



FEDERAL REPUBLIC OF SOMALIA

MINISTRY OF ENERGY AND WATER RESOURCES (MoEWR)

**Stakeholder Engagement Plan – SEP
For the
Somali Electricity Sector Recovery Project
(P173088)**

September 2021

ABBREVIATIONS

ADRA	Adventist Development Relief Agency
BESS	Battery Energy Storage Systems
BSSF	Business Support Services Firm
CLO	Community Liaison Officer
COVID-19	Corona Virus Disease 2019
DoECC	Directorate of Environment and Climate Change
DRC	Danish Refugee Council
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessments
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESPs	Electricity Service Providers
ESS	Environment and Social Standards
EU	European Union
FGS	Federal Government of Somalia
FMS	Federal Member States
GBV	Gender Based Violence
GM	Grant Manager
GRM	Grievance Redress Mechanism
HSDG	Hydrogen-Storage Distributed Generation System
IDPs	Internally Displaced Persons
ILO	International Labour Organization
IOM	United Nations Office for Project Services
LMP	Labour Management Procedure
MoE	Ministry of Environment
MoEWR	Ministry of Energy and Water Resources
Mol	Ministry of Interior
MoPIED	Ministry of Planning and Economic Development
MoPW&T	Ministry of Public Works and Transport
NRC	Norwegian Refugee Council
OHS	Occupational Health and Safety
OPM	Office of Prime Minister
PIU	Project Implementing Unit
PLWDs	People Living with Disabilities
PV	Photovoltaic
RAP	Resettlement Action Plan
SESRP	Somalia Energy Sector Recovery Project
TORs	Terms of Reference
UNDP	United Nations Development Program
UN-HABITAT:	United Nations Human Settlements Programme
UNHCR	United Nations High Commissioner for Refugees
UNOPS	United Nations Office for Project Services
USAID	United States Agency for International Development
WBG	World Bank Group
WVI	World Vision International

Table of Contents

ABBREVIATIONS.....	I
1. INTRODUCTION	2
1.1 BACKGROUND AND PROJECT DESCRIPTION	2
1.2 PROJECT AREA SELECTION AND LOCATION.....	7
1.3 SCOPE OF THE STAKEHOLDER ENGAGEMENT PLAN.....	8
1.4 OBJECTIVES OF THE SEP.....	9
1.5 EFFECTIVE STAKEHOLDER ENGAGEMENT PRINCIPLES.....	9
1.6 WORLD BANK REQUIREMENTS ON STAKEHOLDER ENGAGEMENT	10
1.7 POTENTIAL ENVIRONMENT & SOCIAL RISKS AND IMPACTS.....	11
2. STAKEHOLDER ENGAGEMENT	13
2.1 STAKEHOLDER ENGAGEMENT PRINCIPLES	13
2.2 STAKEHOLDER IDENTIFICATION	13
2.3 STAKEHOLDER MAPPING AND ANALYSIS	14
2.4 FINDINGS FROM THE SITUATIONAL ANALYSIS	19
2.5 STAKEHOLDER ENGAGEMENT PLAN -SEP.....	23
2.6 REPORTING ON STAKEHOLDER ENGAGEMENT.....	27
3. STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE.....	28
3.1 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES	28
3.2 AIMS OF THE CONSULTATIONS	28
4. INFORMATION DISCLOSURE.....	47
5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES ..	49
5.1 RESOURCES.....	49
5.2 RESPONSIBILITIES	49
5.3 ESTIMATED BUDGET	50
6. GRIEVANCE REDRESS MECHANISM (GRM)	51
6.1 POTENTIAL SOURCES OF GRIEVANCE	51
6.2 GRM INSTITUTIONAL FRAMEWORK.....	52
7. MONITORING AND REPORTING	55
7.1 MONITORING.....	55
7.2 REPORTING.....	55
ANNEX-1: PUBLIC CONSULTATION MEETING IN THE FGS	56
ANNEX 2: PUBLIC CONSULTATION MEETING IN SOMALILAND	80
ANNEX 3. SEAP FGS GRM.....	89
ANNEX 4: SEAP GRM SOMALILAND.....	96
ANNEX 5: LIST OF PARTICIPANTS.....	102

1. Introduction

The Federal Government of Somalia (FGS) is preparing the Somalia Electricity Sector Recovery Project (SESRP) for World Bank financial and technical support. The SESRP aim is to increase access to electricity services and to re-establish the Electricity Supply Industry (ESI) in the Project Areas. The project will be implemented by the two PIUs established at the MoEWR (FGS) and the MoEM (Somaliland), in close coordination with the FMSs, the beneficiary ministries, and ESPs.

1.1 Background and project description

The Project Development Objective is to increase access to lower cost electricity supply from diverse energy resources especially from renewable energy resources for climate change mitigation; and access to improved electricity and health and education services.

The proposed Somali Electricity Sector Recovery Project has been conceptualized as the first of a series of three projects. The SOP vision has four themes: (a) infrastructure development, (b) renewable energy generation, (c) electricity supply to public institutions, and (d) sector capacity enhancement. Sector institutional, legal and regulatory enabling environment for sustained sector operations, including enhancing both the public and private capacity to manage and operate the sector. These themes aim to achieve the following outcomes:

1. Increased access to lower cost electricity supply from diverse energy resources especially from renewable energy resources for climate change mitigation; and increased access to electricity services.
2. Improved access to functional health and education services.
3. Sector institutional, legal, and regulatory enabling environment for sustained sector operations, including enhancing both the public and private capacity to manage and operate the sector.

Current Context

The most significant energy resource currently used in Somalia is biomass, and heavy dependence on petroleum fuels. Estimates of the energy needs met through traditional biomass fuels, wood and charcoal vary between 80% and 90% over the whole country. Petroleum products, accounting for about 10% of total energy use, are essentially used for transport and electricity generation and in smaller quantities for cooking and lighting. Electric power generation (almost entirely diesel-fueled) accounts for about two of the ten percentage provided by petroleum fuels. Transportation fuels (gasoline and diesel) account for most of the rest. Liquefied Petroleum Gas (LPG) is used for cooking by the wealthier urban population, while about 5% of households use kerosene for cooking.

Somalia has no national electricity grid infrastructure. Pre-conflict, the Somalia National Electric Corporation (Ente Nazionale Energia Elettrica-ENEE) was the single public utility in operation, supplying Mogadishu and the main regional centers of Hargeisa, Berbera, Burao, Baidoa and Kismayo through distributed diesel generators and associated localized distribution network grids. The municipalities were responsible for electricity supply to the remaining regional centers. This limited and localized public electricity infrastructure was destroyed during the conflict and the associated institutional frameworks are almost defunct at present with ENEE currently only operating 12 MW installed capacity in the towns of Boosaaso and Qardho through a quasi-Public Private Partnership. Private sector players, commonly known as Electricity Service Providers (ESPs), are the main electricity services providers in Somalia using local private mini grids. The Energy Security and Resource Efficiency in Somaliland and Somali Electricity Access Project have laid a foundation especially the institutional arrangement for the project implementation.

This Project will consist of the following four main components:

Component 1 – Sub-Transmission and Distribution network reconstruction, reinforcement and operations efficiency in the major load centers of Mogadishu and Hargeisa (US\$ 75 Million).

The component activities include sub-transmission and distribution network reconstruction and reinforcement in the major load centers of Mogadishu and Hargeisa to improve network reliability and operational efficiency by interconnecting the current ESPs' distribution networks and existing generation in order to optimize overall distribution network operations. These activities will support the ESPs to: (i) decrease in the cost of operations (increased generation efficiency, reduction in distribution network losses and distribution network duplications); and (ii) improve electricity supply and reliability. These investments will enable the establishment of interconnected distribution offtake infrastructure (bulk supply points) that will allow deployment of larger generation capacity and interconnection to the proposed transmission grid with neighboring countries. Both distribution and sub-transmission investments are a key precondition for the establishment of a transmission backbone and interconnection with neighboring countries. To enable the network to adapt to worsening climate condition (increasing rainstorm and flooding) steel tubular and concrete poles with concrete foundations will be used to construct the MV/LV lines and MV/LV poles. In addition, for the proposed new lines, the line route will be selected to avoid known flood prone areas.

Component 1-A. Generator Synchronization and Automation. Currently, most of the ESPs have not implemented synchronization and automation as part of their generation processes. As a consequence, separate generator units are connected to exclusive feeder lines and as result, many generators operate below their expected optimal performance criteria. Further, the absence of automation and synchronization, prevents the ESPs from utilizing parallel generation to assure optimal generator performance and dynamic reactivity to electricity load variations. This kind of operation results in significant amounts of “wet stacking” (diesel fuel waste, extra pollution, and performance degradation). These all combine to reduce the potential maximum generation power output, reduce lifespans of the generator engines and elevate maintenance costs and unscheduled generation downtime. Investments under this component will support equipment supply and installation that will enable synchronizing and automation of the numerous generators presently in operation. Automation and synchronization of the numerous generators will permit the optimization of electricity generation as the synchronization will enable the parallel operation of the generation so that each generator is operating in its optimal performance zone and the automation would makes it easy for a particular generator to be brought online or offline easily and smoothly. The application of automation and synchronization to the numerous generators in each of the targeted major load centers (Mogadishu and Hargeisa) will provide reduced cost of generation accruing from augmentation in generation capacity and reduced wet stacking with concurrent lower fuel consumption, maintenance costs, and reduced GHG emissions.

Component 1-B. Sub transmission and Distribution network interconnection in the major load centers of Mogadishu and Hargeisa. Most of the ESPs with a presence in the targeted project areas operate independently and, as a consequence, there is significant infrastructure and operations duplication. In addition, lack of network interconnection limits the opportunity to share existing generation facilities in addition to the prospect of investing in larger capacity and more efficient generation systems. The subcomponent activities will support investments in the sub-transmission and distribution network infrastructure required to enable generation synchronization and interconnection between the different ESP networks in addition to increased network capacity and reduced network losses. Specific activities include: (i) building bus-bars to permit the generation from several generating units to be synchronized; (ii) interconnection of distribution facilities of individual ESPs with their neighbors; (iii) distribution network reinforcement; and (iv) construction of a greenfield 132KV sub-transmission line. The intention to focus on establishment of an interconnected sub-transmission and

distribution network is deliberate considering the need to consolidate the currently existing investments in infrastructure and concretize the “bottom-up” infrastructure building blocks required to meet increasing electricity demand (see Figure 1):

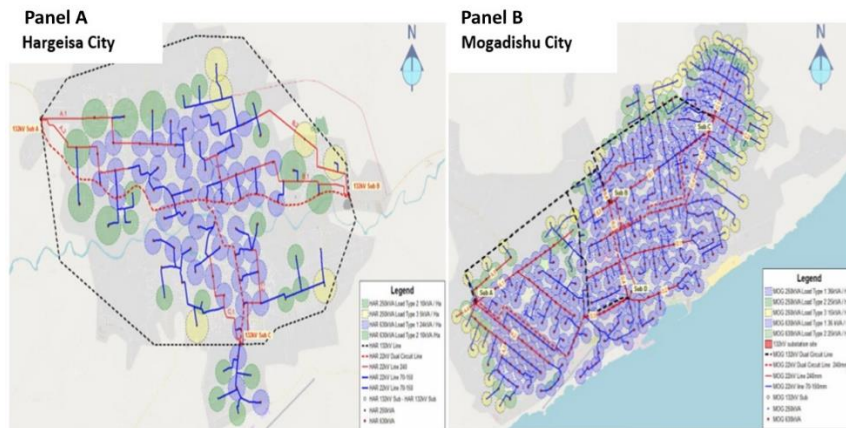


Figure 1: Proposed Sub-transmission and Distribution Network Development

Source: a) Unicon, 2018. Hargeisa City Development Report; b) Unicon, 2018. Mogadishu City Development Report.

Note: For each city this includes construction of a green-field 132 kV subtransmission ring network around the city and MV lines together with associated equipment within the city.

Component 2 – Hybridization and Battery Storage Systems for Mini-Grids (US\$ 20 Million).

This component will support activities aimed at the hybridization and optimization of existing mini-grids. It will support installation of Battery Energy Storage Systems (BESS) and solar PV systems at existing diesel-based generation stations in selected load centers. This component aims at increasing the efficiency of the existing hybrid mini grids (diesel and solar) by optimizing the generation capacity and where possible reduce the diesel consumption by augmenting the installed capacity with BESS and additional solar PV generation. There are several ESPs that have commenced converting their generation systems into hybrid electricity generation mostly via solar PV. These systems are synchronized to operate as part of solar PV-HSDG hybrid generation, with the solar component providing daytime generation. Such hybrid opportunities offer significant improvements in fuel efficiency, fuel consumption, extended generator lifespans, reducing GHG emissions and combustion pollution, along with less reliance on fuel imports. In addition, hybridization has enabled some ESPs to reduce the electricity tariffs by about 40 percent. Further to the proposed efficiency enhancements under component 1, this component will support increased penetration of renewable energy and increased resilience of the existing mini-grids. Retrofitting of the existing ESP owned HSDGs with a BESS unit and setting up additional Solar PV plants would provide them a faster, easier path to greater electrification, better quality of service, lesser cost of generation and also lesser usage and replacement cost of old diesel engines. Complemented by activities under component 1, having synchronized systems offers several benefits: reduce grid shutdowns due to load imbalance, ensure proper load flow and match the generation with the supply available. Further, the synchronized system offers a foundation to foster further greater integration of renewable energy systems like rooftop solar and opens opportunities for future net-metering. The selection of beneficiary ESPs will be based on a set criteria.

Component 3 – Stand-alone solar off-grid access to public institutions (Health and Education) (US\$ 40 Million).

This component complements and expands ongoing activities under the SEAP project (P165497). While SEAP already provides support for nation-wide SHS connectivity scale-up, including for the nomadic population, this component will expand activities to target health and education facilities, which were not part of the SEAP project scope.

This component will finance the delivery, installation, and O&M for Lighting Global certified solar-PV systems over the lifetime of the project for selected education and health facilities. Besides playing a key role in enablement of community co-benefits, facilities that have access to electricity may be better positioned to attract and retain skilled workers, especially in rural areas. Further, this will equip public service institutions to better respond to emergencies, such as COVID-19. The activities under this component support the resilience of the Somali population from the conflict's impact on livelihoods through improved access to functional basic services, such as health and education facilities. Further, it would also strengthen the government's legitimacy before its citizens through the delivery of the "social contract". The component will contribute to the re-establishment of the mandate of the Health and Education line Ministries for the provision of adequate services. The design is also consistent with the Health and Education World Bank projects implementing arrangements to build state capacity and expand revenue mobilization for the line Ministries (through improved services) for improved budget discipline and adequate allocation to cover for the facilities operational costs after the lifetime of the project. In addition, it will establish a platform to rally Development Partners contributions to the budget in the event the revenue mobilized is not sufficient to cover for the facilities expenses.

Selection of the facilities will be underpinned by the Least-Cost geospatial analysis and the list of priority facilities identified by the FGS (in consultation with the FMS) and Somaliland (SL). Site profiling will be conducted during project implementation to confirm beneficiaries' facilities. Component 4 – Institutional Development and Capacity Building (US\$ 15 Million).

Component 4 activities consists of five tailored to the reestablishment of the sector's soft infrastructure for the adequate day-to-day management and establishment of an enabling institutional and regulatory environment for sector operations. Taken together, these activities will lead to the rebuilding of the electricity supply industry in the country and establish the fundamentals for sector development and private sector participation sustainable in the long-run. The component will also support the implementation of the recommendations provided under the ongoing Energy Supply Industry (ESI) Institutional Design option analysis for sector development and project implementation arrangements:

a. Sub-component 1 – Policy and regulatory development. The technical assistance is aimed at strengthening sector governance and regulation to foster autonomy, accountability, and transparency. Specific activities will among others include sector policy, regulation, planning, management and operations, among others. The process of reestablishing the ESI and integrating infrastructure network operations will require a mix of planning and monitoring and, in particular, national skill set advancement and institutional entities. This will also require having in place appropriate regulations, standards, safety and technical including environmental and social performance requirements. Further, the establishment of a regulatory framework will require the ESPs to improve technically, be environmentally and socially responsible, and provide better operations within a levelled and regulated marketplace.

b. Sub-component 2 - Sector Planning and Feasibility Studies for Renewable Energy Projects. Following the adoption of the PSMP, there is need to undertake detailed feasibility studies, such detailed wind resource specific site measurements and geothermal prospecting, so as to progress implementation of the priority investments. The technical assistance will also support MoEWR/MOEM to undertake integrated planning including preparation of a Least Cost Development Plan covering generation, transmission and distribution and Electricity Access Strategy and Investment Prospectus.

Improved sector and electrification planning will inform a more comprehensive electrification program in the country adequately targeting the different segments of the population, including residential, commercial, nomadic, as well as public institutions. In addition, an assessment for productive uses of electricity will be conducted in the project areas to inform a pilot and the broader electrification planning and rollout agenda, also learning from the support provided under the SEAP project in providing off-grid connectivity to businesses. The pilot will be accompanied by a (also pilot) consumer awareness campaign building on the experience in similar contexts. The technical assistance is aimed at supporting the sector to have in place a sector wide development framework that will enhance crowding-in funding, both private and public.

c. Sub-Component 3: ESP Business Support Services. The technical assistance will support selected ESPs to enhance their capacity in both utility business management operations and also assist to set up business processes that would not only enable them comply to the license obligations, but also help them to grow their businesses and revenue stream leading to long-term additional sector investments. The intent of the assistance is to enhance and increase the role of the ESPs, and the private sector in general, in the sector ownership, management and operations. The technical assistance to enhance the ESI institutional capacity would initially support and guide the day-to-day sector undertakings through a Business Support Services Firm (BSSF) approach. The BSSF approach seeks to support and guide the day-to-day sector undertakings over a medium term to reestablish the Somali electricity sector covering both policy, oversight, operations and management including coaching and hands-on training of the sector staff and sector studies. The sub-component will also support ESPs with capacity to manage E&S aspects in their operations including preparation of ESP EHS manuals that would in particular focus on the ESP operations and maintenance obligations of the facilities financed by the project. The BSSF will also support the sector line ministries for the adequate management of sector policies and planning, establishment of an enabling environment for sector operations, including regulations (primary and secondary), safeguards, and day-to-day management and oversight.

d. Sub-Component 4: Project Implementation Support including for environment and social safeguards. This subcomponent will finance execution, design, and supervision consultants to assist the MoEWR/MoEM PIUs and associated agencies in project implementation, sector management and coordination. This subcomponent will also support key functions of the PIUs Project Management Teams (project management, procurement, financial management (FM), safeguards, and Monitoring and Evaluation) required for project implementation. The subcomponent will also include technical assistance to enhance sector fiduciary arrangements as well as setting up an E&S risk management system, enhancing the E&S capacity through staffing and training on the ESF requirements based on a robust capacity building plan. The Sectoral Environment and Social Assessment shall inform the sector wide development framework and E&S risk management capacity and performance for the sector. Specifically, the subcomponent will finance the Owner's Engineer Consultancy Services to support the PIUs with regard to the project design, procurement and contracts' management, including fiduciary and E&S aspects covering responsibility of preparing E&S documents along with the sub project specific designs. A dedicated Environmental and Social firm will support the PIUs in the areas of health, safety, labor management, land, resettlement, community engagement and security. In addition, the sub-component will support other technical assessment and capacity building activities for the successful implementation of the project. This will include, for instance, trainings for the Ministries of Health and Education for the management and operations of the solar PV systems beyond the lifetime of the project.

Sub-Component 5: Implementation of Gender Action Plan. This subcomponent will support a series of interventions envisioned to close the identified gender gaps. A gender diagnostic assessment to identify specific gender gaps within the energy sector, particularly barriers that limit career progression of women within the energy sector, was undertaken as part of the project preparation. The

assessment highlights four critical areas to be considered for women to be employed in the energy sector: (i) pipeline (education sector), (ii) skills-training, (iii) women's employment and retention in the energy sector and (iv) policy and legal framework to support women's employment. The diagnostic gender gap assessment, will be undertaken as part of the project implementation that will inform the gender activities necessary to close gender gaps in the sector including the design and implementation of a pilot incubator to accelerate the employment of women engineers in the sector, and the preparation of a Gender Action Plan and a Gender Capacity Building plans.

1.2 PROJECT AREA SELECTION AND LOCATION

For component 1 activities include sub transmission and distribution network reconstruction and reinforcement in the major load centers of Mogadishu and Hargeisa. This will improve network reliability and operational efficiency by interconnecting the current ESPs' distribution networks and existing generation to optimize overall distribution network operations. These activities will support the ESPs to (1) decrease the cost of operations (increased generation efficiency, reduction in distribution network losses, and distribution network duplications) and (2) improve electricity supply and reliability

For component 2 The beneficiary ESPs will be selected taking into account the following criteria: (1) regional balance with regard to the project scope coverage, to include some of the large load centers in the FMS; (2) maximum impact (reduced GHG emissions) based on the existing load demand; (3) optimized investment costs, for example, ESPs with existing hybrid SPV already installed but without battery storage would be ranked higher due to the lower cost; and (4) availability of land at the existing ESP generation sites for additional infrastructure.

For component 3 the Selection of the facilities will be underpinned by the Least-Cost geospatial analysis and the list of priority facilities identified by the FGS (in consultation with the FMS) and Somaliland. The overall financing needs for providing access to the 4,141 health and education facilities identified by the government is about US\$160 million. The project will provide electricity access to 585 facilities prioritized by the government following a selection criterion agreed with ministries of energy, health, and education. Selection criteria include (1) rural and remote areas with no connectivity, (2) priority connectivity to maternal health centers and secondary schools, (3) presence of both health and education facilities, and (4) presence of internally displaced persons (IDPs) and high levels of poverty and vulnerability. The project activities will also be complemented by similar interventions under the Somalia Education for Human Capital Development (P172434) and the Improving Healthcare Services in Somalia (P172031) projects. Further site profiling will be conducted during project implementation to select the actual facilities and the adequacy of the technology choice. Figure 2 presents the districts prioritized by the fulfillment of the selection criteria.

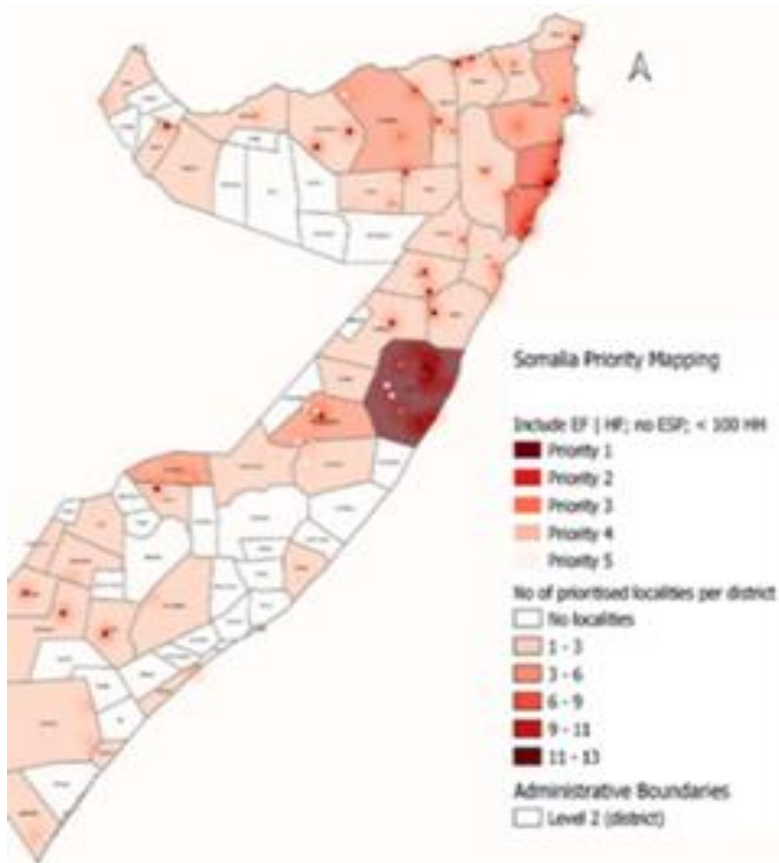


Figure 2: Priority districts for social facility connections

Source: WB estimates

1.3 SCOPE OF THE STAKEHOLDER ENGAGEMENT PLAN

Stakeholder engagement refers to a process of sharing information and knowledge in a meaningful manner, seeking to understand and respond to the concerns of individuals potentially impacted or affected by SESRP in a transparent, inclusive and timely manner and building relationships based on trust.

