

INTEGRATED SAFEGUARDS DATA SHEET CONCEPT STAGE

Report No.: ISDSC8426

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I. BASIC INFORMATION

A. Basic Project Data

Country:	Somalia	Project ID:	P149306
Project Name:	Somalia Urban Development Project (P149306)		
Task Team Leader:	Roland White		
Estimated Appraisal Date:	26-Jan-2015	Estimated Board Date:	30-Apr-2015
Managing Unit:	AFTU1	Lending Instrument:	Investment Project Financing
Sector(s):	Urban Transport (40%), Water supply (20%), Solid waste management (20%), Sub-national government administration (20%)		
Theme(s):	Decentralization (10%), Municipal governance and institution building (20%), Urban services and housing for the poor (20%), Other urban development (50%)		
Financing (In USD Million)			
Total Project Cost:	71.45	Total Bank Financing:	0.00
Financing Gap:	0.00		
Financing Source		Amount	
Borrower		0.00	
Free-standing TFs AFR Sustainable Development		71.45	
Total		71.45	
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		

B. Project Objectives

The PDO for the project will be: "Improved urban infrastructure and urban financing systems in South-Central Somalia, Puntland and Somaliland".

C. Project Description

1. Description

The operation will support investment in urban infrastructure and the development of formal, public-sector institutional systems and capacities in the cities of Mogadishu, Hargeisa, and Garowe which are, respectively, the capital cities of South-Central Somalia, Somaliland and Puntland. Together, the operation's activities will improve the economic productivity of these cities, enhance living conditions and inclusive access to urban economies, and strengthen systems of urban management and governance.

Clearly, urban investment needs in wider Somalia – and in the three cities on which the operation will focus – greatly outweigh available resources. Moreover, a cardinal design consideration for the operation is that it is being developed in the context of the state and peace-building goals of the Compact, including the Special Arrangement for Somaliland, and the associated mandate of the Multi Partner Fund (MPF) to support development throughout South-Central Somalia, Puntland and Somaliland. Accordingly, the operation will comprise four key components: three of these will support focused urban infrastructure and institutional strengthening in each of the three cities, while a fourth will support the expansion, deepening and consolidation of a fiscal transfer to fund basic infrastructure delivery and capacity-building of local governments in the larger urban concentrations across the three territories.

For all the components of the project, the project will support two key phases of activity (i) detailed preparation including engineering design, determination of Bills of Quantity, estimates, bidding documents, test drilling (in the case of water supply), institutional design, social and environmental studies; and (ii) execution of the components i.e. construction, capacity-building etc. The activities for the SUDP will be undertaken on the basis of feasibility and preliminary design studies which will be undertaken under a separate MPF-funded project i.e. the Somalia Urban Investment Planning Project (SUIPP). It should be noted that the team will request the deferral of safeguards instruments from the project preparation phase into the implementation phase, evoking the special considerations for situations of urgent need of assistance and capacity constraints under paragraph 11 of OP10.00. In lieu of safeguards instruments the team will, in accordance with the Guidance Note on Investment Project Financing Situations of Urgent Need of Assistance or Capacity Constraints" (August 2013) prepare a safeguards action plan before project appraisal. This action plan will address applicable environmental and social policies during project preparation individually for each territorial entity and component, and will be annexed to the PAD. During the first phase of project implementation draft TOR for the proposed safeguards instruments will be prepared by the Recipient and submitted for review by the RSA.

The key components of the SUDP operation will be as follows:

Component 1: Mogadishu

This will comprise four chief sub-components:

- Rehabilitation of key primary/arterial roads running through the city;
- Improvement and extension of secondary/tertiary roads at the District level;
- Renovation of the Banaadir Regional Administration (BRA) building;
- Strengthening the key institutions of urban management and governance of the city.

