

PREPARATION OF GENDER SENSITIVE AND CLIMATE-RESILIENT CITY WASH MASTERPLANS, MANAGEMENT MODALITIES AND TECHNICAL FEASIBILITY STUDIES FOR QARDHO AND SOUTH GALKAYO, SOMALIA

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ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA)FOR CONSTRUCTION AND REHABILITATION OF ONSITE WASTE WATER FACILITIES - 100NO. SEPTIC TANKS AND SOAKPITS FOR SOUTH GALKAYO, SOMALIA

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SUBMITTED BY

IN JOINT VENTURE

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LIST OF ABBREVIATIONS

AfDB African Development Bank BOD - Biological Oxygen Demand

CEDAW Convention on the Elimination of All Forms of Discrimination against

Women

C-ESMP Construction – Environment and Social Management Plan

CoC Code of Conduct

ESIRT Environment and Social Incidence Reporting Toolkit

EHS Environmental Health and Safety
EIA Environmental Impact Assessment

ESMP Environment and Social Management Plan

FAO Food and Agricultural Organization FGS Federal Government of Somalia GRC Grievance Redress Committee

GM Grievance Mechanism

GRM Grievance Redress Mechanism IDP Internally Displaced Person

IFC International Finance Cooperation
ILO International Labour Organization

H&S Health and Safety

NEMA - National Environmental Management Authority

MHM Menstrual Hygiene Management NGO Non-Governmental Organization

NOx Sulphur Oxides SOx Nitrogen Oxides

SOP Standard Operating Procedures
SEAH Sexual Exploitation and Abuse
SEP Stakeholder Engagement Plan

SH Sexual Harassment

SWALIM Somalia Water and Land Information Management

OHS Occupational, Health and Safety

Pm Particulate Matter

PPE Personal Protective Equipment

UNEP United National Environment Program

TMP Traffic Management Plan

ToR Terms of Reference

UNICEF United Nations Children Fund WHO World Health Organization

E.1 Definition of Terms

Table 0.1: Glossary Summary

Term	Definition
Effluent	Wastewater or treated water discharged from a treatment plant, septic tank, or industrial facility into the environment, typically into surface waters or for reuse.
Greywater	Wastewater generated from domestic activities such as laundry, dishwashing, and bathing, excluding toilet waste. It contains lower levels of contamination than blackwater.
Leach Field/Drain Field	A subsurface wastewater disposal system consisting of a network of perforated pipes laid in gravel-filled trenches that allows effluent from a septic tank to percolate into the surrounding soil.
Permeability	The ability of a porous material (such as soil or rock) to allow fluids to pass through it, critical for groundwater flow and septic system functionality.
Pit Latrine	A simple sanitation facility consisting of a hole in the ground over which a structure is built, used for the collection and containment of human waste. May be lined or unlined and can include various superstructure designs.
Sanitation	The provision of facilities and services for the safe disposal and treatment of human waste (urine and feces) and the maintenance of hygienic conditions through services such as garbage collection and wastewater disposal.
Sedimentation	A water or wastewater treatment process in which suspended particles settle out of the water by gravity in a clarification tank or basin.
Septic Tank	An underground watertight chamber constructed of concrete, fiberglass, or plastic, designed to receive and partially treat domestic wastewater through settling and anaerobic bacterial digestion before discharge to a drain field.
Sludge	The solid or semi-solid material that settles at the bottom of septic tanks, sedimentation basins, or wastewater treatment units, consisting of organic and inorganic matter requiring periodic removal.
Water Table	The upper surface of the zone of saturation in the ground where soil or rock is permanently saturated with water, representing the level below which groundwater is found.
Wastewater	Water that has been used and contains dissolved or suspended waste materials from domestic, commercial, or industrial sources, requiring treatment before discharge or reuse.
Wastewater Treatment Plant (WWTP)	A facility designed to treat wastewater from various sources through mechanical, biological, and chemical processes to remove contaminants before safe discharge to the environment or reuse.

F. EXECUTIVE SUMMARY

F.1 Project Information

The Federal Government of Somalia has applied for funding from the African Water Facility, to help improve adaptability to climate change and create society resilience through the Building Resilience to Climate Change through WASH in South Galkayo, Project. The Project will support immediate key interventions, undertake preparation studies for bankable projects, which will include identification of site-specific climate risks and vulnerabilities, determination of appropriate climate adaptation and mitigation measures including strengthening watershed and WASH management in the targeted towns of Galkayo and its respective peripheral urban poor settlements and villages.

UNICEF Somalia appointed Tertiary Consulting Engineers Ltd in Joint venture with Vital Care Consultancy Limited to carry out the study in six months and come up with bankable investment projects to address the water and sanitation inadequacy in the city of South Galkayo.

The consultant is required to perform a water and sanitation infrastructure and management baseline assessment. In this regard the team shall be required to analyze current water, solid waste, latrine and fecal sludge management/treatment, wastewater and storm water drainage conditions and modality/functionality of the water and sanitation service providers. The Environment and Social Impact Assessment discussed in this report discusses Construction and Rehabilitation of 100 onsite Waste Water Facilities- Septic Tanks proposed for South Galkayo, Somalia. The septic tanks will be distributed across South Galkayo town in various public institutions and receptors such as schools/educational centres, IDP camps, universities/colleges, hospitals, offices. Some notable institutions will include Galkayo University, Galkayo Hospital, Calanely IDP school and immigration offices among others with detailed coordinates elaborated in Chapter 2.

The proposed project will require a total estimated budget cost of 410,000 USD which comprises of 120,000 USD for construction and rehabilitation of septic tanks, 190,000 USD for community drive awareness programs and an ESMP implementation cost of 100,000 USD.

F.2 Construction and Rehabilitation of Waste Water Facilities

The scope of works for Galkayo is also detailed in the table below.

Table F.1: Summary of Proposed Scope

No.	Position/Description	Unit	Quantity
1.	Construction and rehabilitation of onsite waste water facilities- 100 Units of Septic tanks and soak pits -Public places and vulnerable communities	No.	100
2.	Community awareness drives	Job	1
3.	Introduce community-led maintenance plans with user contributions or fee systems, form & train Community Sanitation Committees to oversee shared facilities	L/S	1
4.	Public-Private Partnerships strategic plan for management	Job	1
5.	Construction of climate-resilient drainage protection works to installed sanitation facilities.	L/S	1

F.3 Objectives of ESIA

Reference is made to the African Development Bank adopted an Integrated Safeguards System (ISS) (also referred to as the "2023 ISS") Environmental and Social Operational Safeguard 1: Assessment and Management of Environmental and Social Risk and Impact. The aim of this overarching Operational Safeguard (OS), together with the other Operational Safeguards (Oss) that complement it, is to mainstream environmental and social (E&S) considerations, including those related to climate change vulnerability. into Bank operations and thereby contribute to sustainable development in the continent. Therefore, the Objectives of the ESIA are aligned to the provisions of relevant environmental laws of FSG and AfDB OS 1 as summarized below;

- Review existing information on environmental and socio-economic condition of the project area and baseline surveys.
- Review existing legal, institutional and policy framework relevant to the proposed project.
- Identify and evaluate significant potential impacts, both positive and negative of the proposed works.
- Provide appropriate mitigation measures for the management of environmental and social impacts associated with the Project
- Provide a platform for public and stakeholder to provide views, opinions and recommendations with regards to the Project.
- Develop and Environmental and Social Management Plan (ESMP) to guide in decision making and future auditing.
- To assess the relative importance of impacts of the alternative project designs, plans, materials and locations.

• Inform the Project design team on key Project components that require amendments or review in order the comply to safeguards provisions.

F.4 Legal and Policy Regulatory Instruments

Federal Government of Somalia

The ESIA made reference to below listed Legal and Policy provisions in Federal Government of Somalia

Table F.2: Summary of ESIA reference Legal Provisions

No.	Legal Provision	Description	
1.	Constitution of Somalia	Establishes the right to a clean and healthy environment	
	(2012)	(Art. 25) and obligates the state to protect ecosystems,	
		biodiversity, and natural resources (Art. 45).	
2.	National Environmental	Aims to promote sustainable development through	
	Policy (NEP) (2017	integrated environmental management, pollution	
		control, and natural resource conservation.	
3.	Climate Change Policy	Provides national direction for climate mitigation and	
	(2020)	adaptation, focusing on resilience in water, agriculture,	
		health, and energy sectors	
4.	National Adaptation	Framework for implementing Somalia's adaptation	
	Plan (NAP) Framework	priorities under the Paris Agreement	
5.	Environmental	Consolidates environmental protection measures,	
	Protection and	formalizes EIA and environmental audits, and	
	Management Act (2024)	strengthens enforcement	
6.	National Environmental	Updated NEP includes climate change, disaster risk	
	Policy (NEP	reduction, and sustainable resource management.	
7.	Environmental and	Provide detailed procedures for conducting EIAs,	
	Social Impact	audits, public participation, and disclosure	
	Assessment (EIA) and		
	Audit Regulations		
8.	Water Resources Law	Governs sustainable use, allocation, and protection of	
	E . 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	water resources; prohibits pollution of water sources	
9.	Forests and Wildlife Law	Provides for protection of forests, wildlife conservation,	
10	E. 1 . 1 (100E)	and biodiversity management	
10.	Fisheries Law (1985)	Regulates exploitation of marine resources, prohibits	
11	Environmental	discharge of pollutants into coastal waters	
11.	Environmental	Establishes environmental governance institutions,	
	Management Bill	introduces a formal EIA process, and defines penalties	
		for non-compliance	

Institutional Framework

The ESIA made reference to below listed private and public bodies with both direct and indirect influence to the proposed project.

Table F.3: Institutions legal framework

No.	Institution	Relevance		
1.	Ministry of	National policy oversight on environment, climate		
	Environment and	change, and safeguards; custodian of the Environmental		
	Climate Change	Protection and Management Act (2024) and EIA		
	(MoECC)	regulations.		
2.	Ministry of Energy	Oversees water policy, water quality standards,		
	and Water Resources	groundwater/water source protection, and wastewater		
	(MoEWR)	regulation at national level		
3.	Federal Member State	Responsible for the implementation and coordination of		
	Ministries	water resource management and infrastructure		
	(Galmudug)	development within the region.		
4.	UNEP - Environment	Providing environmental expertise, coordinating water		
	Program	management, fostering integrated water resource		
		management for resilience against drought and floods,		
		and promoting nature-based solutions.		
5.	UNICEF Somalia	Supports WASH programming in schools and health		
	centres; often co-funds or provides technical support in			
		sanitation projects		
6.	AfDB	Project financier; requires compliance with 2023 ISS.		
		Provides technical guidance, safeguard screening, and		
		monitoring during project lifecycle		

The African Development Bank Integrated Safeguards System (ISS)

In 2013, the African Development Bank adopted an Integrated Safeguards System (ISS) (also referred to as the "2023 ISS"), which established the Bank Group's commitment to sustainable development, consolidating and building on the Environment (2004) and Involuntary Resettlement (2003) safeguard1 policies, as well as cross-cutting policies and strategies on gender (Gender Strategy for 2021–2025, "Investing in Africa's Women to Accelerate Inclusive Growth"), and then the Civil Society Engagement Framework (2012).

The updated ISS improves the consistency of the Bank's approach to key thematic issues, Environmental and Social Assessment (ESA), and stakeholder engagement activities through their 10nr Oss. The 10nr E&S OSs set out the requirements for Borrowers relating to the identification and assessment of E&S risks and impacts associated with operations supported by the Bank.

The ten E&S OSs establish the standards that Borrowers shall meet, as appropriate, in projects, activities, and initiatives supported through Bank financing throughout the life cycle of operations. However, this project only triggers 8/10 of the OS as are summarized below.

Table F.4: AfDB Operational Safeguards summary

No	OS	Provisions	Relevance
1.	Operational	Assessment and Management of Environmental	Triggered
	Safeguard 1	and Social Risk and Impact	
2.	Operational	Labour and Working Conditions	Triggered
	Safeguard 2		
3.	Operational	Resources Efficiency and Pollution Prevention	Triggered
	Safeguard 3	Management	
4.	Operational	Community Health, Safety and Security	Triggered
	Safeguard 4		
5.	Operational	Cultural Heritage	Triggered
	Safeguard 8		
6.	Operational	Stakeholder Engagement and Information	Triggered
	Safeguard 10	Disclosure	

F.5 Baseline Setup

South Galkayo town is one of the largest cities in Somalia with an approximate population of 137,000 (International Crisis Group, 2015) which serves as the capital of the north-central Mudug region. It is semi-arid, receiving an average of only about 158mm of rainfall per year. Water sources include berkads (rainwater harvesting), shallow wells, and boreholes. The most reliable source of water is through the deep boreholes, although the water is brackish.

Half of households in Somalia reported lacking access to improved latrines. The situation is even more critical in high-density neighborhoods and informal IDP settlements, estimated at 72 verified IDP settlements as of March 2024, where sanitation facilities are overcrowded, poorly maintained, and often shared among many households. In some areas, significantly more common in rural areas than urban areas, open defecation is still practiced due to a lack of accessible, safe toilets. During rainy seasons, the absence of proper drainage leads to flooded latrines, which spread fecal matter across South Galkayo municipality and residential areas—posing severe public health risks, including outbreaks of cholera, diarrhea, and other waterborne diseases.

The town relies on ground water for domestic use, livestock, and small-scale farming. Boreholes are generally between 90 meters to 260 meters deep and in some areas can be 400 meters deep. Shallow wells are usually less than 20 meters deep. While yields vary from one aquifer to another, most shallow wells yield between 2.5 and 10 m3/hr., borehole yields are mostly between 5 to 20 m³/hr. (FAO/SWALIM, 2012). However, the water supply cannot meet the demand of the current population, and the quality of

Construction and Rehabilitation of Waste Water Facilities - 100No. Septic Tanks Proposed For South Galkayo, Somalia

water is saline requiring treatment to meet the WHO drinking water standards before distribution.

There are 14 no boreholes provide ground water source for South Galkayo town. The sources of energy for the water abstraction from boreholes are solar, power grid and generator. The boreholes are distributed to various locations in the town. Once the water is abstracted from it collected in the reservoirs, it is then distributed to the consumers through uPVC pipes which are laid along the road reserve. Both Arafat and Durdur Water companies have laid up their independent distribution network.

South Galkayo plays a vital economic role in central and southern Somalia, serving as a regional trade and service hub that connects southern regions, Galmudug State, and neighbouring Ethiopia. The town's economy is driven by a mix of formal and informal activities, with wholesale and retail trade forming a core income source. Shops and markets supply both imported goods—such as foodstuffs, fuel, and household items—and local products, making South Galkayo a major distribution point for surrounding rural areas.

Livestock and livestock products remain a critical economic driver, with Galkayo functioning as a major livestock trading centre that connects producers from rural areas with export routes through ports like Bossaso. The service sector—closely tied to this trade—supports veterinary services, transportation logistics, and export facilitation, creating employment opportunities across the town. Overall, South Galkayo's economy reflects a dynamic mix of trade, services, and remittance-fuelled entrepreneurship, which are vital to both urban livelihoods and rural-urban linkages.

Charcoal, used by wealthier households, and fuelwood, used by poorer households, restaurants and bakeries, provide most of the energy for cooking in Galkayo town. Unplanned urban development has led to deforestation for charcoal/fuelwood production, unsanitary living conditions (lack of sewage treatment and proper waste disposal) and possible overexploitation of water resources.

The current climate variability of Somalia is that the amount of rainfall received across the country varies dramatically in time and space, from drought periods to erratic periods of intense downpours and flooding. The prominent observation from analysis of the weather station rainfall data, across all regions and seasons in Somalia, demonstrates a high inter-annual and inter seasonal variation in rainfall is shown to vary between the range of 57 mm and 660 mm at one weather station in central Somalia during a 20-year observation period (UNDP/ICPAC, 2013). Galmudug state,

characterized by its hot, arid to semi-arid conditions has seasonal rainfall variations averaging 200mm.

Since 1960s, Somalia has experienced at least one major climate extreme event in each decade (Balint et al 2011). Major floods that have been experienced since 1960 include 1961, 1977, 1981, 1997-98, 2005, 2006 and 2009. Major drought events were experienced in 1969, 1976, 1984, 1987, 1999, 2001, 2004 and 2010. In the past decade (2001 to 2010), the country has been alternating from drought to floods within the years (FAO SWALIM, 2012). The observed pattern (IPCC 2007, 2012) shows increasing variability in rainfall for Somalia suggesting an increase in the frequency and severity of future droughts and flash flood events. Somalia is vulnerable to several natural hazards, including drought and floods, and is projected to be at even greater risk in the future due to climate change. The climate is mainly arid to semi-arid, and Somalia has one of the highest inter-annual variations of rainfall in Africa.

F.6 Stakeholder Consultations

A total of 5 key informant interviews and 6 Focused Group Discussions (FGD) were conducted with representatives from the following sectors from 29th May 2025 – 4th June 2025. Additionally, Public participation forums were held from 3rd to 4th September, 2025 at the Five Star Hall Galkayo South.

Table F.5: Key Informant Interviews

Institution/Stakeholder	Date	Key Issues Discussed
Ministry of Women and Human Rights Development (MoWHRD) - Galmudug	-	Gender gaps in WASH policies, GBV referral pathways, FGM prevalence, and MHM needs
Ministry of Water and Energy - South Galkayo Office	May 30 th 2025	Access to safe water, community water management, wastewater management, challenges in IDP settlements
Galkayo Local Authority (Municipal Office)	May 29 th 2025	Urban sanitation, solid waste management, and community infrastructure needs
Ministry of Health - Galkayo Hospital	June 4 th 2025	Public health and hygiene, links between WASH and maternal/child health
Representatives from Local NGOs (e.g., CISP)	June 4 th 2025	Women's participation in service delivery, local, GBV issues, WASH interventions, community outreach

Table F.6: Focus Group Discussions

Group Type	Date	Location	Key Issues Raised
Women-headed households (IDP camp)	June 1st 2025	-	Long distances to water points, lack of latrines, MHM challenges, security concerns
Adolescent girls (ages	May 31st	Hayaan	Lack of MHM materials, school attendance

Group Type	Date	Location	Key Issues Raised
13–18)	2025	Bacaadweyne Camp	issues, privacy in sanitation facilities
Men (local leaders & elders)	May 30 th 2025	Town Center Community roles in infrastructure, tr norms, support for water systems	
Female youth (ages 18–30)	May 31st 2025	Llown Center	Vocational needs, participation in water committees, menstrual stigma
Male youth	r .	South Galkayo Market	Livelihood challenges, involvement in hygiene promotion, water source maintenance
Women entrepreneurs	r .	,	Access to microfinance, sanitation in market areas, female business participation

Table F.7: Public Forums on $3^{\rm rd}$ to $4^{\rm th}$ September, 2025 at Five Star Hall

#	Issue	Mitigation
2	Despite the positive outcomes, the project may generate environmental and social risks. These include vegetation loss, soil degradation, and pollution of water resources.	assessment (EIA) recommendations and environmental management plans (EMPs) must
3	A labor influx management plan and community awareness programs on health, gender, and education are recommended.	Local labor should be prioritized, and contractors must follow fair labor standards
4	Health and safety risks can be mitigated by enforcing occupational safety standards, providing personal protective equipment (PPE), training workers regularly, and monitoring pollution levels with appropriate dust and noise control measures.	will allow timely corrective actions, while a grievance redress mechanism will ensure community concerns are addressed. Alignment

F.7 Project Positive Impacts

Construction phase positive

- Employment Creation: At construction stage, workers will be deployed to help in construction and land preparation activities. This will include both skilled and unskilled personnel especially from the local population. The estimated job opportunities will be approximately 200 with 60-70% of workforce occupied by unskilled personnel and 30-40% occupied by skilled personnel.
- Income/Revenue to Government: Income to government will be realized in terms of taxes generated during the acquisition of relevant statutory licenses which include but are not limited to Water Services License, EIA License, Business permit, Operators permit among others. Materials to be used during construction will also be taxable through revenues generated, the government will be capable of financing its responsibility to her citizens.
- Income to Other Businesses: During implementation of the project, there will be need for transporters, suppliers of raw materials and other service providers, who will benefit from the proposed development.

Sanitation Interventions - Operation phase positive impacts

- Reduced pollution of natural hydrological systems in the area.
- Reduced cases of water borne diseases associated with pollution of water resources by raw sewage.
- Improve aesthetic outlook of Galkayo municipality that is currently comprised by raw sewer.
- Trigger development of modern infrastructure within Galkayo town due to availability of adequate sewer infrastructure.
- Reduce distances covered by exhausters to sludge discharge points (reduced costs).
- Residents will decommission pit latrines which are expensive to construct and unsustainable in the long run due to short fill-up duration.

F.8 Construction Phase Negative Impacts

A summary of negative Impacts anticipated during construction stage are summarized in the table below.

Table F.8: Construction Stage Negative Impacts and Impact Ranking

Impact Area	Negative Impact	Ranking	Mitigation Measures
Water Resources	Risk of surface/groundwater contamination from spills, construction runoff, or improper waste disposal	High	Bund storage areas, proper containment, designated waste disposal sites
Soil Resources	Excavation and compaction leading to erosion and soil degradation	Medium	Controlled excavation, backfilling, soil stabilization, revegetation
Air Quality	Dust and emissions from excavation, trucks, and machinery	Medium	Water sprinkling, covering stockpiles, maintain equipment to reduce exhaust
Noise & Vibration	Disturbance to nearby communities and institutions	High	Limit works to daytime, use silencers, notify stakeholders in advance
Flora	Loss of vegetation during site clearance	Low	Minimize clearing, replant disturbed areas, preserve mature trees where possible
Solid & Liquid Waste	Generation of construction debris, packaging, oils, and wastewater	High	Waste segregation, recycling, proper disposal in designated facilities

F.9 Operation Phase Negative Impacts

Sanitation Interventions

The short-term interventions as detailed in the feasibility report will entitle (i) Deploy mobile desludging units to empty overflowing latrines, (ii) Construct emergency latrines and soak pits in high-density or flood-prone zones, (iii) Construction and rehabilitation of onsite waste water facilities- 100 Units of Septic tanks and soak pits -Public places and vulnerable communities and (iv) Pilot decentralized wastewater treatment at public institutions - (Hospitals/Health centers and schools).

This ESIA Report covers the negative impacts for Construction and Rehabilitation of onsite waste water facilities-100 units of septic tanks and soak pits- Public places and vulnerable communities.

The interventions will pose negative pollution related impacts during operation that will be mitigated as summarized below.

Table F.9: Operation Stage Negative Impacts and Impact Ranking

Impact Area	Negative Impact	Ranking	Mitigation Measures	
Water	Contamination from improper	High	Proper and periodic maintenance of the	
Resources	handling/discharge of sludge,		facilities, Regular cleaning of grit	
	Pollution of Water Resources by		chambers, Construct manholes to	
	raw sewage		withstand anticipated loads, Address	
			blockages promptly.	
Soil	Potential contamination from	Medium	Secondary containment for chemicals,	
Resources	accumulating chemicals and		ensure proper sizing to prevent	
	organic matter		overloading, monitoring soil conditions	
Air Quality	Odor emissions from treatment	Medium	Odor control systems, ventilation, PPE	

	processes		for workers
Solid Waste	Generation of sludge	High	Safe disposal of sludge, total covering of
	_		access points
Public	Disease transmission through	Medium	Ensure all access points are properly
Health &	contaminated ground water, vector		sealed, eliminate standing water around
Safety	breeding grounds for mosquitos		the facilities.

F.10 Environmental and Social Management Plan

Table F.10: ESMP Summary

Anticipated Impact	Mitigation Measures	Responsibility	Monitoring Parameter	Budget (USD)
Contamination, disruption of drainage	Proper pipeline alignment; install silt traps; no waste dumping in water sources	Contractor, Supervising Engineer	Water quality checks; drainage condition	4,500
Erosion, loss of topsoil, contamination	Stockpile topsoil; erosion control; safe fuel/oil storage	Contractor, EHS Officer	Area disturbed vs. footprint; evidence of erosion; spill records	5,000
Dust nuisance, respiratory impacts	Water spraying; cover stockpiles; maintain equipment	Contractor, EHS Officer	Dust levels (visual); service logs; complaints	3,500
Nuisance to communities/workers	Restrict works to daytime; maintain equipment; provide ear protection	Contractor, Clerk of Works	Noise readings; PPE use; complaints	2,500
Vegetation loss, habitat disturbance	Minimize clearance; avoid unnecessary removal; restore disturbed areas	Contractor, District Environmental Office	Area cleared vs. design; restoration evidence	3,000
Accidents, restricted access, conflicts	Fence sites; provide signage; traffic management plan; awareness sessions	Contractor, Local Administration	Records of accidents; fencing/signage present; grievance log	5,500
Accidents, injuries, unsafe exposure	Provide PPE; training; enforce protocols; emergency preparedness	Contractor, Supervising Engineer	Incident records; PPE provision; training logs	6,500
Strain on services, GBV/SEA incidents,	Hire locally; enforce Code of	Contractor, District Labor	% local hires; GBV/SEA cases	5,500

tension	Conduct; GBV/SEA awareness and reporting	Office	resolved; grievances	
Pollution, soil/water contamination	Segregate waste; provide bins; licensed hauler; prohibit open burning	Contractor, Local Authority	Waste disposal records; site condition	4,000
Loss of cultural heritage	Train workers; stop work & notify authorities	Contractor, Supervising Engineer	Records of chance finds & actions taken	1,000
				41,000

F.11 Findings and Recommendations

The AfDB has an ISS that includes Operational Safeguards (OS), and Environmental and Social Procedures (ESAP) used for risk assessment and classification. This particular proposed project is under category 2.

