure.
- Operation of the market in compliance with the best environmental and social practices, including requirements for waste management, sanitation, grain-dust control and community health and safety.
- Establishment of Standard Operating Procedures (SOPs) for the market, including fire safety and emergency response procedures.
- Routine monitoring and maintenance of environmental and social measures to ensure the market remains safe, clean, accessible and environmentally sound throughout its operation.

The drawings below depict the proposed Borame market to be rehabilitated:

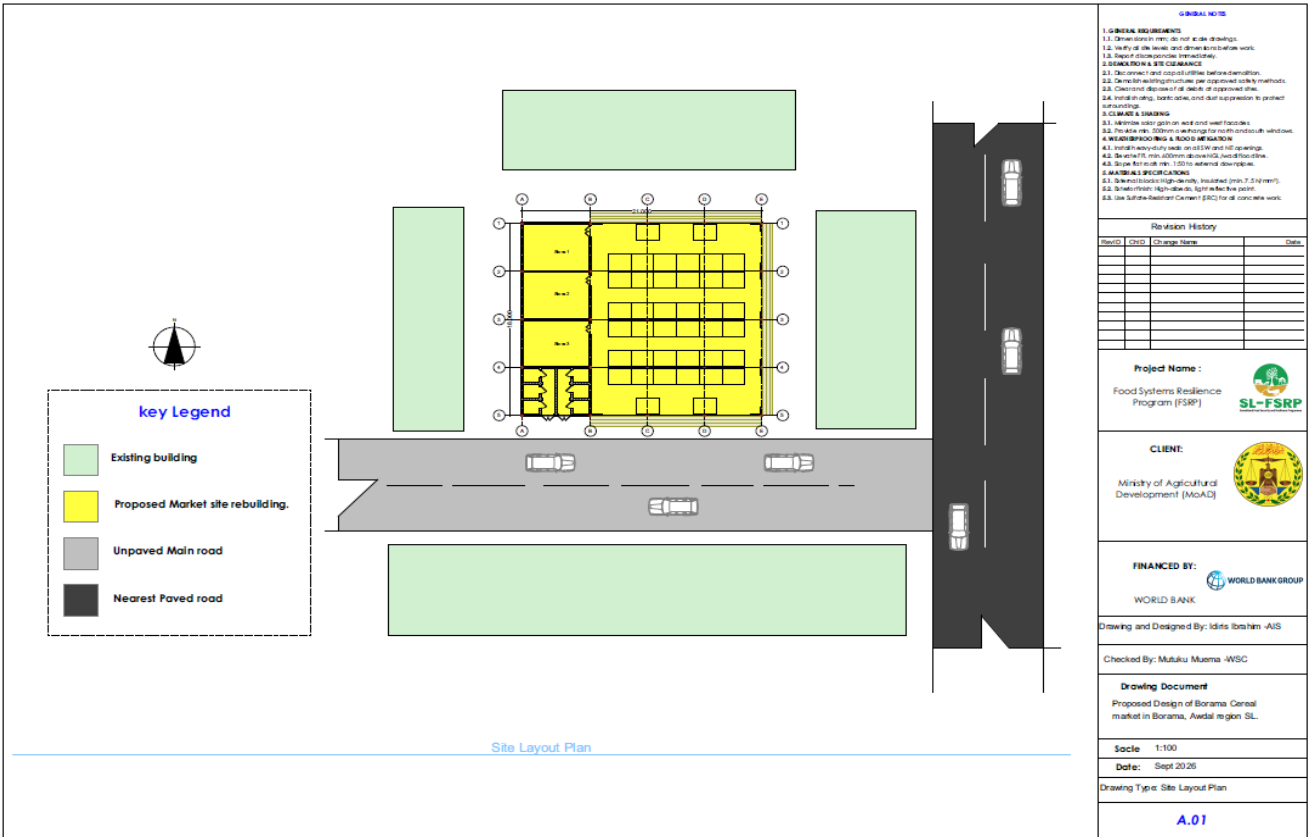


Figure 1: Site Layout of the Market

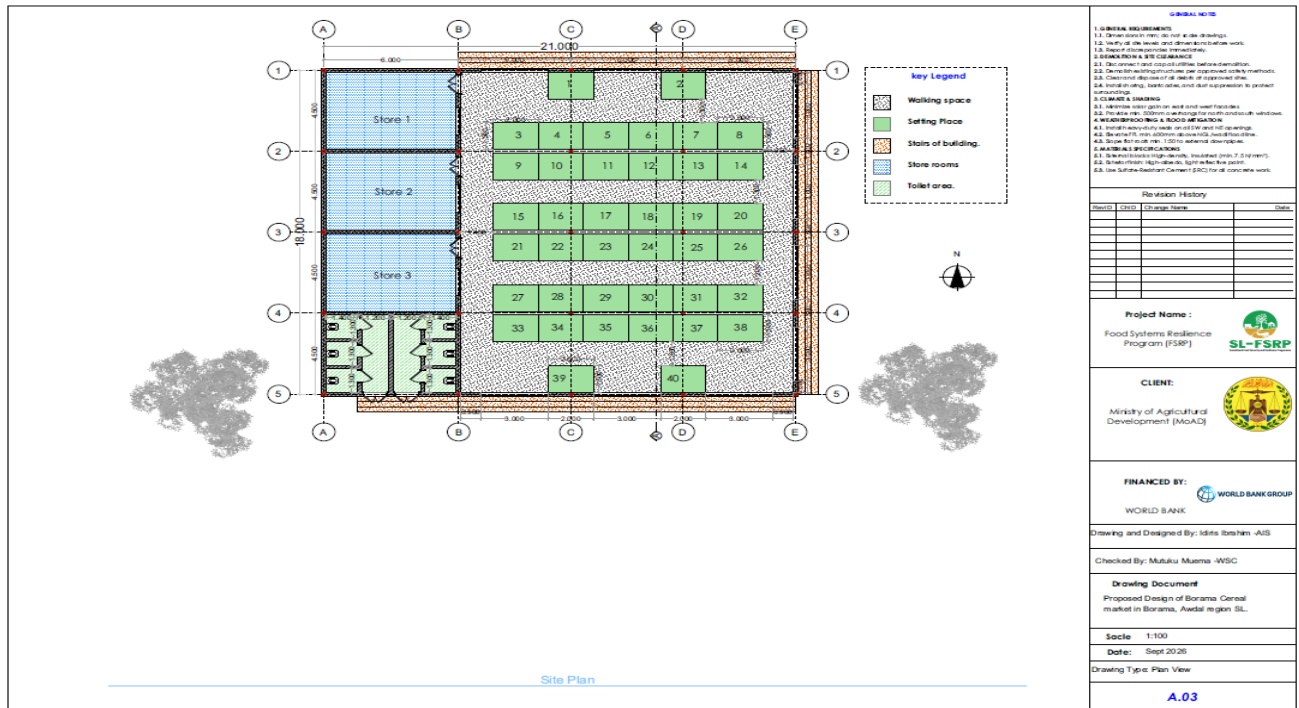


Figure 2: Plan Layout of the Market

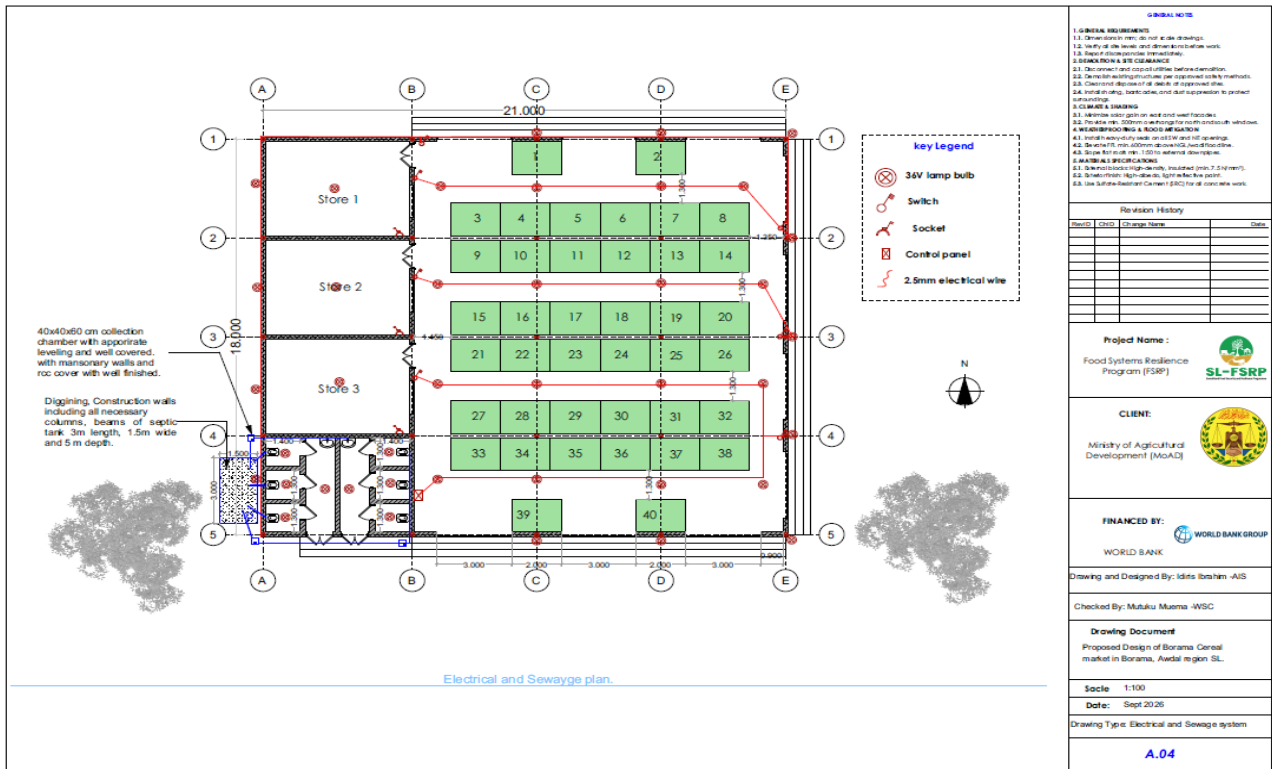


Figure 3: Electrical and Sewage System Plan

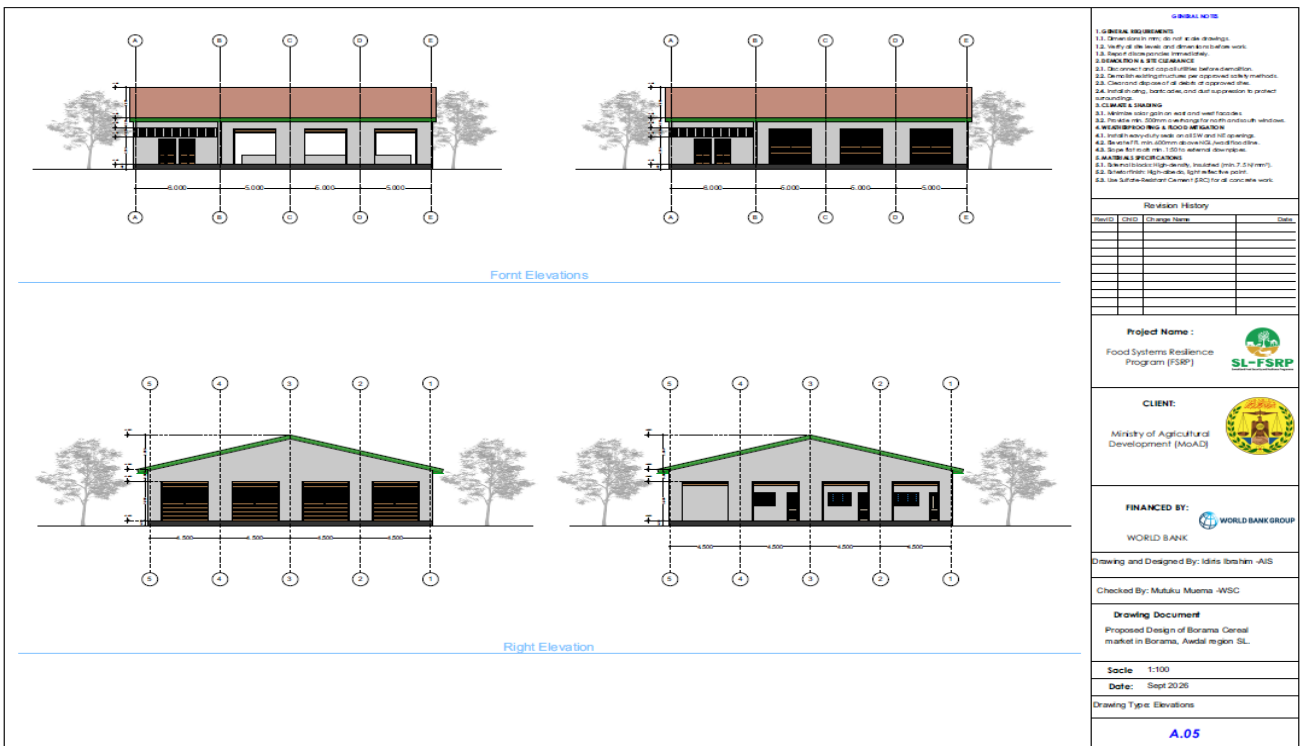


Figure 4: Elevations Plan

2.5 Applicable Design Features and Standards

The rehabilitation and reconstruction of the Borama Cereal Market have been designed to respond to local climate conditions, including heavy rainfall, intense thermal exposure, and flood risk. The roof structure sheds rain quickly and provide shade during hot periods, while gutters collect rainwater and direct it to storage for harvesting, creating a reusable water source and preventing uncontrolled runoff from eroding or damaging the ground surface around the building.

The building relies on natural ventilation rather than mechanical cooling: door openings totaling approximately 90 m² and a clear height of 3.6 m from floor to roof allow continuous cross-ventilation, with warm air rising and escaping at the upper level, so no mechanical cooling system is needed, which lowers electricity consumption and operating costs during the daytime. By combining rainwater harvesting, passive cooling, and flood-resilient design, the market provides a durable, low-energy, climate-adapted facility that protects stored cereals and supports traders and the local community.

The design adopted the following codes, standards and guides:

- Draft Somaliland Building Control Regulations (2022) – Ministry of Public Works, Land and Housing
- British Standards (BS) for Construction Materials and Workmanship
- Eurocode – EN 1990: Basis of Structural Design
- Eurocode 1 – EN 1991: Actions on Structures - Part 1-1: General Actions – Densities, Self-weight and Imposed Loads for Buildings.
- Eurocode 2 – EN 1992: Design of Concrete Structures - Part 1-1: General rules, and rules for buildings
- Eurocode 3 – EN 1993: Design of Steel Structures - Part 1-1: General Rules and Rules for Buildings.
- Eurocode 6 – EN 1996: Design of Masonry Structures - Part 2: Design Considerations, Selection of Materials and Execution of Masonry.
- Eurocode 7 – EN 1997: Geotechnical Design - Part 2: Ground Investigation and Testing.

Section 3: Environmental and Social Baseline Description

3.1 Introduction

This section describes the overall baseline condition of the area around the market, in regard to the biological and physical environment, as well as the socio-economic and cultural background of the sub-project area. The target location is the Borame Cereal Market and its periphery and overall area of Borame city. The environment is largely an urban environment with an already build up area with surrounding commercial and public facilities.