Subcomponent 1.1: Primary roads

As indicated above, with support from the Turkish Government, rehabilitation of 33 kilometers of primary roads is currently underway (expected completion is August 2014). These roads are in a general area north of the airport and north of the port. A further 17 km of primary roads requiring priority attention for rehabilitation to improve transport and transit efficiencies within and through the city have been identified by the city. The economic and social returns to this investment are expected to be high. The roads, once reconstructed, would complete one road network loop which has already been partially undertaken by the Turkish aid program, as well as the rehabilitation of other key roads. The roads requested by BTA and earmarked for financing consideration are: the Heart (Wadnaha), the Thirty (Soddonka), and Industrial Road (Warshadaha). In addition, (i.e. over and above the 17 km) a priority road - perpendicular to Wadnaha, starting from an intersection of Maka-Al-Mukarama and continuing to Industrial Road – which intersects the major market Bakaraha has been identified.

The technical specifications for the road rehabilitation would include replacing the sub-base and base materials of the roads – if determined by road materials tests – with an appropriately designed asphaltic cement road surface. All road infrastructures would be designed to have robust associated road-side drainage networks.

An initial cost estimate of the 17 km of primary road network is approximately US\$ 20.4 million. The cost of traffic management and optimization (junctions, signaling etc.) is roughly estimated at US\$ 0.5 million.

Subcomponent 2: Secondary/tertiary roads

A second priority is the upgrading of secondary and tertiary roads and footpaths (including associated side-drainage) at the District and community levels in Mogadishu (i.e. in all 17 Districts) to enhance intra-neighbourhood mobility and access to the city, particularly among more marginalized communities. These roads would be constructed using interlocking paving block or cobble stone surfacing technologies which are labour-intensive – thus assisting with job creation – and deliver surfaces which are easy to maintain and repair. In addition to mobility (hence productivity) benefits, this activity is likely to improve the hygiene and sanitation of affected neighbourhoods through as a result of enhanced drainage.

Preliminary estimates during the mission indicate that the potentially available resource (US\$ 6.8m) for this activity would be sufficient to finance about 2km of road and drainage upgrading per District.

Subcomponent 3: Renovation of the BRA Administrative building

A third identified priority is the renovation of the heritage City Hall building which is meant to house the offices of the city and regional administration. The building is in very poor condition. Its refurbishment would restore a national architectural heritage asset and alleviate an acute shortage of office space for civil servants, thus providing a basis for the improved management of the city.

Based on some preliminary design work for one wing of the building, which is currently being undertaken by an architect working for the BRA, the total cost estimate of this activity is around US\$ 4 million (structure plus furnishings, cabling etc.). BRA has indicated that it would consider providing limited counterpart financing for the building.

As indicated above, some preliminary design work has been done, covering about a quarter of the building (one wing). This would need to be completed and extended to the whole structure. It is possible that the design and construction of the renovation project could be undertaken in a series of phases.

Subcomponent 4: Institutional strengthening and capacity-building

Strengthening the institutions and systems of urban management and local government, and strengthening the organizational capacities of these institutions is a critical priority. In this context, the project should make resources available, and be designed to incentivize, activities which support these objectives. Broadly, and building on the platform already established by other donor programmes (e.g. the Sustainable Employment Creation and Improved Livelihoods – SESIL- activities which support the BRA Planning Unit; the USAID financial management support), such activities are likely to focus on (i) spatial and project planning; (ii) procurement and contracting, (ii) financial management, (iii) asset management, (iv) project execution and supervision; (vii) environmental and social management.

A likely budget of US\$1-2m would probably be necessary for these activities at a scale sufficient for them to have the desired impact.

Component 2: Hargeisa

This component has four main subcomponents:

- Drainage
- Solid Waste Management (SWM)
- Water Supply
- Institutional Strengthening and Capacity Building

Adequate drainage, SWM and water supply directly translates into cross cutting benefits in public health, job creation, poverty reduction and environmental management.

Subcomponent 1: Drainage

Hargeisa is arid with around 400 mm precipitation falling annually over an average 30 annual rain days in two main seasons. Topographically the city is divided North and South by a wadi (Tugga Maroodhi Jeh) that drains an upstream catchment of some 300km² to Daaboolaaq in the west. The immediate urban catchment of approximately 30km² falls some 100m of elevation within 3 km North to South. Dry antecedent conditions thus give rapid rise to overland spates from comparatively small but intense amounts of rainfall, draining laterally West to East along the Maroodhi Jeh with surface flows in seasonal spate only a few days a year. However major destructive floods have been recorded in 1 in 5 years over the past two decades, destroying one of two city bridges and laying waste to large areas of low lying settlement in 2007 for example.

