



Government of Somaliland

MINISTRY OF ENERGY AND MINERALS (MoEM)

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

MAY 2022

ABBREVIATIONS

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

Table of Contents

ABBREVIATIONS.....	1
1. INTRODUCTION	2
1.1 BACKGROUND AND PROJECT DESCRIPTION	2
Component 1-A. Generator Synchronization and Automation. Currently,) (US\$7 million).....	3
Component 1-B. Sub transmission and Distribution network interconnection in the major load centers of Hargeisa.) (US\$30 million).....	3
Component 3 – Stand-alone solar off-grid access to public institutions (Health and Education) (US\$4 million).....	5
1.2 PROJECT AREA SELECTION AND LOCATION.....	7
1.3 SCOPE OF THE STAKEHOLDER ENGAGEMENT PLAN.....	8
1.4 OBJECTIVES OF THE SEP.....	9
1.5 EFFECTIVE STAKEHOLDER ENGAGEMENT PRINCIPLES.....	9
1.6 WORLD BANK REQUIREMENTS ON STAKEHOLDER ENGAGEMENT	10
1.7 POTENTIAL ENVIRONMENT & SOCIAL RISKS AND IMPACTS.....	11
2. STAKEHOLDER ENGAGEMENT	13
2.1 STAKEHOLDER ENGAGEMENT PRINCIPLES	13
2.2 STAKEHOLDER IDENTIFICATION	13
2.3 STAKEHOLDER MAPPING AND ANALYSIS	14
2.4 FINDINGS FROM THE SITUATIONAL ANALYSIS	19
2.5 STAKEHOLDER ENGAGEMENT PLAN -SEP.....	22
2.6 REPORTING ON STAKEHOLDER ENGAGEMENT.....	27
3. STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE.....	28
3.1 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES	28
3.2 AIMS OF THE CONSULTATIONS	28
4. INFORMATION DISCLOSURE.....	31
5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES ..	33
5.1 RESOURCES.....	33
5.2 RESPONSIBILITIES	33
5.3 ESTIMATED BUDGET	34
6. GRIEVANCE REDRESS MECHANISM (GRM)	35
6.1 PRINCIPLES OF THE GRM	35
6.2 GRM PROCESS FOR SESRP	35
6.3 PERFORMANCE STANDARDS OF SESRP GRM	40
6.4 COMMUNICATION PLAN FOR GRM	40
6.5 MONITORING AND EVALUATION OF THE GRM.....	41
7. MONITORING AND REPORTING	42
7.1 MONITORING.....	42
7.2 REPORTING.....	42
ANNEX-1: PUBLIC CONSULTATION MEETING IN THE GoSL.....	43
ANNEX 2: PUBLIC CONSULTATION MEETING IN SOMALILAND	45
ANNEX 3. SEAP SOMALILAND GRM	53
ANNEX 4: SEAP GRM SOMALILAND.....	60
ANNEX 5: LIST OF PARTICIPANTS.....	66

1. Introduction

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

1.1 Background and project description

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

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

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

Current Context

The energy sector in Somaliland is ad-hoc service provision, and lack of overarching regulations. Biomass accounts for 96 percent of energy sources in the country. This high reliance on biomass has caused both profound deforestation and environmental degradation across many areas; with an estimate of about 83 percent deforestation between 1985-2015. The prevalence of charcoal and wood for cooking also has some serious health impacts at the household level. Petroleum products, which account for about 10 percent of total energy use, are essentially used for transport and electricity generation and in smaller quantities for cooking and lighting. Electric power generation (almost entirely diesel-fuelled) accounts for about two of the ten percentage points provided by petroleum fuels. Transportation fuels (gasoline and diesel) account for most of the rest.

The electricity system in Somaliland comprises of isolated diesel based mini-grids operated by ESPs on the basis of licenses issued by Ministries of Energy. The system of delivering electrical energy to users comprises a network of isolated distribution grids with embedded generation. These island networks are owned and operated by ESPs, each of whom owns and operates their independent generation-distribution-customer revenue chain. The ESPs supply more with the ongoing initiatives to enact the sector laws, substantial efforts are needed to operationalize an enabling institutional and regulatory framework with adequate staffing and capacity.

The Series of Projects (SOP) 1 (the project) will consist of the following four main components:

Component 1 – Sub-Transmission and Distribution network reconstruction, reinforcement and operations efficiency in the major load centers of Hargeisa (US\$ 37.5 Million).

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

Component 1-A. Generator Synchronization and Automation. Currently,) (US\$7 million)

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

Component 1-B. Sub transmission and Distribution network interconnection in the major load centers of Hargeisa.) (US\$30 million)

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

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

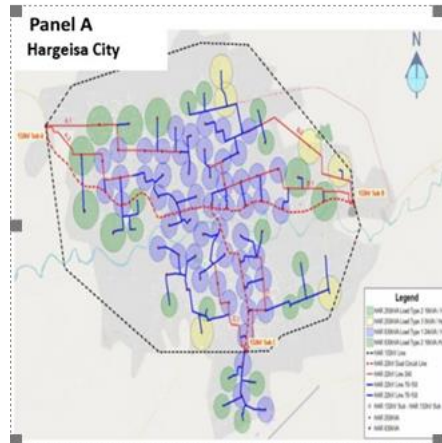


Figure 1: Proposed Sub-transmission and Distribution Network Development

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

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

Component 2 – Hybridization and Battery Storage Systems for Mini-Grids (US\$ 3 Million).

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

Component 3 – Stand-alone solar off-grid access to public institutions (Health and Education)) (US\$4 million)

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

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

Selection of the facilities will be underpinned by the Least-Cost geospatial analysis and the list of priority facilities identified by the SOMALILAND (in consultation). Site profiling will be conducted during project implementation to confirm beneficiaries' facilities.

Component 4 – Institutional Development and Capacity Building (US\$ 5.5 Million).

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

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

b. Sub-component 2 - Sector Planning and Feasibility Studies for Renewable Energy Projects. Following the adoption of the PSMP, there is need to undertake detailed feasibility studies, such detailed wind resource specific site measurements and geothermal prospecting, so as to progress implementation of the priority investments. The technical assistance will also support MoEWR/MOEM to undertake integrated planning including preparation of a Least Cost Development Plan covering generation, transmission and distribution and Electricity Access Strategy and Investment Prospectus. Improved sector and electrification planning will inform a more comprehensive electrification program in the country adequately targeting the different segments of the population, including residential, commercial, nomadic, as well as public institutions. In addition, an assessment for productive uses of electricity will be conducted in the project areas to inform a pilot and the broader electrification planning and rollout agenda, also learning from the support provided under the SEAP project in providing off-grid connectivity to businesses. The pilot will be accompanied by a (also pilot) consumer awareness campaign building on the experience in similar contexts. The technical assistance is aimed at supporting the sector to have in place a sector wide development framework that will enhance crowding-in funding, both private and public.

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

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

the Ministries of Health and Education for the management and operations of the solar PV systems beyond the lifetime of the project.