Assessment Recommendations:

- The Bid documents prepared for the Project incorporate the Environment, Social Health and Safety Provisions discussed under Chapter 7 of this report (Environment and Social Impact Assessment and Mitigation Measures).
- The contractors through the support of ESHS officer will ensure that all workers sign Code of Conduct (CoC) before site deployment
- The supervising and contractor will undertake training of personnel on Environment, Social, Health and Safety matters tailored to the Project Scope prior to commencement of works
- The contractor will through the ESHS officer apply the provision of Environment and Social Management Toolkit (ESIRT) in management of incidences and accident's during project implementation stage
- The contractor will prepare monthly and quarterly reports on status of implementation of Environment and social compliance measures discussed in this report.
- Contractor will be required to commit to implementing the Environment, Social Health and Safety (ESHS) Provisions by (ii) Hiring ESHS officers, (ii) Developing site specific (C-ESHS) and Sub Plans listed under Table 7-1 and (iii) Implement Provisions of the Plans and Undertake Monthly and Quarterly reporting of ESHS compliance.

1. BACKGROUND INFORMATION

1.1 Project Information

South Galkayo, located in the Mudug region of Somalia and serving as a major urban center in Galmudug State, is experiencing rapid urbanization driven by rural-urban migration, internal displacement due to conflict and climate shocks, and natural population growth. Over the past decade, this growth has strained the town's limited infrastructure, especially its water, sanitation, and hygiene (WASH) services. The town's sanitation challenges are compounded by its arid climate, limited government capacity, and recurring episodes of drought and conflict that continue to displace populations from surrounding rural areas.

The majority of South Galkayo residents rely on on-site sanitation solutions, primarily traditional pit latrines and unlined or poorly constructed septic tanks, many of which are located in high-density and flood-prone areas. These facilities are often inadequate, unsafe, and unhygienic, leading to frequent overflows, groundwater contamination, and the spread of disease. The situation is particularly dire in informal settlements and IDP camps, where poor access to desludging services and waste management exacerbates the risk of public health crises.

With a population exceeding 100,000 as of 2023 and early 2024, including more than 14,000 IDPs, South Galkayo's existing water and sanitation systems are overwhelmed. Water supply remains irregular and expensive, disproportionately affecting vulnerable groups such as women and children, who often bear the burden of water collection. Sanitation services are equally deficient, especially in schools, health facilities, and informal settlements, where sharing of basic toilets is common. Fecal sludge management (FSM) is non-functional, and there is no city-wide sanitation strategy or reliable infrastructure to support future growth

The Terms of Reference (ToR) for this project stress the urgent need to develop climate-resilient, scalable, and context-appropriate sanitation solutions for South Galkayo. This includes decentralized wastewater treatment systems (DEWATS), fecal sludge treatment plants (FSTPs), and resilient on-site sanitation options, particularly for high-risk, flood-prone, and informal settlements. The sanitation master plan must also integrate land use, population projections, and infrastructure planning while promoting community engagement and institutional coordination. To address these gaps, the Federal Government of Somalia – with support from the African Water Facility – is implementing the "Building Resilience to Climate Change through WASH in South Galkayo" project.

1.2 The Project Location

South Galkayo is located in the southern part of Galkayo City, within the Mudug region of Somalia's Galmudug State. The town lies within the catchment of several seasonal drainage channels that flow from the surrounding semi-arid plateaus during the Gu (April–June) and Deyr (October–December) rainy seasons. These ephemeral waterways, commonly known as "Toggas", temporarily carry stormwater runoff, often resulting in localized flooding in low-lying neighbourhoods. While these seasonal rivers remain dry for much of the year, their impact during

rainfall events is significant, particularly in informal settlements and flood-prone zones across South Galkayo.

The location of the town is as presented in the figure below in the Federal Republic of Somali.

Figure 1.1: Study Area of South Galkayo

The septic tanks will be distributed across South Galkayo town in various public institutions and receptors such as schools/educational centres, IDP camps, universities/colleges, hospitals, offices. Some notable institutions will include Galkayo University, Galkayo Hospital, Calanely IDP school and immigration offices among others with detailed coordinates elaborated in Chapter 2. The proposed locations of the septic tanks are as presented in the table1-1 and figure1-2 below;

Table 1.1: Summary distribution of Septic Tanks

Institution Category	Institution Name	Number of septic tanks
University	Galkayo University	1
	Galkayo University Main Campus	2
Hospital	Galkayo Hospital	4
	Irid Banaanka Hospital Al Ixsaal	1
Educational Centres	Prof Adow Professional Training Centre	4
	Sh Xasan Xusen Naaleye	1
	Cabdirisaq Xirsi tahliil	1
	Riyadh Al-Saleheen Educational Center	1
Offices	Immigration offices	1
	Gaalkacyo Local Goverment Office	1
Secondary Schools	SHEIKH ALI SAMATER PRI & SEC SCH	2
	AL_BIRRI PRI & SEC SCH	1
	Abdullahi Isse Secondry School	1
	SYL Sec Sch, Gaalkacyo	2

	Markazul Ibnu Mascuud sch	1	
	Mustaqbal secondary	1	
IDP Schools	IDP camp school in Haar haar adjacent	1	
	camp		
	Haar haar IDP camp school	2	
	Hawlwadaag IDP School	1	
	Calanely IDP School	1	
Religious Schools	Imam Al-Muzni Institute for Islamic	1	
	Studies and Arabic Language		
	Machadka Al-Misbaax Ee Barashada Diinta	1	
	Islamka- Religious sch		
Colleges	Imaamu nawawi college	1	

Figure 1.2: Layout of proposed septic tank installation

Source: Google Earth

Galkayo is located in the north-central part of Somalia, and is the capital of Mudug region, which connects the Northern and Southern parts of the country. Also, the town is located at an intersection crossroad area, which makes South Galkayo a thriving trade town. Goods from the Bosaso port in the north-east, Berbera in the north-west, agricultural products from the south and livestock from Ethiopia all find their way and exchange hands in Galkayo. The distance from

Galkayo to Somalia's Capital City of Mogadishu is approximately 721 km and it is 229km from Garowe, Puntland state of Somalia. Its Global Positioning System is 6° 47' 14.1828" N and 47° 26' 21.2496" E.

1.3 Local Administration

Galkayo is a major city in central Somalia and is divided into two administrative zones: North Galkayo, administered by Puntland, and South Galkayo, which serves as a key district under the Galmudug State in Somalia's federal system. South Galkayo is the administrative capital of the Mudug region within Galmudug and plays a central role in the region's governance and service delivery. The town's administration is led by a local council and a mayor, who are responsible for overseeing essential public services including sanitation, water supply, health, and urban development. The implementation of decentralization reforms and democratization efforts, such as local elections, has further shaped governance in the area.

South Galkayo has a diverse and densely settled population, made up of multiple Somali clan groups, with major representation from the Hawiye clan family, particularly the Sa'ad sub-clan of Habar Gidir. Population estimates are critical for effective planning, especially in managing urban expansion, internal displacement, and resource allocation. The presence of both permanent residents and a large number of internally displaced persons (IDPs) at Haar Haar, Calanely and Hawlwadaag IDP camps due to recurrent droughts and conflict has significantly increased pressure on basic services, particularly in informal settlements. This dynamic population landscape highlights the need for inclusive, data-driven urban governance and sustainable infrastructure development.

1.4 Objectives of ESIA

Reference is made to the African Development Bank adopted an Integrated Safeguards System (ISS) (also referred to as the "2023 ISS") Environmental and Social Operational Safeguard 1: Assessment and Management of Environmental and Social Risk and Impact. The aim of this overarching Operational Safeguard (OS), together with the other Operational Safeguards (OSS) that complement it, is to mainstream environmental and social (E&S) considerations, including those related to climate change vulnerability. into Bank operations and thereby contribute to sustainable development in the continent. Therefore, the Objectives of the ESIA are aligned to the provisions of OS 1 as summarized below.

- Screen and categorize the project according to the significance of its potential environmental and social impacts, in line with the AfDB's Operational Safeguard 1 (OS 1) classification system.
- Define the scope of assessment (scoping) to identify key environmental and social issues, areas of influence, and project components requiring detailed study.
- Review existing information on environmental and socio-economic condition of the project area and baseline surveys.
- Review existing legal, institutional and policy framework relevant to the proposed project.
- Identify and evaluate significant potential impacts, both positive and negative of the proposed works.

- Provide appropriate mitigation measures for the management of environmental and social impacts associated with the Project
- Provide a platform for public and stakeholder to provide views, opinions and recommendations with regards to the Project.
- Develop and Environmental and Social Management Plan (ESMP) to guide in decision making and future auditing.
- To assess the relative importance of impacts of the alternative project designs, plans, materials and locations.
- Inform the Project design team on key Project components that require amendments or review in order the comply to safeguards provisions.

1.5 Assessment Methodology

The assessment was guided by Good International Industry Practice (GIIP) guide on preparation of Environmental and Social Impacts assessments as presented in **figure 1.3** below.

Figure 1.3: Impact Assessment Process

1.5.1 Initial Screening and Baseline Assessment

To provide a context within which the impacts of the Project can be assessed, a team of environmentalists undertook a site visit within the months of May and June, 2025 along the proposed project locations using the Project KML files. The purpose of the visit was to identify bio physical and socio-economic data and receptors. The focus was to understand the baseline setup of flora and fauna, water resources, soils, land use and landscape as well as secondary literature review.

1.5.2 Stakeholder Engagement

Galkayo, Somalia

Stakeholder engagements inform of community meetings, Key Informant Interviews (KII) and Focused Group Discussions (FGD) were conducted during the ESIA process to inform project stakeholders of the proposed project and explain the likely impacts, both positive and negative, during the project life cycle. Stakeholder Identification and analysis was done in close liaison with the local administration with Galkayo Town. Detailed Stakeholder Consultation process is presented separately under chapter 5 of this report.

1.5.3 Impact Assessment Methodology

Impact identification and assessment starts with scoping and continues through a structured impact assessment process. The principal steps followed are summarized in **Figure 1.3** above and comprises the below listed steps.

Table 1.2: Principal Steps of Impact assessment

Step 1 -	Impact prediction - This step involves identifying and forecasting the potential
	environmental and social impacts that could result from the proposed Project and
	its related activities. Environmental resources likely to be impacted may include
	air, water, soil and biodiversity while social receptors include land use, business
	disruptions, and vulnerable groups
Step 2 -	Impact evaluation -Once potential impacts are identified, they are assessed to
	determine their overall significance. This evaluation considers, the magnitude of
	the impacts, the sensitivity and values of the affected environmental or social
	receptors.
Step 3 -	Mitigation and enhancement - Appropriate measures are proposed to address
	the impacts identified. For negative impacts, mitigation measures are designed to
	avoid, minimize, reduce or compensate for the adverse effects on the environment
	and communities. As for positive impacts, enhancements measures are developed
	to strengthen the beneficial outcomes
Step 4 -	Residual impact evaluation – This final step involves reassessing the significance
	of impacts after applying the proposed mitigation and enhancement measures. It
	helps in determining residual impacts that would remain even with effective
	implementation of the measures. This evaluation is essential in analysing the
	sustainability of the proposed mitigation measures and in making informed
	decision making including the need for additional safeguards

1.5.4 Impact Evaluation Methodology

Impact evaluation is a structured and detailed assessment process used to determine the significance of the identified impacts in Step 1. This process involves key steps, commencing with the characterization of each potential impact and finalising with an overall significance rating. The process is outlined below.

Characterizing Impact Attribute.

The terminology used to describe impact characteristics is shown in the table below

Table 1.3: Impact characteristics

Characteristic	Definition	Designation
Туре	A Descriptor indicating the relationship of the	Direct, Indirect, Induced
	impact to the Project (in terms of cause and effect	i I
Extent	The 'reach' of the impact (e.g., confined to a small	Local, Regional, International
	area around the Project Footprint, Projected for	1 1
	several km etc.)	
Duration	The time period over which a resource/ receptor	Temporary, Short term, long term
	is affected	Permanent
Scale	The size of the impact (e.g., the size of the area	No fixed designation, intended to be
	damaged or impacted, the fraction of a resource	a numerical value or a qualitative
	that is lost or affected, etc.)	description of intensity
Frequency	A measure of the constancy or periodicity of the	No fixed designation, intended to be
	impact	a numerical value or a qualitative
	1 1	description

2. Impact Type Definitions

The type of impact is further defined as follows in the table below

Table 1.4: Impact Type Definitions

Definition	Designation
Direct	Impacts that result from a direct interaction between the Project and a resource/receptor
	(e.g., between occupation of a plot of land and the habitats which are affected
Indirect	Impacts that follow on from the direct interactions between the Project and its environment
	as a result of subsequent interactions within the environment (e.g., viability of a species
	population resulting from loss of part of a habitat as a result of the Project occupying a plot
	of land).
Induced	Impacts that result from other activities (which are not part of the Project) that happen as a
	consequence of the Project (e.g., influx of camp followers resulting from the importation of a
	large Project workforce).

3. Unplanned Events and Likelihoods

For unplanned events such as accidental spills or equipment failures, an attribute described as likelihood is assessed. This refers to the probability of an event occurring during the Projects lifecycle under normal operating conditions. The likelihood of an unplanned event occurring is designated using a qualitative scale, as described in the table below.

Table 1.5: Definition of Likelihood

Likelihood	Definition
Unlikely	The event is unlikely but may occur at some time during normal operating conditions
Possible	The event is likely to occur at some time during normal operating conditions.
Induced	Impacts that result from other activities (which are not part of the Project) that happen as a
	consequence of the Project (e.g., influx of camp followers resulting from the importation of
	a large Project workforce).
Likely	The event will occur at normal operating conditions (i.e., it is essentially inevitable).

4. Assigning Magnitudes.

Once an impact's characteristics are defined, each impact is assigned a magnitude which is a measure of the severity of the impact on the resource or receptor. Magnitude is a function of a combination of the following impact characteristics:

- Extent
- Duration
- Scale
- Frequency

The magnitude designations themselves are universally consistent, but the descriptions for these designations vary on a resource/receptor-specific basis. The universal magnitude designations are:

- Positive
- Negligible
- Small
- Medium
- Large

In the case of a positive impact, no magnitude designation (aside from 'positive') is assigned. It is considered sufficient for the purpose of the area of influence to indicate that the Project is expected to result in a positive impact, without characterizing the exact degree of positive change likely to occur.

In the case of impacts resulting from unplanned events, the same resource/receptor-specific approach to concluding a magnitude designation is utilized, but the 'likelihood' factor is considered, together with the other impact characteristics, when assigning a magnitude designation.

5. Evaluating Sensitivity, Vulnerability and Importance

Parallel to magnitude, the sensitivity, vulnerability and importance of each affected resource or receptor are assessed. These terms collectively describe how susceptible the receptor/resource is to be impacted. Considerations may include legal protection, government policy, stakeholder views and economic or cultural value.

As in the case of magnitude, the sensitivity/vulnerability/importance designations themselves are universally consistent, but the definitions for these designations vary on a resource/receptor basis. The sensitivity/vulnerability/importance designations used herein for all resources/receptors are:

- Low
- Medium
- High

6. Determining Impact Significance

Once the magnitude of impact and sensitivity/vulnerability/importance of resource/receptor are characterized, the significance was assigned for each impact. Impact significance was designated using the matrix shown in the table below.

Table 1.6: Impact Significance

		Sensitivity/Vulnerability/Importance of Resource/Receptor			
Magnitude of		Low	Medium	High	
Impact	Negligible	Negligible	Negligible	Negligible	
	Small	Negligible	Minor	Moderate	
	Medium	Minor	Moderate	Major	
	Large	Moderate	Major	Major	

The matrix applies universally to all resources/receptors, and all impacts to these resources/receptors, as the resource/receptor-specific considerations were factored into the assignment of magnitude and sensitivity, vulnerability and importance designations that enter into the matrix.

1.5.5 Mitigation and Enhancement Measures

Further, once the significance of an impact was characterized, the next step was to evaluate what mitigation and enhancement measures are warranted. For the purposes of this assessment, the following order or hierarchy was applied for development of mitigation:

- Avoid at Source, reduce at Source: avoiding or reducing at source through the design of the Project (e.g., avoiding by siting or re-routing activity away from sensitive areas or reducing by restricting the working area or changing the time of the activity).
- Abate on Site: add something to the design to abate the impact (e.g., pollution control equipment, traffic controls, perimeter screening and landscaping).
- Abate at Receptor: if an impact cannot be abated on-site then control measures can be implemented off-site (e.g., noise barriers to reduce noise impact at a nearby residence or fencing to prevent animals straying onto the site).
- Repair or Remedy: some impacts involve unavoidable damage to a resource (e.g., agricultural land and forestry due to creating access, work camps or materials storage areas) and these impacts can be addressed through repair, restoration or reinstatement measures.
- Compensate in Kind, Compensate Through Other Means: where other mitigation approaches are not possible or fully effective, then compensation for loss, damage and disturbance might be appropriate (e.g., planting to replace damaged vegetation, financial compensation for damaged crops or providing community facilities for loss of fisheries access, recreation and amenity space).

The priority in mitigation for the Project was to first apply mitigation measures to the source of the impact (i.e., to avoid or reduce the magnitude of the impact from the associated Project activity), and then to address the resultant effect to the resource/receptor via abatement or compensatory measures or offsets (i.e., to reduce the significance of the effect once all reasonably practicable mitigations have been applied to reduce the impact magnitude

Residual Impact

In addition, once mitigation and enhancement measures were specified the next step in the Impact Assessment Process was to assign residual impact significance. This is essentially a repeat of the impact assessment steps discussed above, considering the implementation of the proposed mitigation and enhancement measures.

1.5.6 Management and Monitoring and Audit

The final stage in the impact assessment process was the development of a management plan for implementing controls and mitigation and monitoring effectiveness. Monitoring is done to verify that: a) impacts or their associated project components remain in conformance with applicable standards; and b) mitigation measures are effectively addressing impacts and compensatory measures and offsets are reducing effects to the extent predicted. An Environmental and Social Management Plan (ESMP), which is a compilation of all actions identified in the impact assessment, is provided in Chapter 7. This includes mitigation measures, compensatory measures and offsets and management and monitoring activities.

2. PROPOSED PROJECT DESCRIPTION

2.1 Project Proponent

The project is promoted by HODMAN Co. in collaboration with local authorities (Galmudug State members and development partners such as Ministry of Energy and Water Resources, with technical support aligned to AfDB and UNICEF water sector interventions. The proponent is responsible for financing, construction oversight, and eventual operation and maintenance of the components.

2.2 Proposed Waste Water Facilities in South Galkayo - Project Components

A summary of the scope based on the Detailed Design is given in Table 2-1 below

Table 2.1: Summary of the Proposed Project scope in Galkayo

No.	Position/Description	Unit	Quantity
1.	Construction and rehabilitation of onsite waste water facilities- 100 Units of Septic tanks and soak pits -Public places and vulnerable communities	No.	100
2.	Community awareness drives	Job	1
3.	Introduce community-led maintenance plans with user contributions or fee systems, form & train Community Sanitation Committees to oversee shared facilities	L/S	1
4.	Public-Private Partnerships strategic plan for management	Job	1
5.	Construction of climate-resilient drainage protection works to installed sanitation facilities	L/S	1

Table 2.2: Summary distribution of Septic Tanks

Institution Category	Institution Name	Number of septic tanks
University	Galkayo University	1
	Galkayo University Main Campus	2
Hospital	Galkayo Hospital	4
	Irid Banaanka Hospital Al Ixsaal	1
Educational Centres	Prof Adow Professional Training Centre	4
	Sh Xasan Xusen Naaleye	1
	Cabdirisaq Xirsi tahliil	1
	Riyadh Al-Saleheen Educational Center	1
Offices	Immigration offices	1
	Gaalkacyo Local Goverment Office	1
Secondary Schools	SHEIKH ALI SAMATER PRI & SEC SCH	2
	AL_BIRRI PRI & SEC SCH	1
	Abdullahi Isse Secondry School	1
	SYL Sec Sch, Gaalkacyo	2
	Markazul Ibnu Mascuud sch	1
	Mustaqbal secondary	1
IDP Schools	IDP camp school in Haar haar adjacent	1

	camp	
	Haar haar IDP camp school	2
	Hawlwadaag IDP School	1
	Calanely IDP School	1
Religious Schools	Imam Al-Muzni Institute for Islamic	1
	Studies and Arabic Language	
	Machadka Al-Misbaax Ee Barashada Diinta	1
	Islamka- Religious sch	
Colleges	Imaamu nawawi college	1

2.3 Project Location

The proposed septic tanks can be summarized in location in the table below;

Table 2.3: Location of Proposed Septic Tanks

Institution Name	No. of Septic	Latitude	Longitude
Galkayo University	1	6.749457852	47.42811414
Galkayo University Main Campus	2	6.752287218	47.42322456
		6.752564116	47.42282178
		6.746306246	47.42793195
Galkayo Hospital	4	6.746175524	47.42742946
		6.746497411	47.42717301
		6.746860018	47.42780599
Irid Banaanka Hospital Al Ixsaal	1	6.761646064	47.43301339
		6.746514738	47.42412705
Prof Adow Professional Training Centre	4	6.746882243	47.42497086
		6.746344355	47.42486102
		6.745748418	47.42475468
Sh Xasan Xusen Naaleye	1	6.761914325	47.43232341
Cabdirisaq Xirsi tahliil	1	6.756167025	47.43455883
Riyadh Al-Saleheen Educational Center	1	6.69363879	47.42989756
Immigration offices	1	6.761669548	47.43203028
Gaalkacyo Local Goverment Office	1	6.763983405	47.43147466
SHEIKH ALI SAMATER PRI & SEC	2	6.762416868	47.43314244
SCH		6.762188588	47.43302437
AL_BIRRI PRI & SEC SCH	1	6.760610582	47.43469044
Abdullahi Isse Secondry School	1	6.758403624	47.43718903
SYL Sec Sch, Gaalkacyo	2	6.756640784	47.43611537
		6.756455259	47.43635574
Markazul Ibnu Mascuud sch	1	6.693140719	47.42769051
Mustaqbal secondary	1	6.691619742	47.42793538
IDP camp school in Haar haar adjacent	1	6.706172586	47.43096029
camp			
Haar haar IDP camp school	2	6.694903957	47.43571213
		6.695150682	47.43620917

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Hawlwadaag IDP School	1	6.729182667	47.4472698
Calanely IDP School	1	6.723870486	47.44123228
Imam Al-Muzni Institute for Islamic	1	6.752006493	47.42802148
Studies and Arabic Language			
Machadka Al-Misbaax Ee Barashada	1	6.761246047	47.43122256
Diinta Islamka- Religious sch			
Imaamu nawawi college	1	6.69291117	47.42753419

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Figure 2.1: Layout Plan of the Project Area in Galkayo

2.4 Estimated Project Costs for Galkayo

Based on the adopted unit rates, the cost estimates for the construction and rehabilitation of onsite waste water facilities in South Galkayo are summarized in the table 2-2 below

Table 2.4: Estimated Project Costs

No.	Position/Description	Unit	Quantity	Unit Cost (USD)	Total Cost (USD)
1.	Construction and rehabilitation of onsite waste water facilities- 100 Units of Septic tanks and soak pits - Public places and vulnerable communities	No.	100	1,200	120,000
2.	Community awareness drives	Job	1	100,000	100,000
3.	Introduce community-led maintenance plans with user contributions or fee systems, form & train Community Sanitation Committees to oversee shared facilities	L/S	1	50,000	50,000
4.	Public-Private Partnerships strategic plan for management	Job	1	20,000	20,000
5.	Construction of climate-resilient drainage protection works to installed sanitation facilities		1	20,000	20,000
	Total				310,000

2.5 Project Activities Related to Construction and Rehabilitation of Onsite Waste Water Facilities

The process includes various stages as presented below.

2.5.1 Waste Water Related Activities

Activities associated with above detailed activities will involve repair, renovation and replacement, associated. The activities will be associated with wastes including (e.g. residual sludge, liquid wastes including chemicals, contaminated soil which shall require appropriate disposal. The pollutants will be related to pathogens like bacteria and viruses, organic matter, nutrients like nitrogen and phosphorus, and various chemicals, including heavy metals, pharmaceuticals, and microplastics as summarized below.

Table 2.5: Pollutants Associated with Waste Water

#	Pollutants	Details
1	Pathogens	 Bacteria: Examples include Salmonella, Shigella, Campylobacter, and Vibrio cholerae. Viruses: Examples include hepatitis A, rotavirus, coronavirus, and enteroviruses. Protozoa: Examples include Entamoeba histolytica, Giardia lamblia, and Cryptosporidium parvum.
	 	Helminths: Examples include Ascaris, Ancylostoma, and Trichuris.
2	Organic Matter	 BOD (Biochemical Oxygen Demand): This measures the amount of oxygen required to decompose organic matter in water, indicating the level of pollution. COD (Chemical Oxygen Demand): This measures the amount of oxygen

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	I I I	required to chemically oxidize organic matter, also indicating pollution levels
3	Solids	Include suspended solids (like sediment) and dissolved solids (like minerals).
4	Nutrients	 Nitrogen and Phosphorus: High levels of these nutrients can cause eutrophication, leading to algal blooms and oxygen depletion in water bodies.
5	Chemicals:	 Heavy Metals: Examples include mercury, cadmium, lead, chromium, and copper. Pharmaceuticals: These can persist in wastewater and have potential impacts on aquatic life and antibiotic resistance. Pesticides: Used in agriculture and can contaminate sewage. Surfactants: Used in detergents and can have negative impacts on aquatic ecosystems. Microplastics: Small plastic particles that can accumulate in sewage and pose a threat to the environment. Dioxins and Furans: Toxic chemicals often found in sewage. PCBs (Polychlorinated Biphenyls): Synthetic chemicals that can be persistent and toxic. PAHs (Polycyclic Aromatic Hydrocarbons): A group of organic compounds that can be carcinogenic.
5	Other:	 Oils and Greases: From various sources, including food processing and industrial activities. Heat: From industrial cooling water, which can affect water temperature and oxygen levels. Radioactive Substances: Can be present in sewage from industrial or medical sources. Surfactants: Found in many household products and industrial processes

3. SITE BASELINE INFORMATION

3.1 Climate

South Galkayo's climate is of arid and semi-arid just like Somalia's terrain consists mainly of arid and semi-arid plateaus, plains, and highlands. Most of the country is flat, rising in the southern and central regions to a few hundred meters above sea level near the Ethiopian border. Somalia's Arid and Semi-Arid Lands (ASALs) make up more than 80 percent of the country's landmass and are characteristically prone to extreme weather conditions, including high mean surface temperature, periods of extended drought, and highly erratic rainfall and strong winds (UNDP/ICPAC, 2013).