3.2 Geographic Area of the Site

The Cereal Market is an existing market located within the built-up urban area of Borame City. The market is situated in an accessible area connected to the existing urban road network, which provides access for cereal traders, farmers, customers, vehicles, and other market users. Unlike a new development site, the proposed rehabilitation will take place entirely within the existing market premises, which have been used for cereal trading for many years.

The market is surrounded by an established urban environment, with existing commercial buildings, shops, private properties, access roads, and other public and private facilities in the surrounding area. The neighboring areas are actively used by businesses. On the North side, the market is bordered by a road that branches from the main road. The market's location within the city makes it easily accessible to farmers and traders bringing cereals and other agricultural products from Borame and surrounding areas.

Some of the receptors likely to be affected by the proposed project include Harawo Mosque, a primary school, and a police station. However, these receptors are not located immediately adjacent to the market. Harawo Mosque is separated from the market by the main road and intervening buildings, while the primary school and police station are separated from the market by the road behind the market and an open space. Despite this separation, these receptors may still experience temporary construction-related impacts.

Regarding the traffic, roads around the market are regularly used by traders, customers, pedestrians, public transport, and vehicles transporting cereals and other goods. Traffic and pedestrian movement can be relatively high, particularly during busy periods of the day, which may increase the risk of traffic congestion, vehicle–pedestrian interaction, and accidents during the rehabilitation works.

Before the commencement of the work, the contractor in collaboration with the MoAD/PCU Engineer, and Borame Local Municipality will consider nearby sensitive receptors and pedestrian/vehicle routes and reflect them in the C-ESMP traffic and access arrangements. Safe pedestrian access, barriers, warning signs and delivery scheduling shall be maintained throughout the works.

For clarity, the following picture is the map of the market location. The area to be rehabilitated is the part highlighted with the red color:



Figure 5: Location of the Borame Cereal Market

3.3 Biophysical Environment

a) Topography

Borame City is located in the Awdal Region of western Somaliland at approximately **9°56' N and 43°11' E**. The city occupies an elevated inland setting surrounded by hills and forms part of the upper Dur-Dur watershed. Borame's elevation and topographic setting give it comparatively mild climatic conditions relative to many lower-lying parts of Somaliland. Recent hydrogeological research places the city at approximately 1,450m above sea level, while earlier Somaliland groundwater documentation gives a range of approximately 1,350–1,400 m above sea level.

The wider landscape of the Borame city is characterized by hills, valleys, drainage channels (locally referred to as *togga*) and gently undulating uplands. The Dur-Dur watershed study identifies Borame as part of the upper catchment, where elevations are substantially higher than the coastal and downstream portions of the watershed.



Figure 6: General topographic setting of Borame City

The site of the Borame Cereal Market itself is relatively flat and already developed, despite the hilly character of the wider city. The market is situated in a built-up urban area surrounded by roads, buildings and commercial activities. Consequently, major alteration of natural landforms is not anticipated. Nevertheless, the combination of surrounding elevated terrain, seasonal intense rainfall and urban surfaces makes appropriate stormwater drainage important for the market.

b) Geology and Soil

The geology of Borame and its surroundings is relatively complex. Available hydrogeological investigations identify three major geological units: Precambrian crystalline basement rocks, remnants of karstified Jurassic limestone, and Quaternary/alluvial deposits, particularly along valleys and major *togga*.

The basement surrounding Borame includes metamorphic rocks such as *hornblende-biotite gneiss*, *hornblende schist* and *hornblende mica-schist*, with quartz and feldspar occurring within the gneiss. Jurassic formations occurring in the wider Borame area include sandstone/conglomeratic units and limestone. Quaternary alluvial deposits occur particularly along the Dhamuuq and Amoud drainage systems and on gentler terrain.

Table 1: Geological Characterization of Borame

Geological unit	General characteristics in the Borame area
Precambrian Basement Complex	Metamorphic and crystalline rocks, including gneiss and schist; locally highly fractured
Jurassic formations	Sandstone, conglomeratic rocks and limestone, including locally karstified limestone
Quaternary deposits	Unconsolidated/alluvial materials associated particularly with valleys, <i>toggas</i> and gentler terrain
Alluvial soils/sediments	Mixtures of sand, gravel, silt and clay deposited by seasonal drainage and erosion processes

Source: FAO-SWALIM/Groundwater Survey (K) Ltd., *Dur-Dur Watershed study*

At the wider watershed level, erosion is an important environmental process. Water, wind and gravity contribute to soil erosion, while vegetation loss and land-use pressures can accelerate erosion and runoff.

For the Cereal Market, however, the immediate site is already developed and therefore the natural soil profile has been substantially modified by previous construction and urban activity. Site-specific foundation design should consequently rely on the project's geotechnical investigation rather than regional soil descriptions alone.

c) Climatic Conditions

Borame has a semi-arid climate, moderated by its relatively high elevation. Recent climate datasets classify Borame as BSh (hot semi-arid/steppe climate) under the Köppen-Geiger classification. The city experiences marked seasonal variation in rainfall, while temperatures remain relatively moderate compared with Somaliland's lowland and coastal areas.

Rainfall is variable and is an important control on both surface runoff and groundwater recharge. A recent Borame-specific hydrogeological study reports annual precipitation broadly in the range of 400–500 mm, whereas the WorldClim/CRU 1991–2020 climate normal gives approximately 547 mm/year. The difference reflects the datasets and reference periods used and illustrates the uncertainty associated with climate estimates in this data-scarce area.

d) Average Temperature

The 1991–2020 climate data by the WorldClim/CRU gives Borame an annual mean temperature of approximately 21.8°C. Mean monthly temperatures range from approximately 17.5°C in December to 25.3°C in June. The corresponding long-term mean minimum and maximum temperatures are approximately 15.0°C and 28.5°C, respectively.

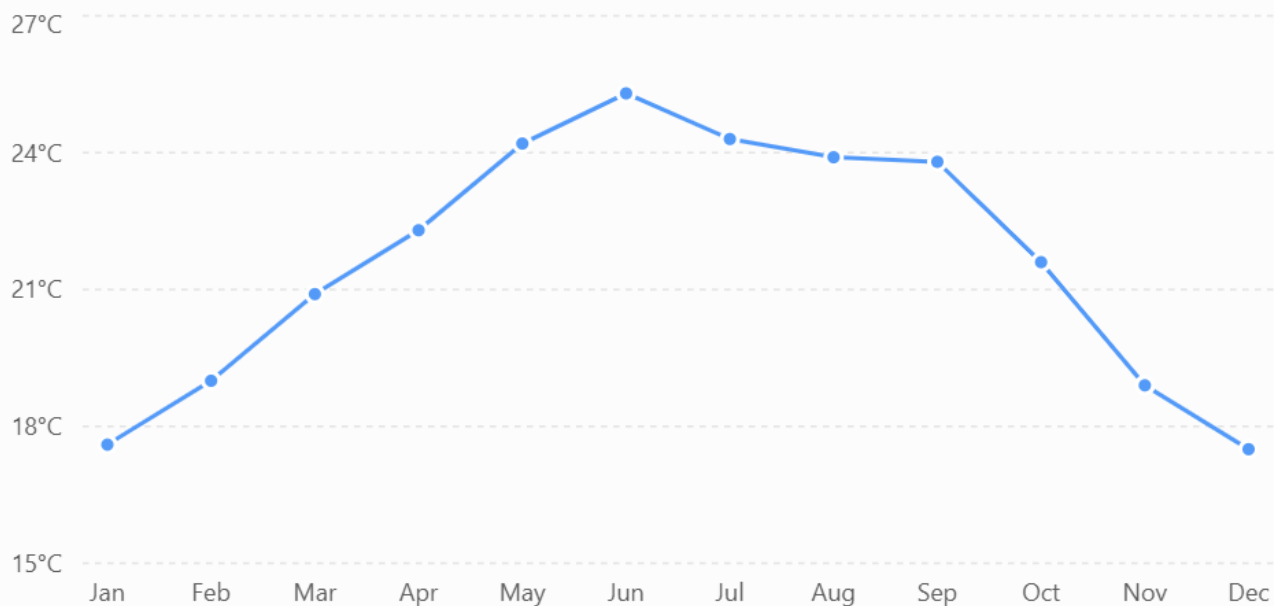
Table 2: Average monthly temperature in Borame (1991-2020)

Month	Minimum (°C)	Maximum (°C)	Mean (°C)
Jan	10.3	24.9	17.6
Feb	11.8	26.2	19.0
Mar	13.8	28.0	20.9
Apr	16.1	28.6	22.3
May	17.7	30.6	24.2
Jun	19.0	31.6	25.3
Jul	18.4	30.1	24.3
Aug	18.2	29.5	23.9
Sep	17.8	29.8	23.8
Oct	14.4	28.7	21.6
Nov	11.5	26.3	18.9
Dec	10.1	25.0	17.5
Annual	≈15.0	≈28.5	21.8

Source: WorldClim/CRU TS v4.09, 1991–2020 climate normals.

Average Monthly Temperature – Borame

Monthly mean temperature, 1991–2020 climate normal.



Source: WorldClim/CRU TS v4.09, as reported by StatsClimat.

The temperature conditions are relevant to the market design because high daytime temperatures during warmer months can increase indoor heat exposure. The proposed use of natural cross-ventilation, roof shading and passive cooling is therefore appropriate for reducing heat accumulation and reliance on mechanical cooling.

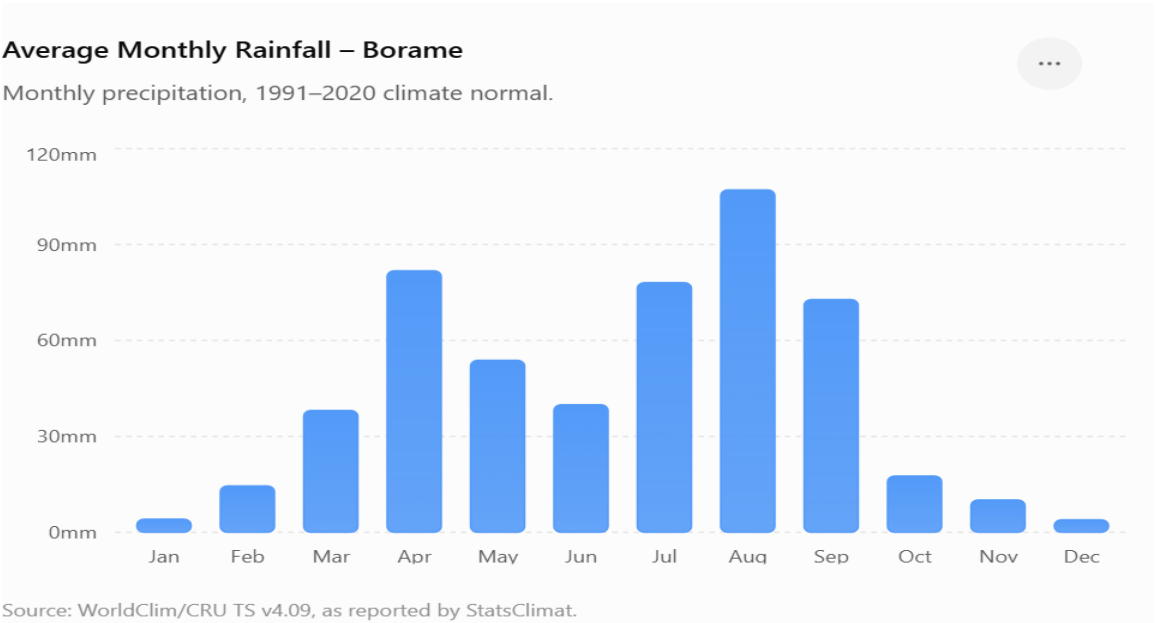
e) Rainfall and Precipitation

Rainfall in Borame is seasonal and variable between years. The 1991–2020 climatological dataset indicates an average annual precipitation of approximately 547 mm. Monthly averages show relatively low rainfall in December–February, followed by increased rainfall from March. April receives approximately 81.8 mm, while August is the wettest month in this dataset, averaging approximately 107.1 mm.

Table 3: Average monthly rainfall in Borame (1991–2020)

Month	Rainfall (mm)
January	4.1
February	14.5
March	38.1
April	81.8
May	53.8
June	39.9
July	78.1
August	107.1
September	72.8
October	17.6
November	10.1
December	3.9
Annual	≈547

Source: WorldClim/CRU TS v4.09, 1991–2020 climate normals



Rainfall is generally seasonal, with the main Gu rains occurring during the spring months and additional rainfall occurring later in the year. The rainfall pattern indicates that the market's drainage system should be capable of safely conveying stormwater during periods of intense rainfall. The proposed roof gutters and rainwater harvesting system can also reduce uncontrolled roof runoff while providing a supplementary source of water.

f) Humidity

Borame generally experiences moderate relative humidity, although humidity varies seasonally. Direct long-term station observations for Borame are limited. Timeanddate's climate series, which explicitly notes that it is based on Hargeisa observations approximately 110 km from Borame, reports an annual average relative humidity of approximately 50%. Monthly values in that reference dataset range from approximately 45% in March to 56% in August. These figures should therefore be regarded as indicative regional values rather than direct measurements on the market.

For the cereal market, humidity control is relevant because prolonged moisture within storage areas can contribute to deterioration of stored cereals, mould growth and pest problems. Good ventilation, dry storage conditions and prevention of water intrusion are therefore important operational considerations.

g) Wind

Wind conditions vary seasonally. The same regional reference dataset reports an indicative average wind speed of approximately 19 km/h, with lower monthly averages of around 14 km/h in December and January and higher values during the middle of the year. July records the highest monthly average at approximately 29 km/h, followed by June at approximately 26 km/h and August at approximately 25 km/h. As with the humidity figures, these are based on the Hargeisa reference station and should be treated as indicative rather than site-specific Borame measurements.

Wind is relevant to the proposed market because it can contribute to dispersion of construction dust and grain dust, while wind loading should also be considered in the structural design of the roof and other exposed elements.

h) Water Resources and Hydrology

Borame lies within the upper Dur-Dur watershed. Surface drainage around Borame consists primarily of seasonal valleys or *toga in Somali*. Important drainage systems identified in hydrogeological studies include Togga Dhamuuq, Togga Lehelou, Togga LaasDhiige and the Amoud system. These drainage channels convey runoff from the surrounding uplands and also play an important role in groundwater recharge through their alluvial deposits.

Historically, Dhamuuq Spring, east of Borame, has been an important water source for the city, with water conveyed by pipeline. Hydrogeological investigations also identify groundwater from wells, boreholes, seepages and alluvial deposits associated with the *toggas*. The geological formations controlling groundwater occurrence include fractured Precambrian basement rocks, karstified Jurassic limestone and Quaternary alluvial deposits.

More recent research indicates that Borame has no significant perennial surface-water resource and depends heavily on groundwater. Groundwater recharge is closely related to seasonal rainfall and infiltration through suitable geological formations and drainage channels. Urban expansion and increased impermeable surfaces can reduce infiltration, while groundwater abstraction has placed increasing pressure on available aquifers.

FAO-SWALIM also maintains a groundwater monitoring station at Dhamuuk Village in Borame District. The observation borehole is approximately 73 m deep, demonstrating the continuing importance of groundwater monitoring in the area.