Sub-Component 5: Implementation of Gender Action Plan. This subcomponent will support a series of interventions envisioned to close the identified gender gaps. A gender diagnostic assessment to identify specific gender gaps within the energy sector, particularly barriers that limit career progression of women within the energy sector, was undertaken as part of the project preparation. The assessment highlights four critical areas to be considered for women to be employed in the energy sector: (i) pipeline (education sector), (ii) skills-training, (iii) women's employment and retention in the energy sector and (iv) policy and legal framework to support women's employment. The diagnostic gender gap assessment, will be undertaken as part of the project implementation that will inform the gender activities necessary to close gender gaps in the sector including the design and implementation of a pilot incubator to accelerate the employment of women engineers in the sector, and the preparation of a Gender Action Plan and a Gender Capacity Building plan.

1.2 PROJECT AREA SELECTION AND LOCATION

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

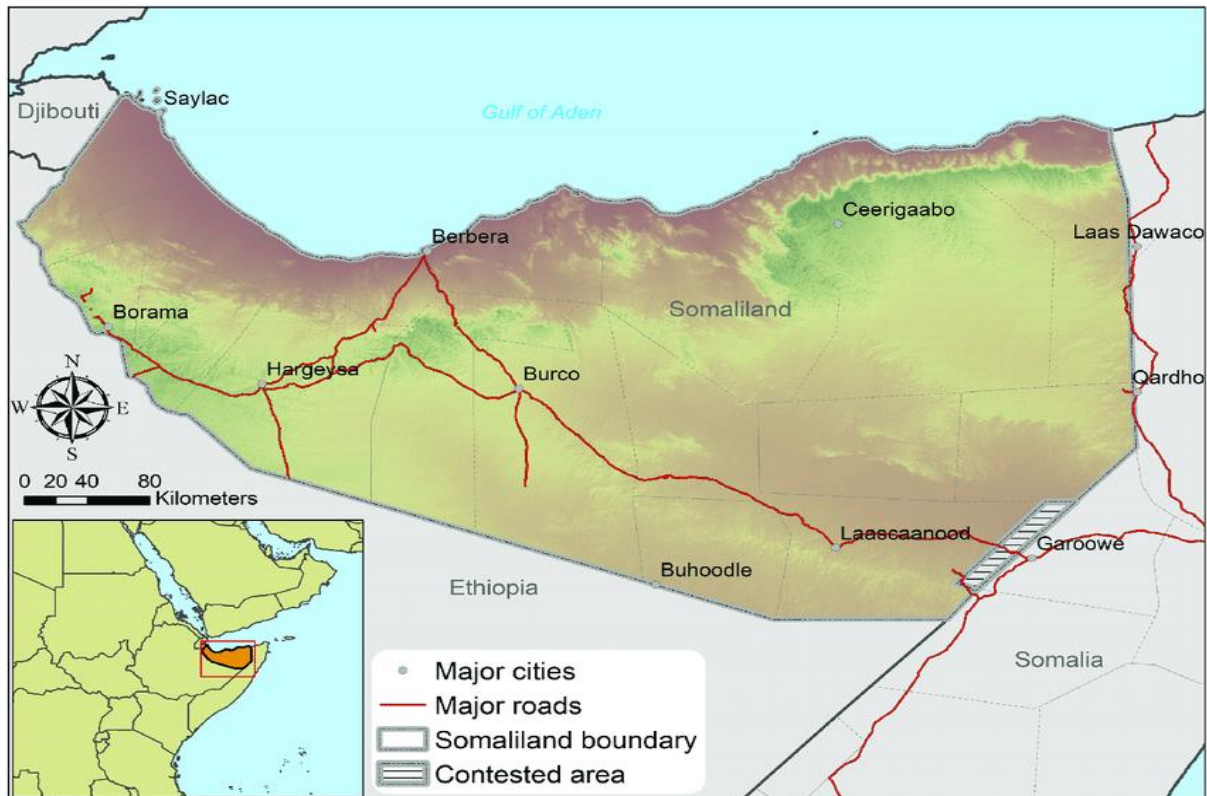


Figure 2: Priority districts for social facility connections

Source: WB estimates

1.3 SCOPE OF THE STAKEHOLDER ENGAGEMENT PLAN

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

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

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

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

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

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

The SEP will take into considerations of the requirements of the Guidance Notes: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting

public meetings and the ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works Projects.

1.4 OBJECTIVES OF THE SEP

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

The specific objectives of the SEP are:

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

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

1.5 EFFECTIVE STAKEHOLDER ENGAGEMENT PRINCIPLES

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

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

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

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

- Respect will be created when rights, cultural beliefs, values and interests of stakeholders are recognized;
- Commitment will be demonstrated by the need to understand, engage and identify stakeholders is recognized and acted upon early; and
- Inclusiveness will be achieved when broad participation is encouraged and supported by providing appropriate participation opportunities.

1.6 WORLD BANK REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

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

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

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

- "The government will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- The government will engage in meaningful consultations with all stakeholders. The government will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The government will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).
- The developed SEP will be proportionate to the nature and scale of the project and its potential risks and impacts. The SEP will be disclosed as early as possible, and before project appraisal, and
- The government shall seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes will be made to the SEP, the updated SEP will be disclosed (World Bank, 2017: 99).

- The GRM shall propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of SESRP in a timely manner (World Bank, 2017: 100).

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

ESS 10 defines the requirements for stakeholder engagement as follows:

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

1.7 POTENTIAL ENVIRONMENT & SOCIAL RISKS AND IMPACTS

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

Social Risk Rating is High. Key social risks include: (1) ensuring security for project operations and workers, (2) potential land acquisition required for the installation of 132 kV sub-transmission network and associated substations, the distribution network, medium voltage line (<33kV) corridors and possible expansion of existing and green field mini-grids, (3) legacy issues around land and claims with the existing generation sites occupied by the ESPs and the distribution network, (4) systemic weakness in the capacity of implementing agencies to identify, understand and prevent adverse environmental and social impacts of the project, (5) potential establishment of workers camp that may exacerbate risks associated with gender-based violence (GBV) or sexual abuse and exploitation (SAE), and other forms

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

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

2. STAKEHOLDER ENGAGEMENT

2.1 Stakeholder Engagement Principles

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

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

2.2 Stakeholder Identification

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

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

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

Affected Persons:

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

Other interested parties

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

Marginalized & Disadvantaged People

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

2.3 Stakeholder Mapping and Analysis

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

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

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

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

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

Table 1: Stakeholders and Their Influence on the Project

Stakeholder Category	Stakeholder Group	Magnitude of Impact/Influence
Community	Farming & Business communities	Impact of Project on Stakeholder: High Level of Interest Influence of Stakeholder on Project: High Level of Interest
	General public	Impact of Project on Stakeholder: High Level of Interest Influence of Stakeholder on Project: High Level of Interest
Energy Service Providers	Current players in the energy market and power distribution	Impact of Project on Stakeholder: High Level of Interest Influence of Stakeholder on Project: High Level of Interest
Government Bodies	Ministry of Finance	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	Ministry of Education	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Ministry of Communication & Technology	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Directorate of the Environment	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest,
	Ministry of Interior	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Ministry of Labour	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Ministry of Planning and Economic Development	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	Ministry of Water Development	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	Ministry of Environmental and Climate Change	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	Ministry of Labor	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
	Ministry of Gender	Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
		Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
		Impact of Project on Stakeholder: High Level of Interest Stakeholder on Project: High Level of Interest
NGOs	International & Local NGOs	Impact of Project on Stakeholder: Moderate Level of Interest Influence of Stakeholder on Project: High Level of Interest
	Community Based Organizations	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
Institutional Stakeholders	World Bank, SIDA, DFID, EU & AfDB.	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest

Stakeholder Category	Stakeholder Group	Magnitude of Impact/Influence
Local Government Authorities	Municipal Councils	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
Government of Somaliland	Somaliland	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest
UN Agencies, INGOs and donor groups	UNDP, UN-HABITAT, United Nations Office for Project Services, International Organization for Migration, ADRA, UNHCR, ILO, UN WOMEN, Norwegian Refugee Council, World Vision International, Danish Refugee Council, European Union and USAID	Impact of Project on Stakeholder: Low Level of Interest Influence of Stakeholder on Project: High Level of Interest

2.3.1 Citizen Engagement

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

2.3.2 Project-Affected Persons (PAP)

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

Table 2: Project-Affected Persons -PAPs

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

2.3.2 Other Interested Parties

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

Table 3: Other interested parties

Other interested parties	Relevance to the project	Indicative list
Line Ministries and Agencies at Somaliland Government	Ministries such as Ministry of Energy and Water Resources, Public Works, Ministry of Planning and Economic Development, Ministry of Interior and the Directorate of Environment and Climate Change. other line agencies are key stakeholders for the project in compliance with legislation and regulations	<ul style="list-style-type: none"> ▪ MoEM ▪ MoPW&T ▪ MoPIED ▪ Mol ▪ MoF ▪ DoECC-OPM ▪ Ministry of Water Development ▪ Ministry of Environment and Climate Change ▪ Ministry of Planning ▪ Ministry of Public Works, ▪ Ministry of Labor ▪ Ministry of Gender.
Local government	<ul style="list-style-type: none"> • Local governments ensure district social services (e.g. electricity) and economic development, • Mobilization of local resources for development 	<ul style="list-style-type: none"> ▪ Municipality Departments (e.g. Public Works, Social Affairs, etc) ▪ Members of Local Council and the mayor ▪ Clan/cultural elders

	<ul style="list-style-type: none"> Local government authority protects the right of communities in the project areas and represents the interest of the PAPs in the project. The issue of land, security, and grievance redress is also among the key responsibilities of the local governments during the project life-cycle –municipality administrations. 	<ul style="list-style-type: none"> Village committees Police
UN Agencies, INGOs and donor groups	UN agencies, INGOs and donor groups in Somaliland supporting the government with similar projects on service delivery as well as economic and infrastructure development. There is need for collaboration and partnership with SESRP.	<ul style="list-style-type: none"> UNDP UN-HABITAT United Nations Office for Project Services International Organization for Migration ADRA UNHCR ILO UN WOMEN Norwegian Refugee Council World Vision International Danish Refugee Council European Union USAID
Community groups	There are community groups including IDPs and host communities who are currently working with the developmental projects in these respective Municipalities, this will be sustained under the SESRP.	<ul style="list-style-type: none"> Community leaders and elders; IDPS, returnees and refugees; Women and youth groups Business community
Other key interested partners	Private companies such as electricity, telecommunication and water supplies. These are key stakeholders during the implementation of the project.	<ul style="list-style-type: none"> BECO SOM-POWER NUWACO; NECSOM; HORMUD SOMTEL
Academic institutions	Universities, think tanks	<ul style="list-style-type: none"> Potential concerns regarding environmental and social impacts Potential educational/outreach opportunities to increase awareness and acceptance of the project.
Local Media	Press and media (including social media)	<ul style="list-style-type: none"> Inform residents in the project area and the wider public about the Project implementation and planned activities

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

2.3.3 Disadvantaged / vulnerable Individuals or Groups

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

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

Table 4: Stakeholder Engagement with Vulnerable and Disadvantaged Groups

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

2.4 Findings from the Situational Analysis

The preliminary situation was undertaken to inform the project preparation and implementation phase. The outcomes from the preliminary situational analysis on communication in the project area and related physical boundaries are as provided below:

i. Literacy Levels of the Local Community

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

ii. Access to District Local Authorities / Offices

Key Informant interviews and group discussion will be practical due to the accessible location of the offices of these stakeholders in most of these areas. Key informants are mainly available in the District

Headquarters. However due to the COVID 19 pandemic the consultant may resort to having interviews with Key informants through phone calls or conduct virtual meetings.

iii. Language

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

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

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

iv. Development of Messages

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

v. Use of Mass Media

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

vi. Public Meetings

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

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

- Leveraging on the use of ICT innovations that include online questionnaires, audio-visual and teleconferencing to undertake comprehensive public consultations during this pandemic.

- The use of comprehensive questionnaires that will include all the details pertaining to the project and a clear description of the proposed project together with architectural drawings.

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

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

vii. Focus Group Discussions

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

The Focus group discussion targets the following groups;

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

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

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

2.5 Stakeholder Engagement Plan -SEP

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

Table 5: Stakeholder Engagement Plan

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

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method (s) used	Location/frequency	Responsibilities
					grievance staff)
	Project Affected Persons - People who will benefit from employment opportunities through construction and maintenance works of the municipal electricity infrastructure	<ul style="list-style-type: none"> - Selection criteria and ToR for employment opportunities; - Environmental laws and regulations; - Project scope, rationale and E&S principles - Grievance mechanism process 	Group meetings with the host community and support groups to engage vulnerable groups;	Prior to start of civil work	<ul style="list-style-type: none"> - PIUs and Engineering and Supervision Consultant; - GM; - Contractor
	Other Interested Parties – Community groups	<ul style="list-style-type: none"> - Ways to outreach to vulnerable groups and address their concerns and interest 	Individual meetings; Focus group meetings; Emails	Prior to start of civil work	<ul style="list-style-type: none"> - PIUs and Engineering and Supervision Consultant; - GM; - Contractor

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method (s) used	Location/frequency	Responsibilities
	Other Interested Parties - External Ministries (SOMALILAND) Academic institutions; Local Government Units; General public; Women organizations; Local commercial banks and Media	<ul style="list-style-type: none"> - Technical details on project design, - Compliance with national regulations and collaboration with relevant programs, - Identification of vulnerable groups of people relevant to the project Compliance with legislations and regulations, - GRM Process 	Official/Public meetings, workshops; Social Media Communication; Disclosure of written information - Brochures, posters, flyers, website; Information desks - In Municipalities and HQ; Grievance mechanism	As needed (and continued throughout the project life)	<ul style="list-style-type: none"> - Project Implementation Units (MoEWR, MoEM), and Engineering and Supervision - Consultant; - GM; - Contractors
Construction	Project Affected Persons- People who physically and economically affected, those residing in project area	<ul style="list-style-type: none"> - Grievance mechanism process; - Health and safety impacts (Construction-related safety measures); - Employment opportunities; - Environmental concerns; - awareness-raising - HIV/AIDS Awareness Program and - Health and Safety Management Plan. 	Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable; Disclosure of written information Information board – On the beginning and at the end of project side;	Monthly/quarterly meetings Communication through mass/social media (as needed);	<ul style="list-style-type: none"> - PIUs and Engineering and Supervision - Consultant; - GM; - Contractor