There is no flood plan for Hargeisa and what little drainage infrastructure exists is not fit for purpose to the needs of an expanding city. Current, poor drainage performance of existing infrastructure is seasonally exacerbated by the build-up of solid waste in culverts and drains before the rains. Drainage, storage, buffer and flood protection measures urgently need to be reviewed and upgraded,

with existing infrastructure cleared of debris and detritus in the short term to reduce the public health risks and regulate the effect of flooding on the local economy.

Review of estimates from recent analysis (UNHabitat) has identified a requirement for 30 km of drainage network interlinking 5 natural gullies in the Northern half of the city. To be implemented in two phases works proposed include engineering of 14 km of streams, 4.5 km of outfalls, 25.6 km of drains and the construction of a new 45,000 m³ sump reservoir (see attached map). These measures are required in the medium term as the funding becomes available.

Under this project the short-term measures will be financed, that are required to build the foundation for further work, and to prepare adequately for the larger, medium-term scale of infrastructure rehabilitation/development. Specifically the following activities are planned: (i) clean out the existing natural drainage channels and engineer basic repairs, (ii) produce feasibility and planning documents, (iii) initiate capacity building at the municipal level.

Subcomponent 2: Solid Waste Management

The World Bank has been supporting preliminary SWM activities in Hargeisa directed at developing an enabling environment for PPPs for investment, services expansion and quality improvements in private provision of solid waste management. There is a rudimentary system in place based on a Public Private Partnership (PPP) between Hargeisa Municipality (HM) and private operators on concession basis. The performance of two contractors during the recent eight months has increased municipal revenues by approximately 120% in one case and 30% in another, with a proportionate rise in the customer base. To date the number of households served by all the contractors has reached 30,000, approximately 35% of the city population.

There is a need to underpin and expand these gains with further support and investment in both the collection and bulk disposal dimensions of the solid waste cycle because Hargeisa is rapidly expanding and the production of solid waste increasing proportionately. Waste ranges from general household waste containing a large amount of organics and plastics, to industrial waste and construction detritus, to specific medical waste from 3 hospitals where incinerators are in need of overhaul. There are currently two major dumpsites, one to the South of town and one to the East, and these are not adequately engineered or managed. The sites are open and present a public health hazard since constant burning results in excessive dioxins released, etc. Informal dumping sites compound the problem, suggesting that regulation of dumpers requires enforcement for SWM across the city to be effective. Inadequate infrastructure at the secondary level of the supply chain (transfer stations) compounds the problem.

The objective of the planned investment support under this project would be to develop the bulk disposal system (i.e. engineered landfill), improve secondary level infrastructure in the refuse collection and disposal chain (i.e. transfer stations), and to scale up the collection system for city wide SWM through building on and expanding the private collection/PPP arrangements that have already been established. An initial cost estimate of the engineering of two landfills -- which are well outside the city's residential areas, and geologically characterized by low permeability formations and deep aquifers -- and the transfer stations and equipment is in the region of US\$ 6 million.

As an immediate, first step during project implementation more accurate estimates would be obtained from the findings of a comprehensive feasibility study (FS). The FS would prepare for, provide guidance for decision-making, and constitute the planning / design basis for the subsequent

implementation of physical works. The actual implementation and supervision of the works, as well as the design of operational plans and procedures, would be closely linked to capacity building activities to reach the minimum institutional structures and skills for planning, engineering and management required to approach internationally accepted standards .

Subcomponent 3: Water Supply

Hargeisa depends for its water supply on groundwater well fields some 35km to the North of the city built originally in the 1970s, and distributing through a reticulated network in Hargeisa that is inadequate to meet current and future needs. The water supply is provided and managed by the HAWA and currently the North of the city receives the vast majority of the supply. The current distribution remains grossly inequitable and much of the Southern part of the city does not receive piped water from HAWA. For citizens directly unserved vended water costs on average five times the amount for a compound/household connection.