For the Borame Cereal Market, no permanent natural surface-water body has been identified within the immediate market site. The principal hydrological consideration is therefore management of stormwater runoff, particularly during heavy rainfall. Roof drainage, gutters, controlled discharge, adequate site drainage and the proposed rainwater harvesting system should be incorporated into the market design to prevent localized flooding, standing water and erosion.

1) Vegetation Cover

Borame and the wider Awdal Region are characterized mainly by dryland vegetation adapted to semi-arid climatic conditions. The natural vegetation generally consists of open shrubland, bushland, scattered trees, grasses and other drought-tolerant plant species. Vegetation density and composition vary according to elevation, soil conditions, rainfall, land use and availability of water. In and around seasonal drainage channels (*togga*) and other areas where moisture is relatively more available, vegetation can be denser than on exposed and drier terrain. FAO-SWALIM land-use assessments identify bushland and shrubland, wooded vegetation, grassland and cultivated areas among the principal land-cover types occurring within the wider Awdal landscape.

Within Borame City, however, natural vegetation has been substantially modified by urban development. Built-up areas are dominated by buildings, roads, commercial premises and other infrastructure, with vegetation generally occurring like scattered trees, shrubs, grasses and planted vegetation within compounds, roadsides and undeveloped/open spaces.

At the Borame Cereal Market, vegetation is very limited because the site is an existing developed urban market surrounded by buildings, roads and commercial activities. Based on the project site assessment, no significant natural habitat or dense vegetation occurs within the immediate market premises. Consequently, the proposed works are not expected to result in significant loss of natural vegetation or habitat.

Nevertheless, any existing trees and vegetation within or immediately surrounding the market should be retained and protected wherever practicable. Unnecessary cutting or damage to trees should be avoided during construction, and areas temporarily disturbed by the works should be restored where appropriate. This approach is consistent with the biodiversity and vegetation protection measures included under ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources in the ESMP.

3.4 Socio-Economic Context

Borame is the administrative and commercial centre of Awdal Region and serves as an important centre for trade, education, health services and public administration in western Somaliland. The city's economy is closely linked with the surrounding agricultural and pastoral areas, with agricultural produce and livestock products moving between rural communities and urban markets. The following subsections summarize the main socio-economic characteristics relevant to the Borame Cereal Market.

a) Population

Reliable and recent city-level population statistics for Borame remain limited because Somaliland has not had a recent comprehensive population census. The 2014 Population Estimation Survey (PESS) conducted by UNFPA remains an important official statistical reference, although it primarily provides estimates at regional and broader geographic levels rather than a current definitive population count for Borame City.

More recent planning documents use substantially different estimates for Borame. For example, the Somaliland Power Master Plan presents two population figures—approximately 150,000 and 400,000—for Borame, explicitly noting that two sets of population data were available. This illustrates the uncertainty surrounding current city-level population figures. A reasonable description is that Borame is one of Somaliland's major urban centres and has experienced considerable population growth and urban expansion, increasing demand for housing, markets, water, electricity, education, health services and municipal infrastructure.

b) Livelihood and Employment

Livelihoods in Borame and the surrounding Awdal Region are diversified. Within the city, important economic activities include retail and wholesale trade, agricultural produce marketing, livestock-related commerce, transportation, construction, public-sector employment, education, health services and other small businesses and services. The city's economic relationship with surrounding rural communities is particularly important because rural livelihoods rely heavily on crop production, livestock keeping and natural resources. FAO-SWALIM describes sustainable farming and natural-resource-based livelihoods as important within the wider Dur-Dur watershed covering Borame, Baki and Lughaya districts.

Agricultural production in surrounding rural areas supports urban food markets. Cereals and other agricultural products are transported into Borame for sale, consumption and onward distribution. The Borame Cereal Market therefore forms part of the local agricultural value chain, connecting producers and suppliers with traders and consumers.

Regarding the Borame Cereal Market, based on information collected specifically during the E&S screening and assessment, approximately 40 traders use the Cereal Market, and cereal trading within the market is dominated by women. Market-based trading represents an important livelihood and source of household income for these traders.

Because the market is already operational, rehabilitation could temporarily interrupt trading and income if access is not adequately managed. Borame Local Municipality will therefore identify and prepare a

suitable temporary trading location where existing cereal traders can continue their businesses during the rehabilitation period. This measure is particularly important for minimizing temporary economic disruption and livelihood impacts.

c) Infrastructure

As one of the principal urban centres in western Somaliland, Borame has established infrastructure including urban roads, electricity distribution, piped water supply, telecommunications, schools, universities, health facilities, markets and municipal services. However, population growth and urban expansion continue to place pressure on existing infrastructure.

The road network provides connections within Borame and to surrounding settlements and other parts of Somaliland. Within the project area, the Cereal Market is accessible through the existing urban road network used by the local residents.

d) Water Supply and Sanitation

Borame has a relatively well-developed piped urban water-supply system compared with many Somaliland towns. The system has benefited from substantial investment through partnerships between government, development partners and private-sector operators.

Currently, the Borame Cereal Market does not have toilet or sanitation facilities within the market premises. As a result, traders, customers, and other market users normally have to leave the market and use public toilet facilities available outside the market. Regarding water availability, Borame City has a piped running water supply network, which provides an opportunity for the market to be connected to the existing water supply system. Adequate water supply will be required to support the operation of the proposed sanitation and handwashing facilities, as well as routine cleaning and general hygiene within the market.

As part of the proposed market improvements, toilet and handwashing facilities will be provided within the market premises. The facilities should be connected to an adequate water supply and maintained through regular cleaning, provision of water and cleaning materials, and appropriate management of wastewater to ensure hygienic conditions for traders, workers, and other market users.

e) Electricity

Borame is supplied through an urban electricity distribution system operated by private electricity service providers. The Somaliland Power Master Plan identifies TELESOM and ALOOG as electricity service providers associated with Borame and reports radial 11-kV distribution infrastructure.

Section 4. Relevant Legal and Regulatory Frameworks

The implementation of the proposed rehabilitation of the Borame Cereal Market will be guided by both national legislations and international safeguard requirements including World Bank E&S policies and guidelines. At the national level, the sub-project activity is subject to the following laws and policies:

1. **The Constitution of the Republic of Somaliland (2001)**: provides the overarching legal basis for environmental protection, public welfare, property rights, labour rights and sustainable development. In particular, Articles 18 and 34 address protection and safeguarding of the environment.
2. **Somaliland National Environment Policy (2015)**: provides the national policy framework for sustainable environmental and natural resource management and requires development activities to avoid or minimize environmental degradation.
3. **Somaliland Environmental Management Act, Law No. 79/2018**: establishes requirements for environmental management, environmental assessment, pollution prevention and environmental compliance of development activities.
4. **Somaliland Environmental and Social Impact Assessment (ESIA) Guidelines**: This necessitates the identification, assessment, management, and monitoring of potential adverse environmental and social impacts associated with development projects. It provides procedures and guidance for environmental and social screening, assessment, mitigation, preparation of management measures, consultation, monitoring and reporting for development projects.
5. **Somaliland National Climate Change Policy (2023)**: relevant to climate resilience, adaptation and consideration of climate-related risks in infrastructure design. This policy is particularly applicable as it promotes the development of climate-resilient infrastructure, improved energy and resource efficiency, and measures to reduce greenhouse gas emissions and the overall carbon footprint of development activities.
6. **Urban Land Management Law, Law No. 17/2001, as amended in 2008**: regulates urban land management and land use in Somaliland and is particularly relevant because the Cereal Market is located on urban land managed by Borame Local Municipality.
7. **Somaliland Labor/Private Sector Employment Law, Law No. 31/2020**: establishes requirements relating to employment conditions, worker rights, contracts, occupational health and safety, workplace sanitation, complaints and protection of workers.
8. **Regional and District Administration (Local Government) Law, Law No. 23/2019** – establishes responsibilities and functions of local governments and is relevant to the role of Borame Local Municipality in market management, municipal services, local infrastructure and development control.
9. **Urban Waste Management and Hygiene Law, Law No. 83/2018** – relevant to management of construction waste, municipal solid waste, sanitation, hygiene and waste generated during operation of the market.
10. **Somaliland Forestry and Wildlife Conservation Law, Law No. 69/2015** – relevant to protection of existing trees, vegetation, birds and other biodiversity that could potentially be affected by project activities.
11. **Somaliland National Gender Policy (2009)**: relevant to gender equality, participation, protection from discrimination and consideration of the needs of women and vulnerable groups. This is

particularly important for the Borame Cereal Market because the project assessment identified women as the principal cereal traders in the market. The Gender Policy is also identified in recent Somaliland government environmental and social framework documentation.

12. **Draft Somaliland Building Control Regulation:** This regulation is relevant to the proposed market rehabilitation by taking into consideration the applicable provisions relating to structural safety, construction quality, fire and life safety, accessibility, building services, materials and workmanship, inspection, and compliance with approved designs and technical requirements.
13. **Somaliland National Development Plan III (2023–2027):** provides the broader national development framework, including priorities for urban development, spatial planning, public infrastructure, environmentally sustainable development and improved construction and rehabilitation of public buildings.
14. **Applicable Ministry of Public Works, Land and Housing requirements and technical standards:** relevant to structural design, building works, physical planning, construction supervision and technical approval. NDP III identifies the Ministry as the primary government institution responsible for design/supervision of public buildings and development of urban and spatial planning frameworks.

The sub-project activities will also align with the World Bank’s Environmental and Social Framework (ESF), which sets out ten Environmental and Social Standards (ESS) designed to ensure that development interventions are environmentally sound, socially inclusive, and sustainable. The following are the ESS standards:

- **ESS1:** Assessment and Management of Environmental and Social Risks and Impacts
- **ESS2:** Labor and Working Conditions
- **ESS3:** Resource Efficiency and Pollution Prevention and Management
- **ESS4:** Community Health and Safety
- **ESS5:** Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- **ESS6:** Biodiversity Conservation and Sustainable Management of Living Natural Resources
- **ESS8:** Cultural, Historical, and Important Archaeological Sites
- **ESS10:** Stakeholder Engagement and Information Disclosure

The following guidelines and good international practices are also applicable to the proposed rehabilitation and operation of the Borame Cereal Market:

- **World Bank Group General Environmental, Health and Safety (EHS) Guidelines**
- **World Bank Group EHS Guidelines** for Construction and Decommissioning, as contained within the General EHS Guidelines
- **Good International Industry Practice (GIIP)** relevant to building construction, occupational health and safety, fire safety, waste management and community safety.

Section 5. Stakeholder Consultations and Feedback

4.1 Stakeholder Consultation

The preparation of this ESMP and design process of the sub-project was highly dependent on stakeholder consultations, conducted as per the Stakeholder Engagement Plan (SEP). Between 24th and 26th July 2026, the Environmental and Social (E&S) Safeguards Team conducted stakeholder consultations and a site assessment for the proposed rehabilitation of the Borame Cereal Market in Borame City, Awdal Region. The main stakeholders consulted included cereal traders and vendors operating within the market, farmers, market users, representatives of the Ministry of Agriculture Development (MoAD), Borame local municipality, neighboring businesses and property users, and other relevant community representatives.

The consultations were undertaken to inform stakeholders about the Somaliland Food Systems Resilience Project (SL-FSRP) and the proposed market rehabilitation; assess the existing condition of the market and its surrounding environment; identify potential environmental and social risks and impacts; understand stakeholders' concerns and priorities; and obtain their views and recommendations on appropriate mitigation measures.

The E&S Safeguards Team initially met with relevant local authorities and MoAD representatives in Borame to introduce the SL-FSRP, explain its objectives, and provide information on the scope of the proposed rehabilitation works. This was followed by a joint site visit to assess the physical condition of the existing market and the surrounding environment and to identify potential environmental and social issues that may arise during implementation.

Following the site assessment, a stakeholder consultation meeting was held with representatives of Borame Local Municipality, MoAD, MoECC, and other relevant stakeholders. A total of 25 participants attended the meeting, comprising 21 males and 4 females. Discussions focused on the proposed rehabilitation activities, existing conditions at the market, potential environmental and social risks and impacts, institutional responsibilities, and measures required to manage identified risks.

A separate consultation meeting was conducted with market traders, vendors, and other market users who may be directly affected by the rehabilitation works. A total of 23 participants attended this consultation, all of whom were women, reflecting the predominant role of women in cereal trading activities within the market. The E&S team explained the proposed improvements and provided participants with an opportunity to raise concerns, identify potential impacts, and recommend measures to minimize disruption to their businesses and livelihoods. During the consultations, the E&S team explained how environmental and social requirements would be integrated into the rehabilitation works through the ESMP.



Figure 7: Consultation with the local authorities (Borame Local Municipality, MOAD and MoECC representatives)



Figure 7: Consultation with traders and market users

4.2 Objectives of the Consultation

The consultation meeting was convened with the following specific objectives:

- To identify potential environmental and social risks and impacts associated with the rehabilitation of the Borame Cereal Market.
- To create awareness and sensitize participants on Environmental and Social (E&S) safeguards, including Gender-Based Violence (GBV) prevention and response.
- To introduce and discuss the Grievance Redress Mechanism (GRM) process and its application during program implementation.

4.3 Key Issues from the Stakeholder Consultation

During the consultation meetings, stakeholders generally welcomed the proposed rehabilitation of the Borame Cereal Market and recognized its potential to improve the working environment, sanitation, safety, and overall condition of the market. However, participants also identified a number of environmental and social risks and concerns that should be adequately managed during the rehabilitation works. The key issues raised are summarized below.

The SL-FSRP E&S team then presented an overview of the project's E&S safeguard framework, explaining the requirements under World Bank Environmental and Social Standards (ESS). Participants were introduced to key concepts including risk identification, mitigation planning, community engagement, and the importance of inclusive approaches that consider vulnerable groups such as women-headed households, IDPs, and minority groups. Awareness was also raised on Gender-Based Violence (GBV) risks and prevention, with emphasis on maintaining a safe and respectful working environment. Finally, the safeguarding team shared information on the Grievance Mechanism (GM) process and its importance, outlining the channels through which community/staff can submit complaints or concerns related to the rehabilitation of the market.

During the consultation, participants actively engaged in discussions and raised several important issues. The following key issues were highlighted:

- Traders expressed concern that the rehabilitation works could temporarily interrupt their businesses and affect their daily income.
- Concerns were raised regarding the generation and disposal of construction waste and debris.
- Participants noted that demolition and construction activities may generate dust, noise and vibration, which could temporarily affect traders, neighbouring businesses, market users and the surrounding community.
- Participants highlighted potential risks of accidents and injuries to construction workers, traders, pedestrians and other market users.

- Participants raised concerns about possible inappropriate behaviour associated with labour influx since women is predominantly the main market traders and users
- Participants highlighted the importance of improving sanitation conditions within the market, particularly through the provision of toilets, handwashing facilities, adequate water supply and proper waste management.
- Participants emphasized the importance of continued consultation and timely communication with traders throughout project implementation.