Project Stage	Target Stakeholders	Topic (s) of Engagement	Method (s) used	Location/frequency	Responsibilities
Post-construction and Operation phase	Project Affected Persons - People who physically and economically affected, those residing in project	<ul style="list-style-type: none"> - Satisfaction with engagement activities and GRM process; - Monitoring and evaluation of project benefit and environmental and social performance - Community health and safety measures during operation; - 	<p>End-line stakeholder survey on project impact,</p> <p>Public meetings, trainings/workshops, individual outreach to PAPs</p> <p>Disclosure of written information - Information board – On the beginning and at the end of project side;</p>	Following the completion of civil work	<ul style="list-style-type: none"> - PIUs and Engineering and Supervision - Consultant; - GM; - Contractor
	All stakeholders	Reporting back to stakeholders on the outcome of the monitoring and evaluation of the project	<p>Public workshop</p> <p>Media releases and/or newsletters via email</p> <p>Project bulletins</p>	Following the completion of SESRP	PIUs and Engineering and supervision consultant

2.6 Reporting on Stakeholder Engagement

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

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

The reports to be submitted include:

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

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

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

3. STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE

3.1 Brief Summary of Previous Stakeholder Engagement Activities

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

Furthermore, community consultations have taken place through community representatives, such as CSOs and non-state actors, as per World Bank guidance under the COVID-19 pandemic. Broader consultations have been hampered, one by the lack of time given that this is an emergency project, and second by the outbreak of the COVID-19 pandemic, which has made community consultations impossible at this stage.

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

3.2 Aims of the Consultations

- Introducing the participants, the Project Development objectives and its components.
- Obtain participants views and feedbacks on project environmental, social, health and safety issues and concerns
- Identify the key social issues such as labour, land security, GBV/SEA, GRM from the relevant stakeholders,
- Filling the gaps in the Preliminary E&S Risk Assessment Report and refine the methodology, and
- Identify the key institutional gaps and capacity issues.

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

Conclusions:

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

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

3.2.1 Brief Summary of Previous Somaliland Stakeholder Engagement Activities

On 28th of April 2021, the Ministry of Energy and Minerals of Somaliland, together with the World Bank group, organised a public consultation event for the environmental and social management framework for the Somaliland electricity sector under the Recovery Project. Opening remarks were made by the project owner, the MoEM

, and attended by other concerned ministries and departments including ministries of social affairs, justice, and environment. During the meeting, the audience was introduced to the project components and anticipated positive impacts. The consultation session included the following key topics:

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

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

Annex I provides the full minutes of meeting.

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

4. INFORMATION DISCLOSURE

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

Table 6: Information during project cycle

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

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

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

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

5.2 Responsibilities

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

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

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

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

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

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

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

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

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

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

Local Municipalities:

5.3 ESTIMATED BUDGET

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

6. GRIEVANCE REDRESS MECHANISM (GRM)

6.1 Principles of the GRM

A Grievance Redress Mechanism receives and facilitate resolution of affected stakeholders' concerns and grievances related to the Project's environmental and social performance. The GRM process should be disclosed publicly and available during the operation phases of the Project, and to be used by all affected stakeholders, Project implementing partners and contractors.

Stakeholders will be informed about the GRM during the stakeholder consultation and disclosure activities. The mechanism will be communicated and made available to all stakeholders and in particular to both genders and vulnerable groups.

Grievances (including labour related, community complains over the project implementation, GBV/SEA/HS, among others), should be received, recorded/ documented and addressed in a manner that is easily accessible, culturally appropriate and understandable to affected stakeholder. Where feasible and suitable for the Project, the grievance mechanism may utilize existing formal and informal grievance mechanisms, that will support the Project-specific proposed arrangements. The Project dedicated personnel on handling grievances will be consistent, experienced and qualified to do so.

Concerns will be addressed promptly, using a transparent process that is readily accessible to all segments of the affected stakeholders and at no cost to them and with no retribution. Grievances received and responses provided will be reported back to the community periodically.

The Project dedicated personnel will be experienced and/or trained to seek solutions to complaints in a collaborative manner with the involvement of the affected stakeholders, taking into consideration customary and traditional methods of dispute resolution, and not impeding access to existing judicial or administrative mechanism available in the country for resolution of disputes. The mechanism includes a redress aspect so that those who feel their complaint has not been addressed in a manner they find satisfactory can have recourse to an external body for reconsideration of their case.

The Project will provide an option for anonymous grievances, including for worker grievances whereby identity can be protected from any repercussions.

The GRM will be prepared by the time RAPs and ESIA's are prepared, and be actively used throughout project implementation till the completion of all construction activities and beyond until the defect liability period ends. A separate mechanism will be prepared to address worker grievances. Note that, all grievances related to the actions of contractors are to be resolved by the contractors.

6.2 GRM Process for SESRP

The SESRP GRM has been designed to provide a timely, responsive and effective system of resolving community groups or individual's grievances in the areas the project is implementing activities. It is a process starting at the local, through the state administration to the federal level. It is a multi-stage process that ensures that all stakeholders from the community level structures to the National office are involved in finding solutions to the grievances raised by the communities the project is targeting.

All project affected persons will be informed of their rights to raise grievances pertaining to national GRM frameworks. Mechanisms will be 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. The policy will identify guiding principles; 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.

6.2.1 STEP 1: IDENTIFYING FOCAL POINTS

Staff in charge of grievance redress should be skilled and professional. Therefore, the SESRP management will identify high-calibre staff (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 SESRP 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 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 stakeholders 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.

6.2.2 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 AP will provide information to the GRM focal point to be captured in the Grievances Registration Form. 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.

6.2.3 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 SESRP-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 SESRP 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 (**Annex 2**) on the outcomes of the investigations and the specific recommendation to resolve the grievance or complaint.

6.2.4 STEP 4: RECOMMENDATIONS 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 SESRP 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.

6.2.5 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 GRP 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).