On a daily basis it is estimated that up to 11,000 m³ of potable water are provided to the city, with 8,000 m³ supplied by HAWA through the city supply pumped from Ged Deeble well field to the North, and with an additional 2-3,000 m³ brought in by private operator tankers.

Supported by UNHabitat HAWA is in the process of developing the supply to increase production from the existing 8,000 m³ day to 20,000 m³ day by 2016 with a potential maximum extraction rate of 24,000 m³/day for the system according to the hydraulic limits of the design. Of this 15,000 m³/day is foreseen from Ged Deeble and Hora Hadlay. A prospective additional quantity of 6,000 m³/day from the Las Dhuure aquifer requires verification through hydrogeological studies and test drilling, before connection to the supply pipeline and commencement of production. In addition to increasing supply, HAWA currently draws from Somaliland Development Fund (SDF) funding to extend the distribution into the South and East of the city. While distribution can draw on up to 24,000 m³/day the requirement to deliver 50 l/c/d from 2016 onwards suggests a shortfall of 16,000 m³/day at that time, and underpins the need for long term water resources investigations to secure adequate supply. The proposed abstractions will not have any major adverse cumulative impacts. This SDF program has a number of critical priorities which are currently unfunded, particularly related to the development of the Las Dhuure aquifer.

The activity proposed to be financed by this project would target these priorities, specifically (i) construction of pump and generator buildings at Ged-Deeble, (ii) Las Dhuure groundwater investigations and test drilling, (iii) civil works for connection of the Las Dhuure aquifer and (iv) delivery of pumps and generators to Ged-Deeble.

In addition, HAWA currently draws from SDF funding for some existing contracts on the production side. However, the HAWA capacity remains constrained, especially engineering support to the HAWA general manager, although limited capacity building is being initiated under the Water and Sanitation Program (WSP) to provide institutional support to HAWA in four key areas, viz. (i) establishment and organization of the HAWA Board; (ii) financial management and procurement; (iii) staffing and HR rules and procedures and (iv) development of a financial statement.

An initial cost estimate of the investments in design, engineering, equipment and civil works for infrastructure is in the region of US\$ 6 million.

Subcomponent 4: Institutional strengthening and capacity-building

Strengthening the governance and organizational systems and capacities for HAWA, and the capacities and systems of urban management for HM are important priorities. In this context, the operation should make resources available, and be designed to incentivize activities which support these objectives. Broadly, and building on the platform already established by other donor programmes (e.g. the Habitat and WSP activities for HAWA and Joint Program for Local Government (JPLG) and UNHabitat activities for HM), such activities are likely to focus on, for HAWA, (i) governance (ii) technical strengthening; for HM, (i) spatial and project planning; and for both (i) procurement and contracting, (ii) financial management, (iii) asset management, (iv) project execution and supervision; (vii) environmental and social management.

A likely budget of US\$1.5m would probably be necessary for these activities at a scale sufficient for them to have the desired impact.

Component 3: Garowe

This component would include two subcomponents: upgrading of key intra-city roads and institutional strengthening.

Subcomponent 1: Intra-city roads

Since 2010, using UN JPLG financing Garowe Municipality (GM) has undertaken a program of upgrading targeted intra-city roads to provide a freer flow of urban traffic, facilitating easier and quicker transport between various parts of the municipality. This improvement in urban mobility is aimed at facilitating increased commercial activity, improving revenue generation and boosting incomes within the urban setting. The upgrading programme from 2010 to 2013 mainly consisted of providing an engineered earth base with some of the roads having a gravel surface applied. USAID is also financing some roads upgrading in Garowe.

This programme has benefited from UN-Habitat technical assistance. A survey of road conditions has been conducted by the Municipality with UN-Habitat assistance, the results of which have been documented and recorded on a GIS platform for improved roads network planning and assets management capabilities of the GM. Currently - with JPLG assistance - three roads with a combined length of 7.6 km are in the process of being upgraded from gravel with the application of a bitumen surface. The bitumen surfaces are of a double-seal dressing technical specification.