The county has an average annual rainfall of about 250 mm. However, there are variations in spatial distributions of rainfall, with about 500 mm recorded annually in the northern highlands and between 300 and 500 mm in the southern regions. The coastal plains register only between 50-150 mm. A few small areas along the coastal strip of Somalia are classified as sub humid. Rainfall in Somalia has great spatial and temporal variability. Seasonal rainfall is dominated by the north and south movement of the Inter-Tropical Convergence Zone (ITCZ), delineated into four seasons:

- Jiilaal: dry season from December to March. The north-east monsoon is in dominance and conditions are generally dry and warm/hot. The northern parts of the country experience some cool and dry air during this season, while the central and southern parts experience very hot conditions.
- i Gu': rainy season starts from April to June. Relatively wet and hot conditions prevail, with Gu' considered as the major rainy season in the country. The southern regions receive more rains than the north. Occasionally, the Gu' season extends into June or July because of the Xagaa rains, which are produced by the onset of the moist onshore winds.
- Xagaa: dry season is from July to September. The south-west monsoon dominates, bringing relatively cool conditions, with showers along the coast, but dry inland.
- Deyr: rainy season is from October to November. The rainfall received in this season is less than that of the Gu' rainy season.

Figure 3.1: Relative Humidity of South Galkayo

Source: Google

The Average high and low temperatures are as presented in the figure below. The months of March and October having the highest average high temperatures.

Figure 3.2: Average High and Low Temperature in South Galkayo from 1981 - 2024

Source: Google

The figure below shows the annual rainfall patter from 1981 to 2023. The trend shows that 1981 -1985 was the worst dry period while from 2021 rainfall has been at its peak.

Figure 3.3: Annual rainfall for South Galkayo

3.2 Physical and Topographic Conditions

3.2.1 The Project Town Location

South Galkayo is located in the southern part of Galkayo City, within the Mudug region of Somalia's Galmudug State. The town lies within the catchment of several seasonal drainage channels that flow from the surrounding semi-arid plateaus during the Gu (April–June) and Deyr (October–December) rainy seasons. These ephemeral waterways, commonly known as "Toggas", temporarily carry stormwater runoff, often resulting in localized flooding in low-lying neighbourhoods. While these seasonal rivers remain dry for much of the year, their impact during rainfall events is significant, particularly in informal settlements (IDP Camps) and flood-prone zones (low-lying areas) across South Galkayo.

The location of the town is as presented in the figure below in the Federal Republic of Somali.

Figure 3.4: Study Area of South Galkayo

The proposed project site locations are as presented in the figure below;

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Figure 3.5: Layout of proposed septic tanks

Source: Google Earth

3.2.2 Topography and Landscape

The topography of South Galkayo is flat. There is minimal slope and that is why when it rains in the town, water rains where it falls. This causes a lot of flooding for the town. The slope of the town id from the northern side sloping towards the southern part of the town. It brings in a lot of water from the Northern part of the town that is under the control of Puntland state.

3.2.3 Geology and Soils

South Galkayo's soil, in extension to project location, is characterized by generally thin, rocky, and low in fertility. These soils are primarily calcareous, meaning they have a high content of calcium carbonate and gypsum. They have poor water retention capacity, which is a major challenge given the region's sparse and irregular rainfall. Consequently, these soil types are not suitable for extensive rain-fed agriculture but are well-adapted for rangeland and pastoral activities, which form the basis of the local economy.

The geology is characterized by ancient crystalline basement rocks covered by thick layers of sedimentary rock from the Mesozoic and Cenozoic eras. The most significant geological formations are the limestone aquifers from the Eocene period. These limestone are crucial for forming karstic aquifers, which serve as the primary source of groundwater for the wells and springs that are vital for human and animal survival in this arid environment. The region's geological structure has been heavily influenced by the rifting of the Somali and Arabian Plates, which has created the sedimentary basins that hold these critical groundwater resources.

3.3 Biological Baseline Data

3.3.1 Flora:

- The project area is primarily peri-urban with patches of semi-arid vegetation.
- Dominant plant species: Acacia spp., Commiphora spp., drought-resistant shrubs, and scattered grasses.
- Vegetation is mostly disturbed due to urban development, livestock grazing, and human activity.
- Limited presence of trees within institutional compounds (schools, hospitals) which may provide shade but are few.

3.3.2 Fauna:

- Mammals: Small urban-adapted species such as rodents, cats, dogs, and some goats and sheep in peri-urban areas.
- Birds: Urban-adapted species such as pigeons, sparrows, and occasional migratory birds.
- Reptiles & Insects: Lizards, scorpions, and various insects typical of semi-arid urban environments.

3.3.3 Environmental Sensitivity:

- No significant protected areas or endangered species in the immediate project area.
- Wildlife presence is minimal due to the urbanized nature of the site

3.4 Social Baseline Data

3.4.1 Demographic Data:

- Estimated population of South Galkayo town: 137000, (ICG 2015).
- Population is predominantly ethnic Somali; clan structures influence social organization.
- Vulnerable groups include low-income households, women, children, and IDPs relying on communal water and sanitation facilities.

3.4.2 Land Ownership:

- Land ownership is a combination of state-owned, community-managed, and private land.
- The construction sites are primarily on public or institutionally leased land, reducing risk of displacement.

3.4.3 Administrative Setup:

- South Galkayo is part of the Galmudug Federal Member State.
- **Local Governance:** Ward-level committees and traditional elders who influence community engagement and land-use decisions.
- **WASH Governance:** Community Water and Sanitation Committees (CWSCs) oversee water points and treatment facilities, ensuring equitable access and maintenance.

3.4.4 Infrastructure & Services:

- The town has **basic road networks** connecting key public institutions.
- Water supply is primarily from existing boreholes; sanitation coverage is limited.

 Health and educational institutions rely on community water sources, highlighting the need for improved water provision systems

3.5 Sanitation Situation

3.5.1 Sanitation Systems

The existing sanitation system in South Galkayo is largely unplanned, fragmented, and insufficient to meet the demands of its growing and increasingly urbanized population. Most households use traditional pit latrines or pour-flush toilets that discharge into unlined pits or poorly built septic tanks, often constructed without technical guidance. These substandard systems pose serious health and environmental risks, particularly when pits overflow or collapse due to high water tables, poor soils, or lack of maintenance.

Fecal sludge management (FSM) in South Galkayo is virtually non-existent or informal, with infrequent and unsafe desludging practices. There is no functional fecal sludge treatment plant (FSTP) in operation, and fecal waste is frequently dumped in open areas, dry riverbeds, or shallow soak pits that leak into the environment, contaminating groundwater and soil.

The situation is even more critical in high-density neighborhoods and informal IDP settlements, estimated at 72 verified IDP settlements as of March 2024, where sanitation facilities are overcrowded, poorly maintained, and often shared among many households. In some areas, significantly more common in rural areas than urban areas, open defecation is still practiced due to a lack of accessible, safe toilets. During rainy seasons, the absence of proper drainage leads to flooded latrines, which spread fecal matter across residential areas—posing severe public health risks, including outbreaks of cholera, diarrhea, and other waterborne diseases.

South Galkayo's topography and poor drainage infrastructure further compound these problems. Low-lying areas become flood-prone, concentrating waste and runoff in the most vulnerable communities. The local government's capacity to manage sanitation is severely limited, with insufficient technical staff, limited funding, and weak enforcement of hygiene and construction standards. There is also a low level of public awareness on proper sanitation and hygiene practices, which contributes to unsafe disposal and widespread environmental contamination.

The private sector's role in FSM is minimal and unregulated, making desludging services unreliable, expensive, and often unsafe. In conclusion, South Galkayo's sanitation crisis stems from inadequate infrastructure, weak governance, and lack of safe treatment and disposal systems—necessitating urgent, integrated interventions that address containment, collection, treatment, and long-term climate and public health resilience.

3.5.2 Household and Communal Latrines

Sanitation in South Galkayo is predominantly characterized by the use of basic pit latrines, many of which are unimproved and poorly maintained. In IDP camps, the majority of residents rely on communal or shared pit latrines, which are often overused, unsanitary, and inadequate for the growing displaced population. Among low-income urban households, many families share latrines or resort to informal sanitation practices due to the lack of private household toilets. While a few recent NGO-led projects have begun installing improved ventilated VIP

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latrines in select settlements, the majority of existing facilities across both host communities and IDP camps remain substandard or non-existent.

Public institutions in South Galkayo—such as markets, health posts, and schools—frequently lack dedicated sanitation facilities or rely on outdated, poorly maintained latrines with insufficient capacity. Latrines fill up quickly, and in the absence of formal desludging or maintenance services, many end up overflowing or collapsing, exposing residents to direct health risks. With limited access to safe water, overall sanitation and hygiene conditions—particularly at the household level—remain severely compromised.

The primary challenges facing household and communal latrines in South Galkayo include: rapid population growth due to IDP influx, land tenure issues, and chronic underfunding. New arrivals often outnumber available facilities, and unplanned urban growth leaves no reserved space for new latrine construction. Weak governance structures, limited technical capacity within the municipal authority, and absence of routine maintenance systems further exacerbate the situation. In many cases, cultural barriers and gender-based concerns hinder latrine access—women and girls frequently walk long distances to find safe sanitation, often exposing themselves to security risks. Additionally, shortages of construction materials, supply chain constraints, and lack of trained local technicians stall both new construction and repair of sanitation infrastructure.

In summary, South Galkayo faces a severe deficit in both the quality and quantity of sanitation facilities, particularly for vulnerable populations. A major investment in latrine infrastructure, coupled with improved management systems, regular desludging, and community engagement, is urgently needed to protect public health and restore dignity for affected communities.

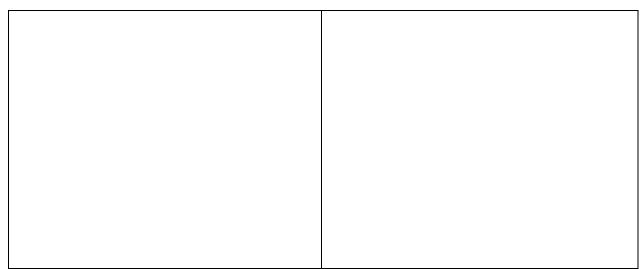


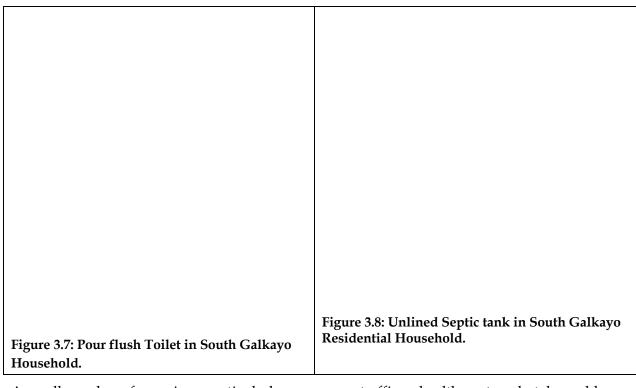
Figure 3.6: Shared Communal latrines in IDP camp

3.5.3 Septic Tanks

In South Galkayo, septic tanks represent one of the more advanced forms of on-site sanitation systems used primarily by residents in formal settlements, institutional compounds, and higher-income households. These systems are designed to provide primary treatment by channeling blackwater—and in some cases greywater—into an underground chamber where

solids settle into sludge and partially treated effluent is directed into soak pits or infiltration trenches for further natural filtration. However, in practice, many septic tanks in South Galkayo are poorly constructed and fail to meet proper technical standards. Common deficiencies include lack of watertight lining, absence of adequate leach fields, and improper venting, which compromises both functionality and safety.

Due to the flat terrain and clay-dominated soils in much of South Galkayo, natural infiltration is limited, leading to frequent soak pit failure, especially during rainy periods. In some areas, especially in unplanned settlements, septic tanks are directly connected to surface drains or seasonal riverbeds (wadis), causing unsafe effluent discharge and environmental contamination. The semi-arid climate, combined with low groundwater tables in some zones, has further complicated proper design and placement of septic systems. These challenges underscore the need for strict construction oversight, public awareness, and investment in regulated fecal sludge management to ensure septic systems in South Galkayo function effectively and do not pose risks to public health or the environment.



A small number of premises, particularly government offices, health centers, hotels, and larger homes, have internal sewerage systems that convey waste from multiple toilets and plumbing points into a centralized compound septic tank. These are usually confined to higher-income neighborhoods or institutional compounds. However, regular desludging of these tanks is rare due to the limited availability of exhauster services.

3.5.4 Fecal Sludge Management

In South Galkayo, fecal sludge collected by exhausters (private institution operations) is typically dumped in open fields or informal sites on the outskirts of town, as there is no designated or engineered disposal site. This practice, while offering a temporary means of removing waste from densely populated areas mostly IDP camps, is highly unsustainable and poses serious environmental and public health risks. Without a properly lined containment

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area or treatment process, raw sludge infiltrates the soil, contaminates surface and groundwater sources, and contributes to the spread of disease—especially during the rainy season when runoff carries fecal matter into residential zones and shallow water points. The lack of regulation around desludging practices further exacerbates the situation, allowing unsafe dumping to occur without oversight or accountability.

To address these challenges, it is urgently necessary to establish a dedicated fecal sludge treatment plant (FSTP) and enforce municipal-level control over desludging activities. A formal FSTP would enable safe treatment, reuse, or disposal of sludge, mitigate groundwater contamination, and support long-term urban sanitation goals. Investing in such infrastructure is essential for protecting public health, improving the environmental integrity of South Galkayo, and transitioning away from harmful, informal practices.

4. POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK FRAMEWORKS

4.1 National Regulatory and Policy Framework

Table 4-1: National Regulatory and Policy Framework

Table 4-1: National Regulatory and Policy Framework					
Legal Provision	Description	Relevance			
Constitution of Son	malia (2012)				
Article 11	together with sub article (3) respectively provides that all citizens have equal rights regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect.	Services from water treatment plant would serve all citizens with no discrimination.			
Article 14	stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.	It prohibits the contractor from sourcing labour from underage citizens.			
Article 24	Labor Relations: Every person has the right to fair labor relations. All workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace.	The project will create employment opportunities for both skilled and non-skilled workers.			
Article 25	Establishes the right to a clean and healthy environment.	 The project must integrate climate resilience, waste reuse/recycling, and pollution control. The project contributes to fulfilling the constitutional right to health and environmental protection by improving water quality. 			
Article 45	Obligates the state to protect ecosystems, biodiversity, and natural resources.	The project must undergo Environmental and Social Impact Assessment (ESIA) before implementation to address all potential impacts to the environment.			
Envisanment (Co.	Legislation & Poli	cies			
Environment & Soc		The ancient investment interest (
National Environmental Policy (NEP	Approved on 13th February 2020, and backstopped by the Global Environment Facility (GEF) and the United Nations Development Program (UNDP), the stated goal of environmental policy is to improve the health and quality of life of the Somali	 The project involves interventions that will improve the health and quality of people. The policy provisions will inform management of sanitation waste, prevention of soil and groundwater contamination, and environmental hygiene standards during project 			

Environmental and Social Impact Assessment (EIA) and Audit Regulations	As of March 2021, the Directorate of Environment and Climate Change has published draft environmental and social impact assessment (ESIA) regulations which provide detailed procedures for conducting EIAs, audits, public participation, and disclosure.		The project must undergo Environmental and Social Impact Assessment (ESIA) before implementation
Water Resources Law	Governs sustainable use, allocation, and protection of water resources; prohibits pollution of water sources		The proposed project will comprise installation of a water treatment plant which will The act will form basis for protection of groundwater from infiltration and contamination caused by poorly sited or
The Somali Labour Code	It covers protection against risks to workers, notification procedures in occupational accidents, medical requirements at site and conveyance of injured workers to hospitals, among others.	•	Construction activities involve local and possibly migrant laborers. Risks include occupational health and safety (OHS) hazards, accidents, and labor influx impacts The code will guide on worker safety during excavation, handling of waste, and PPE use
Health Sector The National Health Sector Strategic Plan (HSSP-II 2017- 2021)	Strategy is based on nine building blocks and prioritizes governance and leadership, followed by human resources, services delivery, health financing, pharmaceuticals and medical technology, health intelligence and information system, social determinants of health, emergency preparedness and response, and health infrastructure	•	Wastewater facilities directly affect public health by reducing waterborne diseases (cholera, diarrhea). Construction phase may create risks of dust, noise, sanitation issues, and accidents The act will provide guidance to disease prevention, sanitation standards, and hygiene promotion.
Water & Sanitation		ı	
Constitution of Somalia 2012	water, sanitation, and a healthy environment		The main objectives of proposed interventions are in line with promoting a healthy environment and providing clean water for citizens.
NEP 2017 EPMA 2024 National Water	Require ESIAs and safeguards for all water and sanitation projects Regulates water use, wastewater	•	ESIA approval is required before commencement of works The Act will form basis for management of sanitation waste, prevention of soil and groundwater contamination, and environmental hygiene standards. The proposed project is governed

Policy	discharge, and pollution	by said laws.
	prevention	
Security Sector		
National Security	Federal Government and	• Construction activities may attract
& Safety	Federal member State are	theft, vandalism, or community
Frameworks	responsible for ensuring security	tensions; presence of heavy
and public safety, including		equipment may cause safety risks,
around critical infrastructure		community safety, especially
		around open pits during
		construction.
Land Sector		
Constitution of	Requires that land and natural	• The septic tanks on communal or
Somalia (2012) -	resources are managed in the	public land to prevent land-use
Land & Natural	public interest, with land	conflicts
Resources Art 43	allocation guided by law	

4.2 Institutional Capacity for Environmental Management in FGS

Table 4-2: Institutional capacity in FGS

1 able 4-2:	le 4-2: Institutional capacity in FGS			
No.	Institution	Relevance		
1.	Ministry of	National policy oversight on environment, climate change,		
	Environment and	and safeguards; custodian of the Environmental Protection		
	Climate Change	and Management Act (2024) and EIA regulations.		
	(MoECC)			
2.	Ministry of Energy	Oversees water policy, water quality standards,		
	and Water	groundwater/water source protection, and wastewater		
	Resources	regulation at national level		
	(MoEWR)			
3.	Federal Member	Responsible for the implementation and coordination of		
	State Ministries	water resource management and infrastructure		
	(Galmudug)	development within the region.		
4.	UNEP -	Providing environmental expertise, coordinating water		
	Environment	management, fostering integrated water resource		
	Program	management for resilience against drought and floods, and		
		promoting nature-based solutions.		
5.	UNICEF Somalia	Supports WASH programming in schools and health		
		centres; often co-funds or provides technical support in		
		sanitation projects		
6.	AfDB	Project financier; requires compliance with 2023 ISS.		
		Provides technical guidance, safeguard screening, and		
		monitoring during project lifecycle		

4.3 Key International Instruments Ratified or Acceded to by Somalia:

Federal government of Somalia has ratified below listed Conventions;

- (i) **Universal Declaration of Human Rights (UDHR)** Affirms the equal rights of men and women and the right to non-discrimination, dignity, and freedom for all individuals. *Triggered through the right to health and a clean environment. The project complies by improving sanitation and reducing disease risks in schools and health centers.*
- (ii) Convention on the Rights of the Child (CRC) Ratified by Somalia in 2015, it emphasizes the protection of children's rights, including those of girls, and calls for the elimination of harmful practices like early marriage and FGM. Triggered as the project targets schools and child health. Compliance is ensured by providing safe sanitation facilities that protect children's dignity and health.
- (iii) Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) Somalia has not yet ratified CEDAW, which significantly limits formal international obligations on women's rights protection. However, civil society and international partners continue to advocate for its ratification and domestication. Triggered through gender-sensitive sanitation needs. The project complies by providing separate, safe sanitation facilities for women and girls.
- (iv) African Charter on Human and Peoples' Rights Somalia is a party to the Charter, which supports gender equality and women's rights within the African human rights system. Triggered through the right to a healthy environment and protection from harmful waste. Compliance is achieved through ESIA, pollution control, and sustainable waste management.
- (v) African Charter on the Rights and Welfare of the Child (ACRWC) Ratified by Somalia, reinforcing children's rights, including protection from early and forced marriage, discrimination, and abuse. Triggered by the project's direct benefits to children in schools. Compliance is ensured by providing safe, accessible WASH services for children.
- (vi) **Sustainable Development Goals (SDGs)** Somalia has committed to the 2030 Agenda, with SDG 5 specifically focusing on achieving gender equality and empowering all women and girls, especially in access to education, health, water and sanitation, and economic opportunities. *Triggered mainly SDG 6 (Clean Water & Sanitation)*, SDG 3 (Good Health), SDG 13 (Climate Action), and SDG 11 (Sustainable Cities). The project contributes by expanding access to improved sanitation and climate-resilient systems.
- (vii) **Kyoto Protocol (2005):** Aim at reducing greenhouse gas emissions and combat climate change by setting binding emission reduction targets for developed countries.
- (viii) **Bamako Convention on (1991):** It ensures ban on the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa (1991).
- (ix) **Basel Convention on the (1989):** It seeks to control Transboundary Movement of Hazardous Wastes and their Disposal.

- (x) **Rotterdam Convention (1998):** It stipulates the prior informed consent procedure for certain hazardous chemicals and pesticides. *Triggered for chemicals and pesticides.* Compliance is ensured by avoiding banned chemicals in construction/operation (e.g., avoiding asbestos pipes, toxic disinfectants).
- (xi) Convention on Oil Pollution Preparedness, Response, and Co-operation (1990): It aims to ensure that countries develop and maintain adequate measures for dealing with oil pollution incidents. Triggered by construction machinery and fuel storage risks. Compliance includes site-specific spill prevention and emergency response plans.
- (xii) International Energy Charter (2015): It aims to enhance energy security, encourage open and competitive energy markets, support sustainable energy development, and promote energy efficiency and environmental protection among member states. Triggered through the project's potential use of renewable/efficient energy for treatment plants. Compliance is achieved by integrating energy-efficient systems (solar pumping, low-energy treatment technologies).

4.4 Relevant International Labour Organization (ILO) and Human Rights Instruments

- Convention concerning Safety in the use of Chemicals at Work (Entry into force: 04 Nov 1993) Adoption: Geneva, 77th ILC session (25 Jun 1990) Status: Up-to-date instrument (Technical Convention); Triggered during construction/operation where chemicals (e.g., disinfectants, treatment reagents, fuels) are handled.
- Occupational Safety and Health Convention (1981) and its Protocol of (2002); *Triggered in ensuring safe working conditions at construction sites.*
- Promotional Framework for Occupational Safety and Health Convention, (2006) (No. 187); *Triggered in establishing a safety culture across the project*.
- Convention concerning the Prohibition and Immediate Action for the Elimination of the worst forms of Child Labour (2002); *Triggered due to risks of child labor in construction supply chains*.
- International Convention on the Elimination of All Forms of Racial Discrimination (CERD) (1976); *Triggered in hiring and community engagement*.
- Optional Protocol to the Convention on the Rights of Persons with Disabilities (2007); *Triggered by the need to ensure accessibility of all resources*.
- The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1985); *Triggered in gender-sensitive WASH provision*.
- The Convention on the Rights of Persons with Disabilities (CRPD) (2012); *Triggered in ensuring equitable access to water and sanitation services*.
- The International Covenant on Civil and Political Rights (ICCPR) (2004); Triggered by the project's obligation to respect community rights (participation, consultation, grievance redress.
- The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004).

4.5 Regional Treaties Relevant to GBV, SEA, VAC and Persons Living with Disability (PLWD)

- African Charter on Human and Peoples' Rights (1981);
- Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol) (2003);
- Violence and Harassment Convention (2019) No.190;
- AU Disability Protocol (Protocol to the African Charter on Human and Peoples' Rights on the Rights of Persons with Disabilities in Africa) (2018);
- Economic Community of West African States (ECOWAS) Gender Policy (2005, revised 2020);
- COWAS Plan of Action to Address Gender-Based Violence (2020–2030);
- Convention Against Torture & other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) (2001);
- Convention on the Rights of Persons with Disabilities (2007);
- The Convention on the Rights of the Child (CRC) (1990);
- The National Action Plan for the Implementation of United Nations Security Council Resolution 1325 (2009);
- The Protocol to the ACHPR on the Rights of Women in Africa (the "Maputo Protocol") (2007).

4.6 African Development Bank Integrated Safeguards System)

In 2013, the African Development Bank adopted an Integrated Safeguards System (ISS) (also referred to as the "2023 ISS"), which established the Bank Group's commitment to sustainable development, consolidating and building on the Environment (2004) and Involuntary Resettlement (2003) safeguard1 policies, as well as cross-cutting policies and strategies on gender (Gender Strategy for 2021–2025, "Investing in Africa's Women to Accelerate Inclusive Growth"), and then the Civil Society Engagement Framework (2012).