Section 6. Environmental and Social Risks and Mitigation Measures

6.1. Introduction

The proposed rehabilitation of the Borame Cereal Market is an important initiative aimed at improving market infrastructure, trading conditions, and overall functionality of the market while supporting local livelihoods and agricultural trade in Borame City and the wider Awdal Region. While the programme is largely beneficial, it carries certain environmental and social risks that must be carefully identified and managed to ensure sustainable and equitable implementation. This section therefore presents a systematic assessment of the potential environmental and social risks associated with the sub-project and proposes mitigation measures to address them. The risk management approach is aligned with the World Bank's Environmental and Social Standards (ESSs) and the Environmental, Health and Safety Guidelines (EHSGs), ensuring that market rehabilitation activities comply with national regulations and international best practices. The following are the anticipated Environmental and Social Risks:

6.2 Anticipated Environmental and Social Risks During Rehabilitation

During the rehabilitation of the Borame Cereal Market, several environmental and social risks and impacts may arise that require appropriate mitigation and monitoring. The main anticipated risks include:

- a) **Temporary disruption of trading activities and livelihoods:** Rehabilitation works may temporarily restrict access to existing trading spaces and affect the daily income of cereal traders. A suitable temporary trading location should be prepared by Borame Local Municipality before work commences, and affected traders should be informed and consulted in advance.
- b) **Construction related waste:** Construction activities will generate debris and other solid waste that, if poorly managed, may cause environmental pollution and health and safety risks. Waste should be properly collected, segregated, temporarily stored, transported, and disposed of at approved disposal locations. Open dumping and burning of waste should be prohibited unless approved by the engineer and the local municipality.
- c) **Inadequate Stakeholder Engagement and Grievance Management:** Poor communication may result in misunderstandings, complaints, or disputes with traders and surrounding communities. The market rehabilitation sub-project will adopt a multi-tier grievance redress mechanism (GRM) to ensure that traders, market users and other stakeholders can raise concerns and have them addressed promptly, transparently, and fairly. Stakeholder engagement should continue throughout the rehabilitation period.

The GRM procedures should be communicated to all the local stakeholders, including how to submit complaints, timelines for response, and overall processes. All grievances will be recorded in a grievance logbook and addressed within a specified timeframe.

- d) **Dust and air pollution:** construction, excavation, material handling, and vehicle movement may generate dust affecting workers, traders, nearby businesses, and other market users. Dust should be controlled through appropriate suppression measures including watering, covering transported materials, good housekeeping, and controlling vehicle speeds. Workers should use PPEs including dust masks.
- e) **Occupational health and safety (OHS):** Workers may be exposed to falls, cuts, injuries, electrical hazards, manual handling risks, dust, noise, and accidents involving tools and equipment. Contractors should implement appropriate OHS procedures, provide PPE, conduct worker induction and toolbox talks, maintain first-aid facilities, and ensure adequate supervision.
- f) **Community health and safety:** Construction activities may expose traders, pedestrians, neighboring businesses, and other community members to accidents, falling materials, open excavations, vehicles, and construction equipment. Work areas should be properly fenced and secured, with warning signs, controlled access, and safe pedestrian routes.
- g) **Labor and working conditions:** Risks may include unfair recruitment, delayed payment, inadequate employment conditions, discrimination, and disputes between workers and employers. Workers should receive clear employment terms, fair and timely payment, appropriate working conditions, and access to a workers' grievance mechanism in accordance with applicable labour requirements.
- h) **Exclusion of women and vulnerable groups:** Women traders and vulnerable market users may be disproportionately affected by temporary access restrictions or changes in trading arrangements. Consultation, temporary trading arrangements, access to information, and project benefits should therefore be inclusive and accessible.
- i) **Increased GBV and SEAH risks:** The presence of construction workers may increase risks of inappropriate behaviour, sexual exploitation and abuse, sexual harassment, and other forms of misconduct. Train all the personnel involved in the rehabilitation of the market on GBV/SEAH prevention. Ensure all project staff, including casual laborers, and other team members, sign and adhere to a Code of Conduct that explicitly prohibits GBV and SEAH. Establish confidential and accessible reporting channels for GBV/SEAH complaints, linked to the project's grievance redress mechanism and referral pathways to health and protection services. Ensure survivor centered approach.
- j) **Damage to existing trees and vegetation:** Construction activities, material storage, and equipment movement may unnecessarily damage existing trees or vegetation within or around the project site. Existing vegetation should be protected wherever practicable, and unnecessary cutting or removal should be prohibited.
- k) **Chance finds and cultural heritage:** Excavation or other ground-disturbing activities may unexpectedly uncover archaeological or cultural heritage materials. A Chance Finds Procedure should be implemented, requiring works in the affected area to stop until the find has been assessed and appropriate clearance has been provided.

6.3 Anticipated Environmental and Social Risks During Operation

During the operation of the market, environmental and social risks are anticipated. Appropriate management and monitoring will be required to maintain a safe, clean, inclusive, and functional market environment. The main anticipated risks include:

- a) **Poor solid waste management:** Routine market activities may generate cereal residues, packaging materials, plastic, paper, sacks, and other general waste. Inadequate collection and disposal may create unsanitary conditions, attract pests, and cause environmental pollution. Adequate waste bins should be provided, waste should be collected regularly and transported to approved disposal locations, and open dumping or burning should be prohibited.
- b) **Poor sanitation and hygiene:** Inadequate cleaning and maintenance of toilets, handwashing facilities, and common areas may create health and hygiene risks for traders and market users. Borame Local Municipality and Market Management should ensure regular cleaning, adequate water supply, functional sanitation facilities, and provision of appropriate cleaning materials.
- c) **Grain dust and poor air quality:** Handling, storage, and movement of cereals may generate grain dust, which can affect workers and traders, particularly those exposed for extended periods. Market areas should be cleaned regularly using low-dust cleaning methods, natural ventilation should be maintained, and appropriate dust masks/PPE should be provided to workers with significant exposure.
- d) **Pest and vector infestation:** Poor storage practices, accumulated cereal residues, waste, or stagnant water may attract rodents, insects, and other pests. Good housekeeping, proper cereal storage, regular waste removal, routine inspections, and safe pest-control measures should be implemented.
- e) **Fire and electrical safety risks:** Storage of cereals, sacks, packaging materials, electrical installations, and other combustible materials may create fire risks. Fire extinguishers should be provided and maintained, electrical installations regularly inspected, emergency exits kept clear, and market personnel provided with basic fire-safety and emergency-response awareness.
- f) **Occupational and public safety risks:** Traders, cleaners, market workers, and customers may be exposed to slips, trips, falls, manual-handling injuries, blocked walkways, and other accidents. Walkways and entrances should be kept clear, spills promptly cleaned, damaged surfaces repaired, and safe working and trading practices promoted.
- g) **Traffic and pedestrian safety:** Loading and unloading cereals and movement of vehicles around the market may create risks for pedestrians and other road users. Loading and unloading activities should be appropriately managed, pedestrian access maintained, and vehicles prevented from unnecessarily obstructing market entrances and surrounding roads.
- h) **Poor cereal storage and handling:** Inadequate storage conditions may result in moisture, mould, pest infestation, contamination, and deterioration of cereals. Trading and storage areas should be kept clean, dry, and adequately ventilated, while spoiled or contaminated products should be promptly identified and appropriately removed.

- i) **GBV/SEA/SH and inappropriate conduct:** Traders, workers, and market users, particularly women, may be exposed to harassment or other inappropriate behaviour. Market Management should promote a safe and respectful environment, provide awareness on acceptable conduct, and maintain accessible and confidential channels for reporting GBV/SEA/SH concerns.
- j) **Inadequate stakeholder engagement and grievance management:** Poor communication between Market Management, traders, and market users may result in misunderstandings or disputes relating to market operations, services, or use of trading spaces. Regular engagement with traders should therefore be maintained, and the market GRM system should be established and remain accessible for receiving and addressing complaints and concerns.

SECTION 7: ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Table 4: Environmental and Social Management Plan Matrix (During Construction Phase)

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
ESS1: Assessment and management of Environmental and social risk and impacts								
	Risk of poor implementation of the mitigation measures and adherence to the set standards and procedures	Sensitize the contractor on E&S risk assessment and implementation of mitigation measures Provide training to the contractor and E&S teams working on the subprojects on understanding and implementing ESMP and requirements of WB's ESF and WBG's EHSs. Raise awareness of workers (including subcontractors, temporary workers, and drivers) regarding the implementation of the OH&S and ESMP tailored to the project scope, through toolbox talks and other platforms	PCU & Contractor	Before the beginning of rehabilitation activity	-Cost of training to be conducted by the PCU is included in the project/ operational cost. -Cost incurred by the contractor is included in its budget	# of awareness sessions provided to the contractor # of training sessions provided to workers	PCU Social and Environmental Safeguard including GBV Specialists	Before the beginning of construction activity

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Lack of notice before the start of rehabilitation of the market to the traders, market users and neighboring businesses	Provide notification through consultations/meetings traders, market users and neighboring businesses Post it on notice boards in common areas or establish appropriate signposts for notice	MoAD and Contractor	Before the beginning of construction activity	Included in the contractor's budget	# of meetings/ awareness raising sessions conducted # of notifications on the notice board/ signposts erected	PCU Social Safeguards Specialists	Before the beginning of construction activity
	ESS 2: Labour and Working Conditions							
	Risks of child and forced labour	Awareness raising on child labour crimes will be conducted through training and posters Contractor to maintain staff records, minimum age for workers to be set at 18 years Implementation of GRM to ensure their voices / complaints are heard	PCU / Contractor	Before and during the construction activity	Included in Contractor's budget	# Labour register showing age and sex of persons # of workers' grievances filed and of GRM cases filed, resolved or pending Records of cases of child and forced labour reported	PCU Social Safeguards Specialist	Prior to commencement of activity and during construction activities (Monthly visit)

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Labor and working conditions are not in compliance with WB and Somaliland legislations	Implement the LMP and ensure the construction is implemented in a safe and disciplined manner designed to minimize impacts on workers in the construction site and the environment. Listing of all staff and titles, new hires and departures Provide necessary personal protective equipment (PPE) to all field workers and conduct training on the use of PPE Grievance Mechanism and hotlines introduced to the workers	Contractor	Before and during the construction activity	Included in contractor's staff costs	Availability of register and logbook # of PPEs provided to workers # of training on the use of PPEs provided % of workers with appropriate PPE # of grievances and/or incidents reported	PCU Social Safeguards Specialist	Prior to commencement of the activity and during construction (Monthly)

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Exposure of labour to physical hazards on the project site, including injury	Undertake safety precautions to address safety hazards for workers and staff, including safety/warning signage, safety barriers around the construction site, and safe driving practices. Provide necessary personal protective equipment (PPE) to all construction workers Provide safety training in the management of hazards identified	Contractor	Before and during the construction activity	Included in contractor's staff costs	# of regular safety training provided # of PPEs provided to construction workers % of workers with appropriate PPE # of OHS incident reported	PCU Social Safeguards Specialist	Monthly
	Delayed payment or underpayment of workers, leading to complaints and conflict	Ensure provision of timely and equitable payment system Provide labour rights orientation training to workers Establish GRM system for workers and introduce them to workers	Contractor	Before and during the construction activity	Included in contractor's staff costs	Record of daily payment and appropriate measures taken for delayed payments # of grievances received # of Labor rights training conducted	PCU Social Safeguards Specialist	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Discrimination against women and vulnerable groups in employment	Provide the orientation of the labour management procedure guideline to the contractor Implement the LMP and comply with WB labour procedures Apply transparent and non-discriminatory recruitment procedures. Grievance Mechanism and hotlines disseminated	Contractor/PCU Social Safeguard Specialist	Before the commencement of the construction activity	Included in contractor's staff costs Cost of training to be conducted by the PCU is included in the project/ operational cost.	# of orientation training on labour management procedures conducted # of women and vulnerable group workers # of grievances received	PCU Social Safeguards Specialist	Monthly
	ESS 3: Resource Efficiency and Pollution Prevention and Management							

	Lack of management and disposal of waste material generated from rehabilitation activities	Establish appropriate designated pathways and sites for disposal of solid waste shall be identified consistently with the local and international requirements Provide waste collection tools for temporary storage of solid waste. Regular collection and disposal of generated solid waste at designated and authorized disposal sites in consistence with the local and international requirements including WBG General EHS Guidelines. Reuse and recycling of the waste generated should be prioritized Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor	Contractor	During the construction activities	Included in Contractor's budget	# of the waste collection tools provided for temporary storage of the solid waste # of waste collection activities conducted/ frequency (daily/in two days/weekly) Records of amount of solid waste re-used, recycled, disposed, where and when # of grievances filed related to Waste management	PCU Environmental Specialist	Monthly
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WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Dust Generation and air pollution	Dust control measures should be employed during the construction such as regular water spraying of the ground Wear PPE (including safety glasses and gloves and dust masks). Ensure all workers wear appropriate personal protective equipment (PPE), like masks and respirators	Contractor	During the construction activities	Included in Contractor's budget	# of dust suppression measures applied (e.g., water spraying) # of PPEs provided to construction workers (including dust masks) % of workers with appropriate PPE	PCU Environmental Specialist	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Increased levels of noise from the construction machinery that can produce noise	Selecting well-maintained equipment with lower noise emissions Provide hearing protection where necessary (when sound level over 8 hours reaches 85 dB(A)) Confining the usage of high machinery to non-working/resting hours No noise is allowed from machinery if used during evening hours	Contractor	During the construction activities	Included in Contractor's budget	# of hearing protection equipment used # of noise/vibration-related complaints received from staff or nearby residents	PCU Environmental Specialist	Monthly
	ESS 4: Community Health and Safety							

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Increased GBV/SEAH cases	Implementation and monitoring of GBV/ SEAH Action Plan All workers to sign CoCs Conduct awareness sessions for both contractors and workers on GBV/SEAH prevention and reporting. Dedicated reporting channel for victims through Project GRM	Contractor/ PCU- Gender Specialist	During the construction activity	-Included in the contractor's budget -Cost of training to be conducted by the PCU is included in the project/ operational cost.	# of GBV-related awareness sessions held % of workers who signed the CoC # of GBV-related grievances recorded # of GBV-related incidents reported	PCU- GBV Specialist	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Traffic, pedestrian and loading/unloading safety risks associated with vehicles delivering materials.	Designate appropriate loading/unloading areas where feasible. Keep pedestrian access routes clear and separated from vehicle movements Avoid unnecessary obstruction of surrounding roads and market entrances. Provide signs and traffic control measures	Contractor	Throughout operations	-Included in the contractor's budget	Loading/unloading areas appropriately designated and managed. Pedestrian routes maintained clear. # of traffic/pedestrian incidents reported. Traffic-control/signage measures available where required. # of traffic/access complaints received.	PCU- Social Safeguards Specialist	Monthly
	ESS 5: Land Acquisition, Restrictions of Land Use and Involuntary Resettlement							

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Legal permits of land or infrastructure ownership issues	All legally required permits shall be acquired from the Borame Local Municipality (land & infrastructure ownership and construction permission) The market is owned and managed by the Borama Local Municipality.	PCU Safeguarding Team	Prior to commencement of construction	No additional cost required	Required paper of land or infrastructure ownership received	PCU Safeguarding Team	Before the start of the rehabilitation