For financing under this project the roads conditions survey and additional planning activities by the GM identified an additional 27.03 km of roads in two categories – gravel and earth-engineered –for priority bitumen surfacing. The cost estimate for design and construction lies in the range of US\$ 10.8 million for the completion of 27 km of roads upgrading. The cost of traffic management and optimization is roughly estimated at US\$ 50,000.

Subcomponent 2: Institutional strengthening and capacity-building

Strengthening the governance and organizational systems and capacities for GM, specifically for urban planning and management for HM is an important priority. In this context, the project should make resources available, and be designed to incentivize, activities which support these objectives. Broadly, and building on the platform already established by other donor programmes (e.g. the JPLG and Habitat), such activities are likely to focus on (i) governance; (ii) technical strengthening; (iii)

spatial and project planning; (iv) procurement and contracting; (v) financial management; (iv) asset management; (vi) project execution and supervision; and (vii) environmental and social management.

A likely budget of US\$0.8m would probably be necessary for these activities at a scale sufficient for them to have the desired impact.

Component 4: Local Development Fund

The Local Development Fund, an activity within the Joint Programme on Local Government (JPLG), provides an average of US\$200,000/annum to 14 of the largest category A DGs in Somaliland and Puntland for investment in basic services and infrastructure in line with local priorities determined through a bottom-up planning process and will expand for the first time to one District Government in South-Central Somalia. The LDF was initiated with a budget of US\$950,000 for 2011. This was doubled to US\$2.1 million for 2012, grew to US\$3 million for 2013 and is budgeted at US\$4.5m for 2014. The grant incentivizes performance and is accompanied by a range of technical assistance and capacity building activities to support sub-project planning and execution and the management of the funds. DGs have used the fund to invest in small-scale projects such as roads construction and maintenance, repair and re-building of schools, water systems, garbage collection, community centres and markets. Given their resource constraints, the LDF provides DGs with one of their only funding streams which allows them to actualize their core service-delivery functions.

One important recent development has been the progression of decentralization policy in Somaliland and Puntland and, to a much more limited extent, in South-Central Somalia. Both Somaliland and Puntland have developed Decentralization Policy Documents which articulate a clear, and similar, vision of a substantially decentralized intergovernmental system in which adequately resourced and empowered local governments are responsible for local governance and service delivery in significant sectors, including municipal infrastructure and services. In the case of Somaliland, the policy document has been endorsed by the Inter-ministerial Committee which has overseen its formulation, and is awaiting Cabinet approval. In Puntland, endorsement has been interrupted as a result of the change in government following the recent election. Progress in South-Central Somalia has been much slower, but work has begun on the development of a decentralization policy framework. Of particular note in the Somaliland and Puntland policy documents is a clear commitment to fiscal decentralization including, among other things, the development of a system of unconditional and conditional intergovernmental fiscal transfers to finance recurrent and development expenditures.

In this context, provision of support to the LDG presents an important potential opportunity. The architecture of the LDF has many of the core features of the sort of systematic, equitable, conditional grant to be used to support development expenditures envisaged in the Somaliland and Puntland policy documents. Over time, and with the right type of support, it could be expanded (from the bottom up, as the system grows) and institutionalized (from the top down, as policy consolidates and is implemented) as a central element of the evolving sub-national fiscal framework throughout Somaliland, Puntland and, eventually (should the policy environment permit it), South-Central Somalia.

The Bank has specific expertise in assisting countries, including a number in the immediate region, develop intergovernmental transfer systems of this kind and could add specific value to the LDF through providing support with this as a core objective. In order to achieve this, two basic types of activity would be necessary: (i) direct support to expanding and deepening the fiscal transfer

mechanism itself, accompanied by design optimisation to the extent necessary (e.g. to enhance its performance orientation, strengthen the way in which capacity-building is delivered etc.); and (ii) support to the institutionalization process, focused on the formulation of a detailed implementation plan to phase in universal coverage, followed by the development and implementation of the grant instruments, mechanisms and procedures (on the foundation, naturally, of what the LDF has already established).

