Appraisal Environmental and Social Review Summary
Appraisal Stage
(ESRS Appraisal Stage)

Date Prepared/Updated: 01/23/2020 | Report No: ESRSA00290
**BASIC INFORMATION**

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Somalia</td>
<td>AFRICA</td>
<td>P171160</td>
<td></td>
</tr>
</tbody>
</table>

**Project Name**: Somali Integrated Statistics and Economic Planning Capacity Building

<table>
<thead>
<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Poverty and Equity</td>
<td>Investment Project</td>
<td>2/3/2020</td>
<td>3/19/2020</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
</tr>
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<tbody>
<tr>
<td>Somalia</td>
<td>Ministry of Planning, Investment &amp; Economic Development</td>
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</tbody>
</table>

Proposed Development Objective(s)

Strengthen the capacity of the Somali national statistical system in the collection, processing and public dissemination of poverty and selected macro-economic data to support policy formulation, planning and reporting.

**Financing (in USD Million)**

<table>
<thead>
<tr>
<th>Total Project Cost</th>
<th>Amount</th>
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<tbody>
<tr>
<td></td>
<td>25.00</td>
</tr>
</tbody>
</table>

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project has four components: (1) Strengthening coordination and data development of the national statistical system, (2) Strengthening human resource capacity, (3) ICT, Statistical Infrastructure Development and Equipment, and (4) Project management component to oversee and supervise the activities covered in the component 1-4. The World Bank's support is planned for five years (2020–2024).

Integrated approach: Given the capacity constraints faced by the Government, an integrated approach that combines strengthening governance and capacity building of the national statistics system, economic policy analysis, and
monitoring and evaluation (M&E) system is adopted to reduce transaction costs and, at the same time, to maximize synergy between the three areas. The project adopts an integrated approach to capacity development to integrate national statistical activities with the requirements of planning, budgeting, M&E and results. The plan also explicitly supports greater transparency and encourages the use of new methods and technologies to increase the reliability and accessibility of statistics needed for economic analysis and monitoring projects, programs and policies that are included in the NDP9.

This project will support: (i) key time-sensitive activities of FGS to fill critical gaps in statistics and economic policy analysis/planning relating to the HIPC process; and (ii) activities to initiate longer-term (phased) capacity building programs.

Complementarity and coordination: The proposed project complements ongoing Technical Assistance (TA) provided by the IMF, Statistics Sweden, UN agencies, and other development partners.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The project’s statistical capacity building coverage is country-wide (all FGS federal member states and Somaliland). There are no salient physical characteristics more specific to this project.

D. 2. Borrower’s Institutional Capacity

The financial management and procurement environment in Somalia remain challenging. The Bank will work closely with staff of the project PIUs in FGS and Somaliland to ensure satisfactory implementation of proposed fiduciary risk mitigation activities. Ministry of Planning, Investment & Economic Development (MOPIED) in FGS and Central statistics department in Somaliland will form a Project Implementation Unit (PIU) drawing its members from external consultants and seconded staffs. The PIU will report to a person to be designated by MOPIED and Somaliland Central Statistics Unit. The PIU will be reinforced with short and extended-term consultants in areas of need. These specialists will help ensure compliance with procurement, disbursement, safeguards and financial management policies and procedures, as well as train staff in DNS on fiduciary practices and project management related issues. PIUs will be responsible for overall project management and coordination, including the compliance with safeguards requirements including on labor and working conditions. The Monitoring and Evaluation expert within PIU will be required to have some safeguards expertise to manage the projects’ environmental, social, occupational health and safety issues and communications officers will help raise awareness including to remote and vulnerable and marginalised communities about the purpose of the surveys, the need for accurate answers and that all data will be anonymised and individual identifiers kept confidential. The capacity for handling data in a secure and sensitive way is limited. Past incidents of abuse have not been recorded, however, regulations and protocols will need to be established for collection, storage, analysis and dissemination.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

<table>
<thead>
<tr>
<th>Environmental Risk Rating</th>
<th>Moderate</th>
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<tbody>
<tr>
<td>Environmental Risk Rating</td>
<td>Low</td>
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The environmental risk rating is Low as no civil works are anticipated in this project. Thus, no environmental study or assessment will be needed. If project activities change at any point forward, to include repair or rehabilitation of existing offices, this rating will need to be reviewed and possible environmental risk management and mitigation actions added. Some computers and equipment will be purchased and E waste Plan will be developed for this.