- 1. The updated ISS improves the consistency of the Bank's approach to key thematic issues, Environmental and Social Assessment (ESA), and stakeholder engagement activities through their 10nr Oss. The 10nr E&S OSs set out the requirements for Borrowers relating to the identification and assessment of E&S risks and impacts associated with operations supported by the Bank.
- 2. The ten E&S OSs establish the standards that Borrowers shall meet, as appropriate, in projects, activities, and initiatives supported through Bank financing throughout the life cycle of operations.
- 3. However, this particular proposed project triggers only 8No. Oss as summarized in the table sub sections below.

Environmental and Social Operational Safeguard (OS) provisions and Applicability to the Project

Table 4.3: Social operation safeguards provision

#	OS	Provisions	Project Applicability
1	Environmental and Social Operational Safeguard 1: Assessment and Management of Environmental and Social Risk and Impact.	Environmental and Social Operational Safeguard 1: Assessment and Management of Environmental and Social Risk and Impact. The aim of this overarching Operational Safeguard (OS), together with the OSs that complement it, is to mainstream environmental and social (E&S) considerations, including those related to climate change vulnerability. into Bank operations and thereby contribute to sustainable development in the continent.	Conduct an Environment and Social Assessment (ESA) of the proposed project, including stakeholder engagement; Undertake stakeholder engagement and disclose appropriate information in accordance with OS10;
		The objectives of OS1 are to Identify and assess the E&S risks and impacts including those related to gender inequalities, climate change, and vulnerability of Bank lending, investment, and grant-supported operations, in their areas of influence in a manner consistent with the Oss among others	Develop an Environmental and Social Plan (ESMP) and implement all measures and actions set out in the financing agreement including the ESMP; and Conduct monitoring and reporting on the E&S performance of the project against the OSs.
2	Environmental and Social Operational Safeguard 2: Labour and Working Conditions	The objectives of OS2 are as follows: To protect workers' rights., To promote safety and health in the workplace and to promote the fair treatment, non-discrimination, and equal opportunity of project workers among others. The categories of workers include; People employed or engaged through third parties to perform work related to the core functions109 of the project, regardless of location (contracted workers). People employed or engaged by the Borrower's primary suppliers110 (primary supply workers); People employed or engaged in providing community labour (community workers).	The borrowers shall under take below listed prior to implementation of the Project Labour Management Procedures (LMPs) that will detail Working conditions and management of worker relationships Preparation of Occupational Health and Safety Management Plan prior to commencement of works Registration with applicable occupational health and safety
3	Environmental and Social Operational Safeguard 3: Resources Efficiency and Pollution Prevention and Management	This Operational Safeguard (OS) recognizes that economic activities often cause air, water, and land pollution, and The OS provides that the Borrower shall implement technically and financially feasible measures for improving the efficient consumption of energy, water, and raw materials, as well as other resources. The Borrower shall apply pollution prevention and control measures consistent with national legislation and standards, applicable international conventions, and internationally	The BORROWER at design Stage shall; Implement Resources efficiency technologies that supports efficient consumption of energy, water, and raw materials, as well as other resources Prepare Pollution Management Plans such as E- Waste Management Plan, Solid and Liquid Waste Management Plan

		recognized standards and good practice, particularly the Environment Health and Safety Guidelines (EHSGs)	
4	Environmental and Social Operational Safeguard 4: Community Health, Safety and Security	OS4 addresses the health, safety, and security risks to and impacts on project-affected communities and the corresponding responsibility of the Borrower to avoid or minimize them, with particular attention to people who, due to their particular circumstances, may be vulnerable. This OS addresses potential risks to and impacts on communities that may be affected by project activities. Occupational health and safety (OHS) requirements for project workers are set out in OS2, and measures to avoid or minimize impacts on human health and the environment due to existing or potential pollution are set out in OS3	The BORROWER will prepare Community health and safety Management Plan Ensure Worker Sign Code of Conduct Prepare and Implement Traffic Management Plan Prepare and implement labour Influx Management Plan Emergency preparedness and response Plan Prepare Security Management Plan
7	Environmental and Social Operational Safeguard 7: Vulnerable Groups	This OS recognizes that some cultural groups, due to their lifestyle, culture, and strong dependence on the natural environment, have identities and aspirations that are distinct from mainstream groups in national societies and are often disadvantaged by traditional models of development. In many instances, they are among the most economically marginalized and vulnerable segments of the population The objectives of OS7 is to ensure that vulnerable groups and individuals are identified as early as possible in Bank Group operations and that engagement is meaningful, taking into account individuals' and communities' specificities, and delivered in an appropriate form	If the cable interphase with such communities, the BORROWER will undertake below listed Early identification of vulnerable groups Social assessment Special considerations related to highly vulnerable rural minorities Adequate Public consultation and participation Vulnerable groups and broader development planning Timely address of Grievances from such communities
10	Environmental and Social Operational Safeguard 10: Stakeholder Engagement and Information Disclosure	The OS provides that Borrowers shall engage with stakeholders throughout the project life cycle, commencing as early as possible in the project development process and in a time frame 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 objectives of OS10 is to establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders, and build and maintain a constructive relationship and channels of communication with them, in particular project-affected parties among other objectives	The OS requires below listed with respect to the Project Engagement during project preparation Preparation of The Stakeholder Engagement Plan Establishing a functioning Grievance mechanisms . Engagement during project implementation and external reporting Organizational capacity and commitment

4.7 Comparison Between FSG and international Standards

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Table 4.4 Comparison of the FGS Frameworks vs other international standards adopted in this project

Thematic Area	FGS Frameworks	AfDB ISS (2023) Safeguards	Other International	Relevance to the Project
			Standards	·
Environmental	Environmental Protection &	OS 1: Environmental & Social	Basel Convention (1989),	Project requires ESIA approval,
Protection & ESIA	Management Act (2024); EIA &	Assessment - comprehensive	Bamako Convention (1991)	mitigation of impacts, and safe
	Audit Regulations	ESIA required		waste management.
Water & Sanitation	Water Resources Law;	OS 4: Pollution Prevention and	SDG 6 (Water &	Ensures sustainable water use,
	National Environmental Policy	Control - efficient resource use	Sanitation), ICESCR (Right	water quality standards, and safe
	(2017)	& pollution prevention	to Water)	sanitation facilities.
Health & Safety	Public Health Law; Somali	OS 5: Labour Conditions,	ILO OHS Conventions	Protects construction workers
	Labor Code (1972)	Health and Safety - safeguard	(1981, 2006), WHO	and reduces disease risks in
		workers & communities	Guidelines	schools & health centers.
Climate Change &	Climate Change Policy (2020);	OS 2: Climate Change - low-	Kyoto Protocol, Paris	Design integrates climate
Resilience	NAP Framework	carbon, climate-resilient	Agreement, SDG 13	resilience (e.g., solar pumping,
		development		flood-resistant structures).
Land & Natural	Constitution (2012) on land	OS 3: Biodiversity & Ecosystem	African Charter on Human	Facility siting must respect land
Resources	ownership; Land Tenure	Services – protect ecosystems	& Peoples' Rights (Right to	tenure, avoid riparian damage,
	(customary + municipal laws)		Environment)	and maintain project area
				ecology.

5. STAKEHOLDER CONSULTATIONS

The Stakeholder Engagement Strategy for this water and sanitation project is designed to ensure inclusive participation and ownership at all levels, particularly among those who are directly or indirectly affected by sub-project activities. It aims to identify and address stakeholder needs, expectations, concerns, and grievances through proactive engagement and feedback mechanisms. By doing so, the strategy seeks to promote transparency, collaboration, and accountability throughout the project's lifecycle, fostering trust between stakeholders and implementers. Ultimately, this approach will strengthen the social license to operate, helping to reduce the risks of resistance or conflict and ensuring smoother implementation and sustainable outcomes.

5.1 Identified stakeholders and their roles

The South Galkayo WASH Project involves a wide range of stakeholders drawn from government institutions, development partners, local authorities, traditional leaders, and community organizations, each playing a key role in ensuring the project's successful implementation and sustainability.

Government Ministries:

The Ministry of Energy, Minerals and Water Resources leads implementation, design approval, and supervision, while the Ministry of Environment, Agriculture and Climate Change oversees ESIA approval, compliance, and climate safeguards. The Ministry of Health ensures water quality, hygiene, and disease control.

Local Authorities:

South Galkayo Municipality and District Administration manage land allocation, permits, and community engagement. Community Water and Sanitation Committees oversee local water points, maintenance, and equitable access, while local elders mediate land issues and support social acceptance.

Development Partners:

UNICEF and AfDB (through AWF) provide financial and technical support, enforce safeguard standards, and strengthen institutional capacity. FAO (via SWALIM) offers hydrological data and groundwater monitoring. The Ministry of Planning ensures project alignment with national frameworks.

Private Sector and Beneficiaries:

Contractors and consultants handle design, construction, and rehabilitation under PMU supervision for quality and compliance. Local communities and IDPs participate in consultations and benefit from improved water access.

Civil Society and Security:

CSOs and NGOs promote hygiene, gender inclusion, and capacity building. Security agencies ensure safety at project sites and protect personnel and assets.

5.2 Stakeholder Consultation Methodology

Stakeholder engagement was conducted in the following ways;

- a) **Key informant interviews (KIIs)** with local authorities, WASH service providers, women's groups, and elders. Focus was to establish for any existing UNICEF gender programmatic review (if one has been conducted), especially if WASH programming was reviewed.
- b) Focus group discussions (FGDs) disaggregated by sex and age to capture diverse perspectives.
- The first FGD was held with a government official from the department of physical planning about the interventions they would require help with in terms of WASH from the project.
- ✓ Another discussion was held with the women at Hayaan Bacaadweyne IDP camp to understand their needs about sanitation and general hygiene
- ✓ The other FGD was held with CISP an NGO dealing with Gender issues in Somalia and specifically South Galkayo
- ✓ The last one was held at Galkayo Hospital with the General Manager to understand the gaps and challenges they face in terms of providing services especially with focus on WASH activities.

5.3 Stakeholder Consultations Summary

5.3.1 Consultation Actions and Methodology

A comprehensive and inclusive consultation strategy was implemented to engage a wide range of stakeholders. The methodology combined several participatory techniques to ensure that all groups, including the most vulnerable, had an opportunity to voice their opinions.

The primary actions taken included:

- Public Meetings (Barazas): Open community meetings were held in key neighborhoods and within the Internally Displaced Person (IDP) camps. These gatherings provided a platform to disseminate information about the project's objectives, scope, and potential impacts, and to receive direct feedback from the community at large.
- Focus Group Discussions (FGDs): Separate FGDs were conducted with specific demographic groups, such as women, youth, and water vendors. This approach

allowed for a deeper exploration of group-specific issues, needs, and concerns in a more comfortable setting. The women's FGDs, for instance, focused heavily on issues of safety, privacy, and menstrual hygiene management related to WASH facilities.

• **Key Informant Interviews (KIIs):** In-depth interviews were held with key stakeholders possessing specialized knowledge or holding positions of influence. This group included local government officials, community elders, religious leaders, and staff from local NGOs active in the WASH sector.

All consultations were conducted in the Somali language by trained facilitators, ensuring clear communication and active participation.

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Table 5.1 Stakeholder Engagement Matrix

ble 5.1 Stakeholder Engagement Matrix					
Stakeholder	Category / Level	Interest in Project	Influence	Roles and Responsibilities	
Galmudug Ministry of Energy, Minerals & Water Resources (MoEMWR)	Government / Lead Implementing Agency	High – responsible for water sector policy, coordination, and infrastructure development	High	Lead implementing agency; oversight of design and construction; ensures project aligns with Puntland Water Policy and national WASH objectives.	
Galmudug Ministry of Environment, Agriculture & Climate Change (MoEACC)	Government / Regulator	High - ensures environmental protection and sustainability	High	Reviews and approves ESIA; issues Environmental Compliance Certificates; monitors environmental safeguards and climate resilience measures.	
Galmudug Ministry of Health (MoH)	Government / Health Authority	High – focuses on public health and sanitation outcomes	Medium	Oversees water quality monitoring and health risk management; coordinates with project on hygiene promotion and disease surveillance.	
Galmudug Municipality / District Administration	Local Government	High – manages land, permits, and community coordination	High	Facilitates land allocation and construction permits; coordinates urban planning and community engagement; supports local conflict resolution.	
Community Water and Sanitation Committees (CWSCs)	Community / Local Governance	High – directly manage and maintain water facilities	Medium	Oversee local water points and treatment plants; ensure equitable access and community participation in operation and maintenance.	
Local Elders and Clan Leaders	Traditional Authority	High – influence social acceptance and land access	Medium- High	Confirm land ownership and boundaries; mediate disputes; facilitate community buy-in and peaceful coexistence.	
UNICEF	Development Partner / Financier	High - provides funding and technical support	High	Finances and supports project implementation; ensures adherence to UNICEF Environmental and Social Standards (ESS); monitors social and gender impacts.	
African Development Bank (AfDB) / African Water Facility (AWF)	Development Partner / Financier	High – co-funding and safeguard oversight	High	Provides financing, ensures compliance with AfDB Integrated Safeguards System (ISS), and monitors environmental and social performance.	
FAO - Somalia Water and Land Information Management (SWALIM)	Technical Partner / Research Institution	Medium - supports data collection and water resource management	Medium	Provides hydrological data, groundwater monitoring, and technical inputs for sustainable water resource management.	

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Ministry of Planning,	Government /	Medium - ensures national High	Ensures project aligns with national plans;
Investment, and Economic	Coordination	alignment and donor	coordinates with donors and oversees reporting.
Development (MoPIED)		coordination	
Contractors and Consultants	Private Sector /	High - responsible for design High	Execute construction, rehabilitation, and installation
	Service Providers	and construction	of water infrastructure; adhere to EHS standards;
			implement ESMP measures.
Supervising Engineer / Project	Technical Oversight	High - ensures quality and High	Supervises works, ensures adherence to
Management Unit (PMU)		compliance	specifications and safeguards, and prepares
			progress and compliance reports.
Local Communities and IDPs	Beneficiaries	Very High - direct users of Low-	Participate in consultations; provide local
		improved WASH services Medium	knowledge; benefit from improved access to safe
			water and sanitation.
Civil Society Organizations	Development /	Medium - promote community Medium	Support community sensitization, gender inclusion,
(CSOs) / NGOs	Advocacy	empowerment and inclusion	hygiene promotion, and grievance redress.
Security Agencies (Police, Local	Public Safety / Law	Medium - responsible for Medium-	Provide site security, protect equipment and
Administration)	Enforcement	protection of assets and High	workers, and respond to safety or conflict incidents.
		personnel	

5.3.2 Outcomes of the Consultation

The consultations were highly productive, yielding valuable insights that have directly informed the project design and the mitigation measures outlined in the Environmental and Social Management Plan (ESMP).

Key discussion points and outcomes are included in the Key Informant Interviews, Focus Groups Discussions and institutional visits detailed in this chapter.

Overall Outcome of Stakeholder Consultation

The stakeholder consultation process confirmed that there is universal and enthusiastic support for the project. The feedback received was overwhelmingly positive, with participants viewing the project as a critical and long-overdue intervention to address the severe water and sanitation crisis.

A total of 5 key informant interviews and 6 Focused Group Discussions (FGD) were conducted with representatives from the following sectors from 29th May 2025 – 4th June 2025.. Additionally, Public participation forums were held from 3rd to 4th September, 2025 at the Five Star Hall Galkayo South.

5.3.3 Key Informant Interviews

A total of 5 KIIs have been conducted with representatives from the following sectors:

Table 5.2: Key Informant Interviews

Institution / Stakeholder	Date	Key Issues Discussed	
Ministry of Women and Human Rights Development (MoWHRD) - Galmudug	May 31st 2025	Gender gaps in WASH policies, GBV referral pathways, FGM prevalence, and MHM needs	
Ministry of Water and Energy – South Galkayo Office	May 30 th 2025	Access to safe water, community water management, challenges in IDP settlements	
Galkayo Local Authority (Municipal Office)	May 29 th 2025	Urban sanitation, solid waste management, and community infrastructure needs	
Ministry of Health - Galkayo Hospital	June 4 th 2025	Public health and hygiene, links between WASI and maternal/child health	
Representatives from Local NGOs (e.g., CISP)	June 4 th 2025	Women's participation in service delivery, local GBV issues, WASH interventions, community outreach	

5.3.4 Focus Group Discussions

Table 5.3: Focus Group Discussions

Group Type	Date	Location	Key Issues Raised
Women-headed households (IDP camp)	June 1 st 2025	Bacaadweyne	Long distances to water points, lack of latrines, MHM challenges, security concerns
Adolescent girls (ages 13–18)	May 31st 2025	Hayaan Bacaadweyne Camp	Lack of MHM materials, school attendance issues, privacy in sanitation facilities
Men (local leaders & elders)	May 30 th 2025	Town Center	Community roles in infrastructure, traditional norms, support for water systems
Female youth (ages 18–30)	May 31st 2025	Town Center	Vocational needs, participation in water committees, menstrual stigma
Male youth	llune 2 nd	South Galkayo Market	Livelihood challenges, involvement in hygiene promotion, water source maintenance
Women entrepreneurs	llune 2nd	South Galkayo Market	Access to microfinance, sanitation in market areas, female business participation

Table 5.4: Public Forums on 3rd to 4th September, 2025 at Five Star Hall

#	Issue	Mitigation	
2	Despite the positive outcomes, the project		
	may generate environmental and social	assessment (EIA) recommendations and	
	risks. These include vegetation loss, soil	environmental management plans (EMPs)	
	degradation, and potential overuse or		
	pollution of water resources.		
3	A labor influx management plan and	Local labor should be prioritized, and	
	community awareness programs on health,	contractors must follow fair labor standards	
	gender, and education are recommended.		
4	Health and safety risks can be mitigated by	Continuous monitoring and evaluation (M&E)	
	enforcing occupational safety standards,	will allow timely corrective actions, while a	
	providing personal protective equipment	grievance redress mechanism will ensure	
	(PPE), training workers regularly, and	community concerns are addressed.	
	monitoring pollution levels with appropriate	Alignment with Somalia's National	
	dust and noise control measures.	Environmental Policy (2020) will further	
		strengthen transparency, inclusivity, and	
		sustainability in project implementation.	

5.3.5 Meetings Outcome

- 1. Limited access to water (long distances to water points)
 - Outcome: Heavy burden on women/children, reliance on unsafe sources.
 - Measures: Construct water points closer to communities and schools; install storage tanks and pipelines to reduce walking distance.
- 2. Unsafe and inadequate sanitation (lack of privacy/safety at latrines, poor school sanitation, stigma around menstruation)
 - Outcome: Protection risks, open defecation, school absenteeism for girls, spread of diseases.
 - Measures: Build gender-segregated and disability-friendly latrines with lighting and privacy; provide menstrual hygiene facilities and supplies; improve sanitation in schools and health centers.
- 3. Low awareness and limited inclusion in WASH (gender-specific needs not considered, stigma, weak capacity)
 - o **Outcome:** Exclusion of women and vulnerable groups, poor hygiene practices, weak facility maintenance.
 - Measures: Conduct inclusive WASH education, hygiene promotion campaigns, and menstrual hygiene awareness; ensure women and vulnerable groups participate in decision-making; strengthen capacity of WASH committees, teachers, and health staff.
- 4. Poor waste management (need for recycling facilities and hygiene support)
 - Outcome: Solid waste buildup, environmental pollution, increased disease risks.
 - Measures: Establish recycling and waste segregation systems; promote composting/reuse; support community hygiene programs led by local champions.
- 5. Underutilized institutions (schools and health centers not fully engaged in WASH promotion)
 - Outcome: Lost opportunity for behavior change and sustained hygiene improvement.
 - Measures: Equip schools and health centers with adequate WASH facilities; use them as platforms for hygiene education, awareness campaigns, and training.

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5.4 Government and Institutional Visits

In addition to interviews, visits were made to:

- District Administration Office: Discussed governance and coordination of basic services.
- Water Service providers and Boreholes: Observed operation, tariff practices, and community usage patterns.
- Health Centers and IDP Camps: Inspected hygiene facilities, water availability, and MHM provisions.
- Women's Centers and Safe Spaces: Engaged with service providers supporting GBV survivors and awareness programs.

5.4.1 Stakeholder Meetings Outcome

1. District Administration Office

- Gained insights into the governance structures responsible for coordination of water, sanitation, and hygiene (WASH) services.
- Identified gaps in capacity and resources, highlighting the need for stronger institutional support and better alignment between district authorities and service providers.
- Confirmed willingness of the administration to collaborate with development partners on WASH infrastructure and service delivery.

2. Water Service Providers and Boreholes

- o Observed that operations are functional but constrained by aging equipment, high maintenance costs, and irregular supply.
- o Tariff practices revealed inconsistencies, with affordability challenges for vulnerable households.
- o Community reliance on boreholes underscored the urgency of upgrading infrastructure and ensuring fair pricing mechanisms.

3. Health Centers and IDP Camps

- Inspections showed inadequate hygiene and sanitation facilities, with limited or intermittent water availability.
- Menstrual hygiene management (MHM) materials and private facilities were insufficient, contributing to reduced dignity and poor health outcomes, especially for women and girls.
- The findings emphasized the need to integrate WASH improvements into health centers and IDP settlements to reduce disease risks and improve wellbeing.

4. Women's Centers and Safe Spaces

- o Discussions revealed ongoing support for gender-based violence (GBV) survivors, but facilities were under-resourced.
- Awareness and advocacy programs were ongoing, yet limited in reach due to funding and staffing constraints.
- Consultations highlighted the importance of embedding gender-sensitive WASH solutions and linking them with GBV awareness initiatives to strengthen protection and empowerment.

5.5 Planned Stakeholder Engagement Activities

5.5.1 Stakeholder Engagement Plan (SEP)

1. Introduction

The SEP outlines how stakeholders will be identified, consulted, informed, and engaged throughout the project lifecycle. It ensures compliance with AfDB ISS Guidance Note 10 and Somali regulatory frameworks on community engagement.

2. Objectives of the SEP

- Identify and analyze stakeholders (interest, influence, and vulnerability).
- Provide a framework for transparent and culturally appropriate engagement.
- Ensure timely disclosure of information to all stakeholders.
- Establish a functional grievance redress mechanism (GRM).

Build ownership and support for sustainable project operation.

3. Stakeholder Identification and Analysis

Table 5.5 Stakeholder Mapping Matrix

Category	Stakeholder	Interest/Concerns	Influence/Power	Engagement Approach
Primary (Directly Affected)	School students & teachers	Safe, hygienic sanitation facilities	Medium	Awareness sessions, school committees
	Health centre staff & patients	Reduced disease risks, safe wastewater handling	Medium	Workshops, staff training, noticeboards
	Local communities (adjacent households)	Odour, safety, local employment	Medium	Community meetings, flyers, grievance desk
Secondary (Indirectly Affected)	Traditional elders & religious leaders	Land access, social acceptance	High	Consultative forums, inclusion in GRM
	Women's groups	Safety, menstrual hygiene management	Medium	Gender-focused consultations
	Youth groups	Local jobs, training opportunities	Low	Public consultations, skills programs
Institutional Stakeholders	Ministry of Environment & Climate Change	ESIA approval, monitoring	High	Formal meetings, compliance reporting
	Ministry of Health	Sanitation-health linkages	High	Joint inspections, technical coordination
	South Galkayo Municipality	Land allocation, service delivery	High	Regular coordination meetings

Development Partners	AfDB	Safeguards compliance, financing	Very High	Formal reporting, AfDB
Private Sector				missions
	UNICEF Somalia	Technical standards for WASH	High	Coordination workshops, joint monitoring
	Local contractors	Project delivery, safety	Medium	Contractor agreements, OHS monitoring
	Waste service providers	Sludge management, O&M	Medium	Partnership agreements

Environmental And Social Impact Assessment (ESIA)

4. Stakeholder Engagement Activities

- **Preparation & Design Phase:** Public consultations, ESIA disclosure, validation of site selection.
- Construction Phase: Continuous community updates, safety briefings, OHS monitoring, job opportunities.
- **Operation Phase:** Hygiene promotion, capacity building of school/health staff, periodic community outreach.

5. Information Disclosure

- What: ESIA/ESMP summaries, project timelines, OHS measures, GRM procedures.
- **How:** Flyers in Somali language, public noticeboards at schools'/health centers, radio programs, AfDB website.
- **Principle:** Timely, accessible, culturally sensitive disclosure.

6. Grievance Redress Mechanism (GRM)

- **Community-level complaint desks** at schools and health centers.
- **Escalation** to Ministry.
- **Final appeal** through AfDB safeguard focal points.
- Free, accessible, and inclusive for all groups, including women and children.

7. Feedback Mechanisms

- Biannual community meetings to share project updates.
- Publicly displayed summaries of resolved grievances.
- AfDB and Puntland government disclosure of monitoring results.

8. Budget for SEP Implementation

Table 5.6 SEP implementation budget

Activity	Estimated Cost (USD)
Consultations & Meetings	2,500
Information Disclosure (media, flyers, translation)	2,500
Grievance Mechanism (training, staff, desks)	3,000
Monitoring & Reporting	1,500
Contingency	500
→ Total Estimated SEP Budget:	10,000 USD

9. Monitoring and Reporting

- **Indicators:** Number of consultations held, % of vulnerable groups consulted, grievances resolved, community satisfaction rate.
- **Frequency**: Quarterly monitoring reports; annual review with AfDB.

5.5.2 **Project implementation phase**

OS 10 (Stakeholder Engagement and Information Disclosure) ensures that the SEP will remain fully operational throughout construction. During the construction Phase the stakeholders will be engaged and key activities will include:

- ✓ Regular information updates to communities on construction schedules, traffic management, safety protocols, and anticipated disruptions, to mitigate rumours and opposition.
- ✓ Real-time impact monitoring through community feedback channels to track and adaptively manage dust, noise, labour influx, and other construction-related effect.
- ✓ Ongoing grievance-redress support, ensuring new or evolving concerns particularly those affecting local livelihoods are addressed before escalation.