6.2.6 STEP 6: REFERRAL TO THE GRIEVANCES COMMITTEE

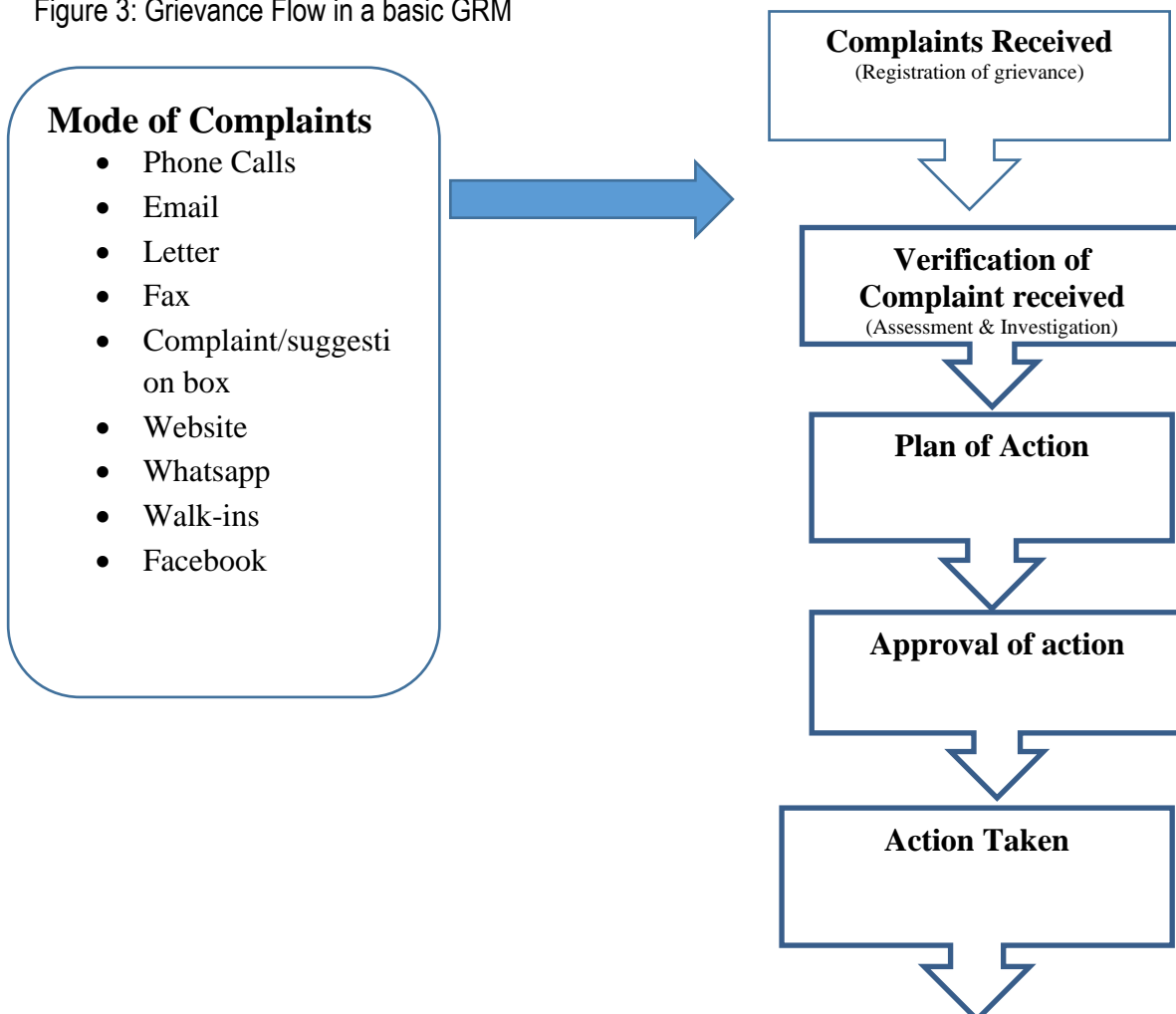
If and when the AP disagrees with the recommendation of the SFP, the SFP shall within 7 days of receiving the notice of rejecting the offer from the AP compile all the necessary documents regarding the grievance from district and the province to the Grievance Committee through the grievance Chairperson 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 PIUs. 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 SESRP 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 SESRP.

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.

For grievances that cannot be resolved at the project level, these will be reported and directed to World Bank Management through the GRS for further redress.

Figure 3: Grievance Flow in a basic GRM



6.3 PERFORMANCE STANDARDS OF SESRP GRM

To ensure that the SESRP GRM is effective and achieve the intended purposes, the Project Management is committed to the following performance standards:

- At each level of the GRM responsible officers shall take measures to ensure the protection of the Aggrieved Party from possible harassment from any other actors in the community.
- No Grievance/dispute shall be considered insignificant or more significant than other. All grievances shall be given equal consideration.
- All grievances will be treated with confidentiality and anonymity.
- All disputes submitted shall be acknowledged by issuance of a grievance acknowledgement form/receipt
- All grievances shall be recorded in a grievances register and the register shall be maintained in a safe and secure place.
- The GRM officer shall have up to 21 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Compensation Committee shall have up to 30 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Aggrieved Party once feedback is provided shall have up to 7 days to respond to the relevant correspondence agreeing or disagree with the resolution.
- If the Aggrieved Party is awarded compensation, the compensation granted should be in such a way that it at least restores the AP to his original condition/status or makes them better.

6.4 COMMUNICATION PLAN FOR GRM

In order to sensitize the various stakeholders (community, individuals etc.) about the GRM, there will be need to produce a number of Information materials such as brochures and posters that will educate the various stakeholders about the content of the GRM and how to access it. Additionally, radio programs will be produced to compliment education materials including translating the GRM into local languages. Other sensitization activities will include community meetings and public forums of the GRM.

6.4.1 Communicate to Build Awareness

Educating local people and contractors about the grievance redress mechanism is an essential and on-going responsibility. It does no good to have a perfectly designed GRM that no one knows about.

6.4.2 Communicating with Stakeholders

For an effective operation of the Project GRM, its objectives and procedures will have to be properly communicated to those who will use it so that they will not only be eager to access it but also to own it, taking cultural peculiarity of each community into consideration.

The goal of communicating the GRM to stakeholders is to create awareness at a general level, to build skills and capacity at leadership level as well as to cause adjustment in behaviors and attitudes at the level of all stakeholders with a view to entrenching inclusion. To entrench this GRM as an efficient management tool for the SESRP-PIUs, a combination of methods and media should be employed. The communication plan must consider the awareness creation and the behavioral change need of the stakeholders. There is the need for a sensitization forum with the

various communities, to acquaint the stakeholders of the project with the guideline and workings of the GRM. A workshop will rally representatives of the states, local governments, traditional institutions as well as key groups and personalities in the project communities.

Accessing the grievance redress system will depend so much on the level of awareness about the mechanism among potential users. This therefore will require groups and mass methods as well as all the media forms available like the mass media, social media, and ministry website and grassroots mobilization.

6.5 MONITORING AND EVALUATION OF THE GRM

Monitoring and evaluation are critical to the success of any GRM. Monitoring refers to the process of tracking grievances and assessing the extent to which progress is being made to resolve them. The project monitoring and evaluation information system will also include indicators to measure grievance monitoring and resolution. These grievance redress indicators will be incorporated into project results frameworks.

Grievance Redress Mechanism (GRM) monitoring involves assessing the progress being made to handle grievances. The overall result of an effective GRM is to enable stakeholders affected by the SESRP project activities to receive timely feedback and appropriate responses. To achieve this result, specific targets are set, and overall improvement is tracked by a set of indicators. Monitoring will be conducted by the project M & E Officers using performance indicators, which are presented on two different outputs: participation and effectiveness every after 3 months (quarterly). For transparency, stakeholders will have an opportunity to track grievances as well. The M & E Officers will on a quarterly basis prepare a report and a list of existing and new grievances and share with stakeholders at all levels. The complaint, region/area and status of grievance handling will be made public.

Feedback—informing GRM users and the public at large about the results of investigations and the actions taken—enhances the visibility of the GRM among stakeholders and increases users' trust in the system (making it more likely that they will lodge grievances). SESRP will provide feedback by contacting the complainant directly (if his or her identity is known) and/or posting the results of cases in high profile locations and conveying the results through radio broadcasts and other media. The project will also inform GRM users about their right to an appeal if they are dissatisfied with the decision, specifying both internal and external review options.