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Temporary disruption of trading activities and restriction of access to existing trading spaces during rehabilitation	Consult traders before rehabilitation starts and provide advance information on the affected areas. Prepare a practical temporary space and trading/access arrangement, where required, to allow affected traders to continue their businesses during rehabilitation. Implement works in phases where it is technically feasible to minimize disruption. Maintain safe access to unaffected trading areas and nearby businesses.	MoAD / Contractor / Borame Municipality / PCU	Before and during rehabilitation	Included in Contractor's budget as applicable	# affected traders consulted temporary arrangements and space established # grievances received and resolved	PCU Social Safeguards Specialist	Before work starts and throughout rehabilitation (Monthly)

	Concerns or disputes regarding allocation of approximately 40 improved trading spaces after rehabilitation	Register and document all traders currently using the areas to be rehabilitated before the commencement of work, including their names, and contact details where available Prepare and maintain a verified baseline register of existing traders, in coordination with the Borame Local Municipality and market representatives. Develop and communicate clear, transparent, and fair criteria for allocation/reoccupation of the improved trading spaces. Ensure that existing traders affected by the rehabilitation are properly considered during the allocation of the improved trading spaces. Provide access to Project GRM for any complaints	MoAD / Contractor / Borame Municipality / PCU	Before and after rehabilitation	Included in Contractor's budget as applicable No significant additional cost anticipated	Existing traders registered before work commence Trader registers available and verified Allocation/reoccupation criteria developed and communicated before work commence # of registered traders allocated/reoccupied trading spaces # of allocation-related grievances received and resolved	PCU Social Safeguards Specialist	Before and after rehabilitation work
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WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
		related to registration and allocation						
	ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources							
	Removal of indigenous trees and ecosystem disruption	Avoid unnecessary cutting or removal of existing trees and vegetation. If required, clearly demarcate and fence the major trees with protective barriers before construction begins. Where vegetation is unavoidably removed or accidentally damaged, trees will be replanted in the area after the rehabilitation to replace those removed or harmed	Contractor	Before and during rehabilitation activities	Included in Contractor's budget	# of trees protected with fence # of trees re-planted after construction	PCU Environmental Safeguards Specialist	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Disturbance or destruction of bird nests, nesting/roosting sites and birds during the rehabilitation	Inspect trees, roofs and structures to be affected by works for active bird nests or nesting/roosting sites before demolition, and roof works Where active nests are identified, avoid disturbing and where practicable, establish an appropriate temporary buffer until the birds have left and the nest is no longer active Where birds or nests are encountered during work, allow them to move away safely before continuing the activity. Include protection of birds and nesting sites in worker induction/toolbox talks, particularly for workers involved in demolition, and roof works	Contractor	Before and during demolition, roof works and other relevant activities	Included in Contractor's budget	Pre-work inspection undertaken where relevant; # of active nests/nesting sites identified and protected; # of bird disturbance incidents reported; Records of corrective/protection measures taken, where required. # of toolbox talks/awareness training sessions conducted on protection of birds and nesting sites.	PCU Environmental Specialist	Before relevant works and Monthly during implementation
	ESS 8: Cultural, Historical, and Archaeological Important Sites							

	Risk of accidental discovery and potential damage to archaeological, historical, cultural, religious, or other cultural heritage materials during excavation and other ground-disturbing activities.	Develop and implement a Chance Finds Procedure as part of the Contractor's C-ESMP before commencement of excavation, demolition, or other ground-disturbing activities. If cultural heritage material is discovered, do not remove, relocate, damage, or otherwise interfere with the material discovered until it has been assessed and appropriate instructions have been provided. Resume work in the affected area only after clearance/authorization has been provided in accordance with the Chance Finds Procedure and applicable requirements. Provide toolbox talks/awareness training to workers on recognizing potential cultural heritage finds and the procedures	Contractor	Before and during excavation, and other ground-disturbing works	Included in Contractor's budget	Chance Finds Procedure prepared and included in the C-ESMP; # of awareness raising conducted and number of workers sensitized; # of chance finds reported; Record of appropriate action taken, where applicable	PCU Environmental & Social Safeguards Specialists	Monthly and whenever chance finds occur
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WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
		to follow if a chance find is encountered.						
	ESS 10: Stakeholder Engagement and Information Disclosure							
	Lack of information disclosure leading to lack of transparency and suspicions of mismanagement of the sub project	Implementation of Project SEP on stakeholder engagement especially those living/trading around the vicinity. Conduct consultations, providing information on the sub-project Display important information and notices at accessible locations within the site.	Contractor / PCU Social Safeguards Specialist	Before and during the rehabilitation activities	-Included in the contractor's budget	# of consultations conducted Consultation/meeting records maintained. Notice boards/ stickers displayed at accessible locations # of stakeholder concerns/complaints raised and addressed.	PCU- Social Safeguards Specialist	Before and during the rehabilitation activities (Monthly)

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Risks of lack of information on access to GRM leading to lack of accountability	Awareness raising on GRM and all the available channels Clearly display GRM contact information and complaint channels within the site. Conduct regular awareness on how and where grievances can be submitted. Maintain a grievance register and track all complaints received.	Contractor / PCU Social Safeguards Specialist	Before and during the rehabilitation activities	-Included in the contractor's budget -Cost of awareness raising sessions to be conducted by the PCU is included in the project/ operational cost.	# of awareness sessions on GRM conducted GRM contact information displayed and accessible. Grievance register maintained and updated. # of grievances received, resolved and pending.	PCU- Social Safeguards Specialist	Monthly

Table 5: Environmental and Social Management Plan (During Operation Phase)

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	ESS 2: Labour and Working Conditions							
	OHS risks to workers, cleaners and other market personnel, including slips, trips, falls, manual handling injuries and other workplace accidents.	Prepare and implement basic health and safety procedures for market operation. Provide regular OHS training/awareness for workers in workplace safety. Keep working areas, walkways and access routes clean and free from obstruction. Maintain first-aid supplies and emergency contacts.	Borame Local Municipality / Market Management	Quarterly	Included in the budget of the Municipality	Prepared and implemented basic health and safety plan/procedures # of OHS training sessions provided # of health and safety plans available First aid kit and emergency contacts provided # of OHS incidents/accidents recorded and documented	Borame Local Municipality	Quarterly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Risk of GBV/SEA/SH, harassment or inappropriate behavior within the market (because the traders in the market are mainly women)	All workers sign CoCs. Establish dedicated reporting channel for survivors Provide GBV awareness training to workers	Borame Local Municipality / Market Management	Quarterly	Included in the budget of the Borame Local Municipality	% of workers signed COCs # of training sessions provided	Borame Local Municipality	Quarterly
ESS 3: Resource Efficiency and Pollution Prevention and Management								

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Risk of poor sanitation conditions and waste management within the market	Provide adequate and clearly located waste bins/containers within the market. Ensure waste is transferred to disposal sites approved by the Borame Local Municipality. Provide cleaning staff with adequate cleaning equipment and materials for toilets. Provide required PPEs for the cleaning staff Establish a regular cleaning schedule for toilets and common areas. Train cleaners on appropriate cleaning procedures and the use of PPEs	Borame Local Municipality	Throughout operation	Included in the budget of the Borame Local Municipality	# waste bins/containers available Frequency of waste collection (daily/two days or one week) # of cleaning staff with adequate cleaning equipment # of facilities/ equipment provided for cleaning # of PPEs provided for cleaners # of training provided for cleaners # waste-related grievances/complaints received	Borame Local Municipality	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Improper management of wastewater and liquid waste, potentially resulting in stagnant water, unpleasant odors, soil contamination or unhygienic conditions.	Regularly inspect and clean drainage systems. Prevent disposal of solid waste into drains. Ensure wastewater is directed to appropriate drainage/disposal systems. Regularly repair damaged drainage infrastructure.	Borame Local Municipality	Throughout Operation	Included in the budget of the Borame Local Municipality	frequency of drainage inspections and cleaning. # of blocked drains identified and cleared. # of drainage/ wastewater related complaints/grievance recorded.	Borame Local Municipality	Monthly
	Dust exposure from cereal/grain handling, potentially affecting traders, workers and customers.	Keep cereal handling and storage areas clean. Use low-dust cleaning methods, such as damp wiping or careful sweeping, and avoid practices that unnecessarily disperse dust into the air. Ensure adequate natural ventilation in enclosed storage areas. Provide appropriate dust masks/PPE to workers regularly exposed to high levels of cereal dust.	Borame Local Municipality	Throughout Operation	Included in the budget of the Borame Local Municipality	Regular cleaning of cereal handling/storage areas. Maintain adequate natural ventilation maintained. % of regularly exposed workers using appropriate PPE where required. # of dust-related complaints and grievances.	Borame Local Municipality	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	ESS 4: Community Health and Safety							
	Fire risks associated with stored cereals, combustible materials, electrical faults and activities within the market	Provide appropriate and accessible fire extinguishers at strategic locations within the market and warehouses. Regularly inspect and maintain electrical installations Keep emergency exits and access routes clear at all times. Prohibit unsafe use of open flames and other potential ignition sources within cereal storage areas. Train market management and relevant workers on fire prevention and use of fire extinguishers. Display emergency contact information and evacuation instructions.	Borame Local Municipality / Market Management	Throughout operation	Included in the budget of the Borame Local Municipality	# functional fire extinguishers available # fire-safety inspections Emergency routes kept clear # fire incidents reported Displayed emergency contacts for fire related incidents	Borame Local Municipality / Market Management	Monthly/Quarterly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Poor cereal storage conditions resulting in spoilage, mould, pest infestation and deterioration of hygiene.	Keep cereal storage areas clean, dry and adequately ventilated. Store cereals appropriately to minimize contact with moisture and contamination. Regularly inspect stored cereals and warehouses for signs of moisture, mould or pests. Promptly remove spoiled or contaminated materials.	Borame Local Municipality / Market Management	Throughout operation	Included in the budget of the Borame Local Municipality	# or frequency of cleaning activities in storage areas Frequency of storage area inspections. # of mould/spoilage incidents identified. # of corrective actions undertaken.	Borame Local Municipality / Market Management	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Pest and vector infestation, including rodents, flies and insects attracted by cereals, waste or stagnant water.	Maintain good housekeeping and promptly remove waste and cereal residues. Keep storage areas clean and dry. Regularly inspect the market for signs of rodents and other pests. Eliminate stagnant water and potential breeding areas. Undertake appropriate pest-control measures when necessary, using safe methods.	Borame Local Municipality / Market Management	Throughout operation	Included in Municipality budget	Frequency of pest inspections conducted # of pest/vector infestation incidents identified. # of pest-control measures undertaken. # of pest-related complaints received.	Borame Local Municipality / Market Management	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Traffic, pedestrian and loading/unloading safety risks associated with vehicles delivering and collecting cereals.	Designate appropriate loading/unloading areas where feasible. Keep pedestrian access routes clear and separated from vehicle movements Avoid unnecessary obstruction of surrounding roads and market entrances. Provide signs and traffic control measures	Borame Local Municipality / Market Management	Throughout operations	Included in Municipality budget	Loading/unloading areas appropriately designated and managed. Pedestrian routes maintained clear. # of traffic/pedestrian incidents reported. Traffic-control/signage measures available where required. # of traffic/access complaints received.	Borame Local Municipality / Market Management	Monthly
	ESS 5: Land Acquisition, Restrictions of Land Use and Involuntary Resettlement							

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Risk of displacement, exclusion or loss of access to trading spaces resulting from changes in market layout, allocation, reallocation or management arrangements.	Maintain an updated register of authorized/existing traders and their allocated trading spaces. Establish and apply clear, transparent and non-discriminatory procedures for allocation or reallocation of trading spaces. Avoid arbitrary displacement or exclusion of existing traders. Consult affected traders before making changes that may result in loss or restriction of access to existing trading spaces. Provide access to the GRM for complaints concerning allocation, exclusion, displacement or access to trading spaces.	Borame Local Municipality / Market Management	Throughout operations	Included in Municipality budget	Trader register maintained and updated before and after rehabilitation Allocation/reallocation procedures documented and communicated. # of traders affected by changes to trading spaces. # of consultations conducted with affected traders. # of allocation/displacement-related grievances received and resolved.	Borame Local Municipality / Market Management	Monthly
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources								

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Damage or unnecessary removal of existing trees and vegetation during market operation, maintenance or repair activities.	Protect existing trees and vegetation from unnecessary cutting or damage. Maintain planted/vegetated areas. Regularly maintain and water planted trees/vegetation Replace trees or vegetation that are unnecessarily damaged or removed	Borame Local Municipality / Market Management	Throughout Operations	Included in Municipality budget	# of trees planted or maintained. # of trees unnecessarily damaged/removed. Frequency of watering and maintenance of trees # of vegetation-related incidents/complaints.	Borame Local Municipality / Market Management	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Risk of disturbance to birds and nesting/roosting sites during operations	Avoid deliberate disturbance, capture or killing of birds within the market premises. Avoid disturbing or removing active nests, eggs and young birds Raise awareness and inform market personnel about protection of birds and active nests.	Borame Local Municipality / Market Management	Throughout Operations	Included in Municipality budget	# of active bird nests identified and protected. # of awareness sessions provided to relevant workers on protection of birds and active nests. # of bird/nest disturbance incidents reported.	Borame Local Municipality / Market Management	Monthly
	ESS 8: Cultural, Historical, and Archaeological Important Sites							

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Risk of accidental discovery and disturbance of previously unidentified cultural heritage resources during operations	Apply the Chance Finds Procedure during operations that involve excavation works Do not remove, damage, alter or dispose of any suspected cultural heritage object identified within the market premises. Report any suspected cultural heritage find to Market Management and the relevant authority, as appropriate. Maintain awareness among market users and personnel on appropriate reporting of cultural heritage finds.	Borame Local Municipality / Market Management	Throughout Operations	Included in Municipality budget	# of suspected cultural heritage finds reported, if any. # of cultural heritage disturbance/damage incidents. Records of actions taken where a cultural heritage find is reported.	Borame Local Municipality / Market Management	Quarterly / As required
	ESS 10: Stakeholder Engagement and Information Disclosure							

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Inadequate stakeholder engagement and information disclosure during the operation and management of the market	Conduct regular meetings and consultations with traders and market users on market management issues. Provide clear and timely information on market rules, services, hygiene, safety and other operational matters. Display important information and notices at accessible locations within the market. Ensure women, persons with disabilities and other vulnerable groups can participate and raise concerns.	Borame Local Municipality / Market Management	Throughout operations	Included in Municipality budget	# of stakeholder meetings/consultations conducted. # of participants of consultations, disaggregated by sex where appropriate. # of operational notices/information disclosed. # of stakeholder concerns/complaints raised and addressed. Consultation/meeting records maintained.	Borame Local Municipality / Market Management	Monthly

WB ESS	E&S Risks and Impacts	Mitigation Measures	Responsibility for Implementation	Timing for Mitigation	Budget for mitigation (in USD)	Monitoring Indicators	Monitoring Responsibility	Monitoring Frequency
	Lack of awareness of or access to the GRM, potentially resulting in unresolved complaints and disputes among traders, market users and other stakeholders.	Establish and maintain an accessible GRM for traders, customers and other market users. Clearly display GRM contact information and complaint channels within the market. Conduct regular awareness on how and where grievances can be submitted. Maintain a grievance register and track all complaints received. Maintain confidentiality and appropriate survivor-centred procedures for SEA/SH complaints.	Borame Local Municipality / Market Management	Throughout operations	Included in Municipality budget	GRM contact information displayed and accessible. # of GRM awareness sessions conducted. Grievance register maintained and updated. # of grievances received, resolved and pending. % of grievances resolved.	Borame Local Municipality / Market Management	Monthly

Section 8. Implementation Arrangements

8.1 Institutional Roles and Responsibilities

The overall responsibility for the implementation of the sub-project rests with the Ministry of Agriculture Development (MoAD), as the lead implementing ministry of the Somaliland Food Systems Resilience Project (SL-FSRP). The Project Coordination Unit (PCU) will provide overall coordination and oversight of the rehabilitation works, including monitoring compliance with the environmental and social requirements of the Project and this ESMP.