**Social Risk Rating**

Considering that the potential risks and impacts, the project meets the majority of the criteria for "Moderate Risk" as set out in the Environmental and Social Directive for IPF, the ESRC of the project is Moderate. The overall social risk rating is Moderate, taking into account the following key aspects of the project: The project will involve fieldwork for the collection of data and will include coverage and inclusion of a number of groups, including those traditionally unreached or marginalized, such as nomads, internally displaced persons and persons with disabilities. Without intentional targeting or focus, there is risk that data collection activities, including in development and administration of household surveys, will not sufficiently capture disaggregated data on these groups. Similarly, without systematic integration of gender in statistical programming and data production activities, including in survey design and administration, there is risk that resulting analyses will not accurately or sufficiently reflect inequalities and differences in the situation of men and women across socio-economic and human development indicators. Ensuring an inclusive and representative focus across all relevant data production activities, including hiring of enumerators, consultations, survey design, collection and analysis is critical to enable informed sectoral policies and development programming and should be documented and addressed within the project. Without strong legislation and regulatory environment the data confidentiality risks and abuse of data particularly for vulnerable and marginalised groups exists.

89. **GBV Risk.** While contextual risk of GBV is high given existing pervasive rates of GBV and the legacy of conflict, displacement and recurring climate-related shocks, which have been known to exacerbate GBV incidence, it is not anticipated that project activities will contribute to or worsen existing risks, in particular as related to sexual exploitation and abuse or sexual harassment. The number of enumerators entering a given community to undertake survey work will be likely be low, with limited anticipated impact community or household dynamics. GBV Risk, therefore, is low. To address potential risks of misconduct, the project will put in place Codes of Conduct and regular trainings on the CoCs to ensure clear expectations for enumerator behavior and performance. The project will also identify key measures to address risks of workplace sexual harassment, including grievance redress measures that will enable reporting on sexual harassment, as well as on sexual exploitation and abuse within communities. Response services and associated referral and information sharing protocol, in case of incidence, will be identified in advance of implementation of project activities.

Labour risk. potential labor risks and labor influx around hiring of enumerators (enumerators may not have mobility in different parts of Somalia due to security risks or potential clan conflicts. So there will need to be consideration for how to manage this, including looking to hire enumerators locally) and data collection workers for the Somali Integrated Household Budget Survey (SIHBS)

Other social risks and impacts include: security risks for stakeholders including project workers and the community, as well as the risk of exacerbating conflict where communities or groups feel that they are misrepresented in surveys or data is collected insensitively particularly of vulnerable or marginalized groups. The project will ensure appropriate methods are used to ensure proper representation of all groups including taking into consideration the impact of
seasonality in data collection e.g. pastoralists movement during dry seasons and inaccessibly of some areas during rainy seasons.

**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1. General Assessment**

**ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

*Overview of the relevance of the Standard for the Project:*

Expected environmental and social benefits: Ultimately, the project is intended to benefit the Somali people who are the target beneficiaries of the rebuilding of the economy to open jobs and opportunities, eradicate poverty and improve their living conditions. The project will provide quality statistics, M&E indicators, economics analysis needed by the Governments to inform and underpin planning and decision-making processes; monitor performance; and evaluate the impact of public projects and programs. If addressed, the project could have positive impacts (through collection of data to inform Government) on vulnerable groups and reduction in discrimination by helping to capture data and focus Government attention on vulnerable groups and other less advantaged groups people and address exclusion or discrimination.

Anticipated environmental risks and impacts: The project may finance the purchase of IT equipment, including desktops, laptops, and tablets and will ensure that all e-waste is disposed of safely. As currently designed, the project has no intent to finance civil works, including repair or rehabilitation of offices hence very minor environmental impact if any.