The scope of the SEP covers SESRP in its entirety in Somalia and Somaliland. As such, the SEP includes the various stakeholders positively, neutrally and adversely affected by SESRP.

The SEP is intended to be initiated early in the project.

The SEP is intended for both projects affected people, and other interested parties,

The SEP is further developed within the applicable reference framework consisting of the regulatory framework and the World Bank's Environmental and Social Framework.

This SEP is intended to be a 'live' document that is updated throughout the SESRP lifecycle to document the implementation of community engagement, communication strategy and changing SESRP landscape. This SEP will be reviewed regularly by the Project Implementation Units (PIUs (MoEWR & MoEM)) Safeguards Team and updated as relevant, and

The SEP will take into considerations of the requirements of the Guidance Notes: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings and the ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works Projects.

1.4 OBJECTIVES OF THE SEP

The goal of this Stakeholder Engagement Plan is to build an informed stakeholder support base, ownership and provide adequate stakeholder participation space and modes of communication for the successful implementation of the project.

The specific objectives of the SEP are:

- To provide stakeholders with a clear process for providing comment and raising grievances;
- To allow stakeholders the opportunity to raise comments/concerns anonymously through using the existing hotlines;
- To structure and manage the handling of comments, responses and grievances, and allow monitoring of effectiveness of the mechanism; and
- To ensure that comments, responses and grievances are handled in a fair, timely and transparent manner in line with international best practice and WB expectations.
- Assist in building strong relationships with the local community and reduce the potential for delays through the early identification of issues to be addressed as the project progresses.
- Document practical engagement strategies, achievements and lessons learnt.
- Provide timely and appropriate information prior to and during project implementation to enable informed participation in the project and definition of appropriate mitigation measures, and
- Facilitate open and continuous communication and consultation between various groups including project managers, stakeholders, and the general public.

Note that the project will involve the acquisition of the land and or resettlement along the Right of Way (RoW) for the transmission lines.

1.5 EFFECTIVE STAKEHOLDER ENGAGEMENT PRINCIPLES

Stakeholder Engagement will be free of manipulation, interference, intimidation and coercion, and conducted on the basis of timely, relevant understanding, accessible information and in a culturally appropriate format. It will involve interactions between identified group of people, providing them with an opportunity to raise concerns and opinions and ensuring the information provided is taken into consideration in decision making.

Effective stakeholder engagement develops a “social licence” to operate which depends on mutual trust, respect and transparent communication between the project and stakeholders. It therefore improves the project’s decision-making and performance by managing risks, avoid conflict, enhance reputation and manage stakeholder expectations.

Stakeholder engagement is informed by a set of core values underpinning interactions with stakeholders. Common principles based on international best practice are:

- Transparency will be demonstrated when stakeholder concerns are acted upon in a timely, open and effective manner;
- Trust is achieved through open and meaningful dialogue that respects and uphold the stakeholders’ values, opinions and beliefs;

- Integrity will occur when engagement is conducted in a manner that fosters mutual respect and trust;
- Respect will be created when rights, cultural beliefs, values and interests of stakeholders are recognized;
- Commitment will be demonstrated by the need to understand, engage and identify stakeholders is recognized and acted upon early; and
- Inclusiveness will be achieved when broad participation is encouraged and supported by providing appropriate participation opportunities.

1.6 WORLD BANK REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

This project is prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard (ESS) 10 on Stakeholders Engagement and Information Disclosure, the implementing agencies are required to provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.

World Bank Requirements on Stakeholder Engagement: Specifically, the requirements set out by ESS10 are the following:

- "The government will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- The government will engage in meaningful consultations with all stakeholders. The government will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The government will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).
- The developed SEP will be proportionate to the nature and scale of the project and its potential risks and impacts. The SEP will be disclosed as early as possible, and before project appraisal, and

- The government shall seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes will be made to the SEP, the updated SEP will be disclosed (World Bank, 2017: 99).
- The GRM shall propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of SESRP in a timely manner (World Bank, 2017: 100).

Currently there are no national legislation relevant to the Stakeholder Engagement.

ESS 10 defines the requirements for stakeholder engagement as follows:

- Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them;
- Assess stakeholder interests and support for the project and enable stakeholders' views to be taken into account in project design;
- Promote and provide means for effective and inclusive engagement with project-Affected Persons throughout the project life cycle; and
- Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.

1.7 POTENTIAL ENVIRONMENT & SOCIAL RISKS AND IMPACTS

Environment Risk Rating is High. The environmental rating is based on the complexity of activities proposed, coverage of the project, as well as its possible impacts. First, the electricity supply industry in Somalia is dominated by private players with poor safety records. Second, the government does not own generation assets and had small leverage and low capacity to oversee the Environmental risks of the project. Third, there is little or no formal regulations or codes of standards of practice and mechanism to vet and enforce electricity services quality, health and safety standards. The potential environmental risks include (1) management of environmental and social risks and impacts of the associated facilities, such as the ESP generation facilities, (2) disposal and management of liquid and solid waste, such as scrap metals, cables, capacitor, wood, glass, and packaging materials, (3) disposal and management of hazardous wastes such as polychlorinated biphenyls (PCBs) from older imported transformers and capacitors, transformer parts and oils, certain amount of heavy metals, used and damaged solar panels, and batteries, (4) soil erosion and degradation, (5) fauna and flora disturbance leading to loss of habitats due to land clearance, (6) dust and noise, (7) contamination and degradation of soil and water, and (8) health and safety of employees and communities including those associated with operation of vehicles, plant and equipment, working at night, contaminations associated with improper handling of e-wastes, electrocution and aesthetic and light reflection, and resource use, mainly in areas of less availability. The potential project risks associated with the disposal and management of hazardous wastes will be aggravated due to limited knowledge about and capacity for disposal, recycling, and management of the anticipated large amount of nonbiodegradable hazardous wastes from electrical equipment, damaged or leftover solar panels and used or damaged batteries, and limited knowledge and capacity in O&M of these new energy technologies, including knowledge about the availability and affordability of parts. These risks and impacts are expected to be managed in accordance with the World Bank environmental, health, and safety guidelines and the relevant requirements of Environmental and Social Standards ESS1, ESS2, ESS3, ESS4, and ESS6.

Social Risk Rating is High. Key social risks include: (1) ensuring security for project operations and workers, (2) potential land acquisition required for the installation of 132 kV subtransmission network and associated substations, the distribution network, medium voltage line (<33kV) corridors and possible expansion of existing and green field mini-grids, (3) historical issues around land and claims with the existing generation sites occupied by the ESPs and the distribution network, (4) Potential

forced eviction of Internally Displaced Persons and others in anticipation of project activities (5) systemic weakness in the capacity of implementing agencies to identify, understand and prevent adverse environmental and social impacts of the project, (6) potential establishment of workers camp that may exacerbate risks associated with gender-based violence (GBV) or sexual abuse and exploitation (SAE), and other forms of GBV, (7) labor influx and associated gender-based violence risks, given the stark poverty rates in the country. Currently, the GBV risk for the project has been assessed to be high, based on the available information and GBV risk assessment tool results. A GBV action plan will be prepared. Social risks are also raised by the absence of a formal legal framework for the management of E&S risks, the intricate stakeholder engagement process due to clan considerations, and the weak institutional capacity to address related social risks—including GBV considerations—that may occur during stakeholder consultations under project activities and subprojects implementation. All E&S risk mitigation measures will be detailed in the appropriate ESF instruments to be prepared in line with ESS1, 2, 4, 5, 7 and 10 and the ESCP. The investments in the subtransmission network, distribution network reconstruction, reinforcement and operations efficiency in the major load centers is likely to involve compensation requirements for affected assets. Compounded by gaps in legal and regulatory frameworks, land appropriation and asset valuation will be challenging. Given the government's own budget situation, the project would require making an exceptional provision for payments of land compensation through World Bank funds.

Stakeholders Risk Rating is Moderate. Several consultations have been undertaken during the project preparation with several key stakeholders, such as the FMS and the ESPs. As a result, the project activities have been prioritized based on the consultations and stakeholder buy-in. Specifically, activities under component 1 and 2 will be implemented in coordination with the respective beneficiary ESPs, whereas the public institutions to be electrified under component 3 will be selected following the criteria agreed upon with the respective ministries in consultation with the FMS. This has mitigated the potential risk that the FMs and other stakeholders may feel left out or higher expectations for project outcomes than can be supported. The project will also conduct workshops and sensitization activities to engage the private sector, civil society, and other partners in the main project areas. The project will have both steering committee and a Sector working group to provide oversight of the project as well as ensure interests of various groups are taken on board.

2. STAKEHOLDER ENGAGEMENT

2.1 Stakeholder Engagement Principles

To ensure compliance with international best practices, the project will apply the following principles during stakeholder engagement.

- Openness and life-cycle approach: public consultations for the project will continue during the whole project lifecycle from preparation through implementation. Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation.
- Prior, informed participation and feedback: information will be provided and widely distributed among all stakeholders in an appropriate format; conducted based on timely, relevant, understandable and accessible information related to the project; opportunities provided to raise concerns and ensure that stakeholder feedback is taken into consideration during decision making.
- Inclusivity and sensitivity: stakeholder identification will be undertaken to support better communication and building effective relationships. The participation process for the project will be inclusive. All stakeholders will be encouraged to be involved in the consultation processes. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups, particularly internally displaced persons and minority groups, and the cultural sensitivity of diverse groups in the project areas.

2.2 Stakeholder Identification

The first step in the stakeholder engagement process for the SESRP is to identify the key stakeholders to be consulted and involved in the projects development phases at national and district levels. Stakeholders are institutions, groups of people or individuals who are affected or likely to be affected by the project and who may have an interest in the project. These stakeholders could be directly or indirectly affected and have potential to influence the projects implementation in a positive or negative way and might therefore need to express their concerns through various stakeholder forums. Borrowing from the SEAP Project, the stakeholders of the project can be grouped into the following category;

- Affected Persons;
- Other interested parties; and
- Disadvantaged/Vulnerable individuals and groups.

From the above, potential stakeholders for SESRP may include but not limited to:

Affected Persons:

- Health Centers,
- Schools
- Energy Service Providers _ESPs
- Business and farming communities;
- Banks and other financial institutions;
- Relevant National Department & Agencies (i.e. Ministries etc);
- Marginalized and Disadvantaged People (include women, children, youth, people with disabilities, elderly, ethnic minorities);
- General public.

Other interested parties

- Security apparatus (e.g. police, military, private security service providers, etc)
- Local Government/Municipalities/Regional Government
- Relevant Government Departments at Member state level
- Local and International NGOs;
- BSSF,
- Supervision consultants;
- Contractors;
- Media organizations
- Civil Society Organizations (CSOs);
- World Bank and institutional partners;
- Ministry of Environment and Water Resources (FGS),
- Ministry of Energy and Minerals (Somaliland),
- Ministry of Health, and
- Ministry of education.
-

Marginalized & Disadvantaged People

- Refugees and internally displaced persons;
- Women;
- Unemployed Youth
- Nomadic communities;
- People with disabilities;
- Ethnic minorities like smaller sub clans.

2.3 Stakeholder Mapping and Analysis

Stakeholder mapping is a process of examining the relative influence that different individual and groups have over a project as well as the influence of the project over them. The purpose of a stakeholder mapping is to:

- Profile stakeholders identified and the nature of the stakes;
- Understand each group's specific issues, concerns as well as expectations from the project that each group retain; and
- Gauge their influence on the project.

Stakeholder analysis is the process of identification of key stakeholders, an assessment of their interests in the project and way in which these interests may affect the project. The reason for doing a stakeholder analysis is to identify who to inform and consult, who to build and nurture relationships with and what roles they should play and at which stage. Based on this understanding, stakeholders are categorized as:

- **High Influence:** are those who are expected to have a high influence over the Project or are likely to be heavily impacted by the Project activities: they should thus be high up on the Project's priority list for engagement and consultation.
- **Medium Influence:** are those who are expected to have a moderate influence over the Project or even though they are to be impacted by the Project, such impact is deemed unlikely to be substantial: these stakeholders should thus be neither high nor low on the Project's engagement list.

- Low Influence: are those who are expected to have a minimal influence on the decision-making process or are to be minimally impacted by the Project: they should thus be low on the Project's engagement list.

Table 1 below provides brief profiles of the various stakeholders in the project and their likely degree of influence leveraging from the lessons learnt from the SEAP project.

Table 1: Stakeholders and Their Influence on the Project

Stakeholder Category	Stakeholder Group	Magnitude of Impact/Influence
Community	Farming & Business communities	Impact of Project on Stakeholder: High Level of Interest Influence of Stakeholder on Project: High Level of Interest
	General public	Impact of Project on Stakeholder: High Level of Interest Influence of Stakeholder on Project: High Level of Interest
Energy Service Providers	Current players in the energy market and power distribution	Impact of Project on Stakeholder: High Level of Interest Influence of Stakeholder on Project: High Level of Interest
Government Bodies	Ministry of Finance	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	Ministry of Education	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Ministry of Communication & Technology	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Directorate of the Environment	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest,
	Municipal authorities	
	Ministry of labour	
	Occupational health and safety department	
	Ministry of Interior	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Ministry of Labour	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Ministry of Planning and Economic Development	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
FMS Ministries	FMS Ministries of Water and Energy	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	FMS Environmental Ministries	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	Ministry of Labor	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	Ministry of Gender	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	FMS Ministries of Public Works	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	FMS Planning Ministries	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	NGOs	International & Local

Stakeholder Category	Stakeholder Group	Magnitude of Impact/Influence
	NGOs	Interest Influence of Stakeholder on Project: High Level of Interest
	Community Based Organizations	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
Institutional Stakeholders and donor partners active in the energy space as well as those relevant for E&S issues	World Bank, SIDA, DFID, EU & AfDB.	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
Local Government Authorities	Municipal Councils	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
Regional Government	Federal Member States	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
UN Agencies, INGOs and donor groups	UNDP, UN-HABITAT, United Nations Office for Project Services, International Organization for Migration, ADRA, UNHCR, ILO, UN WOMEN, Norwegian Refugee Council, World Vision International, Danish Refugee Council, European Union and USAID	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest

2.3.1 Citizen Engagement

The project will establish a citizen's feedback mechanism and grievance redress system which will look at stakeholder satisfaction, and other citizen engagement tools. The stakeholders will be able to register their feedback or complaint towards the performance of the ESPs and SHS delivery. The project will conduct independent surveys to track stakeholders' feedback on their perception and experience of the activities implemented under the project, which will be disaggregated by gender and geographical area. The consultation processes will be an ongoing activity throughout the project cycle to ensure that stakeholders are fully engaged, especially the vulnerable and disadvantaged groups. In addition, to prevent and respond to GBV/SEA/HS during project implementation, measures will be taken to sensitize and train the PIUs, IAs, and contractors on GBV in line with the Project GBV Action Plan that shall be prepared. The final stakeholders of the project, mainly the consumers of electricity services in the country, are unlikely to be aware of the new technologies being presented and will benefit from information about the services, explanation about how the services can be accessed, and the opportunity to interact with service providers to share their feedback and concerns. It will be expected that the representative of consumer groups will sit in the Energy Sector Working Group to voice the

concerns of consumers, as well as help service providers better understand the needs and concerns of their customers. The citizen engagement program will employ a variety of messaging tools and personal interaction to reach various audiences while ensuring opportunities for two-way dialogue.

2.3.2 Project-Affected Persons (PAP)

Project-Affected Persons includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihood. Project-Affected Persons include local communities, community members and other parties that may be subject to direct impacts from the Project activities, which includes impact on land, land-based livelihood, access, assets, and businesses. Project is in both urban, semi-urban and rural areas. In general, the Affected Persons include land owners, land users, those who have encroached on the land, businesses. Detailed description of the PAPs' different categories is listed below:

Table 2: Project-Affected Persons -PAPs

Project-Affected Persons	Relevance to the project	Indicative list
Project Affected Persons (People who are physically or economically affected);	Project-Affected Persons include local communities, community members and other parties that may be subject to direct impacts from the Project activities, which includes impact on land, land-based livelihood, access, assets, businesses as well as Private Sector (SMEs); Vulnerable households.	<ul style="list-style-type: none"> ▪ People who reside or along the roads and occupied the RoW. ▪ Street vendors, taxi drivers and businesses operating along the roads, and ▪ People with claims to land currently being used by the ESPs.
People who will benefit from project-related employment or business opportunities.	The project will generate employment or business opportunities for the community through construction and maintenance works of the municipal electricity infrastructure. Improved service delivery at the hospital and schools connected to the grid lines.	<ul style="list-style-type: none"> • Disadvantaged/vulnerable groups in the community such as IDPs, refugees and returnees who will be engaged by the project i.e target worker recruitment, target beneficiaries for public facilities near their area of stay ; • Local business community who will benefit from project construction phases.

2.3.2 Other Interested Parties

These are government institutions (e.g., MoEWR, MoPIED, DoECC), private companies, international, and national organizations with an interest in the project.

Table 3: Other interested parties

Other interested parties	Relevance to the project	Indicative list
Line Ministries and Agencies at Federal and FMS	Ministries such as Ministry of Energy and Water Resources, Public Works, Ministry of Planning and Economic Development, Ministry of Interior and the Directorate of Environment and Climate Change. other line agencies are key stakeholders for the project in compliance with	<ul style="list-style-type: none"> ▪ MoEWR ▪ MoPW&T ▪ MoPIED ▪ Mol ▪ MoF ▪ DoECC-OPM

	legislation and regulations	<ul style="list-style-type: none"> ▪ FMS Ministries of Water and Energy ▪ FMS Environmental Ministries ▪ FMS Planning Ministries ▪ FMS Ministries of Public Works, Ministry of Labor ▪ Ministry of Gender.
Local government	<ul style="list-style-type: none"> • Local governments ensure district social services (e.g. electricity) and economic development, • Mobilization of local resources for development • Local government authority protects the right of communities in the project areas and represents the interest of the PAPs in the project. • The issue of land, security, and grievance redress is also among the key responsibilities of the local governments during the project life-cycle –municipality administrations. 	<ul style="list-style-type: none"> ▪ Municipality Departments (e.g. Public Works, Social Affairs, etc) ▪ Members of Local Council and the mayor ▪ Clan/cultural elders ▪ Village committees ▪ Police
UN Agencies, INGOs and donor groups	UN agencies, INGOs and donor groups in Somalia supporting the government with similar projects on service delivery as well as economic and infrastructure development. There is need for collaboration and partnership with SESRP.	<ul style="list-style-type: none"> ▪ UNDP ▪ UN-HABITAT ▪ United Nations Office for Project Services ▪ International Organization for Migration ▪ ADRA ▪ UNHCR ▪ ILO ▪ UN WOMEN ▪ Norwegian Refugee Council ▪ World Vision International ▪ Danish Refugee Council ▪ European Union ▪ USAID
Community groups	There are community groups including IDPs and host communities who are currently working with the developmental projects in these respective Municipalities, this will be sustained under the SESRP.	<ul style="list-style-type: none"> ▪ Community leaders and elders; ▪ IDPS, returnees and refugees; ▪ Women and youth groups ▪ Business community
Other key interested partners	Private companies such as electricity, telecommunication and water supplies. These are key stakeholders during the implementation of the project.	<ul style="list-style-type: none"> ▪ BECO ▪ SOM-POWER ▪ NUWACO; ▪ NECSOM; ▪ HORMUD ▪ SOMTEL
Academic institutions	Universities, think tanks	<ul style="list-style-type: none"> ▪ Potential concerns regarding environmental and social impacts ▪ Potential educational/outreach opportunities to increase

		awareness and acceptance of the project.
Local Media	Press and media (including social media)	<ul style="list-style-type: none"> ▪ Inform residents in the project area and the wider public about the Project implementation and planned activities

A further analysis of mapped stakeholders will be done to better understand their relevance and the perspective they offer, to understand their relationship to the project issues and each other, and to prioritize based on their relative usefulness for this engagement.

2.3.3 Disadvantaged / vulnerable Individuals or Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project. Internally Displaced People (IDPs), persons with disabilities, women, nomadic people, ethnic minorities, orphans /child headed households, and elderly with no means of living and households with disabled members, women, unemployed youth, Ethnic minorities' Poor, Child headed Households affected by the project are entitled to allowance.

In order to ensure disadvantaged or vulnerable needs are taken into consideration, and that they are reached, the PIUs will adopt several mechanisms; such as, publishing all information about the project in Somali, holding workshops or meetings at suitable location that women can easily access, provide needed facilities in public meetings for handicap or people with disabilities. In addition, when designing the grievance mechanism, the PIUs will take into account the availability of needed recourse for vulnerable groups to give feedback, or send a complaint.

Table 4: Stakeholder Engagement with Vulnerable and Disadvantaged Groups

Vulnerable groups	Potential barriers to limit effective stakeholder engagement	Specific needs to address the barriers
IDPs, returnee and refugees	<ul style="list-style-type: none"> ▪ Access to IDP camps; ▪ Limited understanding or interest 	<ul style="list-style-type: none"> ▪ Sensitization through their representatives; ▪ Organize meeting with their representatives
Poor households such as female-headed households and elderly people	<ul style="list-style-type: none"> • Lack of time to participate; • Transportation cost 	<ul style="list-style-type: none"> • Flexible timing for meetings; • Provision of transports cost
People with disabilities	<ul style="list-style-type: none"> • Physical disabilities preventing mobility • Various disabilities (e.g., visual, hearing, etc.) 	<ul style="list-style-type: none"> • Sign language; • Ensure other family members or relatives accompany during meetings; • Accessible consultation venues

2.4 Findings from the Situational Analysis

The preliminary situation was undertaken to inform the project preparation and implementation phase. This will give special attention to the needs and status of IDPs given their high concentration in urban areas and informality. The outcomes from the preliminary situational analysis on communication in the project area and related physical boundaries are as provided below:

i. Literacy Levels of the Local Community

The proposed project areas are urban areas Component 1 and 2 are primarily in Mogadishu, Hargesia and other urban load centres , rural areas and semi-urban areas with relatively low literacy levels. Communication with the community will take into consideration the type of messaging that is shared with the community. This also strongly implies the need for support to community members for information that is recorded in written form. This will include minutes of meeting, grievance forms, resolution documents and agreements between the project management (PIUs) and the community.

ii. Access to District Local Authorities / Offices

Key Informant interviews and group discussion will be practical due to the accessible location of the offices of these stakeholders in most of these areas. Key informants are mainly available in the District Headquarters. However due to the COVID 19 pandemic the consultant may resort to having interviews with Key informants through phone calls or conduct virtual meetings.

iii. Language

Development of messages in the Somali language within the chosen project areas will be key during the stakeholder engagement exercise. Development of the messages will require close collaboration the consultant and the Community Liaison Officer (CLO) to be hired by the contractors. These individuals will be invited to the multidisciplinary teams for development of messages for communication to the local community.