The Borame Local Municipality, as the owner and manager of the market, will play an important role in facilitating implementation of the rehabilitation works. The Municipality will coordinate with market traders and other local stakeholders, support access to the project site, and identify and prepare a suitable temporary trading location where existing cereal traders can continue their businesses during the rehabilitation period. Following completion of the works, the Municipality will be responsible for the management and operation of the rehabilitated market, including sanitation, waste management, maintenance, and other routine environmental and social requirements.

A qualified construction contractor will be recruited to undertake the rehabilitation works in accordance with the approved designs, contractual requirements, and this ESMP. The contractor will have primary responsibility for implementing all environmental, social, health and safety (ESHS) mitigation measures during construction. The contractor will prepare and implement a Contractor's Environmental and Social Management Plan (C-ESMP) and other required E&S management procedures before commencement of relevant works.

The SL-FSRP E&S Safeguards Team, together with the relevant technical supervision personnel, will monitor the contractor's compliance with the ESMP, C-ESMP, applicable national requirements, and World Bank Environmental and Social Standards (ESSs). The contractor will be required to address any E&S non-compliance or corrective actions identified during supervision.

Table 6: Institutional Roles and Responsibilities

Institution/Party	Key Responsibilities
Ministry of Agriculture Development (MoAD)	Responsible for overall implementation of the market rehabilitation under the SL-FSRP and coordination with relevant government institutions and stakeholders.
SL-FSRP Project Coordination Unit (PCU)	Provides overall project coordination and oversight; monitors implementation of the ESMP and World Bank E&S requirements; reviews E&S reports; conducts supervision; and follows up on corrective actions and grievances.
Borame Local Municipality	As the owner and manager of the market, facilitates implementation at the local level; coordinates with traders and market users; provides the temporary trading location during rehabilitation; and supports stakeholder

	engagement and grievance management. Following completion, the Municipality will manage and maintain the rehabilitated market.
Supervision Consultant/Engineer	Provides day-to-day technical supervision of the rehabilitation works and monitors the contractor's compliance with approved designs, specifications, ESMP requirements, and ESHS obligations. Any E&S non-compliance will be reported to the PCU and followed up with the contractor.
Contractor	Implements the rehabilitation works in accordance with the approved design, contract, ESMP, and C-ESMP. Responsible for construction-site ESHS management, worker safety, waste management, dust and noise control, community safety, labour management, Codes of Conduct, GBV/SEA/SH prevention, contractor and workers' GRM, incident reporting, and implementation of corrective actions.

8.2 Contractor

The contractor is responsible for complying with requirements for all field activities covered by this ESMP. The contractor is also responsible for ensuring 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 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 sub-contractors 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 mitigation measures laid out in this ESMP, for which the contractor is responsible.
- The contractor to prepare and implement extensive site-specific C-ESMP and other E&S sub plans recommended in this ESMP.
- Ensuring that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- Complying with accident and incident reporting framework as laid out in the ESMF. All severe incidents must be reported to the PCU within 24 hours of occurrence.
- Monitoring the ESMP implementation, against the monitoring indicators laid out in the ESMP Table.
- Participating in community consultative meetings.
- Identifying additional significant matters pertaining to environmental and social compliance.
- Liaising with the PCU on the need for corrective action in the event of unexpected environmental or social problems emerging during the course of 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 a workers' grievance mechanism
- Provide regular training to all workers on OHS related issues (toolbox talks).
- Ensuring signing of code of conduct by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.
- Ensuring technical milestone during project are in tandem with E&S milestones.
- The contractor is obliged to implementing this ESMP with all risk mitigation measures assigned to it.

The contractor will deploy an E&S or EHS Specialist to ensure operationalization of this ESMP, including monitoring, supervision and reporting on mitigation measures. The key tasks of the specialist are:

- Ensure PPEs for workers are available and workers are trained on their use
- Provide OHS training to all workers, based on the ESMP
- Ensure health and safety of all workers and visitors at the construction site
- In case of non-compliance with the technical team on E&S aspects, stop the work to ensure safety and compliance.
- Maintain records of accidents and incidents and ensure appropriate reporting of incidents to the PCU
- Ensure sustainable waste management procedures are followed closely.
- Ensure the health and safety of the community is not compromised during works implementation.
- Ensure availability of water and sanitation facilities for all workers at site
- Conduct toolbox talks for workers
- Train all workers in the CoC and ensure that CoC is signed by every worker
- Liaise closely with the PCU on training workers on GBV issues, as well as community awareness on GBV
- Maintain workers' lists indicating age, gender and vulnerability aspect (persons living with disabilities, etc)
- Maintain records of Workers' GRM
- Ensure all grievances are lodged, acknowledged, resolved and closed within the specific timelines set by the sub-project.
- Ensure all the provisions of this ESMP are implemented.

Section 9. Reporting on ESMP Compliance

The Contractor will prepare and submit monthly Environmental and Social (E&S) monitoring reports on the implementation of the ESMP and C-ESMP during the sub-project implementation. The E&S team of the SL-FSRP within the PCU will review the contractor's monthly reports, conduct regular supervision and monitoring, and prepare quarterly E&S progress reports summarizing the overall environmental and social performance of the sub-project. The quarterly report will then be submitted to the World Bank as part of the Project's E&S reporting requirements. The template of the monthly report to be submitted by the contractor is attached as an Annex.

Table 7: 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 PCU	Compliance status of the Project with the E&S mitigation and monitoring measures. The report should cover: Environmental incidents; Health and safety incidents, child and forced labor; Health and safety supervision; Usage of PPEs by workers; Highlights of inspection; Training conducted, and workers participated; Worker's grievances.	Monthly	Contractor
2	ESMP Monitoring Report to the WB Team	Compliance status of overall Project with ESMP requirements, including findings from supervision and inspections; status of mitigation measures; OHS and community safety; incidents; labour issues; stakeholder engagement; grievances received and resolved; GBV/SEA/SH prevention; and status of corrective actions.	Quarterly	PCU
3	Incident Reports to PCU	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and corrective actions taken to address the future recurrence of this event	Initial investigation report for severe incidents within 24 hours. Detailed Investigation Report within ten days	Contractor
4	Incidents reports from PCU to WB	Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event	Initial investigation report for severe	PCU

			incidents within 48 hours. Detailed Investigation Report within ten days	
	Stakeholder community engagement activities and GRM awareness campaigns	Stakeholder and community engagement activities conducted over the reporting period and the GRM awareness campaign and initiatives undertaken	Monthly/ with key information consolidated into quarterly E&S reporting.	Contractor / PCU
	E&S Training and capacity building	Workers training on the OHS, CoC, workers' GRM, SEAH and GBV issues, emergency preparedness and others	Monthly / as conducted with key information consolidated into quarterly E&S reporting	Contractor / PCU

Section 10. Capacity Building and Training

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

The PCU E&S Team will provide an initial E&S orientation and capacity-building training to the Contractor's key personnel, including the Contractor's senior management, Project/Site Manager, Site Engineer, ESHS specialist of the contractor, supervisors, and other relevant personnel involved in the sub-project.

On-site workers should receive appropriate training to undertake the duties of implementing the necessary mitigation measures. The training workshops should be undertaken prior to commencement of construction activities and as capacity building exercise throughout the project rehabilitation and construction phase during the toolbox talks (refresher training). The recipients of the training are all workers engaged. Costs associated with training and awareness activities to be delivered by the Contractor will be included in the Contractor's ESHS implementation budget and/or the BOQ to be submitted in the BID document.

The E&S training for both contractor and workers should cover, at least, the following issues:

- Occupational Health and Safety (OHS) and community health and safety.
- Site-specific environmental and social risks and required mitigation measures.
- Proper use, maintenance, and replacement of PPEs.
- Safe working procedures, including use of tools, machinery, equipment, and manual handling.
- Labour and working conditions, including workers' rights and responsibilities.
- GBV/SEA/SH prevention, awareness, reporting, and referral procedures.
- Workers' Code of Conduct (CoC) and expected behaviour toward communities and other workers.
- Accident and incident prevention, reporting, investigation, and corrective actions.
- Emergency preparedness and response procedures, including fire safety, first aid, and evacuation.
- Workers' GRM and Project GRM, including available channels for submitting complaints.
- Appropriate segregation, collection, temporary storage, transportation, and final disposal of solid and hazardous waste.
- Dust, noise, pollution prevention, and good housekeeping practices.
- Traffic, pedestrian, and community safety, particularly during movement of vehicles and equipment.
- Protection of existing trees, vegetation, birds, and nesting sites where applicable.
- Chance Finds Procedure for any unexpected cultural heritage discoveries.
- Prevention of child labour and forced labour.
- Appropriate interaction with traders, market users, surrounding communities, and vulnerable people.
- Procedures for reporting environmental, social, health and safety concerns and non-compliance.

In addition to worker training, awareness-raising sessions will be provided to traders, market users, surrounding communities, and other relevant stakeholders, as appropriate.

These sessions will cover the following topics:

- Awareness of potential environmental and social risks and impacts and the measures in place to mitigate them.
- Community safety and appropriate interaction with construction workers.
- Grievance Redress Mechanism (GRM), including available channels for submitting complaints and concerns.
- GBV/SEA/SH prevention and response including awareness of prohibited conduct and available confidential reporting and referral channels.
- Relevant information on construction activities that may temporarily affect access, movement, or normal activities.

Section 11. Grievance Redress Mechanisms

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 Project provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the Project.

For construction related activities, two-tier Grievance Redress Mechanism (GRM) will be applied to receive and address concerns and complaints associated with project activities. The first tier is the Project-level GRM, established and managed by the SL-FSRP through the PCU in accordance with the Project Stakeholder Engagement Plan (SEP). The second tier is the Contractor-level GRM, which the contractor is required to establish and maintain for grievances arising from their activities and employment practices. The two mechanisms will be linked so that grievances that cannot be resolved at the contractor level, or that require project-level intervention, can be referred or escalated to the Project-level GRM. Both mechanisms will be accessible, transparent, culturally appropriate and free of charge, and complainants will be able to raise concerns without fear of retaliation.

The contractor will establish a functional GRM before commencement of activities and designate responsible personnel to receive, register, respond to and follow up complaints. In accordance with ESS2 and the Project LMP, contractors will also provide an accessible grievance mechanism for workers to raise concerns relating to wages, working conditions, OHS, discrimination, harassment and other employment-related matters. Workers will be informed about the mechanism during induction and will be protected against retaliation.

Prior to commencement of the work, the project and contractor-level GRM will be shared and will be available to project beneficiaries, affected persons, community members, businesses, workers and other stakeholders who believe they will be affected by project activities. Construction workers will also have access to the Project-level GRM, particularly where grievances cannot be satisfactorily resolved through the Contractor-level GRM. Information on available grievance channels will be communicated to stakeholders through consultations, awareness activities, notice boards and other appropriate means.

Non-sensitive grievances will be registered, acknowledged, assessed and investigated where necessary in accordance with the project GRM procedures. At the project level, grievances will be received by the Social Safeguards Specialist at the PCU-level through phone call, text, in-person, and/or email and then the grievance will be resolved by the national-level GRM committee for the project. The social safeguards specialist will acknowledge, log, forward, follow-up grievance resolution and inform the complainant of the outcome. Grievances will normally be resolved within seven (7) working days from the date of receipt. Where a complaint requires a more in-depth investigation or consultation, additional time may be provided; however, the total resolution period should not exceed thirty (30) days, except under exceptional circumstances, which must be properly documented and communicated to the complainant.

Complainants will be informed of the outcome and available escalation or appeal options. Appropriate grievance records will be maintained while protecting confidential information. Access to the GRM will not prevent complainants from seeking judicial or other lawful remedies. The GRM includes an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then he/she should be advised of his/her right to legal recourse. Anonymous grievances can be raised and addressed.

National-level Grievance Committee (GC) was already established for the project, consisting of the DG for MoAD as the chair of the committee, and relevant E&S staff of the project including the GBV as well as one member from the civil society organizations outside of the project. The social safeguards' specialist acts as the secretary to the meeting and taking minutes and follow up the grievance resolution process.

Uptake channels include:

- Toll-free telephone hotline number **(9660)** which has separate receivers for general grievances and GBV-related grievances.
- E-mail for general GM: (complaints@sl-fsrp.org)
- Email for GBV-related GM: (confidentialsupport@sl-fsrp.org)
- Walk-in and/or letter to Grievance Focal Points at the sub-project site level and PCU office;
- Complaint form to be lodged via any of the above channels; and
- Register a complaint on a grievance logbook at the sub-project site and/or PCU office.

GBV/SEAH-related grievances/complaints will follow a confidential and survivor-centred approach rather than the normal grievance investigation process. The GRM system has different channels and protocols to enable a confidential and sensitive approach to GBV/SEAH related cases that ensures the safety of survivors and enables survivor-centred care. These grievances and complaints will be handled solely by the GBV specialist of the project to protect the confidentiality of the survivor/victim. With informed consent, survivors will be referred to available support services, with priority given to their safety, confidentiality, dignity and choices. Relevant Code of Conduct and contractual requirements will apply where contractor personnel are involved.

Finally, the contractor will report the number and general status of grievances received, resolved, pending and referred to through their regular E&S reporting, without disclosing confidential information. The PCU E&S team will monitor both GRM tiers, track unresolved or recurring grievances, and ensure that appropriate corrective actions are taken.

Section 12. Implementing Budget

Adequate financial and human resources will be required to ensure effective implementation, supervision, monitoring, and reporting of the environmental and social measures contained in this ESMP. The PCU E&S Team will be responsible for overall E&S supervision and monitoring, including providing initial E&S orientation to the Contractor's key personnel as well as on-site intermittent refresher training and awareness raising sessions. The contractor will be responsible for providing sufficient resources for implementation of all site-level ESHS mitigation measures and for ensuring that these costs are incorporated into the bid and contract price.