Given the limited total budget envelope available for the project, it appears that no more than US\$ 11m would be available for these activities over four years. Of this, approximately 10m would be targeted at support of the grant instrument with approximately US\$1m available for support to the institutionalization process. With MPF Funding, the projected LDF budget for the next 3 years (2015-2017) will increase from US\$ 14.5 million to US\$ 25.4 million. There will be substantial deepening in investment funding with a geographic expansion from 20 LGs to 30 LGs (from 16 in Puntland and Somaliland to 24 and in South Central Somalia from 4 to 6 LGs), with investments in Mogadishu alone increasing about 600 % to enable noticeable contribution to service delivery.

D. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

Project activities will be implemented in or close to major urban areas in Somalia, specifically in Mogadishu as the country's capital and primary city, as well as in Garowe, Puntland's administrative capital, and Hargeisa, the capital of Somaliland. The following project activities and details will be relevant to the project's environmental and social assessment and management arrangements:

Hargeisa Water Supply

The proposed Hargeisa Water Supply Project may have potential negative environmental and social impacts that would need to be mitigated. The two main environmental issues emerging from this mission relate to (i) water quality and (ii) depletion by overexploitation of the Laas Dhuure aquifer. Both risks would need to be assessed during the project preparation phase by appropriate hydrogeological investigations and analyses, relating both to water quality and yield. Any decision to proceed with the development of additional water supply from the aquifer would depend on the outcome of these investigations and the ability to mitigate potential risks.

Negative social impacts on the people living in the area of the Laas Dhuure aquifer cannot be excluded at this stage. There may be impacts on their livelihoods by reduced (ground)water availability, as well as issues connected to land acquisition for boreholes, well-heads, pumping stations, pipelines and other infrastructure. E.g. there may be households or farmers dependent on the aquifer for irrigation purposes, or for livestock or human consumption.

Another key social issue related to this proposed project is related to equity and access of water. The proposed project is meant to increase the production of water and extend the network to reach the population in the southern part of the city. The populations in southern Hargeisa are generally poorer and have been buying water from vendors at a much higher cost than those in the north who benefit directly from the network. Any additional connections and kiosks established through this project would benefit the population in the south but given demand will continue to be higher than the supply, the location and distribution of these connections and kiosks will need to be managed carefully.

The proposed safeguards instruments for this project component would be an ESIA and ESMP, that

would include detailed studies on the aquifer's hydro-geology, screen and establish the exact number of households in the area, how much groundwater local residents, farmers and other stakeholders are currently using, from which depth it is produced (it could well be separate, much shallower aquifers), and if generally their property or homes would be physically affected by the planned water supply infrastructure. If significant impacts on land or livelihoods of local stakeholders are anticipated, an RPF/RAP would additionally prepared to clarify any compensation and restoration requirements.

Hargeisa Waste Management: The existing waste repositories in Hargeisa are characterized by poor planning, lack of basic physical infrastructure (such as side walls, liner, drainage system and seepage treatment plant), and poor management (waste neither compacted, nor covered, frequent fires observed, vectors abundant, household mixed with potentially hazardous waste). The environmental performance of the two main facilities thus is low, and both are currently the source of negative impacts including: aerial emissions via smoke, odors, dust and windblown litter, contaminated runoff, seepage, and the presence of disease vectors (rats, baboons, birds). The project will finance the construction of new cells for waste reception, as well as remedial and upgrading measures for the existing dumps, and thus have a largely positive impact. The proposed safeguards instruments would include an ESIA and ESMP to be produced during further project preparation with the following purposes: (i) to detect significant ongoing risks from the dumps and enable quick, targeted remedies; (ii) to collect required data to inform the design process; (iii) to provide instructions on environmental management of the civil works during the construction phase; (iv) to provide guidance and standards for the remediation and safe closure of the existing dumps.

Mogadishu Intra-Urban Roads Rehabilitation: Given that the activities will only relate to the upgrading of existing main as well as "neighborhood" roads within urban areas that are already built up (and ravaged by decades of civil war), the baseline conditions are extremely low, and any incremental environmental impacts are likely to be limited (and in part positive e.g. as a result of improved side-drainage). Moreover, the works are planned to be carried out with high labor intensity: This will further reduce environmental impacts (e.g. eliminating much of the noise, vibrations, dust and emissions associated with heavy machinery), and also have positive social impacts in terms of employment generation. As the activity will be carried out within the existing right of way (ROW) the social impacts (and any resettlement costs) are also expected to be limited, but it has not yet been possible to estimate them (as the degree of encroachment is unknown). The proposed safeguards instrument would be a simplified ESMP, e.g. in a "checklist format", which would contain targeted mitigation measures that would be communicated in a concise, easy to understand, action-oriented manner to Client, Engineers and Contractors.