The CLO shall be a member of the team developing these messages, it is expected that CLO will have proper understanding of the issues at hand to avoid the risk of the message being “lost in direct translation”.

The project team may also consist of persons of different nationalities, the main ones being Somalia/Somaliland, we recognise that all these teams may communicate in one common language. However, special attention will still be given to facilitate clear communication and messaging among the groups. For avoidance of doubt, verbal communication will always be followed with written communication. Site procedures for submission and record keeping of letters will be uniformly applied at all times.

iv. Development of Messages

Considering the need for capacity building to facilitate meaningful engagement with the various stakeholder groups, messaging will be developed through discussions with multi-disciplinary project staff so as to ensure that any technical information that is simplified for consumption by stakeholders is concise, clear and factually correct.

v. Use of Mass Media

Considering the length of the project as well as the national significance of the project, communication with stakeholders outside the project footprint would benefit from use of mass media such as newspapers (print and electronic), Line Ministry websites and where necessary use of local television and radio stations.

vi. Public Meetings

COVID-19 pandemic has led to halt and or restricted the public meetings and gathering within the proposed project areas and the country at large. This is in addition to other restrictions such as social distancing, cessation of gatherings etc to manage and contain the virus spread. This will pose a huge challenge to effectively conduct public meetings in the project area. Hence the need to develop some consultative innovative solutions to undertake the studies. The information from the Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, will be useful in guiding the process. The consultation will be done in line with the requirements listed in the ESF Interim Note: COVID-19 Considerations in Construction/Civil Works Projects.

In recognition of the difficulty to undertake public meetings, the option of adhering to the best practices on conducting public participations for development projects may adopt the following options:

- Leveraging on the use of ICT innovations that include online questionnaires, audio-visual and teleconferencing to undertake comprehensive public consultations during this pandemic.
- The use of comprehensive questionnaires that will include all the details pertaining to the project and a clear description of the proposed project together with architectural drawings.

The Environment and Social safeguards consultant(s) (E&S firm, and OE) will develop proposals and innovative solutions on how public meetings can be undertaken in the midst of the COVID-19 pandemic. This will entail;

- Development of an open ended questionnaire with questions that will cover the concerns by the community on the project, their views and also recommendations.
- The questionnaires will be simple, be well detailed about the project be translated into local languages for easy understanding by the locals.
- With the help of area chiefs, clan leaders, a minimum of 100 questionnaires will be distributed per location. The questionnaires will later be collected and stamped by the chief and sent to Line Ministries for data entry and analysis of all the concerns raised.
- Other questionnaires will be placed at the chief office where the residents can pick at will for comments.

vii. Focus Group Discussions

Focus group Discussions are one of the participatory methods that will be used to gain insights into the workings of the project area. It will be used to get information about unclear survey results. Due to the COVID-19 pandemic it will be difficult to have the project team undertake group discussion hence relying on CLO/local researchers within the project area in collaboration with the local administration to lead the FGD process.

The Focus group discussion targets the following groups;

- The Men
- Women
- The Youths
- Vulnerable/PLWDs
- Other communities as needed *minority clans

Due to the social distancing measures put in place by the Ministry of health it will be appropriate to strictly have 3-5 individuals per focus group. We propose all this focus groups to be done at one central point preferably the chief's/assistant chiefs place which should be in the open, will be well equipped with all the COVID-19 preventive measures that include provision of sanitizers and facemasks. The CLO will spearhead the invitation of the different groups of persons with the help of the area and in

close consultations with consultant, chief and the Clan elders. The focus groups can be done thrice per day, one in the morning, evening and afternoon.

GBV/SEA issues relating to the SESRP shall be handled in relation to the GBV/SEA Action Plan that shall be developed.

2.5 Stakeholder Engagement Plan -SEP

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table below presents the stakeholder engagement activities envisaged under the project. The activity types and their frequency are adapted to the three main project stages (preparation and design, construction and operation and maintenance (O&M)).

Table 5: Stakeholder Engagement Plan

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method (s) used	Location/frequency	Responsibilities
Preparation; Detailed Design and Pre- construction phase	All stakeholders	<ul style="list-style-type: none"> - Overall project design, - Anticipated environmental and social impacts and proposed mitigation measures in ESMF (including gender action plan), RPF, SEF and LMP. 	Public consultations, Individual meetings, Through community action groups, Emails	Prior to project appraisal at accessible public space	<ul style="list-style-type: none"> - PIUs and Engineering and supervision consultant
	Project-Affected Persons include local communities, community members (Vulnerable households) and other parties that may be subject to direct impacts from the Project activities, which includes impact on land, land-based livelihood, access, assets, businesses as well as Private Sector (SMEs); Vulnerable households	<ul style="list-style-type: none"> - More site-specific environmental and social impacts and mitigation measures in RAP, ESMP (including GBV Action Plan), LMP and SEP. - Awareness-raising on the GRM - ESMF, ESMP, SRA, SMP, RPF, SEP disclosures. - RAP implementation - compensation rates and methodology; - livelihood restoration) - compensation and completing rehabilitation of physical assets; 	Public meeting, individual meetings during preparation and implementation of RAP; Disclosure of written information - Brochures, posters, flyers, websites (Social Media Communication) Face-to-face meetings; separate meetings specifically to affected vulnerable groups and individuals; Grievance mechanism Communication	Prior to start of civil works at project sites; Monthly/quarterly meetings in affected municipalities and villages; The GRM is maintained throughout the project life	<ul style="list-style-type: none"> - Project Implementation Units (MoEWR, MoEM) and Engineering and Supervision, - Consultant; - GM; - Contractors, (Environmental and Social Officers); - Municipal line departments/staff (E.g., grievance staff)
	Project Affected Persons- People who will benefit from employment	<ul style="list-style-type: none"> - Selection criteria and ToR for employment opportunities; 	Group meetings with the host community and support groups to engage	Prior to start of civil work	<ul style="list-style-type: none"> - PIUs and Engineering and Supervision

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method (s) used	Location/frequency	Responsibilities
	opportunities through construction and maintenance works of the municipal electricity infrastructure	<ul style="list-style-type: none"> - Environmental laws and regulations; - Project scope, rationale and E&S principles - Grievance mechanism process 	vulnerable groups;		<ul style="list-style-type: none"> - Consultant; - GM; - Contractor
	Other Interested Parties – Community groups	<ul style="list-style-type: none"> - Ways to outreach to vulnerable groups and address their concerns and interest 	Individual meetings; Focus group meetings; Emails	Prior to start of civil work	<ul style="list-style-type: none"> - PIUs and Engineering and Supervision - Consultant; - GM; - Contractor
	Other Interested Parties - External Ministries (Federal/FMS) Academic institutions; Local Government Units; General public; Women organizations; Local commercial banks and Media	<ul style="list-style-type: none"> - Technical details on project design, - Compliance with national regulations and collaboration with relevant programs, - Identification of vulnerable groups of people relevant to the project Compliance with legislations and regulations, - GRM Process 	Official/Public meetings, workshops; Social Media Communication; Disclosure of written information - Brochures, posters, flyers, website; Information desks - In Municipalities and HQ; Grievance mechanism	As needed (and continued throughout the project life)	<ul style="list-style-type: none"> - Project Implementation Units (MoEWR, MoEM), and Engineering and Supervision, - Consultant; - GM; - Contractors

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method (s) used	Location/frequency	Responsibilities
Construction	Project Affected Persons- People who physically and economically affected, those residing in project area	<ul style="list-style-type: none"> - Grievance mechanism process; - Health and safety impacts (Construction-related safety measures); - Employment opportunities; - Environmental concerns; - awareness-raising - HIV/AIDS Awareness Program and - Health and Safety Management Plan. 	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; Disclosure of written information Information board – On the beginning and at the end of project side;	Monthly/quarterly meetings Communication through mass/social media (as needed);	<ul style="list-style-type: none"> - PIUs and Engineering and Supervision - Consultant; - GM; - Contractor
Post-construction and Operation phase	Project Affected Persons - People who physically and economically affected, those residing in project	<ul style="list-style-type: none"> - Satisfaction with engagement activities and GRM process; - Monitoring and evaluation of project benefit and environmental and social performance - Community health and safety measures during operation; - 	End-line stakeholder survey on project impact, Public meetings, trainings/workshops, individual outreach to PAPs Disclosure of written information - Information board – On the beginning and at the end of project side;	Following the completion of civil work	<ul style="list-style-type: none"> - PIUs and Engineering and Supervision - Consultant; - GM; - Contractor
	All stakeholders	Reporting back to stakeholders on the outcome of the monitoring and evaluation of the project	Public workshop Media releases and/or newsletters via email Project bulletins	Following the completion of SESRP	PIUs and Engineering and supervision consultant

2.6 Reporting on Stakeholder Engagement

The activities to be conducted under this SEP strategy cannot be viewed in isolation. They are to be imbedded in the Framework instruments and Sub project specific Environmental and social impact management plan and related sub-plans for the project include the Resettlement Action plan, the grievance redress mechanism, labour and working conditions, GBV/SEA/HS, HIV/AIDS Management and Project Implementation Safety Awareness Programs.

Monitoring and evaluation of the effectiveness of this SEP will be done at each sub-component level, to ensure that the communication objectives are contextualised and managed effectively. Reporting on stakeholder engagement and communication will also be integrated into the relevant reports as required by the Contract and as proposed in this document.

The reports to be submitted include:

Monthly Progress Reports will outline useful information to the SEP including details of site meetings, any special visits and inspections, financial status both for work contract and supervision contract, specific reports on the environmental and social management plan implementation and project risks.

The stand-alone Annual and Quarterly Environmental and Social Monitoring / Audit Reports will highlight implementation, performance as well as monitoring elements of relevance to the SEP. The annual report will also include lessons learnt and corrective actions that should be communicated back to the relevant stakeholders.

The reports will also include a section on the performance and efficacy of the SEP vis a vis budgetary and resource constraints. It will also highlight lessons learnt and propose corrective actions for adoption in the next SEP annual cycle.

3. STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE

3.1 Brief Summary of Previous Stakeholder Engagement Activities

As part of the wider stakeholder engagement for the proposed Somali Energy Sector Recovery Project (SESRP), the Ministry of Energy and Water Resources engaged discussion with important government bodies and agencies at federal and federal member states. Engagements and consultation on the project design and the planned activities and implementation arrangements have been conducted with key institutional stakeholders including the relevant Government agencies at federal and federal member state levels of the energy and environmental institutions. Electricity service providers and the business selling energy equipment and the non-state actors together with the Horizon Consultant Firm which is the lead entity that is supporting the project in the development of the project safeguard documents.

The four preliminary stakeholder engagement for the Somali SESRP conducted on 22nd of May 2021, has mainly focused on key project stakeholder consultations and inception to the participants views and feedbacks on project environmental, social, health and safety issues and concerns and as well filling the gaps in the inception report and refining the methodology was among the objectives of these stakeholder consultations.

3.2 Aims of the Consultations

- Introducing the participants, the Project Development objectives and its components.
- Obtain participants views and feedbacks on project environmental, social, health and safety issues and concerns and Key social issues such as labour, land security, GRM. It is essential to get feedback on these key E&S issues from the relevant stakeholders.
- Identify the key social issues such as labour, land security, GBV/SEA, GRM from the relevant stakeholders,
- Feedback on Preliminary E&S Risk Assessment Report, and
- Identify the key institutional gaps and capacity issues.

After a brief introduction from the participants, the meeting commenced with the project Coordinator appreciating and thanking everyone for having taken time to attend the meeting. At the end of each introduction remarks, this was followed by an extensive discussion to capture the inputs and feedback of the key stakeholders as this is critical for the preparation of the project. For each of the stakeholder consultation meeting, the meeting agendas were openly discussed and the participants were given opportunities to ask questions and raise suggestions they may have during the session, they have provided explanations with regards to the existing energy, environment and social related issues and also highlighted the overall environmental and social governance and the institutional arrangements and their capacities. At the end of these sessions, the facilitators summarized the relevant feedback at the end of the session.

The key concerns raised & suggestions provided by the stakeholders during the preliminary consultations are categorized as follows:

Table 3-1: Government Bodies and Agencies at Federal level and FMS levels, ESPs and Business Selling Energy Equipment

Stakeholder	Indicative list	Discussion Themes	Issues Discussed & Concerns Raised	Action Point
Government Bodies and Agencies at Federal level and FMS levels	<ul style="list-style-type: none"> - Federal Ministry of Energy and Water Resources - Federal Directorate of Environment and Climate Change- OPM - Galmudug Ministries of Energy and Environment - South-West State Ministries of Energy and Environment - Hirshabelle Ministries of Energy and Environment - Puntland 	<ul style="list-style-type: none"> ▪ Understand the electricity generation mix and capacities ▪ How do companies manage environmental and social issues in energy sector? ▪ Whether the ESPs undertake ESIA study for the energy projects. ▪ Some of the E&S issues common in the sector ▪ The amount of biomass used in the country and in each state. 	<ul style="list-style-type: none"> ▪ In Puntland, more than 90% of the power is supplied by diesel powered generators while less than 10% comes from the renewable sources-solar panels. ▪ While States of Galmudug, Jubbaland and SWS highlighted that 99% of electricity is generated from diesel powered generators while the remaining 1% comes from the renewable energy sources such as the solar. ▪ The use of Biomass mainly the charcoal and wood-fuel in the region is very highly as more than 80% and the remaining percentage use LPG for cooking. ▪ Overall weakness in terms of environmental governance and specifically the environmental safeguard related capacities and capabilities. ▪ In addition, the current environmental institutions set-up and formation is also very weak and does not provide the 	<ol style="list-style-type: none"> 1. FWS needs huge capacity support in terms of establishing and equipping the key environment, social and energy institutions in terms of financial and budgetary support especially in emerging states. 2. Federal Member States to share available documents and such as policies, acts and regulations plus other studies to the project. 3. FMS to submit their needs in a written form prior to the upcoming stakeholder consultations meeting for extensive discussions. <ul style="list-style-type: none"> ▪ The project to support FMS to develop relevant regulations and policies at state levels. ▪ Due to the reported institutional capacity

Stakeholder	Indicative list	Discussion Themes	Issues Discussed & Concerns Raised	Action Point
	<ul style="list-style-type: none"> Ministries of Energy and Environment - Jubaland Ministries of Energy and Environment - Somalia Non-state Actors 		<ul style="list-style-type: none"> necessary arrangements for effective compliance of environmental and social safeguards. ▪ Absence of Environmental and Social safeguard regulations at the Federal and FMS levels creates a huge national safeguard gaps. At the moment, the entire ESS is led by the World Bank or other donors whose safeguard policies are referred for implementation of the development project's ESS. Strong government involvement is needed. ▪ Electricity Service Providers are not oriented towards the safeguards and they don't have safeguard policies or strategies in their companies. 	<p>limitations at all levels, the SESRP project is expected to contribute towards enhancing the capacity needs of the federal and FMS institutions.</p> <p>4. There is need for frequent and more stakeholder technical consultations regarding the project design and ES safeguard related issues especially during the pre-implementation stage.</p>
Electricity Service Providers- ESPs	<ul style="list-style-type: none"> ▪ BECO ▪ WESCO; ▪ NECSOM; ▪ ENEE ▪ Gurmad ▪ Blue Sky ▪ NEPCO 	<ul style="list-style-type: none"> ▪ Actual and potential impacts of energy projects? ▪ Environmental and social challenges of energy projects? ▪ What types of batteries are used for solar PV systems? ▪ How is fuel for 	<ul style="list-style-type: none"> ▪ All the ESPs have admitted that their companies do not have neither environmental social safeguard specialists nor safeguard policies in place. ▪ Off all the ESPs, only NECSOM stated that; their company stores batteries in a safe place and then export it to Ethiopia for recycling and further use. 	<ul style="list-style-type: none"> ▪ Another stakeholder meeting to be held within a short period of time for further technical discussions. ▪ Ministry to help ESPs formulate ES safeguard policies and educate them about the existing country ESS frameworks and

Stakeholder	Indicative list	Discussion Themes	Issues Discussed & Concerns Raised	Action Point
		<p>HSDGs transported, stored and dispensed?</p> <ul style="list-style-type: none"> ▪ What type of panel modules are common in Somalia? ▪ How are old solar modules and batteries disposed or managed? ▪ What E&S concerns do you have about the proposed energy sector expansion and improvements? 	<ul style="list-style-type: none"> ▪ All the ESPs have expressed how poor capacities have limited their companies in addressing the environmental and social safeguard issues. ▪ Most of the ESPs expressed how they pay a great deal of attention in the safety of its customers and addresses their complaints- mostly related to inconveniences from the service. ▪ The issue of waste management and battery recycling was among the huge concerns which are almost shared by all the companies. 	<p>regulations.</p> <ul style="list-style-type: none"> ▪ The project should ensure effective waste management of energy related wastes and pollutions. ▪ The SESRP to support ESPs to carry out the battery recycling within the country through a coordinated approach. ▪ There is need to engage the municipalities for addressing the energy related wastes. ▪
<p>Business selling energy equipment</p>	<ul style="list-style-type: none"> ▪ Samawat Energy ▪ Sun-Max ▪ TESCO ▪ Solargen ▪ Delta Engineering ▪ SECCCO ▪ Dalsan Power ▪ Dayax Power 	<ul style="list-style-type: none"> ▪ The type of energy technology is common-Solar, Generators etc? ▪ The type of solar batteries is in the market- lead acid, lithium ion, nickel cadmium, and flow batteries? ▪ What E&S concerns do you have about the proposed energy sector expansion and 	<ul style="list-style-type: none"> ▪ Mainly the energy selling companies deal with solar batteries, charge controls, solar water pumping, solar street lights solar off-grid among other services. ▪ Solar services providers have polices although most policies do not reflect the realities on the ground ▪ The strongest weakness in the energy sector is the E&S. ▪ Capacity building package to help the SSPs develop efficient 	<ul style="list-style-type: none"> ▪ The waste management issue especially the battery disposal and recycling needs huge consideration to mitigate or reduce the ES risks of the solar energy products. ▪ Promote the local recycling companies such as African Solutions Company that has the potentiality to recycle the battery wastes into useful products.

Stakeholder	Indicative list	Discussion Themes	Issues Discussed & Concerns Raised	Action Point
		<p>improvements?</p> <ul style="list-style-type: none"> ▪ How do you manage waste from the components or system you sell? 	<p>E&S policies</p> <ul style="list-style-type: none"> ▪ Battery disposal and recycling is a major concern and needs adequate attention. ▪ Solar service providers do not have proposer waste management mechanisms and Most companies compile used batteries and ship to other countries for recycling ▪ Public Private Partnership (PPP) to set up a recycling plan in the country to serve the growing demand in the energy sector ▪ Gender participation in the energy sector and the existence of female-led solar companies in the country. ▪ Policies in place to address the issue of gender gap in the sector and how the project intends to address this concern 	<ul style="list-style-type: none"> ▪ The consulting firm Horizon Development to support the SSPs to develop sector specific Environmental and Social Management Frameworks (ESMF). ▪ To promote gender balance the project is committed to empower female in the energy sector. As part of the preparations for the SESRP, Gender Diagnostics Assessment has been conducted and will be shared with the consultant firm.

The Ministry team has further carried further consultations on 24 – 26th May with various stakeholders. Table 3-2 summarizes the key take aways:

Table 3-2: Consultation on Land issues, labour & working conditions, GRM, IDS,

Topic	Discussion Themes	Issues and Concerns	Recommendations
<p>Land acquisition , resettlement and compensation</p>	<ol style="list-style-type: none"> 1. The overall role of local governments in land acquisition, resettlement and compensation. 2. The role and functions of the district land authorities on the existing land tenure system, registry and land dispute resolutions. 3. How much can the municipality support in terms of public land acquisition especially the alternative lands and land acquisition for public use? 4. What kind of support they anticipate from the project. 5. The role and contribution of the municipalities in project security related services. 	<p>Ayanle Hassan, a Benadir Regional Administration Officer has provided an interview of the land related issues and compensation with regards to the development projects implemented in Mogadihsu, Benadir Region.</p> <p>He stated that, usually Benadir Regional Administration keeps the land registry and provide the technical intervention in cases of land ownership issues and are constantly referred to by the courts when addressing the land dispute cases.</p> <p>Similarly, BRA through the land and public works department is the lead department and serves as the entry point for any land and public works related issues. The department under BRA, commonly does the necessary valuations needed in cases of land acquisition or disputes.</p> <p>While explaining the challenges faced by BRA, Mr. Ayanle has also expressed the great concerns related to land acquisition in which he stated the fact that, Land is in the hands of private individuals and usually it is quite difficult for BRA to mobilize and acquire land for public use.</p> <p>In answering the question related to the land eviction and resettlement compensations and how the BRA approaches to such scenarios, Mr. Ayanle has explained</p>	<p>A Resettlement Policy Framework (RPF) will guide the development of site-specific RAPs once the project footprint is known</p> <p>Where land is donated by private owners, a land donation agreement process should be implemented.</p> <p>Municipalities might anticipate the project to provide capacity building and technical support with regards to grievance mechanisms and dispute resolution.</p> <p>The municipal authorities shall be an important partner in disbursing the project activities but the security arrangements are handled at a higher level.</p>

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>how difficult and unusual for BRA to provide compensations due to the very limited capacity in terms of the resources and institutional capacity.</p> <p>In addition to that, Mr. Kalif Dalmar a safeguard specialist from the Office of the Prime Minister has also explained how the Somali Government at Federal and FMS level is facing a huge challenge in resolving resettlement issues that may arise from the implementation of the Projects. He also indicated that, World Bank projects are the ones who initiated the discussions related to social and environmental protection as there were not in the mainstream discussions.</p> <p>He also added that, with weaker or inexistent formal land administration authorities, processes for land expropriation compensation may not be in place or fully established. As a result, resettlement as well due diligence for establishing ownership for voluntary land donations may be challenging.</p> <p>Land disputes are also very common in Somalia, and with reference to the key informant interview conducted, Avv. Dahir Hamid from the Office of the Attorney General has revealed more than 75% of cases filed at the courts are land related disputes and grievances. He also added that, some of these land grievances may take decades without any decisions made due to complications in land registry documentation, false documents and limited availability of supporting documents.</p> <p>On the other hand, Mr. Ayanle; while explaining the land</p>	

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>related disputes, he stated that BRA has established land dispute resolution committee that usually validates the documents using the old land registrations record. They work with Bendair Regional Court to handle such cases. However, their decisions may not be the final verdict and usually appeals are made to go to the formal courts.</p> <p>In addition, many of the tensions are rooted in more historical competition over land, pasture and water between neighboring communities.</p> <p>Mr. Faisal Abdi, A senior Safeguard Specialist for SURP working for the Garowe District, has explained the different challenges attributed to the land governance and management in general and in land acquisition for developmental programs in particular. He specified that land is usually in the hands of private individuals, and due to the fact that, land values are high and land commercialization (as land has become a popular commodity) usually leads to confrontations and disputes over land ownership.</p> <p>Moreover, Urban land management of Puntland usually stipulates the land rights and obligations. But the enforcement of such articles are quite difficult.</p> <p>With respect to land acquisition for public interest is quite better compared to other part of Somalia, as Garowe was among the 1st town benefited from the Banks' projects and has undergone through a lot of challenges. Garowe Municipality usually provides land for developmental projects. But the issue of effective</p>	

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>compensation remains to be among the notable challenges facing the municipality.</p> <p>He added that, usually eviction, economic and short-term residential and economic displacement such as street vendors are complicated issues that require huge consideration. Garowe Municipality usually faces enormous challenges in evaluating such income and economic losses and as well effective compensation of the affected parties.</p> <p>Mr. Fiasal also underlined land disputes and grievances to be among the leading clan and community confrontations. On the other hand, Puntland was among the 1st states in Somalia that has successfully established a “Land Dispute Tribunal”. These serve as an alternative dispute resolution mechanism and mainly constitute of elders, religious leaders and other respect individuals.</p> <p>Moreover, sometimes special ad-hoc committees are appointed through the President’s office and or the Mayor’s office as needed depending on the magnitude and sensitivity of the dispute.</p> <p>He also stated that, municipality level disputes are usually handled by the Land and Public Works Department of Garowe Municipality as the entry points that receive land related disputes.</p> <p>Finally he concluded that, Garowe land registration and land deeds records are automated since 2019 using Geo-referenced coordinates which serves as a remedy for the continued disputes over land ownership and double</p>	

Topic	Discussion Themes	Issues and Concerns	Recommendations
<p>Labor and Work and Grievance Redress Mechanism</p>	<ol style="list-style-type: none"> 1. What are the existing mechanisms and who is responsible for solving labour related issues? 2. The role of the Ministry of Labour 3. Labour inspections at field levels e.g. forced labour 4. The kind of support the Ministry provides to the workers e.g. occupational health and safety. 5. Child labour and labour influx. 6. The existing mechanisms for social protection and the support they expect from the project. 	<p>registration of land title deeds.</p> <p>Ahmed Ali, from the Federal Ministry of Labor and Social Affairs working for the Department of Legal and Labor Relations has responded to several question related to the major concerns of the labor and related issues. He provided overall explanation of this sector in which he highlighted the existing challenges and the recent achievements including the development of key labor, work and social protection related policies and strategic plans.</p> <p>Despite these achievements, still huge gaps exist in terms of the Ministry's capacity to control, monitor and develop the workers' rights, dispute resolution and their protection.</p> <p>He also shared that ILO is supporting the Government of Somalia in conducting country child labor situational assessment and development of national action plan.</p> <p>The Federal Ministry of Labor and Social Protection under the Department of Labor Relations have resolved many labor disputes including the recent airport workers and its employers, Favori LLC.</p> <p>While responding to labor-related risks, he pointed out that women and youth are selected for daily labor works on local construction sites. Construction companies may rely on the fact that they are vulnerable and needy, and because they don't understand their rights, they are often abused, they are paid low wages compared to other</p> <p>Mrs. Abshira A. from the Ministry and Labor, Youth</p>	<p>Support the Ministry's capacity to control, monitor and develop the workers' rights, dispute resolution and their protection.</p> <p>Develop, implement and monitor Labor Management Procedures (LMP).</p> <p>Develop and implement OHS Plan for workers.</p> <p>Conduct regular supervision and regular labor inspections of construction works to identify potential OHS risks and compliance with OHS plan</p> <p>Provide necessary personal protective equipment (PPE) to all field officers directly involved in construction activities.</p> <p>Set-up and operate a Labor specific GRM for workers, as per LMP</p>

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>and Sport (MoLYS), has responded to several questions as she explained the labor related issues in Puntland. She explained that, Puntland’s labor law No.65 usually governs the labor related issues and concerns and his is also in line with ILO labor conventions. In addition, Law No. 65 is also referred during the labor and work related grievances and disputes.</p> <p>In addition, she explained the confusion that exists between the national and international standards regarding the child labor as Children aged 15 are not normally employed and are not regarded as a child labor. On the other hand, she expressed their concerns with regards to balancing the conflicting demands of child labor and the need for income especially the poor households who are usually female headed households. And finally she admitted that they allow certain jobs – usually light work- and supportive role to be assigned for such children.</p> <p>Mr. Faisal also pointed out that, the labor inspection units are not functional. Usually, the PIU of the World Bank funded project are responsible to inspects the workers condition such as OHS and remuneration, working hours, wages, timing and forced labor.</p> <p>He also added that, at project level, usually the contractors provide labor management plan; this stipulates the labor rights and code of conducts.</p>	<p>Impacts of labor influx driven by the small medium scale infrastructure works will be managed by the LMP, including a code of conduct for project workers</p>
Security	1. The anticipated security risks and threats.	Jamal Farah, a Senior Security Officer from the Federal Ministry of Internal Security has explained the general security conditions of the Somalia. He indicated	A social and conflict analysis is needed to carried out.

Topic	Discussion Themes	Issues and Concerns	Recommendations
	<p>2. The security protocols guiding the deployment of the security personnel in the project target locations/sites.</p> <p>3. How the security agencies support the developmental projects and and the support they expect from the project.</p>	<p>Alshabab to be among the significant security threats and risks. Although Al-Shabab is weakened over the past few years, He believes that the are yet to be defeated and in contrast they're ever present and are looking for soft targets to boost their media presence;</p> <p>In explaining the security needs during the implementation of the project, he suggested an integration of the government security forces and the private security providers can be best fitted to guide the security protocols of implementation of such projects.</p> <p>In addition to that, he explained how the private security can be a good option for the provision of the security services as they tend to recruit from the local community. Plus the private security companies have the ability to provide additional security assessment and threat analysis reports which are not otherwise available from the official security institutions for protocol reasons.</p> <p>That said, he also stressed the need to have the oversight of the government security institutions to enforce since they are aware of possible threats that can impact the program he concluded.</p> <p>While answering a question related to the role of the government in provision of security during the implementation of the development project, He underscored how the government security agencies such as the police and the military are crucial to support the development projects. One good example he gave was; how Haramcad Police Unit is providing the security for the construction of Mogadishu-Afgoi corridor. Another</p>	<p>Carry out security risk and threat assessment.</p> <p>Develop and implement security management plans as appropriate during both construction and operation phase.</p> <p>Security stakeholders needs to be engaged and especially continues engagements of the national security agencies are needed</p>

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>example is how SNA helped reconstruct suspensions and small bridges destroyed by Al-Shabab in Lower Shabelle region.</p> <p>Mr. Abdilatif J. a security expert has stated that, the nature of the conflict and the security risk in Mogadishu has changed since 2011 following the withdrawal of Alshabab from most of their territories.</p> <p>Due to the current political and election impasses, the presence of various clan militia groups and the national security forces in several districts poses security risks and protection concerns to the local population and created additional IDPs.</p> <p>The existence of insurgent groups such as Alshabab and ISIS usually pose threats to the government and developmental projects such as infrastructure development. This may pose huge challenges in accessing the project areas and supervision of project, as well as the project beneficiaries. Several security incidents has been recorded targeting projects and sometimes causing it's suspension including, the construction of roads linking Mogadishu to Jowhar and Mogadishu to Afgoi.</p> <p>He also stated that, the development programs such as roads and energy project will definitely improve on security, business, economic recovery and development.</p> <p>Ayanle Hassan, a Benadir Regional Administration Officer has also explained the overall security issues and concerns in Mogadishu from mobile theft, rape, killing and explosives.</p> <p>He also expressed the gaps in the security architecture of Benadir as BRA has no full authority in security</p>	

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>administration as the key security agencies are under the Ministry of Internal Security and the National Police Force.</p> <p>In terms of the implementation of the developmental programs, usually the Benadir districts coordinates with the sector line Ministries and agencies together with the Police Force. The Mogadishu Police Department also provides security support to some of these projects implemented by the Municipality.</p> <p>In addition to that, Private companies are always hired to support security law and order especially during the construction of roads within the city by providing protection to the workers and sometimes blocking these roads if needed.</p> <p>On the other hand, Mr. Faisal explained the relative peace and security that prevails in Puntland unlike the southern parts of Somalia. But he showed some security concerns in Bosaso as ISIS related security incidents has been recorded for the past 5 years.</p> <p>In addition to that, he stated that, the Garowe Municipality usually don't allow to disclose the security related documents and plans to the public domain.</p> <p>He finally recommended project to have budgets for the project security costs. And following their experience, At project level, usually the contactors are responsible for security related responsibilities and are supported by the municipality and the Puntland State Police Force.</p>	
IDPs		<p>Displacement as a result of violence and forced evictions due to land tenure insecurity are increasing in the country as a whole but areas in and around Mogadishu saw a decrease after the adoption of a number of IDPs safeguard policies and guidelines , with the scale of</p>	<p>Further assessments and researches must be conducted regarding the effect of development projects or even private</p>

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>forced evictions of IDPs and the urban poor from public and private land and buildings in Mogadishu and other urban areas increasing</p> <p>Many marginalized communities have no access to land and property rights, as well they are usually neglected their effective participation in the developmental projects.</p> <p>Ahmed Abdi Hashi: Mr Ahmed, IDP at Juba camp, stated that IDPs face discriminations in the job market and only get low paid jobs. He pointed out the fact that majority of kids in the camps makes the future look bleak as these kids will be disadvantaged in the job market in the future even if their IDPs status changes</p> <p>Mr Ahmed added that IDPs had been evicted from lands without compensations and often without prior notice before by private companies but that has changed in the last years.</p> <p>Amina Aden Shirwac: Mrs Amina, IDP camps leader and head of Doha center, complained about the lack of the unemployment pointing out that IDP unemployment level is higher than the national level alluding that there's discriminations against IDPs. Regarding the GRMs, she praised the so called mobile GRM officers that canvass the camps and ask people about their complaints. Mrs Amina stressed the importance of sensitizing the IDPs about the GRMs as most don't know their rights which make them not place complaints. She also stated that some of the camps under Doha Center umbrella have been evicted from their land, government owned, by private companies, leased to them by the government, without compensation but the frequency of such evictions</p>	<p>companies projects on IDPs.</p>

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>dropped after the government put in place IDP safeguard policies.</p> <p>Mohamed Bule: Mr Bule, ARD director, said that his NGO, ARD (Action for Relief and Development) has surveyed a number of camps and found that the huge gap in employed is partly because of lack of skills. He also stressed the importance of simplifying the GRMs - pointing that most IDPs have phone numbers and it will be easy for them to call compliant hotlines.</p> <p>Abdikafar Hassan: Mr Abdikafar, director of humanitarian department at Federal Ministry of Humanitarian affairs and disaster management, stated that Ministry of Education often provides TVET programs to IDPs to fight the rampant unemployment in the camps alluding that disproportionate unemployment rates within the camps have more to do with lack of skills than discrimination. He added that his ministry devised a simple GRM in place (a hotline number) for beneficiaries of their programs in which GRM focal point officers address the complaints and transfer difficult cases to the police and other relevant institutions. As for the land issues and evictions, the ministry and its partners follow the nation policy for IDPs and National Evictions guidelines (both adopted to safeguard land protect IDPs and returnees).</p>	
<p>Grievance Redress Mechanism</p>		<p>Eman Ladan, A social Protection Expert has explained the status of the social protection in Somalia, in which she considered; the absence of formal legal framework for the management of social risks and the weak institutional capacity to address related social risks –</p>	<p>Develop, implement and monitor project GRM.</p> <p>Institutions concerned must improvise a new GRM that</p>

Topic	Discussion Themes	Issues and Concerns	Recommendations
		<p>including GBV and sexual related offenses are attributed to the presence of Social risks without immediate and effective mechanisms to respond such social risks.</p> <p>Abdihamid: Mr Abdihamid said that there is a GRM framework in place for this project as is clear in the E&S Risks and Impact Assessment Reports. The PIU team and Ministry will carry out awareness and sensitization campaign to inform potential APs about the GRM and how it works through town halls, workshops, community engagements and so on.. GVB/SEA related complaints will be handed by professionals with utmost care and confidentiality.</p> <p>Ahmed Abdi Hashi: Mr Ahmed, IDP at Juba camp, stated that IDPs have often been victims of development projects. Land evictions without compensation had been very common before the FGS adopted laws to safeguard the IDPs in 2017. On the other hand, Mr Ahmed noted that large segments of the IDP population do not know where to place their grievances or even how to place them in the instances where there is GRM in place because IDPs are 1) Illiterate or 2) GRM in place complicated and hard to understand. GBV complaints are mostly placed at local police stations which might not always commit resources to investigate as they are overstretched and often lack the capacity to handle/investigate such delicate cases. Ahmed called for less complicated GRMs and making complaint placement very easy for IDPs.</p>	<p>is easily understandable to the IDPs.</p>

Conclusions:

The consultation meetings brought together different stakeholders representing a good cross-section of stakeholders including from the project management unit, government institution and agencies at Federal and FMS levels, the ESPs and business selling energy equipment together with the consultant firm responsible for the ESS assessments and studies. The Project was welcomed and all parties were eager to see full development and implementation with all safeguards as soon as possible and the project at large.

At the end of these stakeholder meetings, the project coordinator commended the participants for their lively engagements and commanded the Horizon team to expedite the process and as well address the previous gaps mentioned by the Bank team and the PIU. Mainly the need to clarify the scope and the methodology during the inception phase. The project coordinator thanked all the participants and closed the meeting.

3.2.1 Brief Summary of Previous Somaliland Stakeholder Engagement Activities

On 28th of April 2021, the Ministry of Energy and Minerals of Somaliland, together with the World Bank group, organised a public consultation event for the environmental and social management framework for the Somaliland electricity sector under the Recovery Project. Opening remarks were made by the project owner, the MoEWR, and attended by other concerned ministries and departments including ministries of social affairs, justice, and environment. During the meeting, the audience was introduced to the project components and anticipated positive impacts. The consultation session included the following key topics:

- The grievance redress mechanism of the project and any existing systems/ procedures. According to the presenters, there are no written complaining procedures, except what is stipulated in Article 10 of the Environment law formed by members of the community. Therefore, for some infrastructural projects in the past a local committee was formed to handling grievances from the broader communities.
- The design of the project, and availability of masterplans for underground lines, the matter that have created a range of environmental and social issues with landowners for some projects in the past. Noteworthy mentioning that the Land law allows expropriation of private land for the sake of installing a public utility, with the possibility for compensation. The Environmental Conservation Act also authorizes the removal of any trees or objects that obstruct the construction of poles or electricity network
- Labor issues. It was explained that the labor law states how to resolve issues with wages/ salaries, and other forms of compensation, as well as contracts, working hours, leaves, bonuses, as well as maternity/ paternity leaves. The Law allows aggrieved staff to lodge their grievances at the ministry.
- Labor inspection. It is only during recruitment process that ministry of labor attends the interview.

- ESIA and environmental permits. The project owner submits his environmental license application, and a site visit is made to assess, in addition to preparing an EIA report, prior to granting a permit.
- Child/ forced labor. It is explicitly stated in article 39 of the labor law that child labor is prohibited. Laws are evolving, and now a child law has been made in effect to protect the rights of children.
- Occupational health and safety inspection. This is regulated within the ministry of labor and social affairs.
- Handling of hazardous waste. This includes oil-contaminated soils from transformers, in particular. The contractor is required to oblige by instructions and provide prevention measures on-site.
- Nuisance form operating generators close to residential areas. Complaints from nearby inhabitants are common. A suggestion to place these generators in a dedicated industrial zones.
- Some of the participants mentioned that the metal poles had great risk to life of the people and animal in the major towns of Somaliland. They suggested whether there are alternatives to reduce the risk of electrocutions caused by the metal poles of the electricity distribution. The metal poles have major problems on the social, so is their plan to replace the metal poles.

Annex I provides the full minutes of meeting.

The project will continue these consultation sessions with a broader groups of project Affected Persons, and will update this SEP document accordingly.

4. INFORMATION DISCLOSURE

Project information will be packaged and shared with key stakeholders using suitable and appropriate methods. The PIUs will be responsible for ensuring that the information is disclosed to stakeholders in a timely manner. Feedback received will be incorporated in the Project documentation to ensure they are robust and inclusive. Table 6 below presents a summary of information disclosure by the project. The project will use the existing institutional and implementation arrangements established under the ongoing SEAP project. This SEP is a living document and may be modified and updated with new information and suggestion from stakeholders.

Table 6: Information during project cycle

Information to be disclosed	Methodology	Target stakeholder	Responsibility
Project Preparation Phase			
Disclosure of Project documents (Preliminary Environmental and Social Risk Assessment,, SEP, ESCP, etc)	Website – World Bank & MoEWR and MoEM Stakeholder Meetings	All key stakeholders	PIUs
Project Initiation			
Disclosure of Project documents, i.e., ESMF, Updated Stakeholder Engagement Plan, Security Management Framework, LMP, GBV Action Plan, Resettlement Policy Framework etc	<ul style="list-style-type: none"> • Websites - CBS and WBG • Stakeholder Meetings • Town hall meetings • Progress reports • Emails 	All key stakeholders	WBG Team PIUs Ministry
Project Design Phase	<ul style="list-style-type: none"> • 		
<ul style="list-style-type: none"> • Preparation of Security Risk Assessment and Security Management Plan for the project (Not for public disclosure) • Disclosure of Sub Project specific documents, i.e., ESIA/ESMP, Security Management Plan, Resettlement Action Plan etc 	<ul style="list-style-type: none"> • Websites - CBS and WBG • Stakeholder Meetings • Town hall meetings • Progress reports • Emails 	All key stakeholders	WBG Team PIUs Ministry
Project Schedule with key activities	<ul style="list-style-type: none"> • Town hall meetings • Press releases 	Implementing partners	WBG Team PIUs

Information to be disclosed	Methodology	Target stakeholder	Responsibility
	<ul style="list-style-type: none"> Stakeholder meetings Progress reports 	General public State and District Administrators	
List of Contractors	<ul style="list-style-type: none"> Websites – WBG & Ministry of Finance Press releases Print & electronic media (Newspaper advert, radio) 	Implementing partners	PIUs Ministry
Update on project progress	<ul style="list-style-type: none"> TV/Radio spots/activations and announcements Print materials (newsletter, flyers, etc.) Social Media (Facebook, twitter) Project progress reports Town hall meetings Websites (World Bank, Ministry of Finance) 		PIUs/
Complaints/Grievance	<ul style="list-style-type: none"> Progress reports Stakeholder engagement meetings External Grievance Register and Complaint Forms 	Business community Local community Vulnerable & Marginalized groups	PIUs Social Safeguard Specialist
Stakeholder Engagement Activities	<ul style="list-style-type: none"> TV/Radio spots/activations and announcements Bulk SMS Town hall meetings Social Media (Facebook, twitter) Email 	All key stakeholders	Social Safeguard Specialist PIUs Coordinator
Project Operation and Maintenance Phase	<ul style="list-style-type: none"> Monitoring and Evaluation 	All key stakeholders	Social Safeguard Specialist PIUs Coordinator
	<ul style="list-style-type: none"> 		

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

The dedicated resources from SESRP will be devoted to managing and implementing the Stakeholder Engagement Plan, in particular, in terms of people, budget and channels maintained to communicate by all parties to the Project.

5.2 RESPONSIBILITIES

The project will be implemented by the two PIUs established at the MoEWR (FGS) and the MoEM (Somaliland), in close coordination with the FMSs, the beneficiary ministries, and ESPs. The PIUs have a direct and overall responsibility for the implementation and regular update of this Stakeholder Engagement plan, including the undertaking and supervising of engagement with all stakeholders in relation to the Project, and draws upon the available internal resources to ensure that the planned activities are conducted effectively and to the appropriate standard.

The responsible persons (Environment and Social Safeguards, Coordinator and other technical teams) within the PIU will coordinate the disclosure of Project information; public consultation activities and the management of the Grievance Redress Mechanism.

Communications specialist(s) will be hired to manage the disclosure on information and SESRP media content for disclosure.

E & S specialists, and GBV specialist (hired under PIUs) will oversee the implementation of environment and social aspects as well as the GBV/SEA/SH and GRM issues of SESRP throughout project implementation.

A Community Liaison Officers will be hired by the contractor to follow up PAPs social concerns with clear communication between the PAPs and the PIUs.

Who will be in charge of the GRM? Also, identify the material resources that will be mobilized. Provide greater detail on the key stakeholders/actors involved in the SEP implementation and their responsibilities.

Contractor: Develop the Contractor ESMP focusing on environment, social, health and safety issues with reference to the relevant documents i.e client ESMP and licenses.

Supervising Consultant: Supervision and manage all the sites with regard to the administration of the Construction Contracts including E&S management compliance related issues.

Department of Gender: supervise the gender related issues during project implementation with emphasize to mitigate the vulnerable PAP especially women, orphans, child headed households, IDPs, and minority group.

Department of Labour: supervise labour related issues especially labour influx, labour related conflict. Labour inspectors will play a key role during the project implementation.

Local Municipalities:

5.3 ESTIMATED BUDGET

#	Item	Main Activities	Budget
1.	SEP implementation		
2.	Stakeholder engagements		
3.	Grievance Redress Mechanisms		

6. GRIEVANCE REDRESS MECHANISM (GRM)

A systematic and functional GRM should be adopted to address the concerns of aggrieved parties (PAPs, vulnerable groups including women, IDPs, gender-sensitive issues, workplace concerns and community concerns). Such a mechanism should detail the processes involved in registering grievances at no cost to the aggrieved parties as mentioned above. A grievance could mean a simple query or inquiry, concern, issue, or formal complaint that bothers the lives of aggrieved parties. The layers of the GRM should be well publicized as a way of educating PAPs, recruited workers and other residents on the process. Alternative means of access, however, will be the public information centres that will be established at various project sites. At the same time, information about where complaints can be lodged should be provided by the client and or the consultant will be published on public notice boards, communicated verbally at all public meetings, and outreach sessions so that there is a wider public understanding and acceptance of the mechanisms proposed for grievance redress.

The primary purpose of the GRM is to hear the complaints or address the concerns of aggrieved parties to a fair extent and on time. Dissatisfaction can cause an aggrieved party to act beyond expectations, which would culminate in some unforeseen repercussions that would negatively affect project implementations and stall project progression. Consequently, the GRM to be proposed during the preparation of the sup projects' ESIA or ESMP shall seek to achieve the following objectives:

- Encourage registration, acknowledgment, and recording of all concerns or issues raised by aggrieved;
- Identify the frequencies of issues raised: for instance, unpaid compensation, inadequate compensation, disregard for local ritual ceremonies, land acquisition, workplace concerns and many more;
- Ensure that complaints are properly registered, tracked and documented, with due regard for confidentiality;
- Address the composition of a committee that would handle all grievances; Inform people of the public information centre establishment and access;
- Establish procedures for the GRM to enhance easy access, transparency and accountability, and tackle escalation of grievances beyond expectations;
- Manage the concerns raised by aggrieved parties to achieve a win-win situation within a reasonable time frame that would comply with national and international best practices; and
- Record all resolutions agreed upon by all parties involved and ensure that aggrieved persons are satisfied with every outcome of remedial resolution to foster harmony in sub-projects.

6.1 Potential Sources of Grievance

Since key project activities will be in dense urban settings, parties have livelihoods that depend on the land, the loss of land is thought to also result in the loss of their livelihoods. In a similar vein, Risks of forced displacement of IDPs by the government: Forced displacement of IDPs, who fled from drought and violence and have settled on idle private or public lands in Somali cities, is rampant especially in urban centers such as Mogadishu, Hargeisa and Garowe where land is scarce and land values are high

Another potential source of grievance may be corruption or unfair benefits to some. Similarly concerns that the compensation due to PAPs may be paid very late, which could create considerable stress and inconvenience and lead PAPs to incur further costs. Other sources of grievance may include work-related concerns such as terms of the employment, rights related to hours of work, wages, overtime, compensation and benefits injuries, deaths, disability, disease and hazards to project workers.