Table 8: ESMP Implementing Budget

No	Responsible Party	Required Resources / Activities	Estimated Cost / Budget Arrangement
A	PCU - ESMP Supervision and Monitoring		
1	PCU	E&S Team per diems for ESMP supervision, site inspections, monitoring, reporting, and follow-up of corrective actions.	\$4,500
2	PCU	Travel and logistics for E&S supervision and monitoring visits.	\$1,500
3	PCU	Initial E&S orientation/training for the Contractor's key personnel, including the Senior Management, Site/Project Manager, Site Engineer, E&S Specialist, OHS personnel, supervisors, and other relevant personnel.	\$500
4	PCU	Stakeholder engagement, GRM awareness, and other E&S awareness activities, as required.	\$2,000
B	Contractor - Implementation of ESMP/C-ESMP or ESHS Measures		
5	Contractor	Qualified E&S Specialist/Focal Person and other ESHS personnel required for implementation of the ESMP/C-ESMP.	Bidder to assess and include in bid price
6	Contractor	Provision and replacement of appropriate Personal Protective Equipment (PPE).	Bidder to assess and include in bid price
7	Contractor	Worker E&S/OHS induction, refresher training and regular toolbox talks.	Bidder to assess and include in bid price
8	Contractor	First-aid supplies, fire extinguishers, emergency preparedness and response equipment.	Bidder to assess and include in bid price
9	Contractor	Waste segregation, collection, temporary storage, transportation, and disposal at approved locations.	Bidder to assess and include in bid price
10	Contractor	Dust, noise, pollution prevention, spill prevention and other environmental mitigation measures.	Bidder to assess and include in bid price
11	Contractor	Safety signs, barriers, fencing, warning notices, and pedestrian/community safety measures.	Bidder to assess and include in bid price
12	Contractor	Adequate toilets, handwashing facilities, drinking water, and other worker welfare facilities.	Bidder to assess and include in bid price
13	Contractor	Traffic and access management measures, where applicable.	Bidder to assess and include in bid price
14	Contractor	Stakeholder/community engagement and implementation of the Contractor-level GRM and workers' GRM.	Bidder to assess and include in bid price

15	Contractor	GBV/SEA/SH prevention measures, Code of Conduct awareness and related worker training.	Bidder to assess and include in bid price
16	Contractor	Environmental and social monitoring, monthly ESHS reporting, incident reporting, record keeping, and corrective action follow-up.	Bidder to assess and include in bid price
17	Contractor	Security and other site-specific ESHS risk mitigation measures, where applicable.	Bidder to assess and include in bid price

The Contractor shall consider the implementation of the ESMP/C-ESMP as an integral part of the works and shall include all associated **ESHS costs in the bid price**. No separate payment should be assumed for measures that form part of the Contractor's contractual ESHS obligations unless specifically provided for in the Bill of Quantities or contract.

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11. **UNFPA Somalia (2014).** *Population Estimation Survey of Somalia (PESS) 2014.* Provides the principal population-estimation framework available for the Somali regions.
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Annex 1 of ESMP: Social summary report for sub-projects (max 5 pages). Please attach community engagement minutes, voluntary land donation/agreement documentation, screening form

Proposed sub-project: Borame Cereal Market

Total no. of market traders in the area is 40

1. Other than technical selection, why was this site chosen for construction compared to other sites (need/distance/challenge with nearest to water point/inclusion etc)

Borama Cereals Market is a public mini-market that was opened in 1994 by Borame Local Municipality. This market focuses mainly on the sale of cereals including sorghum, maize, cowpea and other grains and it's the end market of produce from Borame and its neighboring villages and widely from Awdal region and even cereals brought from the neighboring country, Ethiopia.

The Market was selected because it is an existing and operational cereal market that has been serving traders, farmers, and customers in Borame and surrounding areas for many years. However, the existing infrastructure has deteriorated and is inadequate to provide safe, organized, and suitable conditions for cereal trading and storage. The market is also strategically located within Borame City and easily accessible to traders, farmers, customers, transporters, and other market users. The proposed improvements are therefore expected to benefit the existing market users, including the women who predominantly undertake cereal trading activities in the market.

2. Overview of the project location and key features within 200m of works (to understand impacts):

Borame City is the capital of Awdal Region in western Somaliland and is located approximately 120 km west of Hargeisa, the capital of Somaliland. The market to be rehabilitated is located within the urban center in an established commercial area that has been used for businesses. The area surrounding the market is largely developed, with a mixture of shops, small businesses, commercial structures, local access roads, and other urban infrastructure. On the North side, the market is bordered by a road that branches from the main road. The market's location within the city makes it easily accessible to farmers and traders bringing cereals and other agricultural products from Borame and surrounding areas.



Figure 1. Site for the Borame Cereal Market

3. **Key stakeholders and how they were consulted and engaged for the proposed sub-project activities to ensure broad agreement, ownership and risk identification and mitigation (Please explain)**

The key stakeholders consulted during the E&S assessment of the Market rehabilitation included representatives from:

- Borame Local Municipality, as the main institution that manages the market;
- Ministry of Agriculture Development (MoAD);
- Ministry of Environment and Climate Change (MoECC);
- Traders and vendors operating within the market;
- Other market users and representatives of women traders; and
- Relevant local authorities and representatives from neighboring businesses and property users

The above stakeholders were engaged through consultation meetings, discussions, and a joint site visit to the existing market.



Figure 2: Stakeholder meeting/consultations

4. Consultations with the community on the sub-project (to ensure broad agreement, ownership and risk identification and mitigation)

	Date	Total number of people involved	No. of women	Main concerns raised	and how they will be addressed including training	Challenges in consulting with people e.g. migration, conflicting event, insecurity
Initial site visit	24-25 th July 2026	25	4	Participants discussed the poor condition of the existing cereal market and the need for rehabilitation to improve trading conditions, cereal storage, sanitation, safety, and organization of the market. They confirmed that the proposed market and its land is government-owned. The Borame Local Municipality confirmed that the market is under its ownership and management. The site is suitable for the project, and has adequate space for the planned facilities They raised concerns about environmental and social impacts during rehabilitation The main environmental and social issues raised included: • Construction waste management. • Dust and noise during construction. • Occupational health and safety of construction workers. • Fair employment opportunities for local communities.	The E&S team confirmed the suitability of the site and the importance of the market and its strategic location. The E&S team also discussed the environmental and social assessment process and agreed to incorporate the identified issues into the project design and ESMP. The E&S team emphasized that the contractor will be responsible for implementing all necessary mitigation measures to address these impacts. The E&S team will closely monitor compliance throughout the construction period to ensure that these risks are effectively managed and that the rehabilitation works proceed in an environmentally and socially responsible manner.	No major challenges were encountered during the consultation. Relevant government stakeholders participated in the consultation and site assessment.

				Potential GBV/SEA/SH risks associated with construction workers.		
Community/ stakeholder consultation meeting including: - Sharing sub-project information - Documenting potential E&S impacts/risks - Awareness of GBV prevention; - GRM process	26 th July 2026	23	23	This consultation meeting was mainly participated by market traders, vendors, and nearby businesses. The participants raised concern about the potential temporary disruption of trading activities and access to existing trading spaces during rehabilitation, which could affect their businesses and income. Concerns were also discussed regarding safety during the rehabilitation works and the arrangements for allocation and reoccupation of the improved trading spaces after completion.	The E&S team explained that existing traders will be registered before rehabilitation, informed in advance about the work schedule, and provided with temporary trading space/access arrangements where necessary to minimize disruption.	No major challenges were encountered during the consultation.

1. **Has there been any conflict over this land in the past? If so please describe, what measures the project will take to ensure that project does not exacerbate conflict:**

No, there is no conflict at this location. The market was built in a government-owned land managed by the Borame Local Municipality

2. **Has a safeguards field visit been undertaken to the site? Y/N Date of visit:** Yes, 24-26/07/2026, **Title of visiting officer:** Environmental and social and GBV safeguarding specialists

3. **Will the ESMP be incorporated into the contract for the works and is a safeguards compliance report required before payment?** Yes _____

4. **Type of land required for sub-investment and documentation:**

a. Government land	Title deed/confirmation document attached?	YES The land within which the market is located is government-owned managed by the Borame Local Municipality
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b. Community land	Voluntary land donation form and conversion document attached?	NA
c. Private land	Voluntary land donation form and conversion document attached?	NA

5. **GRM: Has the GRM process and contact information for focal points been disseminated to the community? If so, how and to whom. If not, when will this be done? _**

During the consultation, the project team explained the Grievance Redress Mechanism (GRM) process and informed participants that they could raise any complaints or concerns related to the rehabilitation of the market.

6. **Describe the nearest GBV service providers for health, psycho-social and legal support (to inform the site supervisor and stakeholder in the area):**

The nearest Health provider including GBV, and legal support is Borame main referral hospital which is less than 4km from the site.

7. **GBV/SEAH: Has awareness been carried out on GBV, service providers and confidential survivor centric GBV complaints mechanism? If so, how and to whom. If not, when will this be done?**

Yes. Awareness raising on GBV/SEAH, available service providers, and the confidential survivor-centered GBV complaints mechanism has been carried out as part of the project safeguards implementation, this awareness has been done by the safeguarding team particularly the GBV specialist of the project and she shared the participants about GBV/SEAH information.

Annex 2: Consultation Minutes of the Meeting

1. Introduction

The Somaliland Food Systems Resilience Program (FSRP) is a regional initiative financed by the World Bank intended to increase the resilience of food systems and improve Somaliland's preparedness for food insecurity in the project's target areas. As part of this broad objective, the program also provides support in improving institutional infrastructure and capacity development.

For MoAD, under **Sub-component 3.2**, the project will support the rehabilitation of the existing Borame Cereal Market in Borame City. The rehabilitation is expected to improve the condition, services, and overall functionality of the market for traders and other market users.

2. Community Consultation Discussion

The following table summarizes all the consultation meetings conducted during the assessment.

Community Consultation Meeting Minutes	
Date of Meeting: 24-26 th July 2026	Meeting venue: Borame
Facilitated by:	SL-FSRP Safeguarding Team
How and who mobilized?	MoAD regional coordinator mobilized the stakeholders
Total members participated:	48
Number of Men:	21
Number of Women:	27
Purpose/Agenda of Meeting:	- Sharing Project Information and proposed rehabilitation of the market - Identifying the potential environmental and social impacts associated with the rehabilitation activities - Discussing land ownership issues - Awareness and sensitization on GBV prevention and reporting - Sharing information on GRM process and reporting channels
Key issues discussed and concerns raised by the community:	The E&S Safeguards Team provided information about the Somaliland Food Systems Resilience Project (SL-FSRP), the role of the Ministry of Agriculture Development (MoAD), and the proposed rehabilitation of the existing Borame Cereal Market. Stakeholders welcomed the proposed rehabilitation and recognized its importance in improving the market

	environment and services for traders and other market users. a. Project Overview The E&S team presented the purpose, proposed activities, and expected benefits of the market rehabilitation. Participants were also informed about the scope of the rehabilitation works and the potential environmental and social risks and impacts associated with their implementation. b. Land and Market Ownership • The participants confirmed that the market is owned and managed by the Borame Local Municipality (government-owned) • The rehabilitation will be undertaken within the existing Borame Cereal Market premises. No additional private or community land will be required for the rehabilitation works. • All necessary permits and approvals for the rehabilitation will be obtained from the Borame Local Municipality. c. Site Selection Criteria The participants emphasized that the market was selected because it is an important market that has served traders and other market users for many years but requires improvement due to the poor condition of some of its existing infrastructure. Its location within Borame City also provides good accessibility for traders, customers, transporters, and other market users. Other issues or concerns discussed included: 1. Temporary Disruption of Trading Activities: Participants raised concerns about possible disruption of their businesses and access to trading spaces during the rehabilitation works. 2. Allocation and Reoccupation of Trading Spaces: Traders raised concerns regarding the allocation of the improved trading spaces after completion of the rehabilitation. 3. Local Employment: Participants discussed employment opportunities that may arise during the rehabilitation works. 4. GBV/SEAH Risks: Potential for misconduct or exploitation by project workers. The community was sensitized on:
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	○ Zero tolerance for GBV/SEAH ○ Survivor-centered confidential reporting mechanisms (sharing with reporting channels) ○ Available service providers d. Community Feedback and Agreement • Participants expressed support for the proposed rehabilitation of the Market and emphasized the importance of completing the works in a way that minimizes disruption to existing trading activities. • They expressed appreciation for the transparent engagement and requested continuous communication during implementation.
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Potential Environmental and Social Impacts: *The following information is based on the discussions with the participants in the consultation meeting. The table below summarizes the potential environmental and social risks/impacts identified during the discussions.*

S/N	Potential Impact	Affected Group	Agreed Mitigation Measures
1	Waste mismanagement (solid and liquid waste)	Construction workers + market traders + surrounding environment	Ensure proper collection, storage, and safe disposal of construction waste at approved disposal areas.
2	Dust, noise and vibration from rehabilitation activities	Construction workers + market traders + nearby businesses	Apply water spraying and other dust-control measures; use well-maintained equipment; restrict noisy activities to daytime hours; and provide appropriate PPE to workers.
3	Temporary disruption of trading activities and restricted access during rehabilitation	Market traders + vendors + customers and other market users	provide temporary trading spaces/access arrangements where required; maintain safe access where possible
4	Labor-related issues including unfair employment opportunities	Local workers + construction workers	Promote fair and transparent employment opportunities and prioritize local labor where possible without discrimination.
5	Disputes or exclusion of existing traders during allocation and/or reoccupation of improved trading spaces	market traders, particularly women traders	Register and document existing traders before rehabilitation begins. Apply clear, transparent and fair criteria for reoccupation/allocation of improved trading spaces and provide access to the Project GRM for complaints.
6	GBV/SEA/SH risks due to the labor influx	Market users, particularly women traders, and construction workers	Conduct GBV/SEA/SH awareness for workers and market users; require workers to sign and comply with the Code of Conduct; and provide

			clear, confidential and survivor-centered reporting mechanisms through the Project GRM
Follow-up action needed: • Ensure integration of Environmental and Social Management Plan (ESMP) mitigation measures during project implementation. • Train and sensitize contractors on implementation of the mitigation measures in the ESMP • Conduct regular E&S monitoring to verify implementation of the agreed measures.			
Conclusion: The consultation meeting was productive and participatory, providing participants with an opportunity to share their views, concerns, and recommendations regarding the proposed rehabilitation of the market in Borame. On the other hand, the project E&S team provided information about the project and the grievance mechanism in place, including the hotline number (9660) for any grievances. Overall, the participants expressed strong support for the project.			

Annex 3: Consultations Meeting Attendance



Ministry of Agricultural
Development
Republic of Somaliland

Food Systems Resilience Project (P177816)

E&S screening and assessment for Borame cereals market rehabilitation (Gurrey hadhuudhile)

Borame, Somaliland

Attendance Sheet for community engagement

Date: 26/07/2026



SL-FSRP
Somaliland Food Systems Resilience Project

No	Name	Title	Gender	Telephone	Signature
1	Ahmed Ali Haddi	Dep. Mayor	male	063445367	[Signature]
2	Eng. Abdulkani Good	Ag.ime	" "	0634453985	[Signature]
3					
4	ag: C / Qan: C / S / la: sh: la: i	Ag. W. Arims	" "	0634456847	[Signature]
5					
6	Mustafe Abdi Ahmed	Consultant	///	0634451807	[Signature]
7	Maxamed Axamed Bani	Shopale	///	0634454237	[Signature]
8	Samii Xs maxamed Sami	///	female	0634452342	[Signature]
9	Ahmed Idiris farax	///	male	0634452882	[Signature]
10	Mukhtaar Xasan Clauku	///	male	0634453285	[Signature]
11	Xil: Liibann Cali Cilmi	Xildhibaan	///	0634064900	[Signature]
12	Xil: Maxamed diirige	///	///	0634455072	[Signature]
13	Maxamed cladii sh. hamed	Regional Moad	Male	063-4506377	[Signature]
14	Abdiwahab Hussein Mumin	Regional Coordinator	male	063-4454516	[Signature]
15	Faysal Aden Sulatan	-	male	0634457861	[Signature]
16	Suad sh. Abdulkadi sh. Ali Jantar	W. Boorah	Female	063 459 1677	[Signature]

This attendance sheet MUST be used for all workshops, training sessions, meetings, and other important events /gatherings or as deemed necessary.