Mogadishu Renovation of the BRA Administrative building: The restoration works are expected to be minor, localized, confined to an existing structure within an urban center, and thus will have limited, foreseeable impacts related to civil works. These will be easily mitigated and management with good housekeeping measures, and readily available, standardized and tested mitigation measures. As the building is likely to be considered a physical cultural resource (PCR) under Bank policy, OP4.11 would be triggered, and special attention to design and construction management will be required to preserve any historically, culturally or architecturally valuable physical components and substance of the building. The proposed safeguards instruments would be a simplified ESMP, which would contain targeted mitigation measures that would be communicated in a concise, easy to understand, action-oriented manner to Client, Engineers and Contractors. In addition an architectural / cultural survey of the building would be commissioned and a PCR management plan produced, that would inform design and implementation of the rehabilitation works to preserve a maximum of the buildings historical substance and significance.

Garowe Intra Urban Roads Rehabilitation: Given the nature of the activities, being the upgrading of existing intra-urban roads within areas that are already built up, any environmental impacts are likely to be limited (and in part positive e.g. as a result of lesser dust, less emissions due to more constant travel speeds, and safer due to additional planned sidewalks).

The anticipated negative impacts are likely to be confined to the construction period, connected to routine civil works, and include: emissions such as noise, dust, and exhaust gases from machinery; generation of construction related waste, such as earth, gravel, rubble, concrete slurries, as well as hazardous waste types such as spent engine oil, empty containers of lubricants, paint, bitumen, and scrap metals. Traffic and pedestrian safety will be a key issue due to the works being carried out within densely populated urban areas. All of the described impacts are mitigable with a standard set of readily available, tested mitigation measures, largely related to good housekeeping during construction works.

As the activity will be carried out within the existing right of way (ROW) the social impacts (and any resettlement costs) are also expected to be limited, but it has not yet been possible to estimate their exact scope (as the degree of encroachment is yet unknown). However, as livelihoods and properties may be temporarily be impacted (e.g. kiosks of roadside vendors, access to residences or businesses along the road), OP4.12 will be triggered and a RPF (resettlement policy framework) would be produced in anticipation of potential compensation requirements. Physical cultural resources are not likely to be affected, as the road upgrading will not involve widening or re-routing of roads, and no existing structures would need to be demolished.

The proposed safeguards instruments would be an ESMP, which, considering the simple nature of the project works and impacts, could be in a simplified “checklist format” for clarity and ease of use by Client, Engineers and Contractors, as well as an RPF to prepare for the expected compensation procedures for anticipated temporary impacts on adjacent residents’ and businesses’ livelihood.

Proposed Safeguards Category

The project mostly involves rehabilitation and upgrading of existing facilities. While some components have substantial environmental and social impacts, these can be mitigated. The project is, therefore classified as Category B. Given the potential sensitivities around water supply and waste management, but also the complex social fabric in Somaliland, the team would closely accompany and advise the planning process, as well as the stakeholder dialogue and consultations.

E. Borrowers Institutional Capacity for Safeguard Policies

The institutional environment pertaining to the proposed project needs comprises two key levels. At the national/regional level, there are three national/regional government entities, each of which has its own constitution and institutional and legal structure, although only one of these is formally recognized internationally: the Federal Government of Somalia (FGS), the Government of Puntland, and the Government of Somaliland. Within each of these governmental structures, one or more agencies (Ministries) have a potential key role in respect of the project. In the case of the FGS, this is likely to be the Ministry of Public Works; in the case of Somaliland, the Ministry of National Planning and Development; and in the case of Puntland, the Ministry of National Planning and Development.