Anticipated key social risks and impacts include: (i) labor risks including OHS risks, labor influx, sexual exploitation and abuse, sexual harassment, and other forms of gender-based violence (GBV) that may occur in recruitment or retention of skilled or unskilled female workers (see also ESS2 and ESS4 Sections below); (iii) potential exclusion of disadvantaged and vulnerable groups from project benefits; and (v) security risks for stakeholders including project workers and the community. These risks will be mitigated through preparation of labor management procedures (LMP); adoption of mitigation measures, including among others ensuring enumerators sign Codes of Conduct and receive basic training on expected behavior and consequences for breach of the code. A GBV-sensitive complaints mechanism will be explored and where feasible, GBV service providers will be identified in areas of implementation in advance of survey activities; effective stakeholder engagement including inclusive and transparent consultation process and functional GRM; and measures to minimize security.

Environmental and social instruments: In compliance with the ESF, the project has prepared Stakeholder Engagement Framework (SEF) and Labor Management Procedures (LMP). These frameworks and the Somali translation will be disclosed in before appraisal in country and on the WB website. Relevant provisions of subproject-specific instruments will be incorporated into procurement documents and measures implemented during implementation of the project. Key environmental and social commitments of the borrower have been included in the ESCP.
Key stakeholders include project-affected communities, local residents, NGOS, donors, other development partners, and state authorities. While the project will have no adverse E&S impacts, the identification and outreach to stakeholders would be expected to be an important contribution to the project design. A stakeholder identification, mapping and characterization would be an important tool to understand the scope of potential beneficiaries, as well as the influence, attitude and interests of key stakeholders. The presence of disadvantaged and vulnerable groups will also be considered to ensure non exclusion and equal access to project benefits. The methodology and approach taken to data collection, analysis and storage will need to be clearly communicated to all relevant stakeholders. Data collection and questionnaires will be prepared and administered in consideration of cultural sensitivities and norms.

A stakeholder engagement plan (SEP), commensurate to the projects risks, has been prepared for both FGS and Somaliland. Two consultation meetings held at the Somali Chamber of commerce and industry meeting hall and Ministry of planning, Investment and Economic Development (MoPIED) on 15 and 16 October 2019 respectively. Members from the Project’s line Ministries, Departments and Public agencies (MDAs), representatives of Somali chamber of commerce, business community, women group, youth group, elders from Banadir districts, students from different University, and other Parties that directly or indirectly effecting the SISEP project. One-day workshop on Statistical System project preparation was organised by Central Statistics Department on November 4th 2019 in Hargeisa, Somaliland. The workshop was attended by a wide group of stakeholders from Planning and Statistics Departments, line ministries, Chamber of Commerce, Somaliand National Youth Organization (SONYO) and Hargeisa University, which are expected that the project will support.

Stakeholder engagement program: The updated SEP and LMP and its Somali translation will be disclosed before appraisal in country and on WB website. The disclosure of this tools is being undertaken by focal persons in FGS and Somaliland as PIUs are still not staffed and trained as of project appraisal, Once in place the PIUs will be adequately trained on the ESF. This commitment is included as part of the ESCP.

GRM. The LMP and SEP have adequate information about the mechanism that will be disseminated for complaints to be raised and addressed.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Labor use on the project: The labor category of direct workers will be government civil servants (belonging to the Ministry of Planning, Investment & Economic Development – MoPIED and Somaliland Statistical unit) and staff of the statistics units from other government ministries, departments and agencies (MDAs) benefitting from the project or those deployed as ‘technical consultants’ by the project. While the civil servants are governed by a set of civil services code, the consultants will be governed by a set of mutually agreed contracts. These consultants will be housed in a Project Implementation Unit (PIU) to be established under MOPIED and Somaliland statistical unit office. More details are provided in the LMP.
Potential labor risks and mitigations: Potential risks related to labor and working conditions include (1) labor influx; (2) labor disputes over terms and conditions of employment; (3) discrimination and exclusion of vulnerable / disadvantaged groups; and (4) security risks (workers exposure to attacks). The project will address these labor risks as follows in line with the LMP:

Labor disputes over terms and conditions of employment: To avoid labor disputes, fair terms and conditions will be applied consistent with national Labour Code. The project will also have grievance mechanisms for project workers in place to promptly address their workplace grievances. Further, the project will respect the workers’ right of labor unions and freedom of association, as set out in the national Labour Code.

Discrimination and exclusion of vulnerable/disadvantaged groups: The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship. To address the risk of exclusion of vulnerable and marginalized groups (such as women, IDPs, persons with disabilities and minority groups) from employment opportunities, the project will comply with the national Labour Code on gender equality in the workplace, which will include provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate for men and women workers. Provisions will be also put in place to enable safety in the workplace to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers supported under the project.

Security risks. Considering substantial security risks in some parts of the country, the project will take appropriate but proportionate security measures to minimize the potential risk to the workers. Key security measures will include security protection by public security personnel and restrictions on work hours where security risks are higher (such as night time).

Incidents and accidents notification: The ESCP includes a commitment of the borrower to promptly notify any incident or accident related the project with a significant adverse effect on the environment, the affected communities, the public or workers. The Borrower shall provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it.

ESS3 Resource Efficiency and Pollution Prevention and Management
Use of natural resources, generation of emissions and waste, and significant GHG production are not anticipated.

ESS4 Community Health and Safety
Provision of information by the community requires that anonymization and data confidentiality must be assured to protect individuals and prevent of any abuse of data or singling out of vulnerable and marginalized groups. Thus support to ensuring such provisions are in place for data collection, storage, management and processing and monitored is necessary. The ESCP includes a commitment from the borrower to set up a mechanism to strengthen coordination of statistical activities across the (NSS) by engaging all producers of official data. Sector Statistics Working Groups (SWGs) will be formed, where data producers will plan and coordinate policy and activities relating
to their sectors. SWGs will ensure that statistic products based on administrative data systems are being produced and disseminated according to international best practice

- Code of Practice. This will be designed and promoted across the NSS to ensure that trustworthy statistics are produced across the NSS;
- Sector Statistics Plans. Continue to encourage sectors which will not yet have them to design and implement these plans aligned to the NSDS;
- Data anonymization and confidentiality must be assured at all stages of collection, storage, analysis and dissemination and should be carefully monitored and reported on.

Security of enumerators may be an aspect to emphasize in project design and follow up with the Borrowers. Fieldwork data collection activities may require use of armed security escorts and it is important they are provided with proper training in the use of force and appropriate conduct towards workers and the community. Project activities will not affect ecosystem services.

To address potential risks associated with the security personnel to be hired by contractors, the LMP include mitigation measures in compliance with ESS4.

GBV risks under the project are anticipated to be low. While contextual risk of GBV is high given existing pervasive rates of GBV and the legacy of conflict, displacement and recurring climate-related shocks, which have been known to exacerbate GBV incidence, it is not anticipated that project activities will contribute to or worsen existing risks; the number of enumerators entering a given community to undertake survey work will be likely be low, with limited impact community or household dynamics. Basic mitigation measures will be undertaken, however, to address potential risks, including among others ensuring enumerators sign Codes of Conduct and receive basic training on expected behavior and consequences for breach of the code. GBV-sensitive GBV measures for a complaints mechanism will be explored and where feasible, GBV service providers will be identified in areas of implementation in advance of survey activities.

The project should ensure regular training of staff throughout the project. World Bank team will support conduct preliminary training in house of the PIU and outside expertise will be bought for regular training of the workers including organizations that support training from other ongoing project training.

**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

No land impacts are anticipated and involuntary land acquisition is not anticipated.

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The project will impact neither biodiversity nor living natural resources.

**ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**
ESS7 is not relevant to the project, as the people in the project area are not considered as Indigenous Peoples as defined under ESS7.

ESS8 Cultural Heritage
The project will not impact physical or intangible cultural resources.

ESS9 Financial Intermediaries
The project will not include any financial intermediaries.

B.3 Other Relevant Project Risks
Security risks. There are areas in Somalia that remain in conflict which affects access to locations and insecurity for staff, making data collection difficult. Moreover, the security situation may prevent or delay the data collection exercise and achievement of project objectives.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways
This policy is not applicable due to the nature of the project.

OP 7.60 Projects in Disputed Areas
This policy is not applicable.

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td></td>
</tr>
<tr>
<td>REGULAR REPORTING: Prepare and submit regular monitoring reports on the implementation of the ESCP and ES instruments.</td>
<td>10/2024</td>
</tr>
<tr>
<td>TIMELINE: Quarterly throughout the project implementation</td>
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<tr>
<td>INCIDENTS AND ACCIDENTS NOTIFICATION: Promptly notify any incident or accident related or having an impact on the Project with a significant adverse effect on the environment, the affected communities, the public or workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate.</td>
<td>10/2024</td>
</tr>
<tr>
<td>TIMELINE: Promptly after taking notice of the accident or incident.</td>
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**ORGANIZATIONAL STRUCTURE:**

- PIU of both FGS and Somaliland: The M&E expert within the team should have relevant safeguard experience to oversee projects safeguards aspects and work with the communication officer to ensure strong community engagement and outreach to promote trust in the data collection process, confidentiality and use and quality of data.

**TIMELINE:**

- PIU: Prior to project effectiveness

<table>
<thead>
<tr>
<th>ESS 10 Stakeholder Engagement and Information Disclosure</th>
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<tbody>
<tr>
<td>STAKEHOLDER ENGAGEMENT PLAN (SEP): Consistent with the SEF and ESS10, prepare, disclose and implement the Stakeholder Engagement Plan (SEP) for each subproject, including the project grievance mechanism.</td>
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<tr>
<td>01/2020</td>
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<td>CONSULTATIONS: Conduct consultations to validate and seek the views of stakeholders on SEP and LMP. These instruments shall be duly updated and disclosed.</td>
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<td>10/2024</td>
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<td>TIMELINE: before appraisal.</td>
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<thead>
<tr>
<th>ESS 2 Labor and Working Conditions</th>
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<tbody>
<tr>
<td>LABOR MANAGEMENT PROCEDURES (LMP): Consistent with the LMP and ESS2, develop and implement labor management procedures to address labor risks.</td>
</tr>
<tr>
<td>01/2020</td>
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<tr>
<td>TIMELINE: Prior to effectiveness</td>
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<thead>
<tr>
<th>ESS 3 Resource Efficiency and Pollution Prevention and Management</th>
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<tbody>
<tr>
<td>Data anonymization and confidentiality must be assured at all stages of collection, storage, analysis and dissemination and should be carefully monitored and reported on.</td>
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<tr>
<td>10/2024</td>
</tr>
<tr>
<td>Legislation, regulatory frameworks, guidelines and codes of conduct should be put in place for all workers with access to the data.</td>
</tr>
<tr>
<td>10/2024</td>
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<tr>
<td>Implement mitigation measures including; enumerators sign Codes of Conduct and receive basic training; GBV-sensitive GBV measures for a complaints mechanism; and GBV service providers will be identified in areas of implementation.</td>
</tr>
<tr>
<td>10/2024</td>
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<tr>
<th>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</th>
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<tr>
<td>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</td>
</tr>
<tr>
<td>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</td>
</tr>
</tbody>
</table>
B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?  
No

Areas where “Use of Borrower Framework” is being considered:
Use of borrower framework is not being considered.

IV. CONTACT POINTS

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Borrower/Client/Recipient
Borrower: Somalia

Implementing Agency(ies)
Implementing Agency: Ministry of Planning, Investment & Economic Development

V. FOR MORE INFORMATION CONTACT

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Web: http://www.worldbank.org/projects

VI. APPROVAL

Task Team Leader(s): John Randa, R. Wendy Karamba

Practice Manager (ENR/Social)  
Robin Mearns Cleared on 02-Dec-2019 at 12:21:56 EST