5.5.3 Project closure phase

During the completion stage the stakeholders will be involved in activities encompassing final inspections, ex-post RAP evaluation, and commissioning. The following engagement activities will be conducted to secure sustainable handover-

- ✓ Validation of compensation and restoration outcomes, co-verified with affected persons to confirm delivery of agreed entitlements
- ✓ Lessons-learned workshops with stakeholders to capture effective practices and areas for improvement, informing future projects.
- ✓ Transition planning sessions with communities and local authorities to formalize long term monitoring and maintenance responsibilities.

Table 5.7: Summary of planned stakeholder engagement in project implementation phase

Engagement	ngagement Purpose				
Type		Meetings			
Pre-	Meetings Ensures early disclosure of construction plans,	5			
Construction	timelines, and risks to promote informed stakeholder				
Sensitization	participation.				
Construction	Promotes coordination and clear communication of	1			
Kick-Off	roles/responsibilities, aligned with inclusive engagement				
Meeting	principles.				
Monthly	Forums Fulfils OS 10's requirement for continuous	20			
Community	consultation to manage emerging issues and maintain social				
Feedback	license.				
Grievance	Provides access to an effective GRM as required by OS 10 to	8			
Redress	address construction-related complaints in real-time.				
Meetings					
Environmental	Monitoring Sessions Ensures that construction risks (dust,	8			
& Social Risk	waste, labour influx) are monitored with stakeholder				
	involvement, as required.				
Labour	abour Promotes non-discriminatory employment practices, working				
Engagement	conditions, and grievance channels for workers.				
Meetings					
Traffic and	Informs stakeholders of potential access disruptions and	8			
Public Safety	ensures inclusion of vulnerable road users (per OS 10)				
Meetings					
Women and	Dialogues Supports equitable participation, safeguards	2			
Vulnerable	vulnerable populations, and captures gender-specific				
Group	concerns.				
Emergency	Preparedness Meetings Ensures communities are informed	4			
Response and	and prepared to respond to construction-related incidents or				
	health risks.				
Decommissioni	A decommissioning meeting will be convened to formally	1			
ng meeting	mark the closure of project activities and to ensure a				
	transparent, inclusive, and accountable handover process. The				
	meeting will bring together key stakeholders, including				
	representatives from the implementing agency, local				
	government officials, community leaders, project-affected				
	persons (PAPs), and the project team.				

5.5.4 Process to be followed for arranging engagement activities

- a) Engagement planning & scheduling: This will involve drafting of an engagement calendar aligned with project timelines, selection of venues based on accessibility and security considerations.
- b) **Notification & mobilization:** This will involve issuing of formal invitations or public notices (radio, posters, local leaders), and mobilization at least 5 working days in advance.
- c) **Logistics and resource preparation:** This will include securing venues, arranging refreshments, transport support for vulnerable group, prepare communication materials (presentations, banners, feedback forms), setting up the venue etc.
- d) **Conduct of engagements:** This will be the recording of proceedings and gathering feedback systematically.
- e) **Post-engagement follow-up:** This will involve compiling of meeting minutes and sharing with participants, integration of feedback into project planning.

5.5.5 Engagement protocols

During engagement, the following protocols shall be applied;-

- Respect and Inclusivity: Ensure respectful, inclusive participation with attention to gender, age, and disability considerations.
- Free, Prior and Informed Consent (FPIC): Engagements must be voluntary, based on complete and timely information.
- Language and Communication: Use local languages and culturally appropriate methods to ensure understanding.
- Documentation and Transparency: Maintain detailed minutes, attendance records, and audio/visual documentation (if permitted).
- Feedback and Grievance Mechanism: Inform stakeholders of grievance procedures and encourage constructive feedback.
- Security and Ethics: Ensure safe environments and adhere to ethical standards of engagement.

6. ANALYSIS OF ALTERNATIVES

6.1 Sanitation Works Material Alternatives

The choice of pipe material is influenced by:

- Hydraulic and structural design i.e., whether it is gravity or forced sewer.
- Resistance to chemical and biological processes internally and externally e.g., corrosion
- Physical properties of the pipe material i.e., strength (to prevent abrasion)
- Types and number of joints; in view of water tightness which affects infiltration.
- Availability of required sewer diameters and necessary joint fittings
- Cost and ease of materials and installation.

Due to the numerous requirements in the proposed sanitation works, a combination of various pipe materials, which are manufactured locally to internationally recognized standards have been considered. A brief description of the considered pipe materials is given in the following sub-sections:

Pre-cast Concrete Pipes

Spun concrete pipes are manufactured locally by several companies in Somalia. They are the most commonly used for sewer pipes.

Flexible jointed pipes are manufactured in sizes ranging from 150 mm to 975 mm diameter and are connected using rubber rings. They are vertically cast in vibrated molds. They are the most commonly used type of concrete pipes.

Rigid jointed pipes are rarely used for sewers. They are connected using tarred hessian and cement mortar. Ogee jointed pipes, commonly used for surface water drainage systems, are available in sizes from 100 mm to 1525 mm diameter. Larger sizes and higher strength classes can be manufactured on order. Concrete pipes are usually laid on a concrete bed and provided with a haunch and surround or reinforcement to meet the loading requirements.

The disadvantages of using concrete pipes include their <u>high friction coefficient and</u> <u>susceptibility to corrosion</u> due to the generation of hydrogen Sulphide gas, especially at high ambient temperatures and long retention time.

uPVC Pipes

Un-plasticized PVC pipes are manufactured in East Africa in metric sizes up to 630 mm diameter and in different stiffness ratings. The pipes are manufactured in accordance with KS 06-149 and both rubber ring jointed, and cement jointed pipes are available.

Their main advantage is the low costs associated with purchase, transportation, handling and laying as well as resistance to corrosive atmosphere, soils or wastewater conditions. Most contractors are also experienced in handling uPVC pipes.

However, exposure to strong sunlight over an extended period causes brittleness although this has become less common with modern pipes. There has also been a reservation regarding the quality of the locally manufactured large diameter uPVC pipes and the ability of Contractors to properly lay large dimeter uPVC pipes. Thus, their use has therefore been limited to diameters less than 300 mm.

Steel Pipes

Steel pipes are manufactured in the EAC Region for both Water Supply and Sanitation applications. In the construction of sewers, steel pipes are recommended for pumping mains and at exposed sewer locations such as aerial river crossings. However, protection against corrosion is required internally and externally and this is provided using bitumen sheathing with external sheathing reinforced with glass fiber windings. Alternatively, modern proprietary epoxy coatings can be used. Joints are bolted flanges, flexible couplings, or socket and spigot joints.

From field investigations, it has been found that when steel pipes are exposed to strong sunlight, the external protective bitumen coating becomes brittle and cracks, thus becoming susceptible to the atmosphere. There are also cases where the pipe couplings, and even the pipes, have been vandalized and stolen for recycling purposes. The high cost of steel pipes also discourages their use in other normal conditions.

Double wall HDPE Pipes

HDPE pipes are ideal for many different applications including municipal, industrial, energy, geothermal, landfill and more. HDPEs pipes are strong, durable, flexible and lightweight. When fused together, HDPE has a zero-leak rate because the fusion process creates a monolithic HDPE system. HDPE pipes are also a more environmentally sustainable option as they are non-toxic, corrosion and chemical resistant, have long design life, and are ideal for trenchless installation methods owing to their flexibility.

With manufacture of HDPE Pipes gaining momentum in the region and considering its rapid use in most Municipal / Public Infrastructure, the benefits of using HDPE pipes in Sewerage Systems including internal pipe smoothness, ease of use in confined spaces and resistance to corrosion, make HDPE Pipes the ideal sewer pipe material.

Double Wall High-Density Polyethylene (HDPE) Sewer Pipes are part of the latest innovations aimed at improving performance, longevity and efficiency of Sewers. Due to the associated technical and economic benefits of using double-walled HDPE Sewer Pipes over traditional sewer materials such as concrete, both Double Wall Corrugated (DWC) and Double Wall Structured (DWS) technologies are gaining preference, both globally and in the region.

"Double-walled pipe" is a secondary containment piping system in which a pipe is encased in an outer covering with an interstitial space between the two diameters. The inner pipe is the carrier pipe while the outer pipe is the containment pipe. International standards including U.S. Environmental Protection Agency (EPA) standards mandate double-walled piping for below-ground transport systems in sanitation and other waste-related sites. High Density Polyethylene (HDPE) is one of the most commonly used materials in the manufacture of double-walled pipes for sanitation. DWC and DWS Pipes are the most common forms.

The difference between Double Wall Corrugated (DWC) and Double Wall Structured (DWS) Pipes lies on their outer layer profile and jointing method. A DWC Pipe has a corrugated outer layer and a push-fit socket and spigot with integral rubber ring joint while a DWS Pipe has relatively smooth outer layer with spiral wound profile between the layers and is joined by extrusion welding. Generally, DWS Pipes guarantee higher Ring Stiffness and pose significant benefits for pipes of diameters above 600mm.

Preference to DWC & DWS HDPE sewer pipes over traditional sewer pipes materials such as concrete is based on the following associated benefits.

- Durability: Over 50 years of economic life (compared to 20years for Concrete Pipes)
- Lightweight: easier and faster installation compared to Concrete Pipes
- Corrosion / chemical resistant; more resistant to acidic conditions (H2S gas)
- Abrasion resistant well suited for solids in sewer applications
- Longer Pipe lengths: less joints and faster installation compared to Concrete Pipes
- Leak tight Joints; sockets & spigot jointing with interlocking rubber rings
- Flexibility; better load capacity and higher tolerance to relative ground movement
- Better hydraulics higher hydraulic carrying capacity due to a low Manning friction coefficient.

6.2 No action plan

No Action Alternative implies that the project will not take place. This is highly undesirable because the present project is supposed to provide a reliable sanitation benefits to the local community. If the status quo is maintained, the locals will continue to suffer from the persistent water-borne disease problems currently experienced. The 'No Action' alternative is therefore ruled out.

7. ASSESSMENT OF ENVIRONMENT AND SOCIAL IMPACTS

7.1 Introduction

This chapter identifies the potential environmental impacts resulting from the proposed project activities. The nature of impacts on the identified resources and receptors are categorized as either positive or negative, direct or indirect, long term or short term. The purpose of this assessment is to identify the significant impacts and to determine the appropriate measures to mitigate the negative impacts and to enhance the positive impacts. Significant impacts are defined as being those that:

- Relate to protected areas or to historically and culturally important areas
- Area of public concern and importance
- Trigger subsequent secondary impacts
- Elevate the risk of life-threatening situations

7.2 Project Positive Impacts

Project positive impacts during construction phase are summarized below.

- Employment Creation: At construction stage workers will be deployed to help in construction and land preparation activities. This will include both skilled and unskilled personnel especially from the local population with approximately 200 direct and indirect jobs.
- Income/Revenue to Government: Income to government will be realized in terms of taxes generated during the acquisition of relevant statutory licenses which include but are not limited to Water Services License, EIA License, Business permit, Operators permit among others. Materials to be used during construction will also be taxable. Through revenues generated, the government will be capable of financing its responsibility to her citizens.
- **Income to Other Businesses:** During implementation of the project, there will be need for transporters, suppliers of raw materials and other service providers, who will benefit from the proposed development.
- **Improved public hygiene and sanitation** to all intended target users including homesteads, IDP camps and public institutions..

7.2.1 Operation phase positive impacts

The main objective of the Project is to improve the quality of life of people within Galkayo municipality through provision of improved sanitation services. The positive impacts associated with the Project operation phase include:

- Reduced pollution of natural hydrological systems.
- Reduced cases of water borne diseases associated with pollution of water resources

by raw sewage.

- Improve aesthetic outlook of Galkayo Municipality that is currently comprised by raw sewer flowing in storm drains
- Trigger development of modern infrastructure within Galkayo town due to availability of adequate sewer infrastructure.
- Reduce distances covered by exhausters to sludge discharge points (reduced costs)
- Reduce contamination of ground water.

7.3 Construction Phase Negative Impacts

A summary of negative impacts of the proposed project include;

- Impact on water resources
- Impact on soil resources
- Impact on air quality
- Impact on noise and vibration
- Impact on flora and fauna

7.3.1 Impacts on Water Resources

Galkayo municipality, located within Galmudug state which has mainly groundwater-fed boreholes and shallow wells. The Project activities will either indirectly or directly interact with these water reservoirs through sedimentation and possible pollution from raw sewerage leaking from rehabilitation works within the area.

Potential Impacts

Project activities listed above will interact with water resources within the Project area highlighted above in the following ways.

- Site activities such as trench excavations could result to loosening of soils that could result to sedimentation and siltation that in turn affect the water reservoirs.
- There will be direct interaction from the abstraction of water from surface water bodies for construction (e.g. for dust control).
- Un-serviced plant and equipment on site could result to oils and fuels leaks that could contaminate water resources.
- The nature of the construction activities of the proposed waste water facility construction will render the soils susceptible to agents of erosion subsequent siltation of rivers and stream along the Water alignment. The small magnitude of this impact on surface water quality and the low sensitivity of the rivers to increased turbidity means the significance of this impact is assessed as minor.

Pre- Mitigation Impact Assessment is presented in the table below

Table 7.1: Pre-Mitigation Impact Assessment

	8 1
Impact	Siltation and pollution of Surface Waters Resources

Nature of	Negative	Positi	ve	Neutral		
Impact	Eroded soil and leaked	oils and	fuels enterin	g groundwater-fed		
	boreholes and shallow well	boreholes and shallow wells				
Type of Impact	Direct	Indirect	I	nduced		
	Impact is a result as a direct	t interaction	between Proj	ect activities and the		
	environment around the fac	cility.				
Duration of	Temporal Short	term	Long term	Permanent		
Impact	The impact is expected to be	e short term	, however in t	he case of serious		
	erosion the impacts of siltat	ion of surfa	ce water may	be experienced long		
	term (into the operational p	hase).				
Impact Extend	Local	Regional	I	nternational		
	The impact will be limited to the footprint of the Water alignment and					
	immediate surrounds. The	dilution of	sediments in t	he river will render		
	this impact negligible at the	regional sc	ale			
Impact scale	The impact is considered as	small (loca	l) scale.			
Frequency	Continuous					
Livelihood	Possible					
Impact	Positive Negligib	le Small	Medi	um Large		
magnitude	Based on the above the imp	act magnitu	ide is consider	ed small.		
Resource /	Low	Medium	I	High		
receptor	The sensitivity of the river	s along the	proposed pro	oject to Siltation and		
sensitivity	pollution is considered to be medium to low.					
Impact	Negligible Minor Moderate Major					
significance	Considering the impact ma	0				
	to low, the overall significant	nce is consid	dered to be mi	nor		

Mitigation

The following mitigation measures will be implemented to minimize the potential for siltation and sedimentation of surface water by soils eroded from construction sites

- Activities shall be conducted > 100 m away from water bodies, except where crossings are required.
- All waste water which may be contaminated with oily substances must be managed in accordance with an appropriate Waste Management Plan (WMP).
- No hydrocarbon-contaminated water may be discharged to the environment.
- At construction stage, the contractor will prepare Specific Construction Environment and Social Management Plan (C-ESMP) which included among other; Soil and Sedimentation Control Plan, Spoil Management Control Plan and Waste Management Plan.

Residual Impact

The implementation of the proposed mitigation measures reduces the significance of the residual impact to negligible from minor within water bodies identified. The table below

presents residual impact significance following mitigation measures

Table 7.2: Residual Impact Significance

Impact	Project Phase	Significance	Residual Impact
		(Pre-	Significance
		mitigation)	(Post-mitigation)
Availability and Quality of	Construction	Minor	Negligible
Water Resources			
(groundwater-fed			
boreholes and shallow			
wells)			

7.3.2 Impacts on Soil Resources

Baseline

The dominant soil type in Galkayo is shallow sandy and/or stony soils and deeper calcareous soils, with the central part of Somalia also having moderately deep loamy soils high in calcium carbonate or gypsum. The region features Vertisols on clay plains and is subject to moisture stress, low fertility, and potential salinity

Potential Impacts

The excavation of soil for the construction of septic tanks will disrupt the soil cohesion and also may result in surplus soil due to the installation within the same excavated trenches. If not properly restored or managed, such soils may be eroded off. Temporary soil stockpiles established during construction of infrastructure will be at risk of erosion from wind and rainfall. Soil contamination as a result of possible oil and fuel leaks from unservices plant and equipment on site is also a potential impact.

Impact Assessment

The table presents Pre- Mitigation Impact Assessment.

Table 7.3: Pre-Mitigation Impact Assessment

Impact	Soil Erosion during Construction					
Nature of Impact	Negative		Positiv	Positive		eutral
	Loss of soil cohesion contributing to erosion.					
Type of Impact	Direct Indirect		Induced		ced	
	Impact is a result as a direct interaction between project activities and the environment along the footprint of the project.					
Duration of Impact	Temporal	Short te	t term Long term			Permanent
	The impact is expected to be short term, however in the case of serious					

	erosion the impacts may be experienced long term.								
Impact Extend	Local Regional		International		onal				
	The impact wi	The impact will be limited to the footprint of the project and immediate							
	surrounds.								
Impact scale	The impact is	The impact is considered as small (local) scale.							
Frequency	Continuous	Continuous							
Livelihood	Possible								
Impact magnitude	Positive	Negligib	le	Small	Mediu		lium		Large
	Based on the a	bove the i	mpac	t magnit	tude is c	onsic	lered s	mal	1.
Resource / receptor	Low		Med	lium			High	,	
sensitivity	The sensitivity	y of the	rivers	along	the pro	opose	ed pro	ject	to erosion is
	considered to	oe mediun	n to lo	ow.					
Impact significance	Negligible	Mino	r		Moderate			Ma	njor
	Considering the impact magnitude is small and the sensitivity is medium								
	to low, the ove	rall signif	icanc	e is cons	idered t	o be 1	minor		

Mitigation

The following mitigation measures will be implemented to minimize the potential for soil erosion:

- Vegetation clearing and topsoil disturbance will be minimised.
- Contour temporary and permanent access roads / laydown areas so as to minimise surface water runoff and erosion.
- Sheet and rill erosion of soil shall be prevented where necessary through the use of sand bags, diversion berms, culverts, or other physical means.
- Topsoil shall be stockpiled separate from subsoil. Stockpiles shall not exceed 2 m height, shall be located away from drainage lines, shall be protected from rain and wind erosion, and shall not be contaminated.
- Wherever possible construction work will take place during the dry season.
- Topsoil shall be evenly spread across the cleared areas when reinstated.
- Accelerated erosion from storm events during construction shall be minimised through managing storm water runoff (e.g. velocity control measures).
- Soil backfilled into excavations shall be replaced in the order of removal in order to preserve the soil profile.
- Spread mulch generated from indigenous cleared vegetation across exposed soils after construction
- At construction stage, the contractor will prepare Specific Construction Environment and Social Management Plan (C-ESMP) which included among other; Soil and Sedimentation Control Plan, Spoil Management Control Plan and Waste Management Plan.

Residual Impact

The implementation of the proposed mitigation measures reduces the significance of the

residual impact to negligible from minor along the entire project site. The table below presents residual impact significance following mitigation measures

Table 7.4: Residual Impact Significance

Impact	Project Phase	Significance	Residual Impact
		(Pre-mitigation)	Significance
			(Post-mitigation)
Loss of soil resources due to	Construction	Minor	Negligible
erosion			

7.3.3 Impact on Air quality.

Baseline

As provided by Air quality index (AQI⁺) and PM2.5 air pollution in Somalia, the ambient air quality status of South Galkayo is summarized in **Tables 7.5 and 7.6** below.

Table 7.5: Ambient Particulate Matter (PM_{2.5} and PM₁₀)

Peri Urban	Parameter	Concentration (µg/m³)	Guideline (µg/m³)1
Centers in	Particulate matter ≤2.5 (pm _{2.5})	15 to 20	35
Somalia	Particulate matter ≤10 (pm ₁₀)	20 to 35	100

Table 7.6: Ambient NOx SOx, CO2 and O3

Peri Urban	NO ₂		SO ₂		CO		03	
Centers in Somalia	Conc. (ppm)	EMC AQR guide 2014 (ppm)	Conc. (ppm)	EMC AQR guide 2014 (ppm)	Conc. (mg/m³)	EMC AQR guide 2014 (mg/m³)	Conc. (ppm)	EMC AQR guide 2014 (ppm)
	<0.01	0.5	0.011	0.191	0.07	10.0	0.015	0.12

Activities associated with the Project including machineries and equipment's are not anticipated to generate significant volumes of gases emissions to warrant this impact assessed as significant

Potential Impacts

The following would be expected during construction.

- Emissions of oxides of nitrogen (NO₂ in particular) mainly from constructionrelated vehicles (and to a lesser degree from construction generators and other hydrocarbon powered equipment); and
- Dust and particulate matter (as PM₁₀) created by construction-related vehicle traffic

TCE/VITAL CARE

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¹ Environmental Protection Agency (EPA) National Ambient Air Quality Standards (NAAQS)

on unpaved roads.

Impact Assessment

The assessment identified a list of receptors including churches, schools, markets and health facilities that could be affected by polluted air as a result of Project Activities that release SOx, NOx Co and O_3 and PM_{10} and $PM_{2.5}$

Pre- Mitigation Impact Assessment in **Table 7-7 below.**

Table 7.7: Pre-Mitigation Impact Assessment

Impact	Degradation of the Air-shed during Construction							
Nature of Impact	Negative			Positive		Nε	eutral	
	Increase in airbo	orne poll	lutior	١.				
Type of Impact	Direct		Indi	irect			Indu	ced
	Impact is a resu	lt as a di	rect i	nteracti	on betw	een p	roject	activities
Duration of Impact	Temporal	Shor	t tern	ı	Long t	erm		Permanent
	The impact is ex	cpected t	o be	tempora	ary as er	nissio	ns ari	se throughout the
	construction ph	ase.						
Impact Extend	Local		Reg	ional			Inter	national
	The impact will	be limit	ed to	the foo	tprint of	the p	roject	and immediate
	surrounds.							
Impact scale	The impact is co	onsidere	d as s	mall (lo	cal) scal	e.		
Frequency	Intermittent – ir	npacts w	vill ty	pically	only aris	se du1	ring w	orking hours
Livelihood	Inevitable							
Impact magnitude	Positive 1	Negligib	le	Small		Med	ium	Large
	Based on the ab	ove the i	mpa	t magn	itude is	consi	dered	medium.
Resource / receptor	Low		Med	lium			High	
sensitivity	The sensitivity of	of humai	n rece	ptors is	Mediu	m in d	lwelli	ngs and
	settlements							
Impact significance	Negligible Minor Moderate Major				Major			
	Dust emissions	have the	pote	ntially t	to have l	Mode	rate si	gnificant impacts
	at nearby sensit	ive hum	an re	ceptors.				

Mitigation

As general measures for all locations:

- Regular dust suppression through water spraying on dusty roads and worksites
- Undertake monitoring close to dusty activities, noting that this may be daily visual inspections, or passive/active monitoring as parameter
- Undertake inspections to ensure compliance with the Dust Management Plan;
- Plan potentially dusty activities so that these are located as far from receptors as feasible;
- Erect solid screens if feasible around stockpiles and concrete batching;
- Avoid run off of mud and water and maintain drains in a clean state;

- Remove dusty materials form site as soon as possible if not being re-used. If being re-used, cover or vegetate if possible;
- Impose speed limits on haul routes and in construction compounds to reduce dust generation;
- Minimise drop heights when loading stockpiles or transferring materials; and
- Expose the minimum area required for the works, and undertake; and exposure on a staged basis to minimise dust blow.

Residual Impact

With the implementation of suitable mitigation and with adequate monitoring, residual impacts associated with dust and PM_{10} from construction activities are **Negligible** as presented in the table below

Table 7.8: Residual Impact Significance

Impact	Project Phase	Significance (Pre-mitigation)	Residual Impact Significance (Post-mitigation)
Road Traffic Exhaust Emissions	Construction	Negligible	Negligible
Dust and PM from construction activities	Construction	Moderate	Negligible

7.3.4 Impacts related to Noise and Vibration

Baseline

World Bank Group General EHS Guidelines provide guidance on acceptable noise levels based on WHO standards and these are set out in **Table 7-9** below.

Table 7.9. World Bank Group Noise Level Guidelines

	Maximum Allowable Ambient Noise Levels, LAeq,1hr, dBA Free					
	Daytime	Night-time				
	07:00 – 22:00	22:00 - 07:00				
Residential, institutional,	55	45				
educational						
Industrial, commercial	70	70				

Impact Assessment

Potential Impact

The assessment identified a list of receptors including churches, schools, markets and health facilities that could be affected by excessive noise beyond recommended World

Bank Group Guidelines.

Pre mitigation Impact Assessment is presented in **Table 7-11**.