At the local/sectoral level city governments are also of direct relevance. In fact, given the functional

powers and capacities of these agencies it is likely that they will be directly involved in project implementation. Various activities will be focused on strengthening these agencies as part of the broader effort of the project to improve institutional systems of urban service delivery. The cities of Mogadishu, Hargeisa and Garowe are all managed by municipal administrations, or structures which approximate such administrations. In general these entities are fairly weakly capacitated and have very limited financial resources with which to carry out their mandates.

In Somaliland, where the project activities with the most significant anticipated impacts would be carried out, the regulatory framework includes an environmental policy, a law on the protection of the environment, and by-laws and regulations to implement the legislation in projects and activities. By law the Ministry of Environment (MoE) would have to be consulted for all major activities that other line Ministries prepare and implement. However, in practice there is neither the enforcement and inter-ministerial coordination and cooperation, nor enough capacity in MoE to regulate, monitor and enforce the existing legislation.

For the project it would be important to focus capacity building on those sections and aspects of the environmental legislation that would apply to (i) the environmental and social impact assessment process; (ii) the integration of environmental and social findings, and management procedures into planning, design, construction and operation of public infrastructure projects. Specifically it would be crucial to identify administrative and regulatory nodes and decision points in the planning and preparation process, where reviews and opinions / clearances from environmental agencies and regulators are required by law, and ensure that studies, assessments, instruments would be used to leverage environmental criteria into the design and operation of projects.

Considering time constraints and the low capacity of the Borrower the Bank team will request the deferral of the preparation of the safeguards instruments into the project implementation phase. when more resources and time will be available for the Borrower to comply with the Bank's environmental and social requirements.

F. Environmental and Social Safeguards Specialists on the Team

Abdoul Wahabi Seini (AFTSG)

Wolfhart Pohl (AFTSG)

II. SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/ BP 4.01	Yes	Several environmental and social safeguards instruments (e.g. ESIA's, EMP's) will be prepared during project implementation, once sites and works are finalized. Impacts range from moderate to substantial, but they can be mitigated through comprehensive environmental and social management plans.
Natural Habitats OP/BP 4.04	No	The project will not affect natural habitats.
Forests OP/BP 4.36	No	The project does not affect or involve forests.

Pest Management OP 4.09	TBD	The project may involve pest management measures for the landfill sites. This will be determined at appraisal.
Physical Cultural Resources OP/ BP 4.11	Yes	The project will affect and involve at least one cultural site, which will be refurbished through the project. The ESIA/ESMP will include measures for managing impacts. Other sites and works may affect PCR, and the safeguards instruments will include mitigation measures.
Indigenous Peoples OP/BP 4.10	No	There are no Indigenous Peoples in the project area.
Involuntary Resettlement OP/BP 4.12	Yes	The project may involve land acquisition leading to involuntary resettlement and/or restrictions of access to resources or livelihoods. RAPs will be prepared as and when necessary during project implementation.
Safety of Dams OP/BP 4.37	No	The project does not involve dams.
Projects on International Waterways OP/BP 7.50	No	N/A
Projects in Disputed Areas OP/BP 7.60	No	N/A

III. SAFEGUARD PREPARATION PLAN

A. Tentative target date for preparing the PAD Stage ISDS: 19-Jan-2015

B. Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing¹ should be specified in the PAD-stage ISDS:

The team will request the deferral of safeguards instruments from the project preparation phase into the implementation phase, evoking the special considerations for situations of urgent need of assistance and capacity constraints under paragraph 11 of OP10.00. In lieu of safeguards instruments the team will, in accordance with the Guidance Note on Investment Project Financing Situations of Urgent Need of Assistance or Capacity Constraints” (August 2013) prepare a safeguards action plan before project appraisal. This action plan will address applicable environmental and social policies during project preparation individually for each territorial entity and component, and will be annexed to the PAD.

During the first phase of project implementation draft TOR for the proposed safeguards instruments will be prepared by the Recipient and submitted for review by the Bank. Once cleared, the consultancy will be tendered and a firm selected to carry out the required assessments and produce the respective reports and instruments for all project locations. The duration of the assignment until delivery of finalized, consulted instruments is expected to be 4-6 months. No actual physical works or footprints occur during the project implementation phase, before the required safeguards instruments have been duly finalized.

IV. APPROVALS

¹ Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.

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