7. MONITORING AND REPORTING

7.1 Monitoring

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

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

Performance will be evaluated bi-annually by tracking:

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

7.2 Reporting

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

Data reported on will include the following activities:

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

Annex-1: Public Consultation Meeting in the GoSL

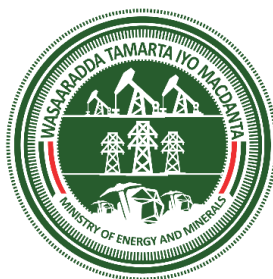
Public Consultation Meeting of E&S Management Framework for Somaliland Energy Sector Recovery Project (SESRP)

No.	Names	Institution	Title/Function
1	Ahmed Ismail Aden	Indho-Power	OP.01
2	Ahmed Ali Nuur	Indho-Power	CEO
3	Hanad Darwiish	MOPCT	Senior Advisor
4	Nasriin Abdishakuur	SOLLA	Lawyer
5	Hussein Mohamed Fadal	SOLLA	Lawyer
6	Abdirahmaan Mohamed	MOJ	Lawyer
7	Gulied Ahmed	SEAP	Technical
8	Dahir Mohamed Farah	SOLLA	Lawyer
9	Abdihakimm Ahmed	Private	Engineer
10	Eng. Mustafe Mohamed	Groupower	Engineer
11	Siman Ahmed Ali	SOLLA	Lawyer
12	Abdilahi Abdi	Sompower	Board, Vice Chairman
13	Eng.Abdirahman Xusen Muse	O.H.H	Engineer
14	Abdiqani Abdilahi Ali	SOLLA	Engineer
15	Abdirahman Ali Hassan	MOJ	General Director (DG)
16	Abdiqani Ahmed Hersi	MOERD	General Director (DG)
17	Said Abiib	SOMRENT	General Secretary
18	Abdirashiid I Abdirahman		General Director (DG)
19	Mustafe Mohamed	Gaafane Power	Chief Enigneer
20	Ahmed Said Ali	Gaafane Power	Chief Enigneer
21	Abdirasak Nour	APD	R.A
22	Mohamed Mahamoud	SEC	DG
23	Mohamoud A. Liban	HECHO/SEPCO	Chairman

24	Shukri Mukhtar Hassan	MOPWH	Dep DG
25	Amiin Hasan Jama	HAVOYOCO	Centre Manager
26	Mohamed Ali Areef	SOLLO	Engineer
27	Hinda Mohamed Hayd	MPWH	Deputy DG
28	Khadar Abdi Abdilahi	SWIA	Doctor
29	Mohamed Abdirisak Said	MoEM	Legal
30	Ali Mohamed	Local Government	Director
31	Mustafe Elmi	APD	Head of Research
32	Gullied Hassan	HWA	Engineer
33	Khalid Abdilahi	SEP	Engineer
34	Abdirisak Yusuf	MOPCA	Development plan
35	Mohamed Aden	Shamso Energy	Chairman
36	Abdishakur Ali Mohamoud	AQN law firm	G. Manager
37	Amal Ali	AQN law firm	Principle lawyer
38	Mohamed Ali	DAWAN media	Reporter
39	Waliid Yusuf Ahmed	MOJ	Deputy Director
40	Hassan Mohamed Mumin	Aloog	Director
41	Khaalid Ahmed Aw Ali	CSP	Engineer
42	Sarah Smith	CSP	Project Manager
43	Muse Jama	Nafis Network	O-development advisor
44	Salebaan Abdi Ali	SEC	Commissioner
45	Ubah Mohamed Mahamoud	SEC	Commissioner
46	Walid Saryan	MO	Deputy Director

Annex 2: Public Consultation Meeting in Somaliland

○ Environmental and Social
Somaliland Electricity Sector



Risk Assessment for the
Recovery Project



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

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

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

Event Report April 28, 2021

1. Introduction

The Ministry of Energy and Minerals of Somaliland together with the World Bank group organised a public consultation event for the environmental and social management framework for Somaliland electricity sector under the Recovery Project. This report provides the key discussions, highlights, contributions, and recommendations from the participants of the public consultation meeting, this in line with World Bank social standard 10: **“Stakeholder Engagement Disclosure”**. The environment and social framework provide guidance of the principles, rules,

guidelines, and procedures to screen, assess, manage, and monitor the mitigation measures to address identified environmental and social impacts for the proposed project.

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

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

Welcome remarks and Speeches

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



Director of Energy Eng. Liban MM Warfa

Mr. Liban, welcomed the meeting attendees and gave brief introductory remarks. He stated the objectives for the meeting. The Director thanked to the World Bank Group who funded this project. He mentioned that this a consultation meeting the improvement and development of the energy sector. This is to make sure that all stakeholders including ESPs government and other partners to take part in development of the sector. The main important that this project is focusing is include the improvement of the distribution network. He mentioned that project will have an effect on the social, environmental elements of the project and disputes resolutions and hence, the Ministry of social affairs, Minister of Environment and the Ministry of justice were invited and also present.

Statement from His Excellency Minister of Energy

HE Jama Haji Mohamud Egal Made the official opening remarks of the event. The Minister thanked the participants, including the ESPs and government officials for their attendance of the crucial event. The main objective of this project is to recover from the electricity drawback Somaliland encountered during the war. The Minister mentioned that there

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

Statement by His Excellency the Electrical Energy Commission.

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



Statements from the Director Generals and other officials



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

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



social development. The Director mentioned that the Ministry of labour and social affairs will support the MoEM in the implementation of this project.



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

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



2. Presentations

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

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

Gap analysis WB ESS & national Legal Framework.

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

Topics	Outcome (suggestions)
<p>What are the existing grievance redress mechanism with regards to project implementation?</p>	<p>One of the participants from the Somaliland lawyer association reported that there is no existing grievance redress mechanism for the community compliant but in general the complaining people go to the local media to submit their complaints.</p> <p>The participants from the local government mentioned that they dot release projects unless the community leaders approve and assess the potential social and environmental risks. The local government start the implementation of its projects including the JLPG when the community agree and sign their consensus. The complaining people direct their complaint to the elders of the community who then submits orally to the local government. But there is no written procedure to follow to submit complaints and grievances.</p> <p>The Hargeisa water agency reported that they face many challenges in the expansion of the water. Although there is no written mechanism to receive the complaints, Hargeisa water agency created local committees of 5 elders for each district. These committees support the project on behalf of the community. Sometimes the committee is receiving and deal with the complaints of the local community.</p> <p>The participants from Ministry of Environment and Rural Development reports that the Somaliland environment law, article 10, section 79 sates there is a committee that responds to complaints from the community.</p>
<p>Do we have the existing way leaves where the transmission lines will pass in case there are no way leave what is the existing mechanisms for land take?</p>	<p>The representatives from the local government mentioned that there is wayleave for the utilities including the distribution and transmission networks of the electricity in their town plans. But due to lack of proper management, these plans are not followed by the private suppliers. Recently the telecommunication companies and some of the electricity suppliers put grounding cables in the town that are not in line with the town plan, so sometimes it creates social and environmental risks. The private companies deal with landowners to wayleaves without consultant of the local authorities.</p> <p>Representative from the Ministry of Public Works mentioned that they recently completed the master plans for the major towns of Somaliland. These masters indicate the wayleaves of the utilities including the transmission and distribution of electricity as per the Somaliland land law.</p> <p>Recommendation: The project needs to review these master plans.</p> <p>Hargeisa Water agency mentioned that they faced a lot of challenges during the Hargeisa Water expansion. They mentioned that they met many underground cables including electricity lines and telecommunication during the excavation the pipelines. these unground cables created problems to workers of the project.</p>

The Water agencies agreed that they will provide the design and drawings of water distribution pipelines to help the Ministry of energy and minerals for their electricity distribution plans.

Recommendation: The Ministry of energy and minerals to follow up the Hargeisa Water agency for these drawing and designs.

The local government mentioned that they started to request the electricity and telecommunication companies to submit their designs and drawings of the ungrounded cables before they implement any project.

There are lot of transmission lines that go through private lands where the owner of the land refused to pass the line. These problems are resolved with support of the traditional leaders. Sometimes the project implementers pay money and sometime jobs to the owners of the land. For example, the fibre optic cable runs throughout Somaliland. Sometimes there are a lot of disputes between the company and landowners which sometimes reach to courts. Most of these disputes were resolved in a traditional way.

The Somaliland Electricity Act, article 15, use of public & private property, states.

1. In Accordance with the provisions of Article 23 of Act No: 17 (Land Law), the Licensee shall have the right to apply the use of public property for installation, transmission of lines or poles, distribution, and generation activities.
2. The licensee shall have the right to use private land in accordance with the agreement between the licensee and the owner of the land.
3. If parties fail to conclude an agreement and the public interest necessitates the use of such private land for the purposes of installing a public utility, the Commission may request from relevant local authorities to expropriate such private land subject to the payment of fair market price compensation to the owner of the land.
4. When, in accordance with the provisions of this Part, the licensee of an undertaking has been permitted to use any land or has placed a transmission line in position, the licensee shall be entitled to reasonable access to such land or line for the purpose of carrying on the operations authorized by his license on such land on maintaining, removing, repairing, or replacing such a line.
5. Any aggrieved party can challenge the decision from the local authorities to the Somaliland High Court.
6. Without prejudice to the provisions of Act No: 04/98 The Environmental Conservation Act, the licensee will request to remove any trees or other objects that obstruct the construction of poles, facilities, or electricity related work.
7. The licensee will give not less than 10 days of notice to the lawful occupier or the relevant authorities its intention to remove such trees or objects.
8. The location of any electricity generation facility shall be in compliance with the provisions of the Public Order Law (Act No: 51/2011) Article 20.

	<p>Recommendations: the project needs to review the land law of Somaliland</p> <p>The participants suggested to conduct adequate social and environmental review for electricity distribution and transmission and develop appropriate mitigation measures.</p>
<p>What is the experience in labour issues in terms of solving labour related issues? for example payment of the wages and salary, the issuance of work contracts?</p>	<p>A representative from the Somaliland lawyer association mentioned that the Somaliland labour Law states how to resolve the labour issues including the payment of wages, salaries, and other compensations.</p> <p>The Somaliland labour Law states the working hours, holidays, bonuses, leaves including maternity/paternity leaves.</p> <p>In general, the complaining employee submits his/her complaint to the ministry of labour and social affairs in compliance with the Somaliland labour law.</p> <p>In addition, the Act no 80, Somaliland Companies law is also in place to resolve the issues of employee and employer in the private sector.</p> <p>Recommendation: The Ministry of energy and Minerals to review the Act no 80, Somaliland Companies Law.</p> <p>In general, there is no written contracts between the employer and employee and after while the employee complains and there is no base to resolve the complaint.</p> <p>Most of the complains occur during the termination of the employee's contract. It is very rare to see an employee complaining during his/her presence in the job.</p> <p>A representative from women lawyer association mentioned that There are waged staff that do not work under contracts. These employees work few days or hours, so the Somaliland labour law do not specify how resolve the issues of such kind of workers. There some people complaining from employers of international companies that goes to the Ministry of foreign affairs. If the local employees There two laws, labour law 2004. That deals with non-civil servant labour and the civil servant law that deals with the issue of government staff.</p> <p>Mostly, the Ministry of labour do not involve during the employment stage, but they involve when complaints arise.</p> <p>There is no labour association in Somaliland but there are law firms that undertake alternative dispute resolution for the private sector.</p>
<p>Do we have labour inspectors at the field to monitor the implementation on labour laws</p>	<p>During recruitment, the Ministry of labour attends the interview of the employee to participate the background of the staff.</p>
<p>ME&RD: What are the</p>	<p>The implementing party submits a request to the Ministry and the Ministry will</p>

<p>approval requirements for the project ESIA, how long does it take if there are no bottlenecks?</p> <p>Does the ministry have adequate staff for reviewing the ESIA reports?</p>	<p>attach experts to assess the impact of the project on the environment. The experts submit their reports to the Ministry and this report help the ministry to decide the way forward for the implementation of the project. The project will not be allowed unless the environmental impact assessment is prepared. There is not enough staff to do the job.</p>
<p>Do we have labour laws prohibiting Use of Forced Labor and or Child Labour?</p>	<p>Article 39 of labour law 2004 state that child labour is prohibited. There are also shifts of work that differ. There is also a child law.</p> <p>A representative from Somaliland Women lawyer association mentioned that the law no 31, 2004, Somaliland labour law, prohibited to send a work while children are learning, nights shifts. The law is also prohibiting to send the child to a work that he/she could not be able physically and morally to do.</p>
<p>Do we have Occupational Health and Safety inspectors?</p>	<p>The Ministry social labour have a section called health and safety.</p>
<p>How the wastes are especially oil contaminated (transformer) handled, do we have approved sites where the contractors can be recommended to?</p>	<p>The contaminated oil is the major environmental problems. The electricity Service providers have a dip to put the oil waste to avoid it contaminating the environment.</p>
<p>What is the role of ESPs in this project?</p>	<p>The ESPs are responsible for protecting the environment and the social. The ESPs will have the biggest role in terms of environmental safety and health.</p> <p>There are some complaints that comes from the neighbour house in regard of the noise of the generators. So, they suggest creating industrial zones where these generation site will be relocated.</p>
	<p>Some of the participants mentioned that the metal poles had great risk to life of the people and animal in the major towns of Somaliland. They suggested whether there are alternatives to reduce the risk of electrocutions caused by the metal poles of the electricity distribution. The metal poles have major problems on the social, so is their plan to replace the metal poles</p>

Annex 3. SEAP SOMALILAND GRM

GRIEVANCE REDRESS MECHANISM PROCESS

Somaliland Electricity Access Project - SEAP

1. INTRODUCTION

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

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

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

2. GRIEVANCE REDRESS MECHANISM TIERS

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

NOTE

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

3. DESCRIPTION OF THE GRIEVANCE REDRESS MECHANISM

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

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

4. MONITORING COMPLAINTS

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

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

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

Note

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

5. STAKEHOLDERS RESPONSIBILITIES IN THE GRIEVANCE REDRESS MECHANISM

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

6. COMPLAINT REGISTER

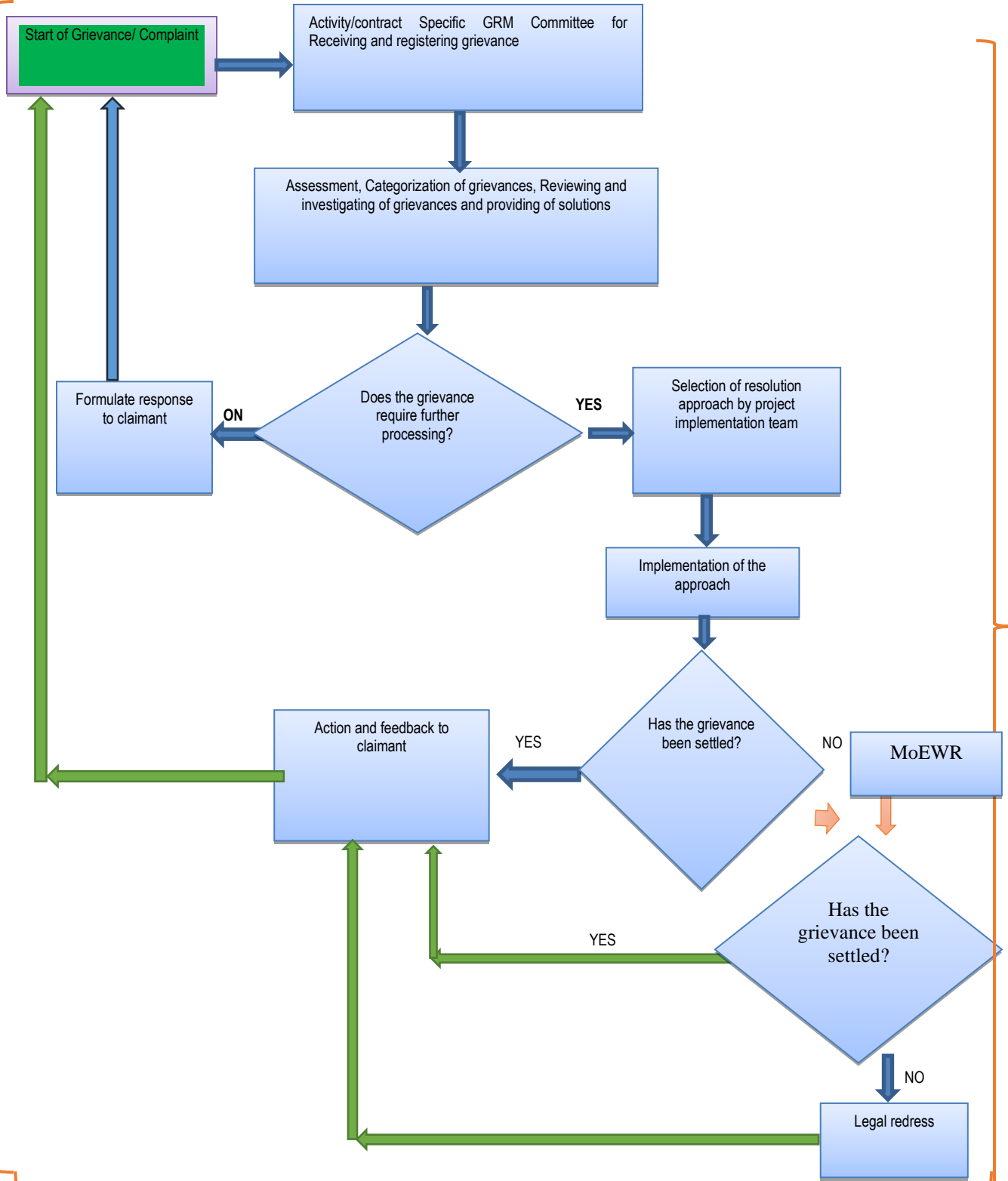
COMPLAINT/GRIEVANCE REGISTER	
Unique Reference No. Pre-Printed	Date:
Name of Complainant or Representative of group of complainants	
Contact Details of complainant or representative of group of complainants (if available), Anonymous complaints are also allowed	Residence:
	Telephone:
Location where complaint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

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

THE GRIEVANCE REDRESS MECHANISM PROCESS

Monitoring and follow up (legal specialist)

Monitoring and follow up (legal specialist)



Monitoring and follow up (legal specialist)

ANNEX 4: SEAP GRM SOMALILAND

WASAARADDA TAMARTA IYO MACDANTA
“WT&M”
SOMALILAND, HARGEISA



MINISTRY OF ENERGY AND MINERALS
“MOEM”
SOMALILAND, HARGEISA

PROJECT IMPLEMENTATION UNIT

GRIEVANCE REDRESS MECHANISM PROCESS of Somaliland Electricity Access Project - SEAP

7. INTRODUCTION

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

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

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

8. GRIEVANCE REDRESS MECHANISM TIERS

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

NOTE

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

9. DESCRIPTION OF THE GRIEVANCE REDRESS MECHANISM

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

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

10. Grievance Redress Mechanism Timing

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

10. MONITORING COMPLAINTS

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

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

Note

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

11. STAKEHOLDERS RESPONSIBILITIES IN THE GRIEVANCE REDRESS MECHANISM

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

12. COMPLAINT REGISTER

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

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

Annex 5: List of Participants

No.	Names	Institution	Title/Function
1	Ahmed Ismail Aden	Indho-Power	OP.01
2	Ahmed Ali Nuur	Indho-Power	CEO
3	Hanad Darwiish	MOPCT	Senior Advisor
4	Nasriin Abdishakuur	SOLLA	Lawyer
5	Hussein Mohamed Fadal	SOLLA	Lawyer
6	Abdirahmaan Mohamed	MOJ	Lawyer
7	Gulied Ahmed	SEAP	Technical
8	Dahir Mohamed Farah	SOLLA	Lawyer
9	Abdihakimm Ahmed	Private	Engineer
10	Eng. Mustafe Mohamed	Groupower	Engineer
11	Siman Ahmed Ali	SOLLA	Lawyer
12	Abdilahi Abdi	Sompsoner	Board, Vice Chairman
13	Eng.Abdirahman Xusen Muse	O.H.H	Engineer
14	Abdiqani Abdilahi Ali	SOLLA	Engineer
15	Abdirahman Ali Hassan	MOJ	General Director (DG)
16	Abdiqani Ahmed Hersi	MOERD	General Director (DG)
17	Said Abiib	SOMRENT	General Secretary
18	Abdirashiid I Abdirahman		General Director (DG)
19	Mustafe Mohamed	Gaafane Power	Chief Enigneer
20	Ahmed Said Ali	Gaafane Power	Chief Enigneer
21	Abdirasak Nour	APD	R.A
22	Mohamed Mahamoud	SEC	DG
23	Mohamoud A. Liban	HECHO/SEPCO	Chairman
24	Shukri Mukhtar Hassan	MOPWH	Dep DG
25	Amiin Hasan Jama	HAVOYOCO	Centre Manager

26	Mohamed Ali Areef	SOLLO	Engineer
27	Hinda Mohamed Hayd	MPWH	Deputy DG
28	Khadar Abdi Abdilahi	SWIA	Doctor
29	Mohamed Abdirisak Said	MoEM	Legal
30	Ali Mohamed	Local Government	Director
31	Mustafe Elmi	APD	Head of Research
32	Gullied Hassan	HWA	Engineer
33	Khalid Abdilahi	SEP	Engineer
34	Abdirisak Yusuf	MOPCA	Development plan
35	Mohamed Aden	Shamso Energy	Chairman
36	Abdishakur Ali Mohamoud	AQN law firm	G. Manager
37	Amal Ali	AQN law firm	Principle lawyer
38	Mohamed Ali	DAWAN media	Reporter
39	Waliid Yusuf Ahmed	MOJ	Deputy Director
40	Hassan Mohamed Mumin	Aloog	Director
41	Khaalid Ahmed Aw Ali	CSP	Engineer
42	Sarah Smith	CSP	Project Manager
43	Muse Jama	Nafis Network	O-development advisor
44	Salebaan Abdi Ali	SEC	Commissioner
45	Ubah Mohamed Mahamoud	SEC	Commissioner
46	Walid Saryan	MO	Deputy Director