No	Name	Title	Gender	Telephone	Signature
17	Suleiman Mumin Tukale	Head of Dept of Planning	MALE	4504885	[Signature]
18	Umalhair Aden Abolalkahi	Moad staff	Female	4883413	[Signature]
19	Abdi Ibrahim Jamac	Moad Staff	male	4451706	[Signature]
20	Jaahir Xasacupar	Sec. OK	male	4505775	[Signature]
21	Suleyman. Cali Habiile	Xisbiiga	male	4503377	[Signature]
22	Cumar su. Muxamed	OHir beere	male	4114613	[Signature]
23	ibraahi Bannunin Cilmi	OHir beere	male	4485581	[Signature]
24	Faahimo Dauid Diirige	Madax Shigaalaha	Female	4526485	[Signature]
25	Abdi Jari Ahmed Adam	Cannan man.	Male	3760873	[Signature]
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This attendance sheet MUST be used for all workshops, training sessions, meetings, and other important events /gatherings or as deemed necessary.



Ministry of Agricultural
Development
Republic of Somaliland

Food Systems Resilience Project (P177816)

E&S screening and assessment for Borame cereals market rehabilitation (Gurrey hadhuudhle)

Borame, Somaliland

Attendance Sheet for community engagement

Date: 25/07/2026



SL-FSRP
Somaliland Food Systems Resilience Project

No	Name	Title	Gender	Telephone	Signature
1	Khadija Cuse Celi	ganeccadde suuf	F	4508913	
2	Alimco Dahir Ibrahim	G. Suuf	F	4582007	
3	Xasne Muur Aalimle	G. Suuf	F	4562224	
4	Faadhimo Meecad Adan	G. Suuf	F	4505794	
5	Sahra Meecad Adan	G. Suuf	F	4006517	
6	Xaeli Muur Celi	G. Suuf	F	4504207	
7	Sahra Xasan Rawex	G. Suuf	F	4454715	
8	Aamina Jamaar Oloonye	G. Suuf	F	4540262	
9	Aamina Jibrii Xasan	G. Suuf	F	6306137	
10	Mariyam Cismaan Cabdi	G. Suuf	F	4503655	
11	Sacade Edris Buleale	G. Suuf	F	4561595	
12	Aamina Muuse Cumer	G. Suuf	F	?	
13	Fayse Cabdi Muuse	G. Suuf	F	3492760	
14	Harweys Ahmed C/laali	G. Suuf	F	4536730	
15	Dhuxs an Xasan	G. Suuf	F		
16	Fadwa Cabdi Xasan	G. Suuf	F	4506847	

This attendance sheet MUST be used for all workshops, training sessions, meetings, and other important events/gatherings as deemed necessary.

No	Name	Title	Gender	Telephone	Signature
17	Xatimo Maxamed Yusuf	G. Suuf	F	4517374	
18	Medina Xasan Rawex	G. Suuf	F	4519915	
19	Raxo Xasan Bafad	G. Suuf	F		
20	Safiya Maxamed Gure	G. Suuf	F	4517540	
21	Shamsi Gacdi Muur	G. Suuf	F	4503850	
22	Qarad Raage	G. Suuf	F		
23	Ceele Xuseen	G. Suuf	F	4001825	
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This attendance sheet MUST be used for all workshops, training sessions, meetings, and other important events/gatherings as deemed necessary.

Annex 4: Land Ownership Documentation

JAMHUURIYADDA SOMALILAND DAWLADA/H EE DEGMADA BORAMA XAFIISKA MAYIR KUXIGEENKA		REPUBLIC OF SOMALILAND BORAMA LOCAL GOVERNMENT OFFICE OF THE DEPUTY MAYOR
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REF No: DH/DB/1170/2025	Date: Aug 05, 2026
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RE: DECLARATION OF PUBLIC OWNERSHIP OF CEREALS MARKET (GURI HADHUUDH)

To Whom It May Concern,

Pursuant to the request of the SOMALILAND FOOD SYSTEMS RESILIENCE PROJECT under the leadership of the Ministry of Agricultural Development, the Borama Local Government hereby certifies and declares that BORAMA CEREALS MARKET, commonly known as GURI HADHUUDH CEREALS MARKET, is a public market established under the authority of the Borama Local Government.

The market is publicly owned, administered, and managed by the Borama Local Government for the benefit of cereal traders, buyers, and the general public. As such, the market is a public asset under the jurisdiction and management of the local municipality.

Furthermore, in accordance with the requirements of the SL-FSRP, the Borama Local Government confirms that there are no ownership objections to the implementation of the proposed rehabilitation works within the market. The planned rehabilitation will cover an area measuring 18 METRES x 21 METRES (378 SQUARE METRES).

Accordingly, the Borama Local Government fully supports the implementation of the proposed rehabilitation works by the SL-FSRP and confirms that the project may proceed within the specified area in accordance with the applicable laws, regulations, and project requirements.

This declaration is issued upon the request of the SL-FSRP for official purposes.

Sincerely,

Ahmed Ali Haddi
Deputy Mayor of Borama District

Signature & Stamp: 



Annex 5: Template Code of Conduct for BID

Code of Conduct for Contractor's Personnel (ES) Form

Note to the Employer:

The following minimum requirements shall not be modified. The Employer may add additional requirements to address identified issues, informed by relevant environmental and social assessment.

The types of issues identified could include risks associated with: labor influx, spread of communicable diseases, and Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) etc.

Delete this Box prior to issuance of the bidding documents.

Note to the Bidder:

The minimum content of the Code of Conduct form as set out by the Employer shall not be substantially modified. However, the Bidder may add requirements as appropriate, including to take into account Contract-specific issues/risks.

The Bidder shall initial and submit the Code of Conduct form as part of its bid.

CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, [enter name of Contractor]. We have signed a contract with [enter name of Employer] for [enter description of the Works]. These Works will be carried out at [enter the Site and other locations where the Works will be carried out]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “**Contractor's Personnel**” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor's Personnel shall:

1. carry out his/her duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. maintain a safe working environment including by:
 - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
 - b. wearing required personal protective equipment;
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
7. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
8. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
9. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. report violations of this Code of Conduct; and
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [enter name of the Contractor's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters] in writing at this address [] or by telephone at [] or in person at []; or
2. Call [] to reach the Contractor's hotline (if any) and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [enter name of Contractor's contact person with relevant experience] requesting an explanation.

Name of Contractor's Personnel: [insert name]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of the Contractor:

Signature: _____

Date: (day month year): _____

Annex 6: SEA/SH Performance Declaration Form for Contractor

Sexual Exploitation and Abuse (SEA) and/or Sexual Harassment Performance Declaration

[The following table shall be filled in by the Bidder, each member of a Joint Venture and each subcontractor proposed by the Bidder]

Bidder's Name: *[insert full name]*

Date: *[insert day, month, year]*

Joint Venture Member's or Subcontractor's Name: *[insert full name]*

RFB No. and title: *[insert RFB number and title]*

Page *[insert page number]* of *[insert total number]* pages

SEA and/or SH Declaration in accordance with Section III, Evaluation and Qualification Criteria
We: ☐ (a) have not been subject to disqualification by the Bank for non-compliance with SEA/ SH obligations ☐ (b) are subject to disqualification by the Bank for non-compliance with SEA/ SH obligations ☐ (c) had been subject to disqualification by the Bank for non-compliance with SEA/ SH obligations. An arbitral award on the disqualification case has been made in our favor. ☐ (d) had been subject to disqualification by the Bank for non-compliance with SEA/ SH obligations for a period of two years. We have subsequently demonstrated that we have adequate capacity and commitment to comply with SEA/ SH obligations. ☐ (e) had been subject to disqualification by the Bank for non-compliance with SEA/ SH obligations for a period of two years. We have attached evidence demonstrating that we have adequate capacity and commitment to comply with SEA/ SH obligations.
<i>[If (c) above is applicable, attach evidence of an arbitral award reversing the findings on the issues underlying the disqualification.]</i>
<i>[If (d) or (e) above are applicable, provide the following information:]</i>
Period of disqualification: From: _____ To: _____

If previously provided on another Bank financed works contract, details of evidence that demonstrated adequate capacity and commitment to comply with SEA/ SH obligations (**as per (d) above**)

Name of Employer: _____

Name of Project: _____

Contract description: _____

Brief summary of evidence provided: _____

Contact Information: (Tel, email, name of contact person): _____

As an alternative to the evidence under (d), other evidence demonstrating adequate capacity and commitment to comply with SEA/ SH obligations (**as per (e) above**) *[attach details as appropriate]*.

Annex 7: Chance Find Procedures

Introduction

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.

Scope

This procedure applies to the Contractor, subcontractors, workers, supervision personnel, and other persons involved in construction activities, particularly excavation, foundation works, trenching, site preparation, and other activities involving disturbance of the ground.

Chance finds may include, but are not limited to:

- Archaeological objects or remains;
- Human remains or burial sites;
- Historical structures, foundations, or ruins;
- Religious or culturally significant objects; and
- Any other object or feature suspected to have archaeological, historical, religious, or cultural value.

Chance Finds Procedure

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the PCU 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 location 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 responsible authority takes over;

- Notify the responsible foreman/archaeologist, who in turn should notify the PCU 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 finding 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 finding;
- Construction work can be resumed only when permission is given from the respective authorities, PCU 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 to any kind of compensation or claim other than what is directly related to the execution of the archaeological findings works and protections.

Discovery of Human Remains

If human remains or suspected burial sites are discovered, work shall stop immediately and the area shall be secured. The remains shall not be touched, moved, removed, photographed unnecessarily, or otherwise disturbed.

The Contractor shall immediately notify the Supervision Engineer, contractor's E&S Specialist/Focal Person and PCU E&S Team. The relevant government authorities shall be informed, and any further action shall be undertaken in accordance with applicable legal requirements and instructions from the competent authorities. Cultural and religious sensitivities shall be respected at all times.

Worker Awareness and Training

Before commencing relevant works, the Contractor shall provide workers with awareness and toolbox training on the Chance Finds Procedure. Workers shall be instructed to:

- Recognize examples of potential cultural heritage finds;
- Immediately stop work when a suspected find is encountered;
- Avoid touching, moving, collecting, or damaging the find;
- Report the find immediately to their supervisor;
- Protect the location from unauthorized access; and
- Follow instructions provided by the Contractor's E&S Specialist and relevant authorities.

Chance Finds Reporting Form

The following form shall be completed whenever a chance find is identified.

Information Required	Details
Project/Sub-project:	
Contractor:	
Date and time of discovery:	
Location of the find:	
Name/position of person reporting:	
Description of the find:	
Activity being undertaken when discovered:	
Immediate actions taken:	
Work stopped:	Yes ☐ No ☐
Area secured/protected:	Yes ☐ No ☐
Contractor E&S Specialist notified:	Date/Time:
Supervision Engineer notified:	Date/Time:
PCU E&S Team notified:	Date/Time:

Relevant authority notified, if required:	Authority/Date/Time:
Assessment/recommendations:	
Protection or corrective measures required:	
Clearance/authorization to resume works:	
Date works resumed:	
Additional remarks:	

Annex 8: Contractor ESHS Monitoring Report Template

CONTRACTOR MONTHLY ESHS MONITORING REPORT TEMPLATE

Environmental, Social, Health and Safety (ESHS)

A. Basic Project Information

Item	Information
Project/Sub-project Name	
Location	
Contractor	
Supervision Engineer/Consultant	
Reporting Month	
Report Prepared By	
Position	
Date Submitted	
Number of Workers	Male: _____ Female: _____ Total: _____
Main Activities Undertaken During the Month	

B. Monthly ESHS Compliance Checklist

Assessment: YES = requirement complied with; NO = requirement not complied with; N/A = not applicable.

#	ESHS Requirement	YES / NO / N/A	Observations / Corrective Action Required
1	ESMP/C-ESMP and required E&S procedures are available and being implemented.		
2	Workers received E&S/OHS induction and relevant toolbox talks.		
3	Appropriate PPE is available and properly used by workers.		
4	Work areas are appropriately secured and warning signs/barriers are provided where required.		
5	Work areas, access routes and emergency exits are maintained safely.		
6	First-aid kits, trained first aiders and emergency arrangements are available.		
7	Accidents, incidents and near misses are recorded, reported and followed up.		
8	Dust, noise, vibration and other pollution are adequately controlled.		
9	Solid and hazardous wastes are properly segregated, stored, transported and disposed of.		
10	Fuel, chemicals and hazardous materials are safely stored and managed, where applicable.		
11	Wastewater, sanitation and drainage are appropriately managed.		
12	Good housekeeping is maintained at the work site and workers' facilities.		

13	Community health and safety measures are being implemented.		
14	Traffic and movement of construction vehicles/equipment are appropriately managed.		
15	Labour and working conditions comply with applicable Project requirements.		
16	There is no evidence of child labour or forced labour.		
17	Workers have signed the Code of Conduct and received GBV/SEA/SH awareness.		
18	Workers' GRM is available, communicated and functional.		
19	Community/Project GRM information is accessible to affected stakeholders.		
20	Stakeholder and community concerns related to the works are recorded and addressed.		
21	Trees, vegetation, birds/nesting sites and other sensitive environmental features are protected, where applicable.		
22	Chance Finds Procedure is available and workers are aware of the procedure.		
23	E&S issues identified during previous inspections have been addressed or are being followed up.		

C. Key Monthly ESHS Statistics

Indicator	This Month
Total number of workers	
Number of female workers	
E&S/OHS inductions conducted	
Toolbox talks conducted	
Workers participating in E&S/OHS training	
ESHS site inspections conducted	
Accidents resulting in injury	
Near-miss incidents	
Environmental incidents/spills	
Community health and safety incidents	
GBV/SEA/SH allegations reported*	
Workers' grievances received	
Community grievances received	
Grievances resolved	
E&S non-compliances identified	
Corrective actions completed	
Corrective actions pending	

***Note:** No names or personally identifiable information relating to GBV/SEA/SH cases should be included. Such cases shall be handled through confidential and survivor-centred procedures.

D. Corrective Action Follow-Up

#	Issue / Non-Compliance	Corrective Action Required	Responsible Person	Deadline	Status
1					
2					

3					
4					

Status should be stated as: COMPLETED / PENDING / ONGOING

E. Incidents and Grievances

Question	YES / NO	Brief Details, if YES
Were any E&S/OHS incidents or accidents reported during the month?		
Were any environmental spills or pollution incidents reported?		
Were any community health and safety incidents reported?		
Were any worker grievances received?		
Were any community grievances received?		
Were any GBV/SEA/SH allegations reported through the appropriate confidential channel?		
Are there any significant unresolved ESHS issues requiring attention?		

F. Priorities for the Next Month

1. _____
2. _____
3. _____

G. Report Certification

Prepared by - Contractor E&S Specialist/Focal Person	Name: _____
	Signature: _____ Date: _____
Reviewed by - Contractor Project/Site Manager	Name: _____
	Signature: _____ Date: _____
Reviewed/Verified by Supervision/PCU, where applicable	Name/Position: _____
	Signature: _____ Date: _____