FEDERAL REPUBLIC OF SOMALIA
Ministry of Agriculture and Irrigation (MoAI)

PROJECT-LEVEL

STAKEHOLDER ENGAGEMENT PLAN

Revitalizing Irrigation Infrastructure and Climate-Smart Agriculture in Somalia; *Beero Oo Barwaaqee Soomaaliya (BBS) Project*

DECLARATION

This Stakeholder Engagement Plan (SEP) has been prepared for the Beero oo Barwaaqee Soomaaliya (BBS) Project — Revitalizing Irrigation Infrastructure and Climate-Smart Agriculture in Somalia — in accordance with the African Development Bank Integrated Safeguards System (ISS 2023) and the applicable laws and regulations of the Federal Republic of Somalia.

The undersigned confirm that the information contained in this Plan is, to the best of their knowledge, accurate and complete, and that this SEP constitutes the agreed framework for stakeholder engagement and the management of stakeholder-related risks associated with the Project. The Plan shall be implemented, monitored, and updated as a binding safeguard instrument throughout the Project period.

Approved and adopted by:

Declaration and Signatures

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Abbreviations

Abbreviation	Full meaning
AfDB	African Development Bank
BBS	Beero oo Barwaaqee Soomaaliya (Irrigation Project)
CBO	Community-Based Organisation
C-ESMP	Contractor Environmental and Social Management Plan
CLO	Community Liaison Officer
CSO	Civil Society Organisation
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
FGD	Focus Group Discussion
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
IDP	Internally Displaced Person
IRM	Independent Recourse Mechanism (AfDB)
ISS	Integrated Safeguards System (AfDB, 2023)
KII	Key Informant Interview
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MoAI	Ministry of Agriculture and Irrigation
NGO	Non-Governmental Organisation
O&M	Operation and Maintenance
OS	Operational Safeguard
PAP	Project-Affected Party / Person
PIU	Project Implementation Unit
PMP	Pest Management Plan
PWD	Persons with Disabilities
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
WUA	Water User Association

Executive Summary

This Stakeholder Engagement Plan (SEP) sets out how the Beero oo Barwaaqee Soomaaliya (BBS) Irrigation Project will engage stakeholders, disclose information, provide feedback and manage grievances across 136 sites in 24 districts of five Federal Member States and Somaliland. It is prepared to meet AfDB Operational Safeguard 10 (OS10), read with OS1 and OS7, and follows the structure recommended in the OS10 Borrower Guidance Note and Business Standard BS#06.4.

Priority environmental and social issues. Engagement is driven by the risks identified in the state-level ESIA reports: inequitable water allocation and abstraction conflicts; construction disruption and community health and safety; occupational health and safety and contractor conduct; SEA/SH risk associated with worker presence; exclusion of women and vulnerable groups; livelihood and access disruption during works; catchment siltation and infrastructure safety; and pesticide and agrochemical risks. These determine where engagement must be most intensive and how disclosure and grievance handling are organised.

Stakeholders. Project-affected parties include farming households, pastoralist communities, women and women's groups, youth, IDPs and returnees, minority groups and clans, downstream and canal users, and Water User Associations. Other interested parties include federal, state and district authorities, traditional leaders, NGOs and service providers, contractors, the AfDB, and — following the May 2026 national consultation — private agribusiness, financial institutions, UN agencies and development partners, regional bodies, research institutions and women's and youth producer associations.

Previous engagement. Consultations were conducted in all 24 project districts between 10 December 2025 and 24 January 2026, complemented by two national events in Mogadishu: the BBS Validation Workshop (10 February 2026, 58 participants) and the BBS Stakeholder Consultation Workshop (13 May 2026, 67 participants from more than 30 institutions). Issues raised and the project's responses are recorded in the comments and response matrix at Annex 4.

Engagement programme. Engagement is organised by project phase — preparation, implementation, and completion and handover — and applied to each site cluster rather than as a single annual cycle. Methods are adapted to community rhythms, literacy, language, gender norms and the security context, and operate through existing governance structures.

Grievance mechanism. A community grievance mechanism will be operational before any physical works begin, with five resolution levels, a confidential SEA/SH pathway and a reprisal-risk protocol. In line with the AfDB recommended structure it is issued as a standalone procedure — the BBS Project-Level Grievance Redress Mechanism — and is summarised in Section 8 of this SEP.