Grievances may also be received during construction activities in terms of damages or inconvenience caused to the nearby community or regarding the behavior of contracted workers.

6.2 GRM Institutional Framework

The project GRM will build on what was created for the Somalia Energy Access Project (See separate SEP). A specific consultation session on the E&S Risk Assessment and Action Plan and GRM will be set up to complete the SEP. A Feedback and Grievance Redressal System that will have a various contact channel is envisioned for SESRP. Noting the indirect benefit of component 1 to citizens/households due to reduction of inefficiencies in the network, the GRM will include mechanisms for citizen or households to be able to register their feedback or complaint towards the performance of the ESPs, their existing supply situation, billings, etc.

The GRM has to be in place by the time RAPs and ESIA's are prepared, until completion of all construction activities and beyond until the defect liability period ends. A separate mechanism is developed to address worker grievances. Grievances related to the actions of contractors are resolved by the contractors.

The GRM will be a project wide GRM that will also be available for use by PAPs. The GRM will work interconnectedly with local level actors at the FMS, community, District, and municipal levels. This is to ensure that all measures are taken to address the grievance. The GRM will be housed at both MoEWR (FGS); and the MoEM (Somaliland) and provides access to SESRP stakeholders and contractors to register complaints received at sub-project level or the field. At the Municipality /Local Government level, a Grievance Redress Committee (GRC) shall be established and composed of local leaders, municipal representatives, the project, community-based organizations, Legal Aid and law enforcement agencies. The GRC will be headed through a consensual appointment done with affected communities, and steps will be taken to ensure that all grievances are properly documented and transferred to the digital platform for tracking of resolution. PAPs may also make complaints directly to the project wide GRM through the digital platform either by calling, sending text, whatsapp etc. The project will identify an NGO GBV service provider to setting up and ethically manage SEA/SH complaints. Detailed structure of the GRM for the project workers will be finalized and described in the LMP and project implementation manual..

The GRM implementation process will involve the following steps:

- The safeguards specialists at respective MoEWR (FGS); and the MoEM (Somaliland) will man the GRM platform for Project level to ensure timely sorting and escalation of grievances to resolving officer
- Assign a focal person (s) from OE, Contractors and local GRC for grievance uptake and reporting
- Train assigned focal person (s) to receive and log complaints in the GRM Database; Constitute GRM Committee to resolve grievances
- Screen, classify and refer complaints to appropriate unit for redress Monitor, track and evaluate the process and results
- Provide feedback to complainant within two weeks, and an opportunity for appeal if not satisfied with resolution approach
- Overall, the process for grievances reporting by aggrieved parties include following
 - Lodge complaints through phone call, text message, WhatsApp, in-person directly to the digital platform or the GRC at the local levels
 - Acknowledgment and registration;
 - The investigation, verification, and determination of resolution options;
 - Provision of feedback to the stakeholder regarding resolution and progress towards resolution and complainant satisfied;

- Final resolution -tracking and documenting actions and outcomes in the database and with the stakeholder;
- Where a PAP is fully satisfied with the resolution process, the matter will be formally closed;
- If the complainant is not satisfied with the mediation provided using the project GRM, a referral should be made to the court of Law. This stage of the process should be avoided, though
- it can be utilized to get a final review of the matter being reported.

1.1 Guidelines and Tools for Reporting and Processing Grievances

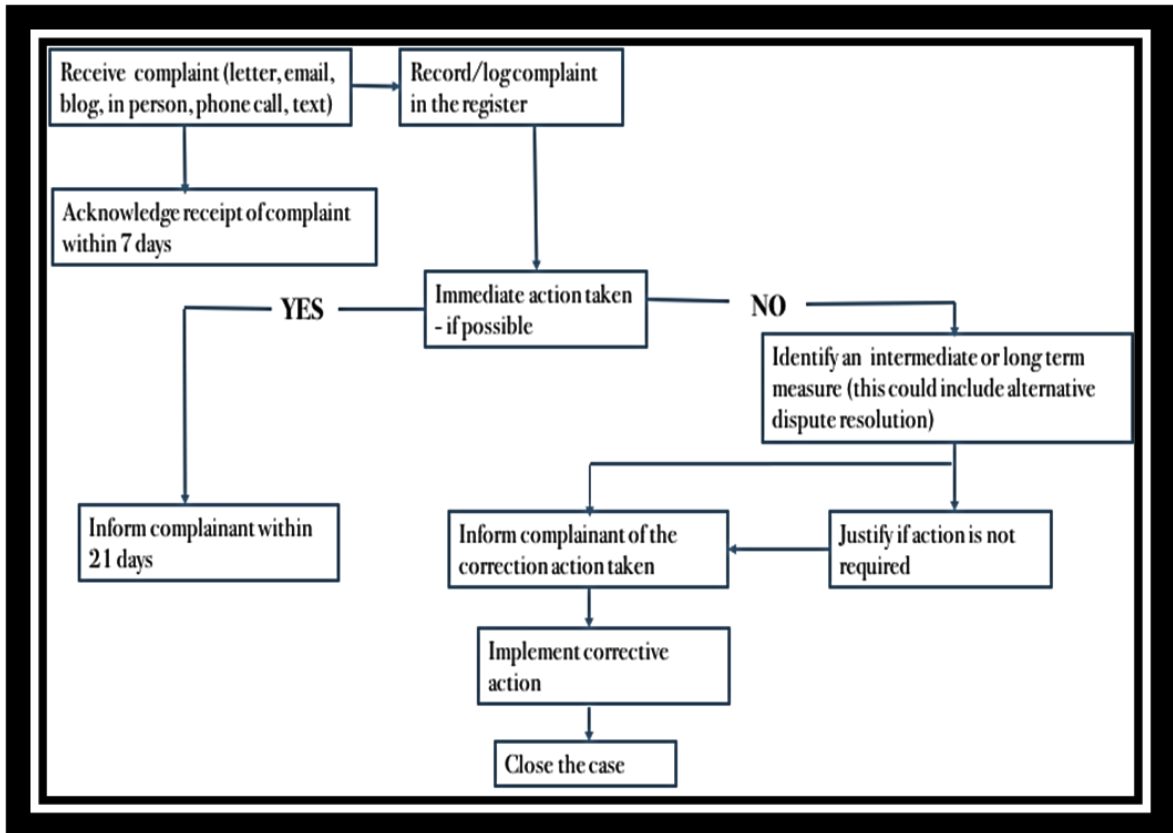
- Grievances will be filed by an aggrieved person at the entry-level using a complaint form. The form will describe the complaint and provide for action at the three levels of redress-community district, Municipal or FMS. Ideally, complaints should be acknowledged in 7 days, provide feedback in 21 days and resolved within Forty-Five (45) days, except complaints and grievances that relate to the valuation of affected assets that need to be managed by a unit set up by the project.
- All complaints received in writing (or written when presented verbally) and processed through the stages identified in the GRM, will be recorded in a register or log sheet. The register presents the date of the complaint, the name of the complainant, the community he/she is from, a description of the complaint, and the actions taken to address the grievance (which shall also note the status of the grievance).
- Simple guidelines for processing and reporting grievances that can be adapted to the different contexts of the project are presented below:
- All grievances concerning non-fulfillment of contracts, levels of compensation, or use/demolish assets without compensation, work-related concerns, etc. shall be addressed to the GRC. All attempts shall be made to settle grievances amicably. Those seeking redress and wishing to state grievances will do so directly to the GRC. If the complainant's claim is rejected, the matter shall be brought before an agreed third party or the local administration before approaching the legal system in case of unresolved complaints at the local level also.
- The GRC shall maintain records of grievances and complaints, including minutes of discussions, recommendations and resolutions made;
- The grievance being reported should be clearly defined;
- The type of grievance being documented should also be defined in terms of how it is received: oral, written, by mobile phone, email, or text message. There should be a clear description of the owner of the complaint or where the grievance comes from to ensure accessibility to the GRM.

Aggrieved parties should choose their entry point that is at their convenience. However, the GRM should start at the local level before allowing appeals to higher levels at the District municipal or FMS levels. If it is at the community level/site specific level, the first point of contact would be the Contractor site incharge. is the GRC established by the project at the district level. The point of contact at the district level is the district Council. The point of contact at the provincial level is the key supervisory body of the GRC or relevant agencies responsible for monitoring the sub-projects, which may comprise MoEWR (FGS); and the MoEM (Somaliland), in Federal Member States, the beneficiary ministries of Health and Education Owners Engineer firm or ESPs

- Mobile phone hotlines should be maintained to provide aggrieved parties with the access they need to those who can document and address their grievances;
- At all three levels, a grievance registry should be maintained to monitor and record the types of grievances that are raised, their status, and the type/level of remedial actions taken.

- Remedial actions have to be flexible They can vary from a letter response to a referral (to the next redress level/structure), a meeting or dialogue with the complainant(s), a final resolution process beneficial to all parties;
- Acknowledgment of receipt of grievance reports should be within seven days. This can be done by any member of the GRC/ local authority and should be forwarded to GRC. Grievances should be addressed in twenty one (21) days following the report or be moved to the next level in the redress mechanism where the problem should be resolved within fourteen (14) days;
- Outcomes from the decision should be provided within thirty (45) days of the receipt of the complaints, which should be communicated by the appropriate GRC representative. Once a grievance or complaint has been resolved or being escalated, the officer responsible shall complete a Grievance/Complaint Resolution/Escalation Form (see Annex v for sample form) to close out the complaint or record the reason for escalation, and the form shall be signed by the officer and the complainant (if s/he so desires), with a witness.
- The court of law will serve as the last resort for all types of grievances. Responsible structures for grievance redress should ensure that this option is avoided as much as possible. However, the decision to use the court as a redress mechanism should be left to the discretion of the aggrieved parties.

The practical steps to be used in addressing grievances for this project are presented in Figure below.



7. MONITORING AND REPORTING

7.1 Monitoring

Monitoring the stakeholder engagement activities is important to ensure that consultation and disclosure efforts are effective and in particular that stakeholders have been meaningfully consulted throughout the process. Monitoring also allows the Project to improve its strategies by using information acquired from the monitoring activities. The Project will monitor the stakeholder engagement activities and in particular:

- The implementation of the SEP
- The effectiveness of the engagement process in managing impacts and expectations by tracking responses received from engagement activities.
- Consultations and disclosure activities conducted with stakeholders; and
- All grievances received and resolved whether anonymous or non-anonymous.

Performance will be evaluated bi-annually by tracking:

- Place and time of formal engagement events and level of participation by specific stakeholder categories and groups;
- Numbers and type of grievance and the nature and timing of their resolution.
- Materials disseminated i.e., type, frequency and location;
- Number of comments by issue/ topic and type of stakeholders, and details of feedback provided; and
- Community attitudes and perceptions towards the Project based on media reports and stakeholder feedback.

7.2 Reporting

The Project Implementation Units (PIUs) will develop regular reports (typically quarterly) which will typically be required by the World Bank and the line Ministries. The reports will present all activities, including stakeholder engagement activities, for the period and summarise the issues. The report and its annexes will also detail the measures taken to address the issues, timeline of responses, as well as corrective and mitigation measures to address grievances and analysis of trends.

Data reported on will include the following activities:

- information distribution of disclosure materials;
- public announcements and engagement of media;
- disclosure and consultation meetings; and collection and incorporation of comments and feedback

Annex-1: Public Consultation Meeting in the FGS

The Project Management and Horizon Consultant Firm Inception Meeting:

Type of Meeting:	Stakeholder Consultation – Project Management Unit and Horizon Consultant Company
Date of Meeting:	22 May 2021
Time:	09.00 Am – 10.30 Am
Venue:	Virtual Meeting – Zoom
Note Taker:	Abdullahi Ahmed -Najib – Environmental Specialist, PIUs, SEAP
Attendees:	Attached as Annex II

This consultation meeting was organized as part of the inception workshop for the Horizon Consultant Company which is responsible to conduct the SESRP environmental and social safeguard related assessments and studies. The meeting was held virtually and was attended by the federal Ministry of Energy and Water Resources, the PIUs and the Horizon Consulting Company on the 22nd May 2021 in accordance with the below agenda and objectives:

Meeting objectives and agenda:

- Understand the overall issues of the Environmental Management Regulations and Institutional Arrangements.
- Understand the project status and what has been achieved/developed so far.
- Filling the gaps in the inception report and refine the methodology.
- The existing land issues and compensations procedures.
- Managing the E&S issues of the sub projects.
- Identifying the key stakeholders necessary for consultations at all levels.
- AoB

The meeting was called to order at 09:00 Am and the following a word of prayers, participants had introduced themselves and agreed on the proposed agenda for discussion. This was followed by an introduction remarks by the Project Coordinator who explained the SESRP project design, key components and the expected contributions in to the national energy sector recovery and the development at large. Mr. Abdisalam reiterated the significance of the meeting and how their input and feedback is critical for the successful project environmental and social safeguards. The coordinator also assured the consultant team the full support of the PIUs and the Ministry of Energy and Water Resources with regards to all their needs during their assignment.

The Project Coordinator then asked the Horizon Consultant team to also provide brief explanation of their companies and how the key issues they need to be supported during the inception phase. Ms. Amin who is the Managing Director of Horizon Consultant Company has provided background information of their company, their team composition and their previous tasks related to the environment and social safeguards.

MEETING MINUTES:**Discussion Points as per their Agendas:**

- **Agenda 1: Understand the overall issues of the Environmental Management Regulations and Institutional Arrangements:**

Thereafter, the Horizon Consulting Firm took over the lead and posed the first question which they asked about the existing national environmental regulations and the institutional arrangements.

In explaining the current states of the environment, existing regulation and the sector institutional arrangements, the project coordinator and the environmental specialists have both explained the overall issues in the current environmental governance. Mr. Abdisalam has started by stating that the National Environmental Regulatory system is weak and under developed! Currently, the Directorate of Environment and Climate Change under the Office of the Prime Minister is the lead institution responsible for the development and implementation of the key policy and regulatory frameworks. The Cabinet endorsed Environmental Management Act acts as the key legal framework to strategically guide the country's environmental regulatory body. NOTE: This section related to the institutional and legal framework of the ACT is not very clear!

Somaliland, Puntland, Galmudug, Jubaland, Hirshabelle and South-West State have established environmental institutions, but their capacity varies greatly. In addition to the line ministries, both Somaliland and Puntland have designated environmental agencies.

In addition, there isn't a fully functional legal implementation and enforcement department within any of the environmental institutions in Somalia to help in enforcing existing fragmented NRM policies and laws. The existing environmental regulations remains in shelves of the institutions with no or limited dissemination and enforcement strategies. This could be attributed to the limited capacities of the public institutions in terms of mobilizing enough resources and as well securing the effective commitment of the wider stakeholders to enforce Somalia's environmental regulations.

The institutional capacity and capabilities are also very weak despite the numerous capacity development programs the government has received. In addition, the current environmental institutions set-up and formation is also very weak and does not provide the necessary arrangements for effective compliance of environmental and social safeguards.

With regards to the existing coordination platforms and mechanisms, The existing political divisions and lack of effective coordination mechanisms in the country make the implementation of national programs challenging. Insufficient mechanisms for coordinating and integrating environmental priorities into the

national policies and plans has led to a fragmented response to the pressing environmental needs and the longer term development. The situation is further aggravated by the lack of or weak Inter-ministerial coordination mechanism to address issue of overlap and duplication of mandates and responsibilities.

Mr. Duncan from the Horizon Development has also asked about the existing national environmental policies and acts. And in response to this question, the Environmental Specialist has explained the existing national environmental regulations, policies and acts which includes; the national Environmental Management Policy, The National Climate Change Policy, The draft National Environmental Management Act, Draft Ozone Layer Protection Regulation Act, the National Charcoal policy and the draft National Environmental and Social Impact Assessment Regulation. In addition to the state level environmental policies and regulations.

Regarding a follow-up question on the existing Somali electricity regulation; the PIUs has responded that the electricity regulator is not established, currently the Ministry of Energy and Water Resources exercises this mandate to act as a regulator. The electricity Act is currently deliberated at the parliament and once it's enacted, the regulator will be established.

- **Agenda 2: Understand the project status and what has been done so far:**

The PIUs response was that; At the project level, The project so far has managed to recruit the E&S specialists, the consultant firm to carry out the E&S safeguards related studies and assessments. The PIUs has also developed environmental and social safeguard instruments and tools ToRs to guide and mitigate the key environmental and social safeguard related issue and gaps that may arise from the absence of the national ES safeguards regulations. A review of the ToRs is still in progress and once they are finalized will be shared with you -the Horizon company.

Regarding your request to have the project feasibility study, unfortunately; a detailed feasibility studies is yet to be carryout on the specific sites expected to develop certain activities such as the major load centers, the sites we plan to deploy mini-grids for example or to do transmissions and distribution network design. This was mainly delayed due to negotiation and contracting challenge with the company and soon we hope to resolve this issue and expedite the process of commencing the work so that it supports the finalization of the project design and as well contribute to the ES safeguard related assessment and studies. At least a background material that is useful for decision making is expected to be completed after the inception phase or by next month.

While we wait for that report, we will alternatively share with you city development plans that were part of the power master plan -which we have already shared with you- and you can generate some of the useful information such as generation sites, the transmission and even scope the land which the transmission and distribution work is expected to affect.

Finally, the Project Coordinator has concluded this agenda by assigning the project environmental and

social specialists to do further discussions with Horizon team together with the legal expert.

- **Agenda 3: Land issues and compensation process**

Mr. Duncan the lead technical person of the Horizon consultant company has asked about the major land issues in Somalia especially with regards to the development projects and the procedures towards dispute settlement and compensations.

This was thoroughly discussed and a number of PIUs team have explained the major land related issues in Somalia and the procedures towards compensation and land related disputes settlement including the legal expert, the project coordinator and the environmental and social experts and these are their contributions.

The legal expert has stressed that the existing land legal frameworks is majorly governed by the Land Laws of 1972 and 1980. Land ownership in general rests in the hands of the government for the benefit of the public interest, and private ownership (beneficiation, to be accurate) is granted by the public authorities, on a permanent basis by or temporarily as the case is with regards to most ownership rights. The main issue in terms of land property rights is contested ownership rights. Prior to the military rule private land ownership was safeguarded as long as it wouldn't contradict the public interest.

The municipal authorities are the lead institution with regards to the land issues. The municipality holds the record/register of land rights and is basically responsible for valuation of land properties. They also do evaluations of the acquired land and as well facilitate the resettlement procedure if needed and as well evaluate the amount of compensations to be provided.

Land administration and management is virtually non-existent in Somalia. The country currently does not have a national land acquisition law; land tenure is likely to remain more collective than individual in nature, particularly in rural areas. When compared to requirement of ESS 5, the federal Government of Somalia laws has inadequacies around consultation requirements, eligibility for compensation, valuation method, grievance redress mechanism, disclosure of information and the timing of compensation payments. Hence, the Bank's ESS5 will take precedence over FGS laws.

In terms of land acquisition for public interest purposes, the state has an absolute right to seize lands for public interest but such a right is conditioned to reasonable compensation, which can be another property proportionate to the acquired land or a monetary compensation. The municipality can evaluate the acquired land as a starting point for determining the proper compensation.

A follow-up question regarding the project land acquisition plans was also asked by Ms. Amina who enquired since the project is going to use the donation principle and they rely on the previous city plan under the former government. Since the collapse of the previous central government, there are people who occupied these public land for many years. So how is the project going to approach these residents?

And in response to this question, the Coordinator has stated that the project will majorly rely on the land donation agreement process and in compliance with the Bank's safeguard standards. The project resettlement plan will generally provide an overview of the land acquisition and if there is a need for resettlement and compensations.

▪ **Agenda 3: Managing the E&S issues of the sub projects**

Another question raised by the Horizon consulting firm was about how the Ministry of Energy manages the environmental and social issues of the sub-projects and the PIU response was that;

-The PIU is committed to manage the environmental and social issues of the sub-projects following the World Bank's environmental and social safeguards standards. Together with the existing national and FMS regulations and policies. The PIU will ensure to develop and implement all the safeguard related frameworks and action plans.

-The project also recruited dedicated specialist responsible for the project environmental and social safeguards and monitor the compliance of the safeguard instruments and standards.

-At the sub-project level, an independent consultant will prepare the environmental and social safeguard instruments including the Resettlement Action Plan, ESMP, SESIA among others.

-Regular monitoring will be made to track the progress and ensure compliance with environmental and social management framework.

-Finally, the Ministry of Energy through the PIU, the Grant Manger, the Contractors and sub-contractors will be responsible for strict implementation of the project environment and social safeguard related issues.

Agenda 4: Institutional and Implementation Arrangements of the Project

Mr. Duncan from Horizon team has also asked about the project governance and management and the different roles played by the PIU, the Ministry and the Project Steering Committee.

In response to this question, the Project Coordinator has elaborated the overall project implementation arrangements and stated the fact that the project will be implemented by the MoEWR, FGS in Mogadishu and Somaliland Ministry of Energy in close coordination with the FMS, ESPs and the other line Ministries such as planning and Finance. The Director Generals at the Ministries of Energy shall have the overall oversight of the respective PIU.

The day to day project activities will be implemented by the two PIUs established at the MoEWR (FGS); and the MoEM (Somaliland), in close coordination with the Federal Member States, the beneficiary ministries and ESPs.

The PIU team comprises of; the Coordinator, The financial experts, procurement specialist, social specialist and environment specialist, M&E specialist, legal expert and project technical expert. The PIU

is sits at the Ministries of Energy both Somalia and Somaliland ad acts as a connecting body for the World Bank and the government institutions. Moreover, PIUs capacity in terms of financial management, procurement, environment and social risk management and monitoring is relatively good and regular training opportunities will be provided.

The project is expected to establish a Project Steering Committee (PSC); both at FGS and Somaliland Ministry of Financing levels respectively. The PSC will provide overall oversight of the project implementation; policy guidance; as well as take decisions on critical high-level implementation issues, such as approval of selection criteria and obligations of the beneficiary ESPs.

For further explanations, the project coordinator has referred the Horizon team to review the Project Appraisal Document-PAD.

Agenda 4: Identifying the key stakeholders necessary for consultations at all levels

Regarding the key stakeholders necessary for the project consultations at levels, the Environmental Specialist has informed the Horizon team that the project has drafted the Stakeholder Engagement Plan-SEP which contains all the necessary details of the project stakeholders, stakeholder analysis and prioritization and their engagement methodologies. The specialist also assured to share the SEP once the review process is completed.

Action Points/Response Given
<ol style="list-style-type: none"> 1. PIU to share with the Horizon Consultant the City Development Plans, 2. Expedite the project feasibility study in order to generate the vital information necessary for the ES safeguard assessments and studies especially the Greenfield and Brownfield projects. 3. PIU to send the Stakeholder Engagement Plan report. 4. Both the environment and social specialists will closely work with the Horizon consultant firm to provide any technical support. 5. The inception report should clarify on the aspect of the capacity development and how Horizon Development is planning to conduct the trainings at the Ministry level, at the private sector and the across all the key actors.

Conclusions:

After the agendas of the meeting were extensively discussed and debated. The project coordinator commended the participants for their lively engagements and commanded the Horizon team to expedite the process and as well address the previous gaps mentioned by the Bank team and the PIU. Mainly the need to clarify the scope and the methodology during the inception phase. The project coordinator thanked all the participants and closed the meeting.

List of Meeting Participants

No.	Names	Institution	Title/Function
1	Abdisalam Abdullahi	MoEWR - PIU	Project Coordinator
2	Abdihamid Abdirahman	MoEWR – PIU	Social Specialist
3	Mohamed Fatih	MoEWR – PIU	Legal Specialist
4	Ismail Bashir	MoEWR – PIU	M&E Specialist
5	Abdiaziz Arte	MoEWR- PIU	Financial Specialist
6	Abdullahi Ahmed (Najib)	MoEWR- PIU	Environmental Specialist
7	Mohamud Abdulkadir	MoEWR – PIU	Technical Expert
8	Liban Ibrahim	MoEWR – PIU	Procurement Specialist
9	Amina Salat	Horizon Developments	Managing Director
10	Ali Botany	Horizon Developments	ES experts
11	Duncan Onyaro	ESF	Lead Consultants
12	Peter Kivuva	ESF	Consultants

MEETING MINUTES

SOMALI ELECTRICITY ACCESS PROJECT (SEAP)

Type of Meeting:	Stakeholder Engagement – Government Bodies and Agencies at the FMS and Federal Level
Date of Meeting:	22 May 2021
Time:	10.00Am – 11.10Am
Venue:	Virtual Meeting – Zoom
Note Taker:	Liban Ali Ibrahim – Procurement Specialist, <i>PIU, SEAP</i>
Attendees:	Attached as Annex II

MEETING AGENDA:

No.	Subject
1.	Energy sector discussion with government bodies and agencies at States and Federal Level
2.	Environmental and social consultations with environmental institutions at state and federal levels
3.	Any Other Business AOB

MEETING MINUTES:

Agenda No.	AGENDA
1.	Environmental and social consultations with environmental institutions at state and federal levels
Discussion Points:	
<p>As part of the wider stakeholder engagement for the proposed Somali Energy Sector Recovery Project (SESRP), the Ministry of Energy and Water Resources engaged discussion with important government bodies and agencies with the federal member states level. The discussions were centered on the questions (Annex I) that were earlier shared with the attendees of the meeting.</p> <p>After a brief introduction from the participants, the meeting commenced with the project Coordinator appreciating and thanking everyone for having taken time to attend the meeting. The project coordinator, Mr. Abdisalam reiterated the significance of the meeting and how their input and feedback is critical for the preparation of the project. The coordinator also encouraged the strengthening of the close collaboration between the Ministry at the federal level and federal member states.</p> <p>Thereafter, the Environmental Specialist of the project took over the lead and posed the questions (Annex 1) for interactive discussions.</p>	

Mr. Ismail Mohamed: the deputy project manager for the Puntland Energy Agency addressed the question of generation. He updated the meeting that power generation in Puntland is from hybrid system (wind turbines, BESS, solar panels and diesel powered generators). 93% of the power is supplied by the diesel powered generators while 7% comes from the solar renewable sources. He further added that, Puntland's annual power consumption is approximate to be 60GWh. In addition, the installation capacity is approximated at 50-55 MW.

The use of Biomass mainly the charcoal and wood-fuel in the region is very highly as more than 80% and the remaining percentage use LPG for cooking. This is mainly responsible for wonton tree cutting and the loss of vegetation cover and biodiversity at large. He also updated the meeting of plans that are underway to implement PPP in Puntland.

Mr. Abdisalam Abdullahi: inquired Puntland and other FMS to put forward the challenges they are facing with regard to the energy sector and support that may require to streamline the sector.

Mr. Ismail Mohamed: highlighted Puntland's concern. The ministry requested support for institutional building to expand the ministry and the implementing agency's infrastructure capacity and shortage in human resource capacity. Mr. Ismail mentioned that Energy policy is ready however there are no other regulations available as at now.

Mr. Mohamud Abdullahi: of Puntland's Ministry of energy suggested the FMS to submit their needs in written form so that they can be discussed extensively in the next stakeholder meeting. Mr. Mohamed also applauded the Ministry of Energy and Water Resources for their commitment and constant engagement with the ministries at the FMS levels. He urged the Ministry to continue fostering the close relationships between the ministries involved.

Aidid Abdulkadir: from Galmudug highlighted that 99% of electricity is generated from diesel powered generators while the remaining 1% comes from the renewable energy sources such as the solar. The solar technology is in early stage in Galmudug regions, Galkacyo for instance produces 8MW. He also stated that the major towns use the energy from the private companies.

In addition to that, Mr. Aidid also identified the energy related regulation as the energy policy is in draft stage and developing solar regulations is progress. Regarding the use of charcoal and wood-fuel, he indicated that more 85% of the population depend on the use of the biomass energy for cooking and the accessibility of the LPG is limited.

Galmudug State raised concern with regards to the institutional building as match needed since the Ministry of energy's infrastructure has a limited space to work. Lack of capacity building and human resources (experts) and lack of policies and regulation that are approved from cabinet or parliamentary.

Mr. Ali Botany: from Horizon Developments inquired Aidid of Galmudug State and representatives from other states to share available documents with regard to the energy sector.

Adan A. Isaak: In south West State approximately 99% of its electricity is generated from the diesel powered generators while the remaining 1% of generation is from renewable energy sources such as solar panels. Biomass use is more than 90% and the use of LPG is significantly limited. Mr. Adan underlined major towns of SWS including; Baidoa, Marka, Wajid, Hudhur, and Dinsoor purely rely on diesel powered generators and mix generation system is yet to be adopted apart from individuals use of stand-alone solar systems.

He informed that South West needs Institutional and human capacity building since the ministry of energy's infrastructure has a limited capacity to operate efficiently. He also touched on the lack of policies and regulations at the states level. Mr. Adan recommended the use of Centre trainings in state levels as an efficient way to enhance the human capacity rather than the use of individual training models.

Mr. Adan A. Isaak, suggested the need to create awareness on the use of solar generated electricity for home appliance and suggested shifting to this mode of generation as an efficient way to reduce deforestation level in South West and the country.

Mr. Yasin: Diesel powered generators produce more than 98% of the energy in Hirshabelle while the renewable energy sources nly contribute in less than 2% and this limited to private companies and individual use. In Hirshabele, people who have access to electricity is also less than 60% and the use of Biomass is 90% for cooking and the rest use LPG gas. Mr. yassin raised the issue of possibility to expand electricity access in the region. He highlighted of how River Shabelle can be put into maximum use to generate hydroelectricity power which will not only suffice Hirshabelle but can service power to the nearby states and the country at large.

Mr. Mohamed Abdullahi: In this state, power generation from fossil fuels is 99%, and there is no any other form of production of electricity in Jubaland. Access to electricity in this region is also less than 50% while Biomass use is 90% and access to LPG is limited. Mr. Mohamed highlighted of the potential of hydroelectric generation in jubaland because of the River Juba.

Action Points/Response Given

- 6. FWS needs huge capacity support in terms of establishing and equipping the key environment, social and energy institutions in terms of financial and budgetary support especially in emerging states.

7. Federal Member States to share available documents and other studies to the project.
8. FMS to submit their needs in a written form prior to the upcoming stakeholder consultations meeting for extensive discussions.
9. The project to support FMS to develop relevant regulations and policies at state levels

Agenda No.	AGENDA
2.	Environmental and social consultations with environmental institutions at state and federal levels

Discussion Point:

Environmental and social issues were discussed with government bodies and environmental institutions at different levels. The discussions are summarized as below:

Mr. Mohamed: from the environmental directorate at the OPM highlighted the policies, and regulations in place to address related environmental and social issues. Mr. Mohamed mentioned of the cabinet endorsement of the climate change policy, 2020, and the National Environmental Act which is at the parliament for approval. The National Environmental Management Policy, 2020 and Ozone Layer Protection Regulation are also in place. The draft Environmental and Social Impact Assessment Regulations will be available soon for the effective implementations of the project. Mr. Mohamed has also mentioned of the existence of Charcoal Policy, 2021 that is intended to protect the environment from deforestation. He concluded his input by stressing the project to align its activities with the environmental and social policies in place.

Mr. Najib: the environmental specialist requested the Mr. Mohamed from the environmental directorate to share the available documents with the project.

Mr. Ahmed Bulshale: from the Puntland Ministry of Environment confirmed to the meeting that the Ministry has Environmental Impact Assessment Act developed in 2016 that guides the developments projects in Puntland region. In addition, Puntland has established the Environmental Management policy, 2016 and the Environmental Management Act 2017. In addition, the Puntland Ministry has also developed the state level environmental strategic plan to guide the state level environment and climate actions.

Concluding his remarks, Mr. Bulshale has expressed the huge gaps that exists in the overall environmental governance in Puntland. Mainly due to the absence of enforcement institutions such as; absence rangers or environmental police. Together with the poor community awareness, poverty and unemployment of youth who are directly depend on environment. This has caused destruction of environmental resources which threats future generation he concluded.

Mr. Mohmed Musse: from Non-state Actors contributed and enlightened the meeting of the existence of Tidal energy. He stated of Somalia’s long coastal line and how that can be strategically used to generate energy for its local consumption. Mr. muse urged the use of renewable energy so as to mitigate the catastrophic drought experienced in the country which is immensely contributed by the use of biomass energy. He suggested future energy projects to take into consideration this type of energy that will be very useful.

Mr. Abuu from the South-West State of Somalia stated that the majority of South-West State’s people, as well as SWSS’s economy, rely on natural resources. The availability of water, pasture, and forests are essential for rural livelihoods, agriculture, and livestock. Natural resource in South-West State SWSS is changing and degrading for various reasons such as consistence of droughts, floods, vegetation destruction and climate change.

SWSS strategic plan of 2019-Present. The Ministry of Environment and Wildlife SWSS established this strategic plan to implement their Forest Policy and Environmental Conservation Policy. The Ministry of Agriculture and Irrigation developed the State Farmland Tenure and pastoral development of 2017. The Ministry of Energy, Water and Mineral Resources developed a State Water Policy and Draft Water Laws of 2019.

And finally, he stated the overall weakness in terms of environmental governance and specifically the environmental safeguard related capacities and capabilities.

Mr. Abdulkadir Kadiye representing the Jubbaland Ministry of Environment and Tourism has explained how their Ministry plays a significant role in advancing the state, social and economic agenda on environmental recovery and empowering environmental policy through sustainable management of the environment.

He further stated that the following policies that are developed by their Ministry and these are; Jubbaland Environmental Policy (2019), Environmental Impact Assessment policy (2018) Solid waste management policy and strategies (2017), Strategies plan and priorities documents (2019). He concluded his remarks by saying that; the existing laws and policies are outdated and sometimes overlap resulting in confusion and costly institutional and management set up.

Issues and Concerns raised by the stakeholders

- Absence of Environmental and Social safeguard regulations at the Federal and FMS levels creates a huge national safeguard gaps. At the moment, the entire ESS is led by the World Bank or other donors whose safeguard policies are referred for implementation of the development project’s ESS. Strong government involvement is needed.
- No capacity to handle ESIA
- Electricity Service Providers are not oriented towards the safeguards and they don’t have safeguard policies or strategies in their companies.
- Greater percentage of the household in all the FMS depends on charcoal and biomass as their main

source of cooking.
<ul style="list-style-type: none"> • Due to the reported institutional capacity limitations at all levels, the SESRP project should contribute towards enhancing the capacity needs of the federal and FMS institutions. • There is need for frequent and more stakeholder technical consultations regarding the project design and ES safeguard related issues especially during the pre-implementation stage.

Agenda No.	AGENDA
4.	Any Other Business (AOB)
Conclusions:	
There being no any other business the project coordinator closed the meeting	
Action Points:	
N/A	

MEETING ACTION POINTS:

Min	Action Item	Responsible Party	Status
1	Need for institutional and human resource capacity building at state levels.	MoEWR/SESRP	
2.	Federal Member States to share available documents and other studies to the project.	FMS	
3.	FMS to submit their needs in a written form prior to the upcoming stakeholder consultations meeting for extensive discussions.	FMS	
4.	The project to support FMS to develop relevant regulations and policies at state levels	SESRP	
5.	Directorate of Environment at OPM to share existing environmental and social documents, policies and regulations with the project for guidance and implementation	OPM	
6.			

NEXT MEETING – Stakeholder Consultation Meeting

Date	Location
Tentatively, 7 th June. 2021	TBD

DISCUSSION QUESTIONS

1. What is the generation mix and capacities?
2. Is there hydroelectric power generation in Somalia? If yes where and capacity?
3. How do you manage environmental and social issues in energy sector?
4. Projects implemented by development partners.
5. Do the proponents undertake ESIA study for the energy projects?
6. What are some of the E&S issues common in the sector?
7. Is biomass used in energy generation?

LIST OF PARTICIPANTS

No.	Names	Institution	Title
1.	Ismail Mohamed	Puntland State PEDA	Deputy Manager
2.	Muna Abdillahi	Puntland State PEDA	Energy Director
3.	Mohamud Abdullahi	Puntland State PEDA	Planning Officer
4.	Omer Mohamed Jama	Puntland State Ministry of Energy	Planning Director
5.	Mohamed Abdullahi	Jubaland State Ministry of Energy	Director of Energy Department
6.	Abdulkadir Kadiye	Jubaland State Ministry of Environment	Environmental Technical Adviser
7.	Aden A. Isaak	South West State Ministry of Energy	Director General
8.	Abdulkadir Abuu	South West State Ministry of Environment	Environmental Governance Adviser
9.	Aidid Abdulkadir	Galmudud State	Director of Energy Department
10.	Abdinuur Khaliif	Galmudug State Ministry of Energy	Admin and Finance
11.	Ummul-khair M.	Galmudug State Ministry of Energy	Environmental Governance Adviser
12.	Yasin Ahmed	Hirshabelle State Ministry of Environment	Environmental Adviser
13.	Ahmed Bulshale	Puntland State	Environmental Officer
14.	Amina Salat	Horizon Developments	Managing Director
15.	Ali Botany	Horizon Developments	ES experts
16.	Duncan Onyaro	ESF	Lead Consultants

17.	Peter Kivuva	ESF	Consultants
18.	Mohamed Musse	Non- State Actors	Information Director
19.	Mohamed Shakir	Directorate of Environment - OPM	Legal Compliance Director
20.	Abdisalam Abdullahi	MoEWR	Project Coordinator
21.	Abdullahi Ahmed (Najib)	MoEWR	Environmental Specialist
22.	Abdihamid Abdirahman	MoEWR	Social Specialist
23.	Ismail Bashir	MoEWR	M&E Specialist
24.	Abdiaziz Arte	MoEWR	Financial Specialist
25.	Mohamed Fatih	MoEWR	Legal Specialist
26.	Mohamud Abdulkadir	MoEWR	Technical Expert
27.	Liban Ibrahim	MoEWR	Procurement Specialist

MEETING MINUTES

SOMALI ELECTRICITY ACCESS PROJECT (SEAP)

Type of Meeting:	Stakeholder Engagement – PIU, Horizon and ESPs.
Date of Meeting:	22 May 2021
Time:	10.00Am – 11.10Am
Venue:	Virtual Meeting – Zoom
Note Taker:	Abdihamid Abdirrahman Hassan, <i>PIU, SEAP</i>
Attendees:	Attached as Annex III

MEETING AGENDA:

No.	Subject
1.	Evaluating the existing environmental and social safeguards of the ESPs.
2.	GRM frameworks of the ESPs
3	Any Other Business AOB

MEETING MINUTES:

Agenda No.	AGENDA
1.	Evaluating the existing environmental and social safeguards of the ESPs.
Discussion Points:	
<p>Mr Abdisalam, the project coordinator, opened the meeting and welcomed all the participants: PIU team, Horizon and representatives from the EPSs. After a brief introduction, the project coordinator proceeded to the first agenda of the meeting which was evaluating the existing environmental and social safeguard policies/frameworks in place for ESPs and whether have they E&S specialists.</p>	

NECSOM CEO Abdirizak: Mr Abdirizak noted that his company does not have environmental and social safeguard specialist nor E&S safeguard policies but they do carry out E& S risk assessments before they undertake new projects- mostly carried out by project engineers. Mr. Abdirizak added that they understand the importance the environmental and social safeguard but they lack the capacity to address them. As for the disposal of the batteries, Mr. Abdirizak was very happy to report that his company battery disposal plan – batteries are stored in a safe place before they're sold to an Ethiopian company which recycles them in Ethiopia.

ANEE (Bossaso) Abdiaziz: Anee representative, Mr Abdiaziz stated that his company does not have an environmental and social specialist but has safeguard policies/procedures, albeit at rudimentary stage, to address the E&S risks and they are in the processes to hire an E&S safeguard specialist and formulate proper ES safeguard policies asking for the ministry's help for both. Operating in Puntland means they have to follow state's ES safeguard regulations- making hiring E&S specialists compulsory.

NEPCO (main ESP in Nugaal and Mudug) Mohamud: Mr Mohamud stated that his company has both ES safeguard specialist and a well-established environmental and social safeguard policies. They also follow the state's social and environmental safeguard regulations (Puntland State has a relatively developed ES safeguard regulations). He also averred that his company's objective is go 100% renewable energy and take further steps to address all negative social and environmental impacts from their process.

BEC, Adam: Mr adam noted that his company lacks capacity to address environmental and social issues but have been working to formulate environmental and social safeguard policies and hiring E&S specialists. Mr Adam further asked for help in both policy formulations and training for their social and environmental specialists when they hire them.

Blue Sky CEO Abdulkadir Hassan: Mr Hassan stated that his company has environmental and social safeguard policies in place and is working on hiring environmental and social safeguard specialists.

WESCO, Mahad Awad: Awad said that his company does not have ES safeguard policies but practice bits and parts of it: addressing occupational hazards complains and putting the safety of their employees and customers first in their projects. Mr Awad added that they compensations processes is not well structured (no proper GRM policies) but still proved to be effective when addressing complaints.

Environmental safeguard specialist, Najeb: Mr Najib inquired if ESPs undertake EIAs and other risk assessment studies before undertaking a new project.

Blue Sky CEO Abdulkadir Hassan: Mr Hassan noted that while they don't have comprehensive risk assessments mechanisms in place, they carry out environmental and social impact assessments and is addressed by project Engineers rather than actual ES specialists. On the other hand, Blue Sky protects its employees from occupational hazards by giving them protections gears and compensations in the case of injury at the place of work. Blues sky also protects customers but employing advanced equipments with a 24/7 hotline for complaints -mostly related to inconveniences from the service.

WESCO engineer, Mahad Awad: Mr Awad also gave similar answer. Plus, confessed his company has doesn't carry EIAs before projects. .

BEC, Adam Isak: Mr Adam said while his company does not undertake EIAs before projects for now they are going to in the near future as they are working on formulating their safeguard policies and hiring E&S safeguard specialists.

NECSOM, Abdirizak: NESCO carries out EIAs before projects but it's undertaken by engineers rather than specialists.

NEPCO, Mohamud: Mr Mohamud detailed how his company carries out EIAs before new projects – carried out by specialists in the field – and as a result, they reduced adverse environmental and social impacts of their projects.

ANEE (Bossaso) Abdiaziz: Mr Abdiaziz As a company with established ES safeguard policies and specialists, ANEE carries out EIAs and other ES safeguard studies before projects.

Action Points:

10. Another stakeholder meeting to be held within a short period of time
11. Ministry to help ESPs formulate ES safeguard policies and educate them about the existing country ESS frameworks and regulations

Agenda No.	AGENDA
2.	GRM frameworks of the ESPs
Discussion Points:	
<p>Social safeguard specialist, Abdihamid: Mr Abdihamid sought to understand how ESPs address grievances and whether they have GRM frameworks.</p> <p>NEPCO, Mohamud Yasin: Mr Mohamud stated that NEPCO has an advanced ES safeguard policies, ES specialist and a comprehensive GRM framework, albeit with gaps. And because NEPCO operates in Puntland, a state with relatively advanced E&S safeguard frameworks and regulations, they apply those regulations to all their projects. Farah further added the importance of filling the gaps in their ES frameworks and sought the PIU and Ministry's help on that.</p> <p>WESCO engineer, Mahad Awad: Mr Award, on the other hand, conceded that his company has no GRM framework in place and as result asked the Ministry to help them formulate their ES and especially GRM frameworks. Further noting that any aggrieved party can directly call the company but they don't receive social or environments complaints alluding that the public is not sensitized about these issues.</p> <p>Abdirizak Muse, CEO of NECSOM: Abdirizak stated that, although, his company doesn't have the E&S safeguard frameworks in place yet it implement parts of ES safeguards and even address grievances. He also asked for governments help to formulate these policies</p> <p>Blue Sky, Abdikadir Hassan: Mr Hassan admitted that while ES safeguards frameworks and GRM are almost nonexistent but pointed out they still practice ES risk mitigation procedures and address complaints related to labor and land.</p> <p>NECSOM AND EENEE representatives, Adam and Mohamud, also gave similar answers. Parts of GRM</p>	

are practiced inadvertently but there's no comprehensive framework in place. Adding that both are to have these policies in place soon and hire E&S safeguard specialists.

In summary, not all ESPs were equal when it comes to environmental and social safeguard policies. Some had advanced ES safeguard policies while others had incomplete ones. Where deficiency was across the board was GRM frame work except NEPCO. It is important to point out that almost all had compensation mechanisms is the case of occupational health hazard for their employees. All ESPs sought government's help in the formulation of these policies and frameworks. Almost all ESPs practice bits and parts of GRM especially when it comes to compensating for injuries for their employees and investigating OHS related complaints. As for land related issues, local governments allots them the land and hence avoid land disputes with individuals –which increases the cost as they take longer route or use underground lines. Lack of capacity and awareness about GRM was raised by all ESPs and sought the ministry's help.

Action Points:

- 1-Help ESP formulate GRM frame works
- 2-Ministry to help raise awareness regarding the GRM
- 3- Hold capacity building training for ES safeguard specialists of the ESPs

Agenda No.	AGENDA
3	Any Other Business (AOB)
Conclusions:	
<p>There's no other business after the two agendas of the meeting extensively addressed and debated. The project coordinator commended the participants for their lively engagements and encouraged the ESPs to take ESS very seriously promising the Ministry and PIU team will do everything they can to address these issues.</p> <p>On the other hand, the ESPs representatives stressed the importance of moving to renewable energy and bringing down electricity costs so that can contribute emergence of startup and small scale business and as a result economic growth</p> <p>The project coordinator thanked all the participants and closed the meeting.</p>	
Action Points:	
N/A	

MEETING ACTION POINTS:

Min	Action Item	Responsible Party	Status
1	Capacity building training for ESPs' social and environmental safeguard specialists.	Project coordinator- Abdisalam- and – El & S safeguard specialists of the PIU-Abdihamid and Najeb.	
2.	To help ESPs develop ES safeguard policies and frameworks	E & S safeguard specialists of the PIU- Abdihamid and Najeb.	
	To evaluate the gaps in GRM frameworks of ESPs and	Social safeguard	

3.	help other ESPs develop their own.	specialists of the PIU - Abdihamid	
4.	To help ESPs recruit ES safeguard specialists.	Environmental and Social safeguard specialists of the PIU	
5.	To carry out awareness campaign to encourage clean energy.	Environmental and Social safeguard specialists of the PIU	
6.	To share ES policies of the ESPs with the ministry.	ESPs	
7.	To prepare environmental and social safeguard training plans	Environmental and Social safeguard specialists of the PIU.	

NEXT MEETING

Date	Location
Early next month	YTB

DISCUSSION QUESTIONS

8. How do you manage environmental and social issues?
9. Do the proponents undertake ESIA study for new projects?
10. Do you have ES safeguard policies? Do you have GRM ?
11. What are the challenges ESPs face with regard to E&S issues?

LIST OF PARTICIPANTS

No.	Names	ESPs	Position
1	Abdisalam Abdullahi	MoEWR	Project Coordinator
2	Abdullahi Ahmed (Najib)	MoEWR	Environmental Specialist
3	Abdihamid Abdirahman	MoEWR	Social Specialist
4	Ismail Bashir	MoEWR	M&E Specialist
5	Abdiaziz Arte	MoEWR	Financial Specialist
6	Mohamed Fatih	MoEWR	Legal Specialist
7	Mohamud Abdulkadir	MoEWR	Technical Expert
8	Liban Ibrahim	MoEWR	Procurement Specialist
9	Abdirizak Muse	NECSOM	General Manager
10	Mohamud A. Awad	WESCO	Chief Operating Officer
11	Abdikadir Hassan	Blue Sky	Chief Executive Officer
12	Eng. Abdiaziz Farah	ENEE	Chief Technical Officer
13	Mohamud Yassin	NEPCO	Chief Technical Officer
14	Adam Isak	BEC	Chief Technical Officer
15	Amina Salat	Horizon Developments	Managing Director
16	Ali Botany	Horizon Developments	ES experts
17	Duncan Onyaro	ESF	Lead Consultants

18	Peter Kivuva	ESF	Consultants
----	--------------	-----	-------------

MEETING MINUTES

SOMALI ELECTRICITY ACCESS PROJECT (SEAP)

Type of Meeting:	Stakeholder Engagement – SSPs
Date of Meeting:	22 May 2021
Time:	1:30pm – 2:45pm
Venue:	Virtual Meeting – Zoom
Note Taker:	Liban Ali Ibrahim – Procurement Specialist, <i>PIU, SEAP</i>
Attendees:	Attached as Annex 1

MEETING AGENDA:

No.	Subject
1.	Consultations with SSPs on Environmental and Social Safeguard, and waste management plans
2.	Any Other Business AOB

MEETING MINUTES:

Agenda No.	AGENDA
1.	Consultations with SSPs on Environmental and Social Safeguard, and waste management plans
Discussion Points:	
Discussion Point:	
<p>Mr. Abdisalam: The project coordinator opened the meeting and appreciated all the attendees: PIU at the MoEWR, SSPs and Horizon developments members for joining the virtual meeting. After brief introductions, Mr. Abdisalam updated the SSPs on the status of the Grant Facility informing the participants the first advance payment is being proceed and will receive the payment in the course of next week.</p>	
<p>Mr. Muhyiddin: The local coordinator for the Grant Facility provided a quick summary on the findings of</p>	

the grant manager with regard to environmental and social parameters of Solar Service Providers. Mr. Muhyidin mentioned that some of the weaknesses of the companies in the energy sector is lack of strong environmental and social policies that guide their operations. He highlighted that SSPs have some policies that help in the management of batteries but nothing beyond these policies reflect much of the realities on the ground. The rest of the policies SSPs have are general in nature such as gender, community policies etc. The SSPs generally need to be supported to develop important policies such as, Environmental policy, Gender Policy and BESS and Waste management policies that will be useful on the ground.

Mr. Dancan Onyaro- Harizon consultant firm: - Inquired to know from the SSPs the common technology that is available in the market. The type of batteries used, their impacts, and policies in place for their storage and disposal

Mr. Bashir Mohamed – Dalsan Power: - Stated that his company uses OFF-GRID technology. He also added the Battery types his company uses is Gel and LED ACID battery. He further added his company sells solar off grid products such as solar decentralize lights, solar pumping, solar water, solar chargers' components etc. Mr. Bashir said that they ship their used batteries to neighboring countries for recycling.

Mr. Musse Kahiye - SunMax Company: To supplement the points of Mr. Bashir, Musse stated his company is using Lithium type of battery which has 10years of life time but they also supply LED Acid Battery. He highlighted his company is aware and are concerned with the environment wellbeing and as a result compile all the used batteries in one place before disposing it.

Mr. Said Mohamud - SECCCO: He noted that despite the use of new technology in the market in attempt to advance the local market and keep pace with the technology world, the private solar providers are still faced with waste management problems and he attributed his concern to lack of government policies in place for battery disposal and recycling. As a SECCCO company, Mr. Said stated that they collect all the used batteries and ship to Kenya/Ethiopia for disposal purposes. He emphasized the importance to develop a waste management mechanism or facility in the country.

Mr. Bashir Mohamed – Dalsan Power: To further comment on the waste management, Mr. Bashir has highlighted the existence of a company known as African Solution Company that has waste management factory that Dalsan as a company has already contacted for future disposal and recycling of their used batteries and other wastes.

Mr. Najib Ali: To clarify more on the existence of recycling facility in Mogadishu, Mr. Najib stated that he happened to visit the African Solution Company that does recycling of plastics but doubts whether the company does battery recycling and is unaware of this development.

Mr. Bashir Mohamed: To support his earlier comment with regard to the African Solutions Company, Mr. Bashir argued that the director of the company Mr. Hirsi Abdi informed him of the ongoing processes

to provide waste management services for private companies that lack waste management mechanisms and are seeking external support to provide bring services closer to the locals

Mr. Hussein kiro - SolarGen: commented on use of LED Acid and other technologies. He asserted that SolarGen has developed its own policies on west management program with regard to batteries and solar appliances. He highlighted the importance of applying the Environmental policies at the national level.

Mr. Dancan Onyaro: Sought to understand whether there were some conditions attached to SSPs benefiting from the grant facility.

Mr. Abdisalam: responded to the clarification requested by Dancan and clearly highlighted some of specific conditions and compliance requirements attached to grant process. He further invited Muhyiddin to clarify more on the capacity building package mainly addressing the Environmental and Social issues that were to be provided to the SSPs.

Mr. Muhyiddin: clarified the capacity building package and said the package was aimed to provide the SSPs with general understanding of environmental and social concepts. He further noted that, the consultant doing the environmental and social studies for the project is expected to assist the SSPs to establish an indigenous Environmental and Social Management Framework (ESMF) that is specific for the industry.

Mr. Mohamed abdirihim - Hayle Baires: Urged the SSPs and the Ministry of Energy to develop waste management policies and find a lasting solutions to the waste related problems. He touched on the fact that most companies in the energy sector are slightly over 5 years and will definitely face challenges in 25 year time when they will need to recycle their solar panels and Batteries. To avert future obstacles, Mr. Mohamed suggests the private companies and the Ministry to engage dialogue to erect a recycling plant as this will help companies reduce costs in transporting wasting to neighboring countries.

Mr. Dancan Onyaro: requested to know the participation of women in the energy sector, and gender policies available.

Mr Abdisalam: responded to Dancan's comments by highlighting that, there are female led energy companies in the country and Yasmin - who is the chief operations officer (COO) is part of the meeting. He updated the meeting of the recently concluded a gender diagnostic assessment as part of the project's efforts to address the gender gaps in the energy sector. He further mentioned that the project has a gender focal point that support the project on gender related issues.

Action Points/Response Given

1. SSPs need for waste management plans

2. The consulting firm, Horizon Developments to help SSPs develop specific ESMF for the energy sector
3. Gender Diagnostic Assessment and Action plans is available and will be shared with the consultant firm.
4. Promote local companies like African Solutions Company that has the potentiality to recycle the battery wastes into useful products.

Agenda No.	AGENDA
4.	Any Other Business (AOB)
Conclusions:	
The project coordinator thanked the participants for the interactive and lively discussions. He urged for the continuous support and collaboration of the SSPs and promised that the ministry is determined to enhance the energy sector.	
The project coordinator appreciated the attendees and closed the meeting.	

MEETING ACTION POINTS:

Min	Action Item	Responsible Party	Status
1	SSPs need for waste management plans	Crosscutting	
2.	Consultant hired for the environmental and social studies to help SSPs develop specific ESMF for the energy sector	Horizon Developments	
3.	The project to share the Gender Diagnostic Assessment and Action plans with consultant	PIU - MoEWR	
5.			

Attendees:

No	Name	Title	Represent
1.	Eng siciid Mohamud	Business Development Manager	SECCCO
2.	Eng. Bashir Mohamud	Managing Director	Dalsan Power
3.	Yusuf Abdi	Operations Officer	Safa Energy
4.	Mohamed abdirihim	Operations Manager	Hayle Barise
5.	Mohamed Adil	Chief Operating Officer	Somnuur
6.	Muse Kahiye	Managing Director	SunMax
7.	Nur Abdiqadir	Operations Manager	Tamarso
8.	Ishak Salad Dahir	CEO	TESCO
9.	Abdihakim Shiekhdon	CEO	Delt Engineering

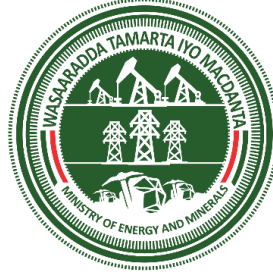
10.	Hussein Kirow	Project Engineer	SolarGen Technologies
11.	Yaasmin sheikhdoon	Chief Operations Officer	Samawat Energy
12.	Sammy Ratemo	Environment and Social Specialist, TA	World Bank
13.	Muhyiddin Sayid	Local Coordinator	Grant Facility, IBS
14	Amina Salat	Managing Director	Horizon Developments
15	Ali Botany	ES experts	Horizon Developments
16	Duncan Onyaro	Lead Consultants	ESF
17	Peter Kivuva	Consultants	ESF
18	Abdisalam Abdullahi	Project Coordinator	MoEWR
19	Abdullahi Ahmed (Najib)	Environmental Specialist	MoEWR
20	Abdihamid Abdirahman	Social Specialist	MoEWR
21	Ismail Bashir	M&E Specialist	MoEWR
22	Abdiaziz Arte	Financial Specialist	MoEWR
23	Mohamed Fatih	Legal Specialist	MoEWR
24	Mohamud Abdulkadir	Technical Expert	MoEWR
25	Liban Ibrahim	Procurement Specialist	MoEWR
26			

NEXT MEETING



Date	Location
Tentatively, 7 th June. 2021	TBD

Annex 2: Public Consultation Meeting in Somaliland

- Public Consultation meeting
Environmental and Social
Somaliland Electricity Sector



Risk Assessment for the
Recovery Project



WORLD BANK GROUP

**KULANKA WADATASHIGA DADWEYNAHA EE
QIIMAYNTA KHATARTA DEEGAANKA IYO
BULSHADA EE MASHRUUCA SOO-KABASHADA
AAGGA KORONTADA SOMALILAND**

*Public Consultation Meeting of Environmental and Social Risk
Assessment for the Somaliland Electricity Sector Recovery project*

📅 28 – April – 2021 4:00pm – 8:00PM 📍 Maansoor Hotel Hargeisa

Event
Report

○ A

April 28, 2021

1. Introduction

The Ministry of Energy and Minerals of Somaliland together with the World Bank group organised a public consultation event for the environmental and social management framework for Somaliland electricity sector under the Recovery Project. This report provides the key discussions, highlights, contributions, and recommendations from

the participants of the public consultation meeting, this in line with World Bank social standard 10: “**Stakeholder Engagement Disclosure**”. The environment and social framework provide guidance of the principles, rules, guidelines, and procedures to screen, assess, manage, and monitor the mitigation measures to address identified environmental and social impacts for the proposed project.

Somaliland Electricity Sector Recovery project seeks to expand and increase access to electricity services and to re-establish the electricity supply industry in the country and the project is currently under preparation. The components of the project Somaliland Electricity Sector recovery are.

1. Distribution Network Reconstruction, Reinforcement, and operations efficiency generator synchronisation and automation
2. Sub-transmission and distribution network integration in the major load centres
3. Renewable energy generation optimization
4. Electricity Service for improved public service (Health, education, and the water supply institutions)
5. Sector Capacity Enhancement and the project implementation capacity support

Welcome remarks and Speeches

Mr Abdi Fattah, The Director of Planning, and event facilitator greeted the participants and welcomed to the conference room. The facilitator presented the objective and agenda of the event. Mr. Mohamed recited verses of the holy Quran to able to proceed the next sessions of the event.

Director of Energy Eng. Liban MM Warfa

Mr. Liban, welcomed the meeting attendees and gave brief introductory remarks. He stated the objectives for the meeting. The Director thanked to the World Bank Group who funded this project. He mentioned that this a consultation meeting the improvement and development of the energy sector. This is to make sure that all stakeholders including ESPs government and other partners to take part in development of the sector. The main important that this project is focusing is include the improvement of the distribution network. He mentioned that



project will have an effect on the social, environmental elements of the project and disputes resolutions and hence, the Ministry of social affairs, Minister of Environment and the Ministry of justice were invited and also present.

Statement from His Excellency Minister of Energy

HE Jama Haji Mohamud Egal Made the official opening remarks of the event. The Minister thanked the participants,



including the ESPs and government officials for their attendance of the crucial event. The main objective of this project is to recover from the electricity drawback Somaliland encountered during the war. The Minister mentioned that there is a need to get safe and affordable electricity, he also said that the government promoting to get a well-developed electricity sector in terms of price and safety and accessibility. The Minister mentioned that local investors started to recreate the energy sector we have reliable electricity supply which is better than what many countries in the world. The expected amount to invest this project more than millions of dollars that intend to improve the social sector including the health and education. The Minister thanked the World Bank Group for the provision of this project and make it a reality in Somaliland. The Minister highlighted that during the preparation it is needed to assess the environmental and social impacts and that is the reason we invited these participants, since the project will seek to improve the existing generation sites and solar project. The Minister finally announced that the event is open.

Statement by His Excellency the Electrical Energy Commission.

His Excellence, Ahmed Adare made his

welcoming remarks. He thanked the participants for attending and mentioned the consultation on the development of the electricity sector very important. He highlighted that this consultation would bring a fruitful outcome that will contribute to the planning of this project. The Somaliland Electrical Energy regulatory Commission is responsible for Implementing the regulation framework to ensure that the sector is developing with less risk on social and environment.



is

Statements from the Director Generals and other officials



Mr Abdunnasir, the Director General of Ministry of Environment made his word about the event. The director mentioned that electricity is generated from charcoal and then the diesel. He mentioned that generation of the diesel releases the gasses to the air and create environmental risks and negative impact on the climate. He mentioned that friendly environment energy needs to improve. He mentioned that the Ministry of environment encourages that the green energy to save life and people and animals.

Mr. Abdirashid, the Director General of the Ministry of Labour and Social affairs. The director highlighted that this consultation will help us succeed in this project. He mentioned that there are challenges to the accessibility of the electricity to low-income people. He mentioned that this project is very important to the social development. The Director mentioned that the Ministry of labour and social affairs will support the MoEM in the implementation of this project.



Mr. Abdirahman, Director General of Ministry of Justice. He mentioned that the reconstruction of the infrastructure is very difficult. The Ministry of justice is involved in such project in terms of justice. He mentioned that any damage caused by the electricity, this case will go the justice. As long as the project will affect the environment and social, it needs to weigh the justice and fairness.

Mr. Mohamed Abdirahman. Secretary of the SEA. He mentioned that electricity sector is improving. The Somaliland electricity association has members of the major electricity supplier to exchange lessons learned and find a platform where the ESPs meet regularly to address the common challenges.

2. Presentations



Mr Liban, director of energy and the project coordinator of SEAP project, presented the background of the project. See attached annex 1 of the presentation. The main contents of the presentation are.

- i. Introduction
- ii. Project Components
- iii. Need For E&S Due Diligence
- iv. Policy, Legal, & Institutional Framework
- v. Institutional Capacity for E&S Management
- vi. Ratified International Conventions/Treaties
- vii. World Bank Environmental and Social Standards (ESS)
- viii. Gap Analysis WB-ESS & National Legal Framework
- ix. Project Biophysical and Socioeconomic Setting
- x. Implementation Arrangements

Gap analysis WB ESS & national Legal Framework.

The following sections summarise key outcomes and emerging issues from the consultation meeting:

Topics	Outcome (suggestions)
<p>What are the existing grievance redress mechanism with regards to project implementation?</p>	<p>One of the participants from the Somaliland lawyer association reported that there is no existing grievance redress mechanism for the community compliant but in general the complaining people go to the local media to submit their complaints.</p> <p>The participants from the local government mentioned that they dot release projects unless the community leaders approve and assess the potential social and environmental risks. The local government start the implementation of its projects including the JLPG when the community agree and sign their consensus. The complaining people direct their complaint to the elders of the community who then submits orally to the local government. But there is no written procedure to follow to submit complaints and grievances.</p> <p>The Hargeisa water agency reported that they face many challenges in the expansion of the water. Although there is no written mechanism to receive the complaints, Hargeisa water agency created local committees of 5 elders for each district. These committees support the project on behalf of the community. Sometimes the committee is receiving and deal with the complaints of the local community.</p> <p>The participants from Ministry of Environment and Rural Development reports that the Somaliland environment law, article 10, section 79 sates there is a committee that responds to complaints from the community.</p>

<p>Do we have the existing way leaves where the transmission lines will pass in case there are no way leave what is the existing mechanisms for land take?</p>	<p>The representatives from the local government mentioned that there is wayleave for the utilities including the distribution and transmission networks of the electricity in their town plans. But due to lack of proper management, these plans are not followed by the private suppliers. Recently the telecommunication companies and some of the electricity suppliers put grounding cables in the town that are not in line with the town plan, so sometimes it creates social and environmental risks. The private companies deal with landowners to wayleaves without consultant of the local authorities.</p> <p>Representative from the Ministry of Public Works mentioned that they recently completed the master plans for the major towns of Somaliland. These masters indicate the wayleaves of the utilities including the transmission and distribution of electricity as per the Somaliland land law.</p> <p>Recommendation: The project needs to review these master plans.</p> <p>Hargeisa Water agency mentioned that they faced a lot of challenges during the Hargeisa Water expansion. They mentioned that they met many underground cables including electricity lines and telecommunication during the excavation the pipelines. these unground cables created problems to workers of the project.</p> <p>The Water agencies agreed that they will provide the design and drawings of water distribution pipelines to help the Ministry of energy and minerals for their electricity distribution plans.</p> <p>Recommendation: The Ministry of energy and minerals to follow up the Hargeisa Water agency for these drawing and designs.</p> <p>The local government mentioned that they started to request the electricity and telecommunication companies to submit their designs and drawings of the ungrounded cables before they implement any project.</p> <p>There are lot of transmission lines that go through private lands where the owner of the land refused to pass the line. These problems are resolved with support of the traditional leaders. Sometimes the project implementers pay money and sometime jobs to the owners of the land. For example, the fibre optic cable runs throughout Somaliland. Sometimes there are a lot of disputes between the company and landowners which sometimes reach to courts. Most of these disputes were resolved in a traditional way.</p> <p>The Somaliland Electricity Act, article 15, use of public & private property, states.</p> <ol style="list-style-type: none"> 1. In Accordance with the provisions of Article 23 of Act No: 17 (Land Law), the Licensee shall have the right to apply the use of public property for installation, transmission of lines or poles, distribution, and generation activities. 2. The licensee shall have the right to use private land in accordance with the agreement between the licensee and the owner of the land.
--	---

	<ol style="list-style-type: none"> 3. If parties fail to conclude an agreement and the public interest necessitates the use of such private land for the purposes of installing a public utility, the Commission may request from relevant local authorities to expropriate such private land subject to the payment of fair market price compensation to the owner of the land. 4. When, in accordance with the provisions of this Part, the licensee of an undertaking has been permitted to use any land or has placed a transmission line in position, the licensee shall be entitled to reasonable access to such land or line for the purpose of carrying on the operations authorized by his license on such land on maintaining, removing, repairing, or replacing such a line. 5. Any aggrieved party can challenge the decision from the local authorities to the Somaliland High Court. 6. Without prejudice to the provisions of Act No: 04/98 The Environmental Conservation Act, the licensee will request to remove any trees or other objects that obstruct the construction of poles, facilities, or electricity related work. 7. The licensee will give not less than 10 days of notice to the lawful occupier or the relevant authorities its intention to remove such trees or objects. 8. The location of any electricity generation facility shall be in compliance with the provisions of the Public Order Law (Act No: 51/2011) Article 20. <p>Recommendations: the project needs to review the land law of Somaliland</p> <p>The participants suggested to conduct adequate social and environmental review for electricity distribution and transmission and develop appropriate mitigation measures.</p>
<p>What is the experience in labour issues in terms of solving labour related issues? for example payment of the wages and salary, the issuance of work contracts?</p>	<p>A representative from the Somaliland lawyer association mentioned that the Somaliland labour Law states how to resolve the labour issues including the payment of wages, salaries, and other compensations.</p> <p>The Somaliland labour Law states the working hours, holidays, bonuses, leaves including maternity/paternity leaves.</p> <p>In general, the complaining employee submits his/her complaint to the ministry of labour and social affairs in compliance with the Somaliland labour law.</p> <p>In addition, the Act no 80, Somaliland Companies law is also in place to resolve the issues of employee and employer in the private sector.</p> <p>Recommendation: The Ministry of energy and Minerals to review the Act no 80, Somaliland Companies Law.</p> <p>In general, there is no written contracts between the employer and employee and after while the employee complains and there is no base to resolve the complaint.</p> <p>Most of the complains occur during the termination of the employee’s contract. It is very rare to see an employee complaining during his/her presence in the job.</p>

	<p>A representative from women lawyer association mentioned that There are waged staff that do not work under contracts. These employees work few days or hours, so the Somaliland labour law do not specify how resolve the issues of such kind of workers. There some people complaining from employers of international companies that goes to the Ministry of foreign affairs. If the local employees There two laws, labour law 2004. That deals with non-civil servant labour and the civil servant law that deals with the issue of government staff.</p> <p>Mostly, the Ministry of labour do not involve during the employment stage, but they involve when complaints arise.</p> <p>There is no labour association in Somaliland but there are law firms that undertake alternative dispute resolution for the private sector.</p>
Do we have labour inspectors at the field to monitor the implementation on labour laws	During recruitment, the Ministry of labour attends the interview of the employee to participate the background of the staff.
ME&RD: What are the approval requirements for the project ESIA, how long does it take if there are no bottlenecks? Does the ministry have adequate staff for reviewing the ESIA reports?	The implementing party submits a request to the Ministry and the Ministry will attach experts to assess the impact of the project on the environment. The experts submit their reports to the Ministry and this report help the ministry to decide the way forward for the implementation of the project. The project will not be allowed unless the environmental impact assessment is prepared. There is not enough staff to do the job.
Do we have labour laws prohibiting Use of Forced Labor and or Child Labour?	<p>Article 39 of labour law 2004 state that child labour is prohibited. There are also shifts of work that differ. There is also a child law.</p> <p>A representative from Somaliland Women lawyer association mentioned that the law no 31, 2004, Somaliland labour law, prohibited to send a work while children are learning, nights shifts. The law is also prohibiting to send the child to a work that he/she could not be able physically and morally to do.</p>
Do we have Occupational Health and Safety inspectors?	The Ministry social labour have a section called health and safety.
How are the wastes especially oil contaminated (transformer) handled, do we have approved sites where the	The contaminated oil is the major environmental problems. The electricity Service providers have a dip to put the oil waste to avoid it contaminating the environment.

contractors can be recommended to?	
what is the role of ESPs in this project?	<p>The ESPs are responsible for protecting the environment and the social. The ESPs will have the biggest role in terms of environmental safety and health.</p> <p>There are some complaints that comes from the neighbour house in regard of the noise of the generators. So, they suggest creating industrial zones where these generation site will be relocated.</p>
	<p>Some of the participants mentioned that the metal poles had great risk to life of the people and animal in the major towns of Somaliland. They suggested whether there are alternatives to reduce the risk of electrocutions caused by the metal poles of the electricity distribution. The metal poles have major problems on the social, so is their plan to replace the metal poles</p>

Annex 3. SEAP FGS GRM

GRIEVANCE REDRESS MECHANISM PROCESS

Somalia Electricity Access Project - SEAP

1. INTRODUCTION

This Grievance Redress Mechanism (GRM) is prepared by the Somalia Electricity Access Project (SEAP) for purposes of addressing and subsequent resolving grievances stemming from the implementation of the SEAP project, funded by the World Bank.

Ministry of Energy and Water Resources and the Project Implementation Unit (PIU) will ensure that project affected persons are fully informed of the GRM and their role, procedure for filing/logging and redress of grievances at the earliest time possible. This will allow any potential grievance to be addressed as soon as possible.

Grievance is any complaint that is related to the project whereas non-grievance (in reference to grievance register) is any complaint that is not related to the project.

2. GRIEVANCE REDRESS MECHANISM TIERS

Tiers Levels	Membres
Tier 1 Contract/ activity level	1. contractor 2. Project legal specialist
Tier 2 SEAP Project level	Project implementation unit.
Tier 3	1. Project coordinator 2. Director General of MoEWR

NOTE

- The above would constitute the project GRM. If the project level GRM levels fail to resolve a case, the complainant is free to seek redress from other mechanisms such as the Somali legal/judicial systems or the World Bank’s GRM which includes the Grievance Redress Service (GRS).*
- Responsibilities of the members in the different tiers is as per the verbatim in section 2.*

3. DESCRIPTION OF THE GRIEVANCE REDRESS MECHANISM

- i. Eligibility to register a complaint or grievance;
 - Any person directly affected by the operation of the SEAP project; and
 - Residents interested in and/or affected by the project living in the affected areas.
 - Person's mandated to speak for directly affected persons
- The project level GRM has been designed to be accessible, effective, easy, and understandable and without costs to the complainant except if they choose to pursue the legal route.
- Any grievance can be brought to the contract/activity (the lowest project implementation unit) grievance mechanism committee in writing, calling, WhatsApp, SMS, verbally in a face to face situation, email, or by filling in the grievance form. Complainants can choose to identify themselves or to remain anonymous or use third parties.
- The SEAP project shall provide a grievance register log that will have all necessary elements to disaggregate the grievance by gender of the complainant as well as by type of grievance. Each grievance will be recorded in the register with the following information at minimum: description of grievance; date of receipt, description of actions taken (investigation, corrective measures), and date of resolution and closure/provision of feedback to the complainant.
- All grievances shall follow the path of the following mandatory steps: receive, log, assess and assign, provide feedback to complainant/aggrieved, investigate, respond, follow-up and close-out.
- A contract/activity grievance redress committee (GRC) shall be set chaired by the legal specialist who will ensure complainants are able to register their grievances easily. The committee will assess the grievance and try to resolve it. In the event the matter is beyond the committee to deal with, the same will be referred to the project Implementation Unit.
- The grievance logbook will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The information to be recorded will include:
 - Name, age, gender of complainant/third party
 - Date the complaint was reported;
 - Date the grievance logged;
 - Action taken;
 - Date information on proposed corrective action sent to complainant (if appropriate);
 - The date the complaint was resolved and closed; and
 - Date response was sent to complainant.
- **Grievance Redress Mechanism Timing**

No	Action	Timeframe
1	Acknowledgement of receipt of complain	3 days
2	Sorting out complains, investigate and assign for action	10 days
3	Resolution implementation	15 days
4	Frequency of updating the complainant about progress of the complaint resolution	Weekly

4. MONITORING COMPLAINTS

The activity/ contract Grievance Redress Mechanism committee shall be responsible for receiving and assessing the complaints as received and resolving where applicable. The activity/ contract GRMC will receive the forms and forward to the project legal specialist to follow up on the grievances. The legal specialist will determine whether the complaints need an administrative redress or can be solved at the contract/ activity level depending on the nature of the complaint. These processes will ensure transparency, fairness, consensus building across cases, eliminate unsubstantiated claims and satisfy legitimate claimants at low cost. It is notable that the response time will depend on the issue to be addressed but all measures will be put in place to ensure efficiency.

If the issue is not resolved at the activity/contract level, it will be escalated to the Project Implementation Unit.

If the grievance is not solved, the MoEWR can mediate between Project and the complainant to find a solution after which if the issue is not resolved, the complainant can seek legal redress but as a last option. MOEWR will endeavor to solve all grievances without resulting to the courts.

Note

MOEWR at all means discourages complainants to revert to the courts or to the World Bank directly before exhausting the low-level mechanisms provided. This is because the process may cost more and take longer time.

5. STAKEHOLDERS RESPONSIBILITIES IN THE GRIEVANCE REDRESS MECHANISM

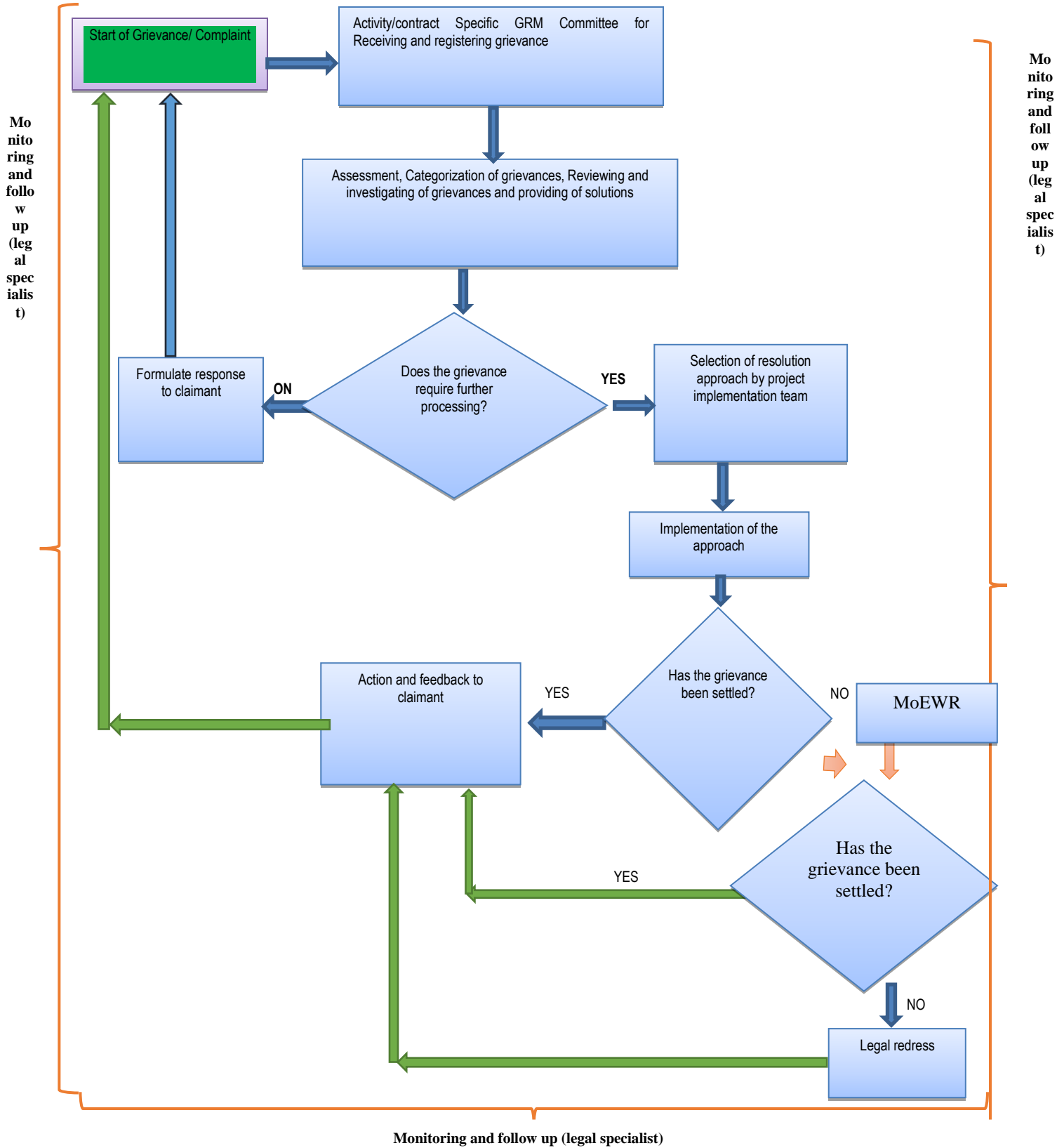
STEP	RESPONSIBILITY	REMARKS
1.	Complainant	Aggrieved Project Affected Person (PAP) raises complaint to Scheme GR Committee (SGRC).
2.	Contract GRM Committee	Formed at the contract/activity level and includes members (project legal specialist, project technical ex and the contractor) and tasked with Assessment, Categorization of grievances, Reviewing and investigating of grievances and providing of solutions. If it is not resolved immediately it is forwarded directly to tier 2 or through the legal specialist.
3.	Contractor	The Contractor resolves issues under his control. Any un-resolved issues are elevated to Project Committee.
4.	Project PIU	Consisting of the Project Implementation Unit arbitrates grievances between the Contractor and the PAPs, those that he is unable to resolve, the project coordinator escalates to the Ministry Director General
5.	MoEWR	Arbitrate grievances of aggrieved parties and refer issues to relevant Government institutions at the appropriate level whenever necessary.
6.	Regional court	All the grievances not resolved by the agreed GRM or which the aggrieved persons are dissatisfied with in terms of resolution, will be reverted to the complainant who will channel them to the Somalia court system, starting at Regional Court level.

6. COMPLAINT REGISTER

COMPLAINT/GRIEVANCE REGISTER	
Unique Reference No. Pre-Printed	Date:
Name of Complainant or Representative of group of complainants	
Contact Details of complainant or representative of group of complainants (if available), Anonymous complaints are also allowed	Residence:
	Telephone:
Location where complaint is received:	Location the grievance is related to:
State	State
Region	Region
District	District
Grievance is related to (nature of complaint):	
	Other
Description of Complaint:	
Grievance	Non-grievance (grievances not related to the project)
Name of Complainant:	Signature/Thumb print of Complainant
Name of witness (If available)	Signature/Thumb print of witness (If available)
Name of recipient	Signature of recipient
Mode of receipt	Phone:
	Letter:
	Verbal:

INVESTIGATION OUTCOME/RESOLUTION	
Reference no of registered complaint:	Date:
Name of complainant or representative of group of complainants:	
Contact details of complainant or representative of group of complainants (if available):	Residence:
	Telephone:
Location where complaint is received:	Location where complaint is related to:
County:	County:
Sub-County:	Sub-County:
Division:	Division:
Location:	Location:
Sub-location:	Sub-location:
Village:	Village:
Project	
	Other
Complaint is related to:	
Response to complainant (investigation outcome and resolution proposed)	
Acknowledgement of resolution by complainant: <i>I hereby acknowledge that the resolution provided by.....is acceptable to me and/or to the group that I represent.</i>	
Name/Thumb print of complainant or representative of group of complainants	Signature/Thumb print of complainant or representative of group of complainants
Name/thumb print of witness (if available)	Signature/thumb print of witness (if available)
Name of personnel	Signature of personnel

THE GRIEVANCE REDRESS MECHANISM PROCESS



ANNEX 4: SEAP GRM SOMALILAND

WASAARADDA TAMARTA IYO MACDANTA
"WT&M"
SOMALILAND, HARGEISA



MINISTRY OF ENERGY AND MINERALS
"MOEM"
SOMALILAND, HARGEISA

PROJECT IMPLEMENTATION UNIT

GRIEVANCE REDRESS MECHANISM PROCESS
of
Somalia Electricity Access Project - SEAP

7. INTRODUCTION

This Grievance Redress Mechanism (GRM) is prepared by the Somali Electricity Access Project (SEAP) for purposes of addressing and subsequent resolving grievances stemming from the implementation of the SEAP project, funded by the World Bank.

Ministry of Energy and Minerals and the Project Implementation Unit (PIU) will ensure that project affected persons are fully informed of the GRM and their role, procedure for filing/logging and redress of grievances at the earliest time possible. This will allow any potential grievance to be addressed as soon as possible.

Grievance is any complaint that is related to the project whereas non-grievance (in reference to grievance register) is any complaint that is not related to the project.

8. GRIEVANCE REDRESS MECHANISM TIERS

Tiers Levels	Membres
Tier 1 Contract/ activity level	3. contractor 4. Project legal Advisor
Tier 2 SEAP Project level	Project implementation unit.
Tier 3	3. Project coordinator 4. Director General of MOEM

NOTE

3. *The above would constitute the project GRM. If the project level GRM levels fail to resolve a case, the complainant is free to seek redress from other mechanisms such as the Somaliland legal/judicial systems or the World Bank's GRM which includes the Grievance Redress Service (GRS) and the Inspection Panel (IP) .*
4. *Responsibilities of the members in the different tiers is as per the verbatim in section 2.*

9. DESCRIPTION OF THE GRIEVANCE REDRESS MECHANISM

- ii. Eligibility to register a complaint or grievance.
 - Any person directly affected by the operation of the SEAP project; and
 - Residents interested in and/or affected by the project living in the affected areas.
 - Person's mandated to speak for directly affected persons.
4. The project level GRM has been designed to be accessible, effective, easy, and understandable and without costs to the complainant except if they choose to pursue the legal route.
5. Any grievance can be brought to the contract/activity (the lowest project implementation unit) grievance mechanism committee in writing, calling, WhatsApp, SMS, verbally in a face-to-face situation, email, or by filling in the grievance form. Complainants can choose to identify themselves or to remain anonymous or use third parties.
6. The SEAP project shall provide a grievance register log that will have all necessary elements to disaggregate the grievance by gender of the complainant as well as by type of grievance. Each grievance will be recorded in the register with the following information at minimum: description of grievance; date of receipt, description of actions taken (investigation, corrective measures), and date of resolution and closure/provision of feedback to the complainant.
7. All grievances shall follow the path of the following mandatory steps: receive, log, assess and assign, provide feedback to complainant/aggrieved, investigate, respond, follow-up and close-out.
8. A contract/activity grievance redress committee (GRC) shall be chaired by the legal specialist who will ensure complainants are able to register their grievances easily. The committee will assess the grievance and try to resolve it. In the event the matter is beyond the committee to deal with, the same will be referred to the project Implementation Unit.
9. The grievance logbook will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The information to be recorded will include:
 - Name, age, gender of complainant/third party
 - Date the complaint was reported;
 - Date the grievance logged;

- Date receipt of grievance was acknowledged
- Action taken;
- Date information on proposed corrective action sent to complainant (if appropriate);
- The date the complaint was resolved and closed; and
- Date response was sent to complainant.

10. Grievance Redress Mechanism Timing

No	Action	Timeframe
1	Acknowledgement of receipt of complaint	3 days
2	Sorting out complains, investigate, and assign for action	10 days
3	Resolution implementation	15 days
4	Frequency of updating the complainant about progress of the complaint resolution	Weekly

10. MONITORING COMPLAINTS

The activity/ contract Grievance Redress Mechanism committee shall be responsible for receiving and assessing the complaints as received and resolving where applicable. The activity/ contract GRMC will receive the forms and forward to the project legal specialist to follow up on the grievances. The legal specialist will determine whether the complaints need an administrative redress or can be solved at the contract/ activity level depending on the nature of the complaint. These processes will ensure transparency, fairness, consensus building across cases, eliminate unsubstantiated claims and satisfy legitimate claimants at low cost. It is notable that the response time will depend on the issue to be addressed but all measures will be put in place to ensure efficiency.

If the issue is not resolved at the activity/contract level, it will be escalated to the Project Implementation Unit.

If the grievance is not solved, the MOEM can mediate between Project and the complainant to find a solution after which if the issue is not resolved, the complainant can seek legal redress but as a last option, and at their own cost or seek the interfection of the World Bank’s GRS or Inspection Panel. MOEM will endeavor to solve all grievances without resulting to the courts or Bank intervention.

Note

MOEM at all means discourages complainants to revert to the courts or to the World Bank directly before exhausting the low-level mechanisms provided. This is because the process may cost more and take longer time.

11. STAKEHOLDERS RESPONSIBILITIES IN THE GRIEVANCE REDRESS MECHANISM

STEP	RESPONSIBILITY	REMARKS
7.	Complainant	Aggrieved Project Affected Person (PAP) or other interested party raises complaint to Scheme GR Committee (SGRC).
8.	Contract GRM Committee	Formed at the contract/activity level and includes members (project legal advisor, project technical expert and the contractor) and tasked with Assessment, Categorization of grievances, Reviewing and investigating of grievances and providing of solutions. If it is not resolved immediately it is forwarded directly to tier 2 through the legal advisor.
9.	Contractor	The Contractor resolves issues under his control. Any un-resolved issues are elevated to Project Committee.
10.	Project PIU	Consisting of the Project Implementation Unit arbitrates grievances between the Contractor and the PAPs, those that he is unable to resolve, the project coordinator escalates to the Ministry Director General
11.	MOEM	Arbitrate grievances of aggrieved parties and refer issues to relevant Government institutions at the appropriate level whenever necessary.
12.	Regional court	All the grievances not resolved by the agreed GRM or which the aggrieved persons are dissatisfied with in terms of resolution, will be reverted to the complainant who will channel them to the Somaliland court system, starting at Regional Court level.

12. COMPLAINT REGISTER

COMPLAINT/GRIEVANCE REGISTER	
Unique Reference No. Pre-Printed	Date received:
Name of Complainant or Representative of group of complainants	
Contact Details of complainant or representative of group of complainants (if available), Anonymous complaints are also allowed.	Residence:
	Telephone:
Location where complaint is received:	Location the grievance is related to:
State	State
Region	Region
District	District
Grievance is related to (nature of complaint):	
	Other
Description of Complaint:	
Grievance	Non-grievance (grievances not related to the project)
Name of Complainant:	Signature/Thumb print of Complainant
Name of witness (If available)	Signature/Thumb print of witness (If available)
Name of recipient	Signature of recipient
Mode of receipt	Phone:
	Letter:
	Verbal:

INVESTIGATION OUTCOME/RESOLUTION	
Reference no of registered complaint:	Date:
Name of complainant or representative of group of complainants:	
Contact details of complainant or representative of group of complainants (if available):	Residence:
	Telephone:
Location where complaint is received:	Location where complaint is related to:
City:	City:
District:	District:
Avenue:	Avenue:
Location:	Location:
Sub-location:	Sub-location:
Village:	Village:
Project	
	Other
Complaint is related to:	
Response to complainant (investigation outcome and resolution proposed)	
Acknowledgement of resolution by complainant:	
<i>I hereby acknowledge that the resolution provided by.....is acceptable to me and/or to the group that I represent.</i>	
Name/Thumb print of complainant or representative of group of complainants	Signature/Thumb print of complainant or representative of group of complainants
Name/thumb print of witness (if available)	Signature/thumb print of witness (if available)
Name of personnel	Signature of personnel

Annex 5: List of Participants

No.	Names	Institution	Title/Function
1	Abdisalam Abdullahi	MoEWR - PIU	Project Coordinator
2	Abdihamid Abdirahman	MoEWR – PIU	Social Specialist
3	Mohamed Fatih	MoEWR – PIU	Legal Specialist
4	Ismail Bashir	MoEWR – PIU	M&E Specialist
5	Abdiaziz Arte	MoEWR- PIU	Financial Specialist
6	Abdullahi Ahmed (Najib)	MoEWR- PIU	Environmental Specialist
7	Mohamud Abdulkadir	MoEWR – PIU	Technical Expert
8	Liban Ibrahim	MoEWR – PIU	Procurement Specialist
9	Amina Salat	Horizon Developments	Managing Director
10	Ali Botany	Horizon Developments	ES experts
11	Duncan Onyaro	ESF	Lead Consultants
12	Peter Kivuva	ESF	Consultants
13	Ismail Mohamed	Puntland State PEDA	Deputy Manager
14	Muna Abdillahi	Puntland State PEDA	Energy Director
15	Mohamud Abdullahi	Puntland State PEDA	Planning Officer
16	Omer Mohamed Jama	Puntland State Ministry of Energy	Planning Director
17	Mohamed Abdullahi	Jubaland State Ministry of Energy	Director of Energy Department
18	Abdulkadir Kadiye	Jubaland State Ministry of Environment	Environmental Technical Adviser
19	Aden A. Isaak	South West State Ministry of Energy	Director General
20	Abdulkadir Abuu	South West State Ministry of Environment	Environmental Governance Adviser
21	Aidid Abdulkadir	Galmudud State	Director of Energy Department
22	Abdinuur Khaliif	Galmudug State Ministry of Energy	Admin and Finance
23	Ummul-khair M.	Galmudug State Ministry of Energy	Environmental Governance Adviser
24	Yasin Ahmed	Hirshabelle State Ministry of Environment	Environmental Adviser
25	Ahmed Bulshale	Puntland State	Environmental Officer
26	Amina Salat	Horizon Developments	Managing Director
27	Ali Botany	Horizon Developments	ES experts
28	Duncan Onyaro	ESF	Lead Consultants
29	Peter Kivuva	ESF	Consultants
30	Mohamed Musse	Non- State Actors	Information Director
31	Mohamed Shakir	Directorate of Environment - OPM	Legal Compliance Director
32	Abdirizak Muse	NECSOM	General Manager
33	Mohamud A. Awad	WESCO	Chief Operating Officer
34	Abdikadir Hassan	Blue Sky	Chief Exective Officer
35	Eng. Abdiaziz Farah	ENEE	Chief Technical Officer
36	Mohamud Yassin	NEPCO	Chief Technical Officer
37	Adam Isak	BEC	Chief Technical Officer
38	Amina Salat	Horizon Developments	Managing Director

39	Ali Botany	Horizon Developments	ES experts
40	Duncan Onyaro	ESF	Lead Consultants
41	Peter Kivuva	ESF	Consultants
42	Eng siciid Mohamud	Business Development Manager	SECCCO
43	Eng. Bashir Mohamud	Managing Director	Dalsan Power
44	Yusuf Abdi	Operations Officer	Safa Energy
45	Mohamed abdirihim	Operations Manager	Hayle Barise
46	Mohamed Adil	Chief Operating Officer	Somnuur
47	Muse Kahiye	Managing Director	SunMax
48	Nur Abdiqadir	Operations Manager	Tamarso
49	Ishak Salad Dahir	CEO	TESCO
50	Abdihakim Shiekhdon	CEO	Delt Engineering
51	Hussein Kirow	Project Engineer	SolarGen Technologies
52	Yaasmin sheikhdoon	Chief Operations Officer	Samawat Energy
53	Sammy Ratemo	Environment and Social Specialist, TA	World Bank
54	Muhyiddin Sayid	Local Coordinator	Grant Facility, IBS
55	Ayanle Hussein	Benadir Regional Administration	Project Coordinator
56	Dahir Hamid	Office of the Attorney General	Legal Expert
57	Faisal Abdi	Garowe Municipality	Senior Safeguard Specialist-SURP working for the Garowe District
58	Kalif Dalmar	Office of the Prime Minister	safeguard specialist
59	Ahmed Ali	Federal Ministry of Labor and Social Affairs	Works for the Department of Legal and Labor Relations
60	Mrs. Abshira A.	Ministry and Labor, Youth and Sport (MoLYS),	Admin and Finance
61	Abdikafar Hassan	Federal Ministry of Humanitarian affairs and disaster management	Director of Humanitarian department
62	Jamal Farah, a	Federal Ministry of Internal Security	Senior Security Officer
63	Mr. Abdilatif J.	Private	Independent Security Consultant
64	Mohamed Bule Dahir	ARD (Action for Relief and development)	Deputy director
65	Amina Aden Shirw	Doha Center	Head
66	Ahmed Abdi Hashi	Juba IDP camp	IDP