Table 7.10: Pre-Mitigation Impact Assessment

Impact	Noise during Construction						
Nature of Impact	Negative	Negative Positive				eutral	
	Elevated noise lev	vels from	n operatior	of construc	ction equ	uipment.	
Type of Impact	Direct		Indirect		Indu	ced	
	Impact is a result	of noise	e generated	by construc	ction act	ivities.	
Duration of Impact	Temporal	Short	term	Long tern	n	Permanent	
	Impacts are expec	ted to b	oe short teri	n (up to one	e month	at any	
	individual water	line wit	hin each of	the target d	lrainage	area.	
Impact Extend	Local		Regional		Inter	national	
	The impact will b	e limite	d to the foo	tprint of the	e project	and immediate	
	surrounds.						
Impact scale	The impact is con	sidered	as small (le	ocal) scale.			
Frequency	Impacts may occu	ır durin	g daytime	periods ove	r a short	-term duration at	
	each water line al	ignmen	ıt.				
Livelihood	Inevitable						
Impact magnitude	Positive No	egligible	e Small	M	edium	Large	
	Based on the above	ve the ir	mpact magi	nitude is cor	nsidered	negligible to	
	small.						
Resource / receptor	Low		Medium		High		
sensitivity	_	Dwellings are considered to have a high sensitivity to noise					
Impact significance	Negligible Minor Moderate Major					,	
	Considering the i	-	-				
	sensitivity is high	, the ov	erall signif	cance is cor	sidered	to be minor	

Mitigation

The following standard mitigation measures will be employed

- Siting noisy plant and equipment as far away as possible from human settlement, and use of barriers (e.g. site huts, acoustic sheds or partitions) to reduce the level of construction noise at receptors wherever practicable;
- Where practicable noisy equipment will be orientated to face away from the nearest Human settlement and other receptors;
- Working hours for significant noise generating construction work (including works required to upgrade existing access roads or create new ones), will be daytime only;
- Alternatives to diesel and petrol engines and pneumatic units, such as hydraulic or electric-controlled units, will be used, where practicable;
- Where practicable, stationary equipment will be located in an acoustically treated enclosure;

- For machines with fitted enclosures, doors and door seals will be checked to ensure they are in good working order; also, that the doors close properly against the seals;
- Throttle settings will be reduced and equipment and plant turned off, when not being used;
- Equipment will be regularly inspected and maintained to ensure it is in good working order. The condition of mufflers will also be checked; and fitting of mufflers or silencers of the type recommended by manufacturers.

Residual Impact

Residual Impact Significance is presented in **Table 7-12** below.

Table 7.11: Residual Impact Significance

Impact	Project Phase	Significance	Residual Impact
		(Pre-mitigation)	Significance
			(Post-mitigation)
Noise from construction activities affecting nearby dwellings	Construction	Minor	Negligible

7.3.5 Impacts on Flora

Baseline

Galkayo Somalia falls within Arid and Semi-Arid (ASALs) zone within ecological zone V-VI. Zone V receives rainfall between 300mm-600mm annually and is characterized by low trees, grass and shrubs while zone VI receives annual rainfall of 200mm to 400mm. The Project area which is estimated to be approximately $20m^2$ receives an average of 240mm of rainfall per year, the rainfall is erratic and short making it unfavorable forvegetation growth. However, the area was once covered exhibits arid characterizes with dominant species noted as cactus family and *Acacia sp* including; Acacia species (*A. mellifera*, *A. tortilis*), Commiphora spp., Dobera glabra, Boscia coriacea.

Potential Impact

There are **no** protected vegetation cover within the proposed septic tanks locations that is considered a fragile ecosystem, sensitive to changes to its components. Pre mitigation Impact Assessment is presented in **Table 7-13 below**.

Table 7.12: Pre-Mitigation Impact Assessment

Impact	Flora and Vegetation during Construction						
Nature of Impact	Negative	Positive	Neutral				
	Disturbance to vegetation cover along the Water alignment.						
Type of Impact	Direct	Indirect	Induced				

	Impact is as a result of a direct interaction between the project (i.e.								
	Construction activities) and the existing vegetation along the water and								
	sewer lines	sewer lines							
Duration of Impact	Temporal	Shor	t term	ı	Long t	erm		Per	rmanent
	The effect is co	onsidered	perm	anent a	s the are	eas w	here v	eget	ation will be
	removed for the	ne constru	ıction	of the l	ine will	have	to be j	pern	nanently kept
	with vegetation	n for mai	ntena	nce pur	poses di	uring	the op	erat	tional phase
Impact Extend	Local		Reg	ional			Inter	natic	onal
	The impact wi	ll be limit	ed to	the foot	tprint of	the p	oroject	and	immediate
	surrounds.								
Impact scale	The impact is	considere	d as s	mall (lo	cal) scal	e.			
Frequency	Once off								
Livelihood	Inevitable								
Impact magnitude	Positive	Negligib	le	Small		Med	lium		Large
	Based on the a	bove the	impac	t magn	itude is	consi	dered	neg	ligible
Resource / receptor	Low		Med	lium			High		
sensitivity	The onsite wa	astewater	facili	ties wi	ll be co	nstru	cted v	with	disturbed or
	modified envi	ronment t	heref	ore the	sensitivi	ity is	consid	lered	l low.
Impact significance	Negligible	e Minor		Moderate			Ma	ijor	
	Considering tl	ne impact	magr	nitude is	negligi	ble a	nd the		
	sensitivity is lo	ow, the ov	erall	signific	ance is c	onsi	dered t	to be	negligible

Mitigation

The following standard mitigation measures will be employed

- Avoidance of impacts should be prioritised.
- Vegetation shall only be cleared along the Water alignment only if the vegetation and will interfere with Project construction and/or present a hazard.
- Areas to be cleared shall be agreed and demarcated before the start of the clearing operations to minimize exposure.
- Stage vegetation clearance is also recommended so as not to clear the entire corridor all at once.
- The use of existing cleared or disturbed areas for the Contractor's Camp, stockpiling of materials etc. shall be encouraged.
- Whenever possible, all damaged areas shall be reinstated and rehabilitated upon completion of the contract to as near pre-construction conditions as possible.
- Rehabilitation of temporary construction sites and pioneer camps (if needed) should be done as swiftly as possible and always with suitable native grasses and other plants

Residual Impact

Residual Impact Significance is presented in the table below

Table 7.13: Residual Impact Significance

Impact	Project Phase	Significance	Residual Impact
		(Pre-mitigation)	Significance
			(Post-mitigation)
Disturbance to vegetation	Construction	Negligible to Minor	Negligible
cover			

7.4 Waste Management on Site

Wastes on Site will include both liquid and solid wastes,

Liquid Wastes

- •
- Minor spills of fuels, oils, and lubricants during construction from equipment.
- Concrete wash water from mixing equipment and tools.

Solid Wastes

- Excavated soil, sand, gravel, and debris from construction.
- Packaging materials (plastic, cardboard) and construction offcuts.
- Used personal protective equipment (PPE).
- Minor metal scraps and broken tools.

Such wastes will be managed as summarized below;

- The contractor shall develop a comprehensive Waste Management Plan (WMP) prior to commencement of works
- Properly labelled and strategically placed waste disposal containers shall be provided at all places of work
- Litter bins should have secured lids to prevent animals and birds from scavenging
- All personnel shall be instructed to dispose of all waste in a proper manner
- Recycling of construction material shall be practiced where feasible e.g. containers and cartons
- Earth spoils shall be disposed of in pre identified sites
- Water containing pollutants such as concrete or chemicals should be directed to a conservancy tank for removal from the site where applicable
- Potential pollutants of any kind and form shall be kept, stored and used in a manner that ensures no escape
- In case of any form of pollution, the contractor should notify the Resident Engineer (RE)
- Wash areas shall be placed and constructed in a manner that ensures the surrounding areas including groundwater are not polluted
- No grey water, runoff or uncontrolled discharges from the site or working areas to any adjacent Storm water channels.

7.5 Social Resources and Receptors

7.5.1 Workers, Community Health Safety and Security

Baseline

The Assessment recorded receptors that could be exposed due to Project activities. The risks will be to both; (i) Project Workers, (ii) School Children and Students and (iii) General Community Members

Some of the receptors recorded included;

- Hawlwadaag IDP School
- Calanely IDP School
- Prof Adow Professional Training Centre
- Residential areas
- Educational and Religious Centres

The proposed septic tanks would be constructed within the various institutions as elaborated in Table 2-2 compounds hence will be in close proximity.

Potential Impact

The presence of the Project could affect the health, safety and wellbeing of the communities along the proposed water alignment routes including increased project-related traffic during site preparation including site clearance and excavation works and inappropriate waste handling or disposal, and accidental leaks and spills could result to be below listed risks.

- Accidents associated with plant and equipment movement around the project locations or open unbarricaded trenches or without warning tapes.
- Air pollution beyond thresholds provided by national legislations
- Noise and excessive vibrations beyond the levels provided by national legislations
- Drowning risks to school children and community Members who might trip and fall into trenches that have percolated runoff water.
- Cave-Ins- The greatest danger in trenching and excavation is cave-ins. Unstable soil and inadequate shoring or sloping can lead to sudden collapses, burying workers and causing serious injuries or fatalities to workers
- Falls and Falling Loads: Workers or equipment near the edge of a trench can fall in, leading to injuries. Additionally, tools, machinery, or materials can fall into the trench, posing risks to those working inside.
- Utility Strikes; Contact with underground utilities, such as electrical cables, internet, or water mains, can cause severe injuries or disrupt services leading to community unrest and grievances
- Equipment-Related Accidents, heavy machinery used for digging or transporting materials can create additional risks, such as accidental contact with workers or trench edges

Impact Assessment

Pre mitigation Impact Assessment is presented in **Table 7-14 below**.

Table 7.14: Pre-Mitigation Impact Assessment

Impact	Community Safety an	Community Safety and Environment Health						
Nature of Impact	Negative Positive Neu					eutral		
	ESHS risks to Commu	ESHS risks to Community and Workers						
Type of Impact	Direct	Indi	rect		Indu	ced		
	Impact that result from	n a direct in	teractio	n between th	e Proj	ect (i.e. increased		
	plant and equipment	traffic) and	the lo	cal population	n alor	ng the water and		
	sewer lines.							
Duration of	Temporal	Short term		Long term		Permanent		
Impact	The increased traffic e			_	-			
	construction activities	_	ace in a	sequential m	anner	during the		
	length of the construct							
Impact Extend	Local	O	ional			national		
	The impact will be lim	ited to the f	ootprin	t of the projec	t and	immediate		
	surrounds.							
Impact scale	The impact is consider		,					
Frequency	The frequency is cons							
	along the proposed pr	oject site ov	er the d	uration of the	cons	truction phase.		
Livelihood	Inevitable							
Impact		egligible	Small	Med		Large		
magnitude	Based on the above the			e is considered				
Resource /	Low		lium		High			
receptor	The sensitivity of the r	- `				- ,		
sensitivity	road users including v	ehicle users	, pedes	trians and cyc	clists)	is considered		
	medium.			T				
Impact	Negligible	,				,		
significance	Considering the magn							
	community safety d		ruction	activities is	cons	sidered to be of		
	moderate significance.	•						

Mitigation

- Conduct a Pre-Work Assessment, assess the soil type, weather conditions, and proximity to structures or utilities. Identify potential hazards and plan the excavation accordingly.
- Use Protective Systems, implement appropriate protective systems, such as: (i) Shoring: Positioning supports to prevent soil movement. (ii) Shielding: Creating interior trench boxes to protect workers and (iii) Sloping: Cutting back trench walls at an angle to reduce collapse risk.
- Inspect Trenches Daily, a competent person should inspect trenches daily and after

events like rainstorms or vibrations to ensure continued stability.

- Maintain Safe Access and Egress, provide ladders, ramps, or other safe means of
 entry and exit in trenches that are four feet or deeper. Always place these within
 twenty-five feet of workers, for deep cut provide reinforced cage for workers.
- Stay Aware of Utility Locations: Use "Call Before You Dig" services to locate and mark underground utilities before excavation begins.
- Monitor Hazardous Atmosphere, test the air quality inside trenches over four feet deep for oxygen levels, toxic gases, and flammable atmospheres. Use ventilation if necessary.
- Control Water Accumulation, use pumps or diversion systems to keep water out of the trench. Avoid working in trenches with standing water unless proper precautions are taken.
- Secure the Site, keep heavy equipment and materials away from trench edges. Install barriers and warning signs to protect workers and prevent accidental falls.
- Train Workers, ensure all workers are trained in trench safety, recognizing hazards, and responding to emergencies.
- Ensure that work sites are fenced and that signs are put up around work fronts and construction sites advising people of the risks associated with trespass. When work fronts are less than 10 metres from a community or house, employ security guards from the local community to prevent trespass.

Residual Impact

The significance of the residual impacts on community health and safety after the implementation of mitigation measures is presented in **Table 7-19** below.

Table 7.15: Residual Impact Significance

Impact	Project Phase	Significance (Pre-mitigation)	Residual Impact Significance (Post-mitigation)
ESHS risks to Community and	Construction	Moderate	Minor
Workers			

7.5.2 Children Protection

The possibility of contractor children abuse is through hiring of child labour, also labour force on site might abuse children within the Project area through sexual advances that could lead to early pregnancies and school dropout, including exposure to communicable diseases such as HIV and AIDS. The contractor will undertake the below listed mitigation measures.

Mitigation Measures

- The contractor will develop and implement a Children Protection Strategy that will
 ensures minors are protected against negative impacts associated by the Project
 including SEA.
- All staff of the contractor must sign, committing themselves towards protecting children, which clearly defines what is and is not acceptable behaviour
- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children to worker's home, unless they are at immediate risk of injury or in physical danger.
- Refrain from physical punishment or discipline of children
- Refrain from hiring children for domestic or other labor, which is inappropriate
 given their age, or developmental stage, which interferes with their time available
 for education and recreational activities, or which places them at significant risk of
 injury.
- Comply with all relevant local legislation, including labor laws in relation to child labor specifically provisions of Somalia's Employment Act Cap 226 of 2007 Part VII on protection of children against exploitation

7.5.3 Sexual Exploitation and Abuse (SEA)

This impact refers to sexual exploitation and abuse committed by Project staff against communities and represents a risk at all stages of the Project, especially when employees and community members are not clear about prohibitions against SEA in the Project.

Mitigation Measures

- Develop and implement a SEA action plan with an Accountability and Response Framework as part of the C-ESMP. The SEA action plan will follow guidance on the World Bank's Good Practice Note for Addressing Gender-based Violence in Investment Project Financing involving Major Civil Works (Sept 2018).
- Prevention of SEA: including COCs and ongoing sensitization of staff on responsibilities related to the COC and consequences of non-compliance; project-level IEC materials;
- Response to SEA: including survivor-cantered coordinated multi-sectoral referral
 and assistance to complainants according to standard operating procedures (SOP);
 staff reporting mechanisms; written procedures related to case oversight,
 investigation and disciplinary procedures at the project level, including confidential
 data management;
- Engagement with the community: including development of confidential community-based complaints mechanisms discrete from the standard GRM; mainstreaming of Sexual Exploitation and Abuse (SEA) awareness-raising in all community engagement activities; community-level IEC materials; regular community outreach to women and girls about social risks and their SEA-related rights;
- Management and Coordination: including integration of SEA in job descriptions, employments contracts, performance appraisal systems, etc.; development of contract policies related to SEA, including whistle-blower protection and investigation and disciplinary procedures; training for all project management; management of coordination mechanism for case oversight, investigations and disciplinary procedures; supervision of dedicated PSEA focal points in the project and trained community liaison officers.

7.6 Operation Phases Negative Impacts

7.6.1 Sanitation Works Operation Impacts

Environment and social Impacts during operation phase of the proposed construction and rehabilitation of onsite waste water facilities is presented in sub sections below

Water Pollution by Raw Sewerage

Water sources in the area are mainly shallow wells, dams, seasonal rivers and ground water aquifers. Poorly maintained and designed sewers can lead to spillage of raw sewage particularly at manholes and burst areas into the environment which eventually seeps in water sources. These can cause outbreaks of water borne related diseases like cholera and typhoid.

Mitigation Measures

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- The water and sanitation departments will ensure proper and periodic maintenance of sewers and treatment plants
- The water and sanitation departments will activate a community watch group for information sharing on the status of the sewers
- Regular cleaning of grit chambers and sewers to remove grease, grit, and other debris that may lead to sewer backups
- Development of an inventory of system components, with information including age, construction materials, and drainage areas served
- Design manhole covers to withstand anticipated loads and ensure that the covers can be readily replaced if broken to minimize entry of garbage and silt into the sewer system
- Ensure sufficient hydraulic capacity to accommodate peak flows and adequate slope in gravity mains to prevent build-up of solids and hydrogen sulphide generation
- Regular inspection of the system to ensure performance is maintained at high levels
- Blockages should be detected and promptly replaced
- Regular monitoring and sampling of the wastewater at influent and effluent points as well as in the receiving water bodies
- Communities living within the river basins where the trunk sewers will be constructed should be enlightened on dangers of using raw sewerage to irrigate farmlands.

Oduor Menace

The process of wastewater collection, conveying or treatment has the potential to generate and release odors to the surrounding area. Most odor problems occur in the collection system, in primary treatment facilities and in solid handling facilities as well as the sludge drying beds. The most frequently reported symptoms attributed to odors from treatment plants include headache, nausea, hoarseness, cough, nasal congestion, palpitations shortness of breath, stress, drowsiness, alterations in mood, and eye, nose, and throat irritation. Hydrogen Sulphide (H₂S) is the most prevalent gas associated with domestic wastewater collection and treatment.

The conditions leading to Hydrogen Sulphide formation usually favor the production of other odorous gases such as ammonia which may have considerably higher undetectable odor thresholds, and consequently H₂S may be an indicator of their presence. Exposure of receptors to levels of hydrogen sulphide above 5ppb can lead to odor nuisance.

Mitigation to odor menace

• The water and sanitation departments will ensure appropriate covering/ventilation

of the septic tank

- The water and sanitation departments will ensure appropriate handling and removal of sludge
- The water and sanitation departments will ensure scum is appropriately disposed of or properly stabilized
- The water and sanitation departments will ensure that the pond series have adequate water flow and aeration to reduce the potential of odour formation
- The perimeter of the proposed site should be vegetated with trees and plants of varying heights thereby forming windbreaker and reduce dispersion of odour

Risks Associated with Sludge

Septic tanks often require sludge removal overtime in order to guarantee efficient operation of the facility. However, if sludge is not management properly it can pose significant health hazards to workers, community and water quality from the de-sludging exercise.

Also, if sludge on site is not properly managed, it leads to significant land and soil contamination at the disposal site and eventually pollution water resources when leachate from the sludge flows into water resources. Therefore, mitigation measures for sludge associated risks are presented below.

Mitigation Measures

- The water and sanitation departments will dry sludge on the drying beds before disposing it off
- Dried sludge could be used to make briquettes as a charcoal substitute or be sold to farmers as fertilizers
- Excess sludge can be disposed in a designated landfill which shall only be for disposing dry odourless sludge.
- Preparation and enforcement of operational guidelines for sludge management by the local County Government

Solid Wastes Impacts

Wastewater trunk and secondary sewers are often used illegally as dumping sites at open manholes. Therefore, solid wastes which include plastic bottles, wood, cloths and debris are often screened and disposed of at screening chambers at inlet works of the sanitation works.

Mitigation Measures

- The water and sanitation departments will develop a comprehensive Waste Management Plan (WMP) for management of solid wastes.
- The water and sanitation departments will employ personnel who will be in charge

of maintaining hygiene and cleanliness of the septic tanks including removal of solid wastes from screen chambers

- Properly labelled and strategically placed waste disposal containers shall be provided
- Solid wastes once removed from screens shall be collected and disposed appropriately as required by waste Management Regulations.

8. ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN (ESMP)

8.1 C-ESMPs and Sub Plans

The contractor upon signing of civil works contract will prepare Construction Environmental and Social Management Plans (C-ESMPs) and Sub Plans for review and approval. **Table 8-1** below presents details of Sub plans

Table 8.1: C-ESMPs and Subplans

#	C-ESMPs and Sub Plans	Preparation Stage Responsibil	lity Estimated Cost (USD)
1	C-ESMP	After signing of Works Contractor Contract	
2	GBV/SH/SEA	After signing of Works Contractor Contract	
3	Campsites Management Plan	After signing of Works Contractor Contract	
4	Labor Management Plan	After signing of Works Contractor Contract	
5	Labor Influx Management Plan	After signing of Works Contractor Contract	
6	Water Resources Protection Plan	After signing of Works Contractor Contract	
7	Waste Management Plan	After signing of Works Contractor Contract	
8	Traffic Management Plan	After signing of Works Contractor Contract	
9	Drug Abuse and Substance Awareness Plan	After signing of Works Contractor Contract	
#	Approximate Cost		1500

8.2 Licenses and Permits (Occupational Health and Safety Related)

The contractor will be required to comply to below listed provisions as required by Occupational Health and safety provisions as detailed in the table below

Table 8.2: Permits and Licenses

#	Permits and Licenses	Preparation Stage	Responsibility	Estimated Cost (USD)
1	Workplace registration certificates from DOSH	After signing of Works	Contractor	

		Contract		
2	Fire clearance certificates from DOSH -	After signing	Contractor	
	Ministry of Labor and Social Services	of Works		
	Somalia	Contract		
3	Additional Statutory requirements, as per	Within the 1st	Contractor	
	OSHA Act	Quarter of		
	Risk Assessment	Works		
	Safety and Health Audit			
	Fire Safety Audit			
4	Development and implementation of	Within the 1st	Contractor	
	Polices required at the Work place	Quarter of		
	Safety & Health Policy	Works		
	Fire Safety Policy			
	Environment Policy			
5	Personnel Trainings Required	After signing	Contractor	
	Fire marshal training	of Works		
	Statutory: First Aid Training	Contract		
	Statutory: Safety and Health Committee			
6	Occupational Health Programme at	After signing	Contractor	
	Workplace	of Works		
	•Statutory Medical Examinations.	Contract		
	Pre-employment			
	Periodical			
	• post-employment (exit medical checkup)			
7	Operations Safety:	Monthly	Contractor	
	All plants, lifting equipment and			
	machinery inspected			
	Inspection of ladders / scaffoldings			
8	Permit to Works (PTW) are required for	Whenever	Contractor	
	non-routine hazardous work.	required		
9	Fire Safety Requirements:	Bi Annually	Contractor	
	• Fire drill			
	firefighting equipment			
	• Fire escapes			
10	Emergency Response Plan Required:	One off	Contractor	
	Injury emergency response;			
	Non entry rescue mission to persons in			
	confined space;			
	Fire emergency response;			
	Approximate Cost			2000

8.3 Purpose and Objectives of ESMP

The specific objectives of the ESMP are to:

• Serve as a guiding document for the environmental, health and safety monitoring activities during construction and operation of the onsite waste water facilities.

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- Provide detailed specifications for the management and mitigation of activities that have the potential to impact negatively on the environment, health and safety of workers and community.
- Provide instructions to relevant personnel regarding procedures for protecting the environment and minimizing environmental effects, thereby supporting the operator's goal of minimal or zero incidents.

The Environmental, Social Management and Monitoring Plan (ESMP) is summarized in the table below

Table 8.3: Environment and Social Management Monitoring Plan - Construction Phase - Construction and Rehabilitation of Waste Water Facilities- Septic Tanks Works

Risk	A	nticipated Impact	Mitigation	Responsibil	M	Ionitoring parameter	_
				ity			(USD)
Impacts on Water	•	Site activities such as	• Activities shall be conducted > 100 m away from water bodies,	Contractor	•	State of storm	Prelimina y Sum of
Resource		pit excavations could	except where crossings are required.			water drainage	USD 2000
Resource		result to loosening of	,			channels adjacent	to be
		soils that could result	must be managed in accordance with an appropriate Waste			to the facilities	allowed
		to sedimentation and	Management Plan (WMP).		•	Quality of water	for water
		siltation of storm	No hydrocarbon-contaminated water may be discharged to the			flowing within	pollution
		water drainage	environment.			rivers	control
		channels and eventually the rivers	At construction stage, the contractor will prepare Specific				Control
		and streams.	Construction Environment and Social Management Plan (C-ESMP)				
			which included among other; Soil and Sedimentation Control Plan,				
	•	Un-serviced plant and	Spoil Management Control Plan and Waste Management Plan.				
		equipment on site could result to oils and					
		fuels leaks that could contaminate water					
		resources rising the BoD and adversely					
		affecting aquatic					
		organism in the					
		rivers/ streams					
	There will be direct						
	•	interaction from the					
		discharge of treated					
		domestic wastewater					
		to surface water					
		bodies during					
		operation of the waste					
		operation of the waste					

Risk	Anticipated Impact	Mitigation	Responsibil	Monitoring parameter	Budget (USD)
	water facilities in the event of blockages		ity		(03D)
Impacts on Soil Resource	 soil include erosion resulting from activities such as excavation of pits, clearing of vegetation Soil contamination as a result of possible oil and fuel leaks from unserviced plant and equipment on site. 	 Vegetation clearing and topsoil disturbance will be minimised. Contour temporary and permanent access roads / laydown areas so as to minimise surface water runoff and erosion. Sheet and rill erosion of soil shall be prevented where necessary through the use of sand bags, diversion berms, culverts, or other physical means. Topsoil shall be stockpiled separate from subsoil. Stockpiles shall not exceed 2 m height, shall be located away from drainage lines, shall be protected from rain and wind erosion, and shall not be contaminated. Wherever possible construction work will take place during the dry season. Topsoil shall be evenly spread across the cleared areas when reinstated. Accelerated erosion from storm events during construction shall be minimised through managing storm water runoff (e.g. velocity control measures). Soil backfilled into excavations shall be replaced in the order of removal in order to preserve the soil profile. Spread mulch generated from indigenous cleared vegetation across exposed soils after construction At construction stage, the contractor will prepare Specific Construction Environment and Social Management Plan (C-ESMP) which included among other; Soil and Sedimentation Control Plan, Spoil Management Control Plan and Waste Management Plan. 	Contractor	 Status of soil resources within the project area State of storm water drainage channels within South Galkayo towns Quality of water flowing within rivers 	Preliminar y Sum of USD 2000 to be allowed for soil erosion control
Impacts on	• Emissions of oxides of	Liaise with local communities to forewarn of potentially dusty	Contractor	Compliance level	Preliminar

Risk	Anticipated Impact	Mitigation	Responsibil	Monitoring parameter	Budget
			ity		(USD)
Air Quality within active work sites	nitrogen (NO ₂ in particular) mainly from construction-related vehicles (and to a lesser degree from construction generators and other hydrocarbon powered equipment); and Dust and particulate matter (as PM10) created by construction-related vehicle traffic on unpaved roads.	 activities; Undertake monitoring close to dusty activities, noting that this may be daily visual inspections, or passive/active monitoring as parameter Undertake inspections to ensure compliance with the Dust Management Plan; Plan potentially dusty activities so that these are located as far from receptors as feasible; Erect solid screens if feasible around stockpiles and concrete batching; Avoid run off of mud and water and maintain drains in a clean state; Remove dusty materials form site as soon as possible if not being re-used. If being re-used, cover or vegetate if possible; Impose speed limits on haul routes and in construction compounds to reduce dust generation; Minimise drop heights when loading stockpiles or transferring materials; 		Dust Management Plan Services reports of plant and equipment Air quality monitoring report findings Number of complaints from community related to dust menace	y Sum of USD 1000 to be allowed for air pollution control
Noise and Vibrations Impacts within active work sites	Construction activities and equipment are not expected to result in significant levels of vibration. Equipment that might high levels of vibration (such as impact piling or vibratory compaction) will not be used	 Where practicable noisy equipment will be orientated to face away from the nearest Human settlement and other receptors; Working hours for significant noise generating construction work (including works required to upgrade existing access roads or create new ones), will be daytime only; Alternatives to diesel and petrol engines and pneumatic units, such as hydraulic or electric-controlled units, will be used, where practicable; Where practicable, stationary equipment will be located in an acoustically treated enclosure; 	Contractor	Serviced plant and equipment to manufacturers specification	Preliminar y Sum of USD 500 to be allowed for noise and excessive vibration control

Risk	Anticipated Impact	Mitigation	Responsibil ity	Monitoring parameter	Budget (USD)
		 For machines with fitted enclosures, doors and door seals will be checked to ensure they are in good working order; also, that the doors close properly against the seals; Throttle settings will be reduced and equipment and plant turned off, when not being used; 			
Impacts on vegetation cover within active work sites	The area was once covered exhibits arid characterizes with dominant species noted as cactus family and Acacia sp including; Acacia species (A. mellifera, A. tortilis), Commiphora spp., Dobera glabra, Boscia coriacea	 Avoidance of impacts should be prioritised. Areas to be cleared shall be agreed and demarcated before the start of the clearing operations to minimize exposure. Stage vegetation clearance is also recommended so as not to clear the entire corridor all at once. The use of existing cleared or disturbed areas for the Contractor's Camp, stockpiling of materials etc. shall be encouraged. Whenever possible, all damaged areas shall be reinstated and rehabilitated upon completion of the contract to as near preconstruction conditions as possible. Rehabilitation of temporary construction sites and pioneer camps (if needed) should be done as swiftly as possible and always with suitable native grasses and other plants 	Contractor	 Status of water line alignment with regards to vegetation cover. Number of trees replanted as compensatory trees Status of reinstatement of completed sites 	Preliminar y Sum of USD 500 to allowed for procureme nt and planting of ASAL resistant trees
Community Health Safety and Security Impacts	Increased Project-related civil works for site preparation including site clearance and excavation work, change to the environment due to increased noise, decreased air quality, inappropriate waste handling or disposal, and accidental leaks and spills, and the presence of	Community Health and Safety Management Plan (CHSMP) Contractor will develop Emergency Response Plans (ERPs) in cooperation with local emergency authorities and hospitals.	Contractor	 Number of incidences recorded on site and within communities Community satisfactory reports with regards to health and safety 	Preliminar y Sum of USD 1000 to allowed for addressin g Communit y health and security

Risk	Anticipated Impact	Mitigation	Responsibil ity	Monitoring parameter	Budget (USD)
	the Project workforce all present potential hazards for the health and safety of local communities	 construction camp sites to avoid pressure on local healthcare infrastructures. Contractor will implement a Community Grievance Mechanism. Contractor will develop and implement a Traffic Management Plan covering aspects such as vehicle safety, driver and passenger behaviour, use of drugs and alcohol, operating hours, rest periods, community education on traffic safety and accident reporting and investigations. 		Reported and addressed grievances on site and from communities	impacts
Worker Health and Safety and Workers Management impacts	Workers' rights including occupational health and safety need to be considered to avoid accidents and injuries, loss of man-hours, labour abuses and to ensure fair treatment, remuneration and working conditions. These issues should be considered not only for those who are directly employed on the Project. The Project could potentially lead to workforce-related social and health issues throughout the life cycle of the Project if worker management and rights do	 and maintained such that robust barriers are in place to prevent accidents. Contractor will ensure that its Code of Conduct is followed to regulate the performance and behaviour of all workers, including provision for disciplinary action for anti-social behaviour and noncompliance with health and safety regulations such as lack of use of PPE. 		 Number of incidences recorded on site and within workers Workers satisfactory reports with regards to health and safety Reported and addressed grievances on site and from workers 	Preliminar y Sum of USD 1000 to allowed for addressin g Worker's health and security impacts

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Risk	Anticipated Impact	Mitigation	Responsibil	Monitoring parameter	Budget
			ity		(USD)
	not meet Somalia law or				
	international best practice.				
	Gender-Based Violence	Develop and implement a plan to manage the risk of SEA/SH.	Contractor	Inspection Reports	Preliminar
	Sexual Exploitation and	Map the GBV referral pathways and create awareness among		Records at the referral	y Sum of
	Abuse (SEA) and Sexual	women and men on the risk of SEA/SH.		pathways	USD 1000
	Harassment (SH)	Ensure the GRM is SEA/SH-responsive.		Records of	for
		• Ensure all those with physical presence on site sign and		investigation Reports	addressin
		understand the Code of Conduct.		on cases Reported	g SEAH
		Put in place measures for monitoring GBV/sexual harassment			issues
Total Budget for Implementing the ESMP (USD)					9,000.00

Table 8.4: Environment and Social Management Monitoring Plan - Operation of Sanitation Related Works

Issue	Action required		Responsi	Provisional
			bility	Budget
Pollution	•	Galwaaq Water Company will ensure proper and periodic maintenance of septic tanks	Galwaaq	To be
of Water	•	Galwaaq Water Company will activate a community watch group for information sharing on the status of	Water	established at
Resources		the sewers	Company	Operation Phase
by raw	•	Regular cleaning of grit chambers and sewers to remove grease, grit, and other debris that may lead to		and included in
sewage.		blockages.		the operation of
	Development of an inventory of system components, with information including age, construction materials, and drainage areas served			the Project
	Design manhole covers to withstand anticipated loads and ensure that the covers can be readily replaced if broken to minimize entry of garbage and silt.			
	• Ensure sufficient hydraulic capacity to accommodate peak flows and adequate slope in gravity mains to prevent build-up of solids and hydrogen sulphide generation			
	•	Regular inspection of the system to ensure performance is maintained at high levels		
	•	Blockages should be detected and promptly replaced		

Issue	Action required		Provisional	
		bility	Budget	
Odour	Galwaaq Water Company will ensure appropriate covering/ventilation of the septic tank	Galwaaq	To be	
Menace	Galwaaq Water Company will ensure appropriate handling and removal of grit/grease	Water	established at	
	Galwaaq Water Company will ensure sludge is appropriately disposed of or properly stabilized	Company	Operation Phase	
	• Galwaaq Water Company will ensure that the facilities have adequate water flow and aeration to reduce		and included in	
	the potential of odour formation		the operation of	
	• The perimeter of the proposed site should be vegetated with trees and plants of varying heights thereby		the Project	
	forming windbreaker and reduce dispersion of odour			
	Repairing of dilapidated the roofs of the sludge drying beds to ensure quick drying of sludge and			
	appropriate disposal to reduce odour emanating from wet sludge.			
Risks	Galwaaq Water Company will dry sludge on the drying beds before disposing it off	Galwaaq	To be	
Associated	 Dried sludge could be used to make briquettes as a charcoal substitute or be sold to farmers as fertilizers Excess sludge can be disposed in a designated landfill which shall only be for disposing dry odourless sludge. 		established at	
with			Operation Phase	
Sludge			and included in	
	Preparation and enforcement of operational guidelines for sludge management		the operation of	
			the Project	
Solid	• Galwaaq Water Company will develop a comprehensive Waste Management Plan (WMP) for	Galwaaq	To be	
Wastes	management of solid wastes from screen chambers	Water	established at	
Impacts	Galwaaq Water Company will employ personnel who will be in charge of maintaining hygiene and	Compan	Operation Phase	
	cleanliness of the facility including removal of solid wastes.	У	and included in	
	Properly labelled and strategically placed waste disposal containers.		the operation of	
	Solid wastes once removed from screens shall be collected and disposed of appropriately as required by		the Project	
	city by laws			

8.4 Decommissioning Plan

The Project has been designed to operate effectively for over 30 years. In the event that the infrastructure will be required to be overhauled, then the following steps should be considered in order to undertake the procedure in a structured manner with minimum impact to both human and natural environment.

Table 8.5: Decommissioning Flow Chart

#	Action	Actor
Step 1	Initiation	Proponent
	Development of an Objective Worksheet and checklist incorporating	
	references, legal, stakeholder engagement and policies	
	Undertake decommissioning audit	
Step 2	Prepare Road Map for Decommissioning Design	Proponent
	Conduct design review to validate elements of the design and ensure design	
	features are incorporated in the decommissioning design. Public	
	consultations	
Step 3	Prepare and Award Contract	Proponent
	Prepare a contract that incorporates validated project information and award	
	to a contractor as per the Procurement rules.	
Step 4	Execute Decommission Works	Contractor
	Implement design elements and criteria on the Project in accordance with	
	specifications and drawings. Inspect during decommissioning and at Project	
	completion to ensure that all design elements are implemented according to	
	design specifications.	
Step 5	Non-Conformance, Corrective/Preventive Action	Proponent
	Determine root cause	
	Propose corrective measures	
	Propose future preventive measures	

8.5 Monitoring Plan

The final stage in the impact assessment process is the development of a Management Plan for implementing controls and mitigation and monitoring the effectiveness. Monitoring is done to verify that: a) impacts or their associated Project components remain in conformance with applicable standards; and b) mitigation measures are effectively addressing impacts and compensatory measures and offsets are reducing effects to the extent predicted.

All the activities to be financed under the Project will follow the AfDB ISS, Ministry of water and Environment will make sure that all bid documents and contracts include the ESMP and require compliance with it. Environmental and social monitoring seeks to check the effectiveness and relevance of mitigation measures through the implementation/operation phase. Environment and Social focal points shall monitor Project activities as detailed in the table below

Table 8.6: Monitoring Plan - During Construction Phase

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
МО	NITORING AND REPORTING		
A	REGULAR REPORTING Prepare and submit to AfDB regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, status of preparation and implementation of E&S instruments required, stakeholder engagement activities, and functioning of the grievance mechanisms.	Submit quarterly E&S reports to the AfDB throughout the first year of Project implementation commencing after the Effective Date and biannually thereafter throughout Project implementation.	Galwaaq Water Company
В	INCIDENTS AND ACCIDENTS Promptly notify the AfDB of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries. Provide sufficient details regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising entity, as appropriate	Notify the Association within 48 hours after learning of the incident or accident using such reporting formats as the Association may specify. A detailed report of the incident shall be provided within fifteen (15) days of notifying the Association of the incident or accident, unless a different timeline is agreed with the Association.	Galwaaq Water Company
С	CONTRACTORS MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.	Submit the monthly reports to the Association as annexes to the reports to be submitted under action A above.	Contractor and Supervising Engineer

ESS 1	ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS						
1.1	ORGANIZATIONAL STRUCTURE Establish and maintain an organizational structure within the MOECC with qualified staff and resources to support management of ESHS risks and impacts of the Project including one full-time environmental and social specialist.	Establish and maintain E&S staff no later than four weeks after the Effective Date and maintain throughout Project implementation.	Galwaaq Company	Water			
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS Prepare, disclose, consult upon, adopt Stakeholder Engagement Plan (SEP) Prepare, disclose, consult upon, adopt and implement site-specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs)	ESIA and SEP shall be prepared, disclosed, consulted upon and adopted before Effective Date, and thereafter implemented throughout Project implementation.	Galwaaq Company	Water			
ESS	2: LABOUR AND WORKING CONDITIONS						
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with OS 10.	Establish grievance mechanism prior to engaging Project workers, and thereafter maintain and operate it throughout Project implementation.	Galwaaq Company	Water			
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, and ESMPs including through, inter alia, implementing adequate OHS measures and incorporating LMP and SEA/SH requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.	Measures to be operational prior to engaging Project workers.	Galwaaq Company	Water			

ESS	ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT				
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Resource efficiency and pollution prevention and management measures shall be incorporated in the ESMPs to be prepared under the project	Prepare Construction Specific Environmental and Social Management Plans	Contractor		
ESS	4: COMMUNITY HEALTH AND SAFETY				
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared	Prior to commencement of civil works	Contractor		
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities [, including, inter alia,] [specify any areas of risks that may require emphasis, e.g., behaviour of Project workers, risks of labor influx, response to emergency situations], and include mitigation measures in the ESMPs	Prior to commencement of civil works	Contractor		
4.3	SEA AND SH RISKS Adopt and implement a SEA/SH as part of the C-ESMP, to assess and manage the risks of SEA and SH.	Prior to commencement of Project Activities	Contractor		
ESS	8: CULTURAL HERITAGE				
8.1	CHANCE FINDS Describe and implement the requirements including Chance Finds procedures and site-specific ESMPs. This procedure shall be followed if cultural heritage is encountered during Project activities. Ensure relevant workers shall be trained in the requirements of the procedure prior to ground disturbance during actual construction work.	Prior to commencement of Project Activities	Contractor		
ESS 1	ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE				

Construction and Rehabilitation of Waste Water Facilities - 100No. Septic Tanks Proposed For South Galkayo, Somalia

10.1	STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION	SEP p	repared,	disclosed,	and	Galwaaq
	Prepare a Stakeholder Engagement Plan (SEP) for the Project, consistent with OS 10, which	adopted.				Water
	includes measures to, inter alia, provide stakeholders with timely, relevant, understandable					Company
	and accessible information, and consult with them in a culturally appropriate manner, which					1 /
	is free of manipulation, interference, coercion, discrimination and intimidation. The Recipient					
	shall conduct additional stakeholder consultations targeting communities and other					
	disadvantaged groups and update the SEP and thereafter implement the SEP throughout					
	project implementation.					

9. GRIEVANCE REDRESS MECHANISM

9.1 Purpose of GRM

9.1.1 Purpose of Grievance Redress Mechanism (GRM)

The purpose of the Greivance Redress Mechanms (GRM) is to offer project stakeholders an opportunity to seek and receive grievance redress and strengthen project's team to identify, track, resolve and refer eligible grievances thereby enhancing project's efficiency and development results and outcomes. The GRM further provides guidance, guidelines and modalities for managing and addressing grievances that may emerge from SERP implementation process. The GRM framework provides modalities for raising awareness, visibility, and understanding of the project interventions and providing feedback on its implementation

The AfDB Integrated Safeguards System (ISS) require that bank supported projects facilitate mechanisms that address concerns and grievances that arise in connection with a project. The ISS 10 (Stakeholder Engagement and Information Disclosure) provides under one of the objectives that project-affected parties are provided with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances.

As good practices, this GRM makes the following distinctions:

- **Project-related complaints and grievances**: it focuses on Project-related complaints and grievances and defines the different steps of handling such;
- GBV/SEA/SH related complaints and grievances: complaints and grievances relating to Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH), given their sensitivities and considerations related to a survivor-based approach, are reported to the available GRM grievance recipients, but the grievances follow a different process.
- Labor-related complaints and grievances: Complaints from project workers raising
 workplace concerns, terms of employment and other related concerns will be registered
 through the Workers' GRM, which is a separate GRM elaborated in this document;
- Second tier / escalated complaints and grievances: This concerns complaints and grievances that cannot be solved by the first tiers (Project-wide and workers' complaints and grievances) or have been escalated by users dissatisfied with the resolutions from the first tiers. This GRM describes procedures how these grievances shall be addressed through an appeals mechanism.

9.2 Objectives of GRM

The primary purpose of the GRM is to ensure the collect and address the complaints or 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 Project's GRM will seek to achieve the following objectives:

- Encourage registration, acknowledgment, and recording of all concerns or issues raised by aggrieved;
- 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 center 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 during project implementation.

The GRM is expected to contribute to continuous improvement in performance of the SERP through an analysis of trends and lessons learned. The GRM does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties

9.3 GRM Core Principles

The GRM is based on six core principles summarized below:

- **Fairness:** Grievances are treated confidentially, assessed impartially, and handled transparently.
- Objectiveness and independence: The GRM operates independently of all interested
 parties in order to guarantee fair, objective, and impartial treatment in each case. GRM
 officials have adequate means and powers to investigate grievances (e.g., interview
 witnesses, access records).
- **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that PAPs can easily understand them. Project PAPs have a range of contact

options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety.

- **Responsiveness and efficiency:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.
- **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.
- Participation and social inclusion: A wide range of PAPs, including community
 members, members of vulnerable groups, project implementers, civil society, and the
 media, are encouraged to bring grievances and comments to the attention of the Project
 staff. Special attention is given to ensure that marginalized or vulnerable groups,
 including those with special needs, are able to access the GRM

9.4 GRM Framework

9.4.1 Grievance Category

Grievances will be categorized using the guidance summarized below, including basic information communication; public administration ethics and conduct; governance; human rights; environmental compliance; corruption and economic crimes. Grievances outside the SERP mandate will be referred to the appropriate statutory institution. The table below summarized

Table 0.1 Categories of Grievances

#	Categories of Grievances	Federal Republic of Somalia
		Provisional Constitution 2012
		Provisions
1	Basic information	Article 32
	Access to information	
2	Ethics and conduct	Article 115 to 119
	Government entities and staff	
	Implementing Partner staff	
3	Violation and breach of codes of ethics	Article 115 to 119
	Violation of codes of ethics;	
4	Breach of the code of ethics by government	Article 115 to 119
	officers:	
	Breach of Code of Conduct and Ethics by staff of	
	Implementing Partners	

5	Violation of human rights and fundamental	Article 111B
	freedoms	
	Gender equality and general equality matters.	
	Equality and freedom from discrimination (Equality	
	-every person; Equality of men and women to	
	opportunities in political, economic, cultural and	
	social)	
	Economic and Social Rights (health, sanitation,	
	freedom from hunger, adequate and quality food,	
	clean safe and adequate water, social security,	
	education, emergency medical treatment)	
	Non-discrimination of special needs groups	
6	Corruption and Economic crimes	Article 111C
	Unethical conduct	
7	Labor and working conditions	Article 24
	Termination/Summary Dismissal,	
	Breach of Employment Contract Terms	
	Conflicts with Trade Unions	
	Work Injury	
	Discrimination	
	Sexual Harassment	

Figure 0.1 Categories of Grievances

9.4.2 GRM Provisions

All project affected persons will be informed of their rights to raise grievances pertaining to national GRM frameworks. Mechanisms are put in place to ensure that grievances are recorded and considered fairly and appropriately. Project management will issue and publicize a grievance redress policy that clearly states that management embraces grievance reports and views them as opportunities for project improvement and identified a guiding principle; defining the scope and types of grievances to be addressed; setting out a user- friendly procedure for lodging grievances; outlining a grievance redress structure; describing performance standards; and spelling grievance review mechanisms.

The GRM will be a project wide GRM and will work inter-connectedly 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 Ministry of Finance (MoF) at Federal Government of Somalia (FGS) and provide access to SERP stakeholders and contractors to register complaints received at sub-project level or the field.

At the project level, a Grievance Redress Committee (GRC) will be established and will comprise, legal advisor, gender specialist, environmental and social safeguard specialists of the project. Local, state and municipality level GRC that consists of local leaders, municipal representatives, community-based organizations, Legal advisor and law enforcement will be established after the first of the project or once the construction activities start. This 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.

The project shall explore and collaborate with existing network of service providers to setup and ethically manage SEA/SH complaints as documented in the separate GBV and SEAH Action Plan. Detailed structure of the GRM for the project workers will be finalized and described in the LMP and project implementation manual.

9.5 GRM Implementation Steps

The GRM structure provides multiple channels to aggrieved parties to file their grievances and receive feedback with regards to the project. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

STEP 1: Identification of Focal Person

The SERP management will identify experienced (Focal Points) at all levels of their projects and assign them responsibility for handling (receiving and registering) grievances. GRMs can have multiple focal points to receive and register grievances. This GRM is designed to give the aggrieved parties access to seek redress to their perceived or actual grievance using this mechanism or other existing mechanisms such as the National legal system (i.e. Courts), mediation boards (elders), GRCs and traditional systems (village courts). It is equally important to have someone who has overall responsibility for tracking and following up on issues and complaints raised. The descriptions of the GRM functions should clearly stipulate the official designations and the roles of the focal points so that they can really be held accountable for performing their functions. The GRM for the SERP will have identified the focal point persons from community to national level and their tasks have been formulated.

At community level, the project grievance redress structure will be linked and interface to the existing traditional authority structure as this already provides for resolving conflicts in the communities. This will ensure accessibility to the GRM as the traditional structures are close to

Pilot- decentralized Wastewater treatment in Public Institutions (Hospitals/Health centers and schools) in South Galgayo -Somalia

the people. The Focal Person will be someone with knowledge of the local and/or official language of communication and should be able to record the grievances where need be.

The Project will implement training program to teach staff, Focal Points, community members and other stakeholders how to handle grievances and why the GRM is important to the project's success. This training should include information about interacting with beneficiaries about grievances, the organization's internal policies and procedures in relation to grievance redress. It will also be useful to establish or build on local and community based GRMs by providing grievance redress training for stakeholders at the local level. This greatly reduces GRM costs while enhancing beneficiary satisfaction with, and ownership of, the grievance redress process.

STEP 2: Registration of Grievances:

A register of grievances which will be held by the GRM Officer or any other appointed person by the project. The Aggrieved Party (AP) must register their grievances with the GRM focal point.

To register the grievance, the contractors and suppliers will provide information to the GRM focal point to be captured in the Grievances Registration Form as presented in the annex. The GRM will accept complaints from the APs submitted through verbal, email, phone, Facebook, WhatsApp, meeting or letter to the office of the GRM, in English or local language. The focal point persons handling grievances will transcribe verbal submissions. Receipt of grievances shall be acknowledged as soon as possible, by letter or by verbal means.

When a complaint is made, the GRM will acknowledge its receipt in a communication that outlines the grievance process; provides contact details and, if possible, the name of the GRM officer who is responsible for handling the grievance; and notes how long it is likely to take to resolve the grievance. Complainants will receive periodic updates on the status of their grievances. This GRM has established clearly defined timetables for acknowledgment and follow-up activities. And to enhance accountability, these timetables will be disseminated widely to various stakeholders, including communities, civil society, and the media.

Means of Filing a Grievance

Diverse methods for reporting grievances that are culturally appropriate are to be used and they should permit for self-identified, confidential, or anonymous procedures (professional letter writers, suggestion boxes, Email, toll-free telephone etc).

Avenues for verbal complaints are:

Pilot- decentralized Wastewater treatment in Public Institutions (Hospitals/Health centers and schools) in South Galgayo -Somalia

- Complaints to members of the local Grievance Redress Committee (GRC)
- Social Safeguards & Communications desks at the SERP -PCU
- Open community mediation sessions
- Operators' Customer Care Unit
- Town hall meetings

Avenues for written complaints are:

- Complaint Boxes in the community, operator's office or by hand
- Letters or Email to the SERP-PCU
- Dedicated telephone lines shall include:
- SERP -PCU hotlines
- Operator Costumer Care hotlines

STEP 3: Assessment and Investigation:

This step involves gathering information about the grievance to determine its validity and resolving the grievance. The merit of grievances should be judged objectively against clearly defined standards. Grievances that are straight forward (such as queries and suggestions) can often be resolved quickly by contacting the complainant.

Having received and registered a complaint, the next step in the complaint-handling process is for the focal points to establish the eligibility of the complaint received. The Grievances Registration Officer once a complaint or grievance is registered shall within 5 days assess the registered complaint or grievances to determine its validity and relevance i.e. is it within the scope of the SERP-GRM as defined in this document. The following criteria can be used to assess and verify eligibility:

- The complainant is affected by the project.
- The complaint has a direct relationship to the project.
- The issues raised in the complaint fall within the scope of the issues that the GRM is mandated to address.

Having completed the complaint assessment, a response can be formulated on how to proceed with the complaint. This response should be communicated to the complainant. The response should include the following elements:

- Acceptance or rejection of the complaint
- Reasons for acceptance or rejection
- Next steps where to forward the complaint

• If accepted, further documents and evidence required for investigation e.g. field investigations

Once the registered grievance or complaint has been determined as falling within the scope of this GRM, the focal point shall investigate the complaint. Investigation of the complaint may include the following:

- On site visit and verification.
- Focus Group discussions and interviews with key informers.
- Review of secondary records (books, reports, public records); and
- Consultations with local government and traditional authorities.

The PCU GRM Committee will ensure that investigators are neutral and do not have any stake in the outcome of the investigation. At the end of the field investigation, the GRM officer shall compile a Grievance Investigation Report (GIR) using a standard template as provided in annex on the outcomes of the investigations and the specific recommendation to resolve the grievance or complaint.

STEP 4: Recommendation and Implementation of Remedies:

After the investigations, the GRM officer shall inform the AP of the outcome of the investigations and the recommended remedies if any. The AP shall be provided with written response clearly outlining the course of action the project shall undertake to redress the grievances and the specific terminal date by which the recommended remedies shall be completed. Potential actions will include responding to a query or comment, providing users with a status update, imposing sanctions, or referring the grievance to another level of the system for further action. The project will take some action on every grievance. If the recommended remedy involves monetary compensation, the GRM must then seek the approval of the Grievance Committee through the SERP project coordinator.

The Aggrieved Party shall, provide a response agreeing or disagreeing with the proposed course of action within a minimum reasonable period after receiving the recommended actions.

STEP 5: Referral to the State Office:

In the likely event that the AP is not satisfied with the recommended remedy. The GRM officer shall forward the copy of Grievance Registration Form (GRF) and the Grievances Investigation Report (GIR) to the State GRM focal point (SFP).

The SFP shall once has received the GRF and the GIR from the District must conduct own investigations and complete his own GIR and communicate to the AP within 30 working days (i.e. repeat stages 2-3). The SFP in his recommendation shall take into consideration the reasons why the AP rejected the remedies offered by the district GRM focal point. He may decide to offer the same remedies as the GRM officer or different and improved offer.

Once the SFP has concluded the investigations and communicated to the AP. The AP shall have 7 days or less to agree or disagree with the proposed remedies. If the AP is agreeable to the remedy the SFP shall ensure that the remedy is implemented within the agreed time frame. For a remedy that requires monetary compensation the SPF submit the information to the relevant government department(s).

STEP 6: Referral to the Grievances Committee:

When the AP disagrees with the recommendation of the SFP, the SFP shall within 7 days of receiving the notice of rejecting the offer from the AP compile all the necessary documents regarding the grievance from district and the province to the Grievance Committee through the grievance Chairperson who will be elected by the Committee.

The government implementing partners at the national level shall investigate the matter further and taking into consideration the recommendation of the coordinator and PCU. The Environmental and Social safeguards Officers shall compile the GIR and submit to the Grievance Committee for consideration. Once the Grievance Committee arrives at a decision it is the responsibility of the SERP to implement the remedies within the agreed time. If the AP disagrees with the remedy offered by the Grievance Committee, the AP reserves the right to appeal to other external GRMs outside SERP.

The above-described steps and timeframes will be followed to address grievances emanating from implementing of project activities. For grievances that need quick and urgent attention, the described steps will be adhered to. However, in terms of timeframe, the grievances will be addressed in the shortest feasible period based on case-to-case basis.

Pilot- decentralized Wastewater treatment in Public Institutions (Hospitals/Health centers and schools) in South Galgayo - Somalia	Environmental And Social Impact Assessment (ESIA
Figure 0.2 Grievance Flow in Basic GRM	
TCE/VITAL CARE	

Figure 0.3 Detailed GRM Flow Chart

10.FINDINGS AND PROVISIONS

10.1 General Outcome of the Assessment

10.1.1 Positive Impacts Identified

- Improved Water Quality: Safe and treated water for households, schools, and health centers, reducing waterborne diseases.
- **Strengthened Public Health:** Reliable water testing capacity in South Galkayo improves disease surveillance and outbreak response.
- **Institutional Capacity Building:** Establishing a monitoring laboratory enhances local technical capacity in water quality management.
- **Employment Opportunities:** Creation of short-term construction jobs and long-term operational positions.
- Climate Resilience: Improved water security supports adaptation to droughts and dry season shortages.

10.1.2 Negative Impacts Identified

- Water Resources (High): Risk of contamination from construction wastewater, fuel.
- **Soil Resources (High-Medium):** Erosion and compaction during excavation and heavy equipment use.
- **Air Quality (Medium):** Dust emissions and machinery exhaust, especially during dry/windy conditions.
- Noise and Vibration (Medium-Low): Disturbance from drilling, mixing, and machinery operation.
- Flora (Low): Minor clearance of shrubs and grasses within the project site.

10.1.3 Trade-offs

- Higher construction & maintenance costs for new and existing boreholes and associated amenities, but with long-term benefits of efficiency and water safety.
- Temporary construction nuisances (dust, noise, traffic disruptions) against the permanent improvement in water access, health, and resilience.
- Localized vegetation loss versus the greater community benefit of improved sanitation and water safety.

10.1.4 Mitigation Measures to Address Negative Impacts

- Regular inspection.
- Soil stabilization measures (controlled excavation, re-vegetation after works).
- Dust suppression (water spraying, covering trucks).
- Limiting noisy works to daytime hours, using well-maintained equipment.
- Replanting trees/shrubs after site works to restore vegetation cover.

10.1.5 Contrast between Positive vs. Negative Impacts

• Positive impacts are long-term, widespread, and transformative, directly improving health, resilience, and institutional capacity.

 Negative impacts are localized, short-term, and manageable with proper mitigation measures.

The benefits clearly outweigh the adverse impacts, as the project will significantly enhance sanitation security, public health, and environmental sustainability in South Galkayo

10.2 Assessment Recommendations:

- The Bid documents prepared for the Project incorporate the Environment, Social Health and Safety Provisions discussed under Chapter 7 of this report (Environment and Social Impact Assessment and Mitigation Measures).
- The contractors through the support of ESHS officer will ensure that all workers sign Code of Conduct (CoC) before site deployment
- The supervising and contractor will undertake training of personnel on Environment, Social, Health and Safety matters tailored to the Project Scope prior to commencement of works
- The contractor will through the ESHS officer apply the provision of Environment and Social Management Toolkit (ESIRT) in management of incidences and accident's during project implementation stage
- The contractor will prepare monthly and quarterly reports on status of implementation of Environment and social compliance measures discussed in this report.
- Contractor will be required to commit to implementing the Environment, Social Health and Safety (ESHS) Provisions by (ii) Hiring ESHS officers, (ii) Developing site specific (C-ESHS) and Sub Plans listed under Table 7-1 and (iii) Implement Provisions of the Plans and Undertake Monthly and Quarterly reporting of ESHS compliance.

10.3 Pre-Construction Safeguards Readiness

Permits and Licenses

- The Contractor shall ensure that all pertinent permits, certificates and licenses have been obtained prior to any activities commencing on site and are strictly enforced/ adhered to
- Obtain the license in Department of Occupational Health and Safety Registration from Ministry of Labour and Social Services
- Reach out to Water Resources Authority (WRA) for the necessary approvals
- Obtain Approval of Plans from South Galkayo County Government Physical Planning Department for any structures on site
- Acquire Permits from Public Health Department (South Galkayo County) of sanitation facilities installed on site
- The Contractor shall maintain a database of all pertinent permits and licenses required for the contract as a whole and for pertinent activities for the duration of the contract

Engage ESHS Officers

• Prior to construction, the contractor will engage a qualified ESHS expert who will be responsible for below listed tasks

- Prepare and implement Construction Specific Environmental and Social Management Plan for the Project (CESMP)
- Train all staff on ESHS and ensure all staff sign Code of Conduct (CoC) prior to commencement of works.
- Report all accidents and incidents timely as required by World Bank Environment and Social Incident Reporting Tool kit (ESIRT)
- Audit of compliance with the environmental protection, and pollution prevention and control regulations;
- Monitor and report implementation of environmental mitigation measures;
- Monitor the compliance with the environmental protection clauses/specifications in the Contract;
- Investigate and evaluate complaints and identify corrective measures;
- Liaise with the Engineer on all environmental performance matters and timely submission of all relevant environmental monitoring reports;
- Advice the contractor on environmental improvement, awareness, enhancement matters, etc. on site; and
- Modify the ESMP and monitoring program in consultation with the Engineer if necessary throughout the period of works.

Preparation of C-ESMP and Sub Plan

The contractor upon signing of civil works contract will prepare Construction Environmental and Social Management Plans (C-ESMPs) and Sub Plans for review and approval by the implementation authority, a summary of the Sub Plans is presented below

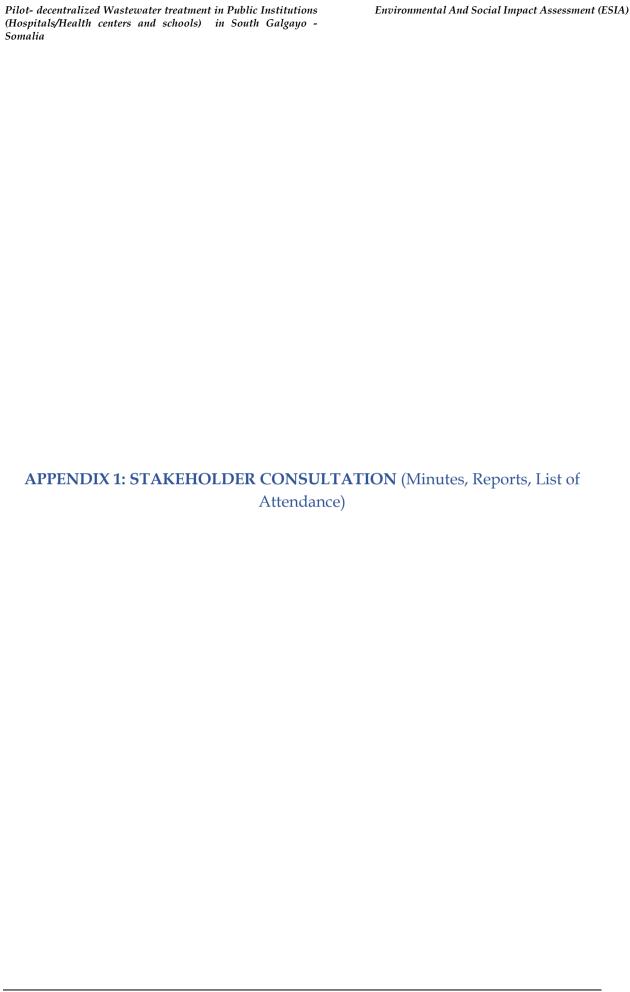
- GBV/SH/SEA
- Campsites Management Plan
- Labor Management Plan
- Labor Influx Management Plan
- Water Resources Protection Plan
- Drug Abuse and Substance Awareness Plan

ESHS Training

The supervisor and contractor will undertake training of personnel on Environment, Social, Health and Safety matters tailored to the Project Scope prior to commencement of works.

11.APPENDIXES

- 1. Evidence of Stakeholder Engagement; Minutes, Attendance Lists, Photos.
- 2. Photograph of South Galkayo Current areas
- 3. Project Technical Designs and Layout



CLUSTER 1 ESIA PUBLIC PARTICIPATION MINUTUES ON PROPOSED SANITATION INTERVENTIONS (PIT LATRINES, SEPTIC TANKS AND DTF) HELD ON 23RD OCTOBER, 2025 AT HAAR HAAR FOR SOUTH GALKAYO

AGENDA ITEM	DISCUSSION POINTS
MOENDIN ITEM	
1. INTRODUCTION	 Welcome and Opening Remarks The meeting commenced with a word of prayer after which the consultant welcomed all stakeholders to the consultation meeting for the proposed Sanitation Project in South Galkayo. Purpose of Meeting: To present the proposed sanitation project to key stakeholders To provide detailed information on project scope and implementation To gather stakeholder input, concerns, and recommendations. To ensure community participation and ownership of the project.
2. PROJECT INFORMATION	Project Background: The consultant outlined the situational analysis highlighting current sanitation conditions in South Galkayo with the proposed project having a primary objective of improving the sanitation condition by increasing access to improved sanitation facilities in the area. The consultant informed the members present of the proposed project components as follows; Construction of 100 septic tanks across institutions; offices, schools, universities, educational centres and hospitals. There will be 2No. WWTP; at Bulo Burde village and at Durdur area. Construction of 175No. Pit Latrines spread across institutions; offices, schools, universities, educational centres and hospitals. Expected Benefits: Reduced cases of diseases outbreak. Improved sanitation facilities within South Galkayo. Creation of several employment opportunities. Hygiene promotion and community mobilization. Protection of groundwater from contamination. Enhanced environmental sanitation and aesthetic improvement. Improved dignity and privacy, particularly for women and girls.
ANSWER SESSION	Q1: How will the project address the specific sanitation needs of women and girls, particularly regarding menstrual hygiene and privacy? A1: Women and girls have specific sanitation needs that the project prioritizes such as all latrines will be designed with lockable doors and proper lighting for safety and privacy and also having Institutional latrines be gender-segregated with menstrual hygiene management (MHM) facilities including water, disposal bins, and soap. Q2: What benefits will the project have to the community at large? A2: Employment opportunities will be created. Priority is hiring of local especially the youth for construction labor including excavation, material transport, and general construction

AGENDA ITEM	DISCUSSION POINTS
	support. Q3: Will sanitation facilities be accessible for persons with disabilities? A3: Accessibility is an important consideration in our design standards. Household & Institution beneficiary selection will prioritize households with persons with disabilities (PWDs) where Latrine designs will be adapted to individual needs. Q4: When will the project commence? A4: The project will begin once all the necessary approvals have been sought and funding released.
4. CLOSING REMARKS	The consultant expressed gratitude to all participants for their attendance, active participation, and valuable contributions. The meeting was officially closed at with a closing prayer.

ATTENDANCE LISTS

PHOTO REPRESENTATION



ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) STUDY REPORT FOR GALKAYO SOUTH WASH PROJECTS.

MINUTES OF ENVIRONMENTAL IMPACT ASSESSMENT (EIA) IMMEDIATE INTERVENTIONS- PUBLIC PARTICIPATION FORUM HELD 3rd TO 4th SEPT 2025 AT FIVE STAR HALL GALKAYO SOUTH.

MINUTES OF MEETING

MINU	MINUTES OF MEETING					
<u>Item</u>	<u>Minutes</u>	Action By				
1.	Introduction: Reason for Stakeholder Consultation The meeting commenced with opening remarks delivered by focal points from the Galkayo Municipality, representing the Departments of Public Works, Social Affairs, and district Council members. These representatives emphasized the importance of inclusive dialogue and collaboration between the local government, technical experts, and the community.					
	Following the opening remarks, all participants were given the opportunity to introduce themselves, promoting transparency and encouraging open communication among stakeholders.					
	The session then proceeded with the Consultant Engineer, Abdikani Dahir representing the Tertiary Consultant, who presented a clear overview of the meeting agenda including list of projects go to discuss their impacts. The Consultant welcomed all attendees and highlighted the key purpose of the stakeholder consultation – to gather meaningful input from community members and stakeholders regarding the potential environmental and social impacts of the proposed project.					
	 Participants were urged to actively contribute their views, concerns, and suggestions on both positive and negative impacts of the project. This feedback would play a critical role in: Enhancing the design and implementation of mitigation measures, Finalizing the engineering designs, and Ensuring the project aligns with both community expectations and environmental sustainability. Public private partnership (PPP) strategies 					
	The session reinforced the legal and policy basis for public participation as outlined in the Provisional Constitution of Somalia and the Somalia National Environmental Policy (2020), emphasizing transparency, inclusivity, and sustainability in environmental decision-making					
2.	Project Information The Tertiary Consultant representative Mr Abdikani Dahir thanked stakeholders for allocating time to come and participate in the ESIA public participation forum for Galkayo South WASH Project components. He gave a brief of the proposed Project scope as below bullets:					

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3.	 The project encompasses a comprehensive range of activities aimed at improving water supply, sanitation, and hygiene infrastructure. These include the extension of new pipelines ranging from 200mm to 12.5mm in diameter, complete with all necessary fittings and appurtenances. It also involves the rehabilitation of chambers, air valves, washouts, junctions, and marker posts. Zonal and master meters will be supplied and installed at borehole sites and throughout the existing network, including appropriate chambers and markers. In South Galkayo, guided by a groundwater study, new boreholes will be drilled and equipped, while existing boreholes will undergo rehabilitation, including the replacement of pumps. Solar panels will be replaced for existing boreholes and installed for new ones, alongside standby generators (110 Kva) to serve as backup for unreliable mains electricity. Water storage tanks with a cumulative capacity of up to 3000m³ will be constructed both at borehole sites and key town locations to ensure balanced water pressure distribution, based on hydraulic modelling. A new adsorption-based water treatment plant (2000m³/day capacity) will be constructed at selected borehole sites, with an overall production target of 4000m³/day from two plants. Additionally, a water quality monitoring laboratory will be established and equipped with modern tools and machinery. In terms of sanitation, two mobile desludging trucks (10m³ capacity each) and five manual desludging units will be deployed to empty overflowing latrines, especially in IDP camps. Emergency latrines and soak pits will be constructed in high-density and flood-prone areas. Furthermore, 100 units of septic tanks and soak pits will be constructed or rehabilitated in public areas and vulnerable communities. To enhance long-term sanitation management, community awareness campaigns will be introduced. A Public-Private Partnership (PPP) strategic plan will also be developed for sustainable facility management.<	
	The project is expected to deliver several important benefits to the Galkayo community. Improved water and sanitation infrastructure will enhance hygiene practices, reduce exposure to waterborne diseases, and	
	address health issues caused by saline water, such as dental discoloration	

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	and eye irritation. Access to safe water and sanitation will restore dignity, particularly for vulnerable populations in informal settlements and IDP camps, while also reducing the prevalence of Acute Watery Diarrhea (AWD). Better wastewater management and decentralized treatment systems will help protect groundwater from contamination.	
	Women and girls will benefit significantly, as the burden of water collection and caregiving related to waterborne illnesses will be reduced. This creates more opportunities for education and economic participation. The project is also expected to increase land values and encourage better housing development. It will generate employment, with direct jobs during construction for both skilled and unskilled workers, and operational roles such as sewer operators later on.	
	Finally, by replacing multiple unsafe water sources with a single, reliable, multipurpose supply system, the project will improve efficiency, reduce costs, and ensure long-term sustainability.	
	Negative Impacts Despite the positive outcomes, the project may generate environmental and social risks. These include vegetation loss, soil degradation, and potential overuse or pollution of water resources. Socially, the influx of workers could strain local resources and services, while creating risks of child labor, gender inequality, teenage pregnancies, and school dropouts. Land acquisition and resettlement may displace vulnerable groups, such as IDPs, leading to loss of livelihoods. Construction activities may also cause noise, dust, air pollution, and occupational hazards, affecting both workers and nearby communities.	
	Mitigation Measures To minimize risks, environmental impact assessment (EIA) recommendations and environmental management plans (EMPs) must be implemented. These should include reforestation, erosion control, and monitoring of water use to avoid over-extraction.	
	A labor influx management plan and community awareness programs on health, gender, and education are recommended. Local labor should be prioritized, and contractors must follow fair labor standards.	
	Health and safety risks can be mitigated by enforcing occupational safety standards, providing personal protective equipment (PPE), training workers regularly, and monitoring pollution levels with appropriate dust and noise control measures.	
	Continuous monitoring and evaluation (M&E) will allow timely corrective actions, while a grievance redress mechanism will ensure community concerns are addressed. Alignment with Somalia's National Environmental Policy (2020) will further strengthen transparency, inclusivity, and sustainability in project implementation.	

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4.	Wastewater Management and Decentralized Treatment Systems The selected site for the proposed wastewater management and decentralized treatment system is located at 6.7524N, 47.4524E. Proximity to health facility: The site is less than 200 meters north of a health centre constructed in 2024 by the Ministry of Health and Qatar Charity. During the months of May to August, prevailing winds blow southward, which means that odors from the treatment site will directly affect the health centre, undermining its function and exposing patients and staff to health risks.	
	Proximity to IDP settlements: Over the past six months, more than 50 internally displaced households (IDPs) have settled on both sides of the proposed site, also within a 200-meter radius. The treatment site poses environmental and public health hazards to these already vulnerable communities.	
	Nearby residential and community structures: To the west of the site are established residential homes, a large mosque, and the main Golol Road, which serves as a busy community access route. The placement of the system here risks causing odor nuisance and contamination concerns for daily commuters and worshippers.	
	Key Concern The proposed site location is unsuitable due to its close proximity to critical social infrastructure (health center, mosque, residential homes) and newly established vulnerable IDP households. If implemented at this location, the plan will create negative health and social impacts, particularly during the windy season when odors will spread toward the health facility and surrounding residents.	
	Proposed Mitigation To relocate current health centre, IDPs settlement and stop town growing towards this direction or to assign another location for this project.	
5.	Any Other Business (AoB). Collaboration & Ownership: Maintain close collaboration with government institutions, local authorities, and community representatives to strengthen long-term ownership, accountability, and sustainability of interventions. Land Acquisition: Recognize that all identified lands are privately owned. There is a need for clearer and transparent rules governing both private and public interests to avoid disputes and ensure fair, inclusive decision-making.	
6.	Closing Remarks Director of Social affairs and Training Department for Local Authority Farah Abdulkadir said "I would like to sincerely thank all participants for their valuable contributions to today's meeting. I extend my deepest appreciation to our donor, the African Development Bank, for their continued support, to UNICEF as the implementing partner, and to the consultant team from Tertiary Engineers for their tireless efforts in guiding and supporting this important initiative. As we close, I urge all stakeholders to expedite the implementation of the planned projects so that the people of Galkayo South may begin to benefit from improved WASH services as soon as possible. Together,	

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	through our collaboration and commitment, we can ensure the success of these vital projects and deliver lasting impact to our community.	

Minutes Prepared by:- Abdikani Dahir, water specialist and civil engineer at Galkayo South, Signed and stamp









MINUTES OF PUBLIC PARTICIPATION ON PROPOSED SANITATION INTERVENTIONS (WWTP, SEPTIC TANK AND PIT LATRINE CONSTRUCTION) HELD ON 29TH MAY 2025 AT FIVE STAR BOARDROOM SOUTH GALKAYO

	Welcome and Opening Remarks The meeting commenced with the consultant welcoming all stakeholders to the consultation meeting for the proposed Sanitation Project in South Galkayo and giving an opportunity to all	
1. INTRODUCTION	members present to introduce themselves.	
	 Purpose of Meeting: To present the proposed sanitation project to key stakeholders To provide detailed information on project scope and implementation To gather stakeholder input, concerns, and recommendations. To ensure community participation and ownership of the project. 	
2. PROJECT INFORMATION	Project Background: The consultant outlined the situational analysis highlighting current sanitation conditions in South Galkayo. Key statistics presented included households lacking access to improved sanitation facilities, high prevalence of open defecation particularly in periurban areas, frequent outbreaks of diseases, contamination of groundwater sources from poor waste disposal, and absence of wastewater treatment infrastructure leading to environmental degradation. Project Objectives: • Eliminate open defecation in target communities. • Increase access to improved sanitation facilities in households. • Establish proper wastewater collection and treatment systems. • Reduce incidence of waterborne and sanitation-related diseases. • Protect groundwater sources from fecal contamination. • Strengthen capacity of local institutions for sanitation service delivery. The consultant informed the members present of the proposed project components as follows; Component 1: Septic Tank Construction	

AGENDA ITEM	DISCUSSION POINTS	
	They will be spread across institutions; offices, schools, universities, educational centres and hospitals.	
	 Component 2: Waste Water Treatment Plant (WWTP) There will be 2No. WWTP; at Bulo Burde village and at Durdur area. 	
	 Component 3: Pit Latrine Construction Construction of 175No. Pit Latrines and associated facilities. 	
	They will be spread across institutions; offices, schools, universities, educational centres and hospitals.	
	 Expected Benefits: Reduced cases of diseases outbreak. Improved sanitation facilities within South Galkayo. Creation of several employment opportunities during construction and capacity building. Hygiene promotion and community mobilization. Protection of groundwater from contamination. Enhanced environmental sanitation and aesthetic improvement. Improved dignity and privacy, particularly for women and girls. 	
	Q1: How will the project address the specific sanitation needs of women and girls, particularly regarding menstrual hygiene and privacy? A1: Women and girls have specific sanitation needs that the project prioritizes such as all latrines will be designed with lockable doors and proper lighting for safety and privacy and also having Institutional latrines be gender-segregated with menstrual hygiene management (MHM) facilities including water, disposal bins, and soap.	
3. QUESTION AND ANSWER SESSION	Q2: Health facilities generate wastewater that may contain infectious materials. How will the WWTP handle potentially hazardous healthcare waste, and what about existing health facility septic systems? A2: The WWTP design includes provisions for receiving and treating wastewater with higher pathogen loads; additionally, Healthcare facilities will be required to have preliminary treatment (septic tanks) on-site before discharge to the collection system.	
	Q3: We've seen many sanitation projects in the past where latrines were built but fell into disuse or disrepair within a short time. How will this project ensure that facilities are actually used and maintained? A3: Sustainability through actual use and maintenance is our primary concern and learning from past experiences, Community-	

AGENDA ITEM	DISCUSSION POINTS	
	Led Total Sanitation (CLTS) approach will be used to trigger behavior change before construction, creating internal demand rather than external supply.	
	Q4: What opportunities exist for young people in this project, both for employment during construction and for longer-term livelihoods in sanitation services? A4: Youth employment and entrepreneurship are important project outcomes. Priority is hiring of local youth for construction labor including excavation, material transport, and general construction support.	
	Q5: Will sanitation facilities be accessible for persons with disabilities? Many public toilets are impossible for wheelchair users or those with mobility challenges to use? A5: Accessibility is an important consideration in our design standards. Household & Institution beneficiary selection will prioritize households with persons with disabilities (PWDs) where Latrine designs will be adapted to individual needs.	
	Summary of Key Discussion Points: The consultant summarized the main outcomes of the meeting which included Strong stakeholder support for the sanitation project confirmed, clear understanding of project scope, and components established. Multiple channels were established for ongoing stakeholder communication.	
4. CLOSING REMARKS	Vote of Thanks: The consultant expressed gratitude to all participants for their attendance, active participation, and valuable contributions. The commitment demonstrated by stakeholders reinforces the project's foundation for success and sustainability.	
	Closing: The meeting was officially closed with a closing prayer. Informal discussions continued among participants.	

Attendance List





Appendix 2: Photographs of Situations in Various Parts of South Galkayo

Distantial	IIibib
Pictorial views of South Galkayo Town	Hayaan Bacadweyn IDP community Centre
A household in the IDP camp	Sanitation facilities in the one of the camps

APPENDIX 3: PROJECT TECHNICAL DESIGNS AND LAYOUT