Implementation and budget. The MoAI Project Implementation Unit leads delivery, supported by a Social/GBV Officer, supervision consultants, community liaison officers, district focal points, WUAs and contractors whose engagement obligations are embedded in bidding documents and contracts. The indicative PIU-managed SEP and GRM budget is USD 89,000 over four years, with site-level engagement funded through works contracts.

1. Project Description

1.1 Purpose, nature and scale of the project

The BBS Irrigation Project is an initiative of the Federal Republic of Somalia's Ministry of Agriculture and Irrigation (MoAI), financed by the African Development Bank. Its purpose is to improve water security, agricultural productivity and climate resilience by rehabilitating and upgrading priority irrigation canals, water catchments, boreholes and related infrastructure. By restoring existing water infrastructure the project supports both farming and pastoral livelihoods and strengthens resilience to recurrent drought and flooding.

The project will rehabilitate and upgrade irrigation and water infrastructure at 136 sites across six states and Somaliland, covering 24 districts. The project is classified as AfDB Category 1, and an ESIA with an integrated ESMP has been prepared.

1.2 Project components and area of influence

Interventions include canal clearing and reshaping, repair of control structures, river breakage closures and riverbank stabilisation, earth-dam (catchment) rehabilitation, borehole and well drilling and rehabilitation, solar pumping systems, water distribution points, and supporting WUA capacity building. The area of influence comprises the scheme command areas, the communities served by each water point, downstream users along rehabilitated canals and river reaches, and pastoralist routes intersecting project catchments.

Table 1: Project footprint by state and district

State	Districts	Sites	Primary interventions
Somaliland	Caynabo, Zeylac, Salaxlay, Boorama	68	Earth-dam and shallow-well rehabilitation, borehole drilling, water catchments, pipeline canals, solar systems
Galmudug	Cadado, Xeraale, Gaalkacyo, Dhuusamareeb, Wisil, Hobyo	13	Earth-dam rehabilitation, dug/boreholes, solar pumps, storage tanks, water kiosks
Hirshabelle	Balcad	13	Rehabilitation of irrigation canals (Shabelle riverine)
South West State	Xudur, Marka, Qansax Dheere	22	Catchment and canal rehabilitation, boreholes, solar pumps, water kiosks, culverts
Jubaland	Luuq, Kismaayo, Dollow	13	Piped canal, solar irrigation, storage tanks
Puntland	Gaalkacyo, Qardho, Garoowe, Armo	4	Water catchment and borehole rehabilitation
NorthEast	Ceerigaabo, Buuhoodle, Laascaanood	3	Water-catchment / water-harvesting rehabilitation
Total	24 districts	136	

1.3 Duration and phases of project activities

The project is implemented over a 48-month period. Engagement is organised around four phases: planning and design (site verification, disclosure, inclusive consultation); construction (mobilisation, active works, disruption management); operation and handover (commissioning, O&M and WUA governance); and monitoring, evaluation and learning (reporting, community validation and annual review). Because works proceed cluster by cluster rather than simultaneously, each phase is applied to each site cluster in turn.

1.4 Anticipated environmental and social risks and impacts

Anticipated risks are set out in Section 2 and Table 2. In summary, they concern water allocation and competition between farmers and pastoralists; community health and safety around open canals, excavations and drilling; contractor conduct and occupational health and safety; SEA/SH risk linked to worker presence; the exclusion of women and vulnerable groups from consultation and benefits; temporary disruption to irrigation and water access during works; catchment siltation and infrastructure safety; and pesticide and agrochemical risks where irrigation intensifies cropping.

1.5 Potential project opportunities and development benefits

The project is expected to deliver more reliable water for irrigation and domestic use, reduced exposure to drought and flood, improved agricultural productivity and household food security, local employment during construction, skills transfer in the operation and maintenance of solar pumping and irrigation equipment, and strengthened community water governance through WUAs. Consultations identified particular opportunities for women in horticulture, storage and processing, and for youth in agribusiness, agritech and equipment maintenance.

2. Priority Environmental and Social Issues Requiring Engagement

2.1 Priority E&S issues and risks

Engagement under this SEP is driven by the environmental and social risks identified in the state-level ESIA reports. These risks determine where engagement must be most intensive, which stakeholders must be reached, and how disclosure and grievance handling are organised.

Table 2: Priority environmental and social risks requiring engagement

Risk	Where most acute	Engagement focus / linked OS
Inequitable water allocation and abstraction conflicts	Jubaland (Juba corridor), Hirshabelle (Shabelle), Galmudug (scarce water points)	Transparent allocation rules, WUA strengthening, upstream/downstream and farmer–pastoralist dialogue; GRM (OS1, OS10)
Construction disruption and community health & safety	All states; open canals/excavations, drilling, equipment movement	Advance notice, safe crossings, signage/barriers, child and livestock safety messaging (OS4)
Occupational health & safety and contractor conduct	All active work fronts	Worker inductions, codes of conduct, site-level grievance uptake (OS2)
SEA/SH risk linked to worker presence	All states with worker influx	Community awareness, confidential survivor-centred pathway, referral mapping (OS2, OS10)
Exclusion of women and vulnerable groups	All states	Women-only sessions, targeted outreach, accessible formats, disaggregated monitoring (OS7, OS10)
Livelihood and access disruption during works	Riverine areas (Balcad, Janaale, Luuq/Dollow)	Sequencing around irrigation cycles, advance notice, temporary water provision (OS1)
Catchment siltation and infrastructure safety	Dryland districts (Somaliland, Galmudug, Southwest)	Community awareness, maintenance responsibilities, hazard reporting (OS1, OS4)
Pesticide and agrochemical risks	Riverine cropping areas	IPM messaging, safe handling, incident reporting via GRM/PMP (OS3)

2.2 Issues requiring engagement during project preparation

- Verification of site footprints, command areas and affected water users, including downstream users;
- Water allocation arrangements and the inclusiveness of existing or proposed WUA governance;
- Identification of vulnerable groups per cluster and the barriers they face to participation;
- Disclosure of the ESIA/ESMP, this SEP and the Labour Management Procedures, and collection of comments;
- Establishment and publicising of the grievance mechanism before works commence;
- Confirmation of GBV/SEA referral pathways and service-provider mapping per district.

2.3 Issues requiring engagement during project implementation

- Advance notice of works, access changes, canal closures and temporary water-supply arrangements;
- Community, child and livestock safety around excavations, open canals, drilling rigs and equipment movement;
- Transparent local hiring, employment opportunities and contractor conduct;

- SEA/SH awareness and confidential access to the survivor-centred pathway;
- Continuous grievance uptake, resolution and feedback to complainants and communities;
- Pesticide and agrochemical safety messaging where irrigation intensifies cropping.

2.4 Issues requiring engagement during project completion and closure

- Commissioning and handover of infrastructure, and confirmation of O&M roles and responsibilities;
- Water allocation rules, fee arrangements and cost recovery agreed with users before handover;
- Continuity of WUA governance, including women's and youth representation;
- Continued access to the grievance mechanism after project closure and its institutionalisation within local governance;
- Final reporting back to communities on how their feedback shaped project outcomes.

Source basis: OS10 Borrower Guidance Note, Annex 1; Business Standard BS#06.4.

3. Stakeholder Identification, Mapping and Analysis

3.1 Method used to identify stakeholders

Stakeholder identification is a continuous, iterative process. An initial list drawn from desk review and screening was verified and expanded through consultations conducted during ESIA preparation (December 2025 – January 2026) across all 24 districts, and subsequently validated and broadened at two national events in February and May 2026 (Section 4).

The approach combined desk review of legislation, institutional mandates and OS10/OS1/OS7 requirements; field consultations with farmers, pastoralists, WUAs and traditional leaders; district-level technical and administrative interviews; and state and federal institutional engagement. It follows four principles: inclusivity (women, youth, IDPs, minority clans, persons with disabilities and pastoralists recognised as primary stakeholders), representation (mapping along existing governance structures), contextualisation (district-specific actors added), and dynamic updating (new actors such as contractors added as the project evolves).

3.2 Project-affected parties

Project-affected parties are those whose livelihoods, land or water use, health, safety or social conditions may be directly affected, positively or negatively, by project activities.

Table 3: Project-affected parties (primary stakeholders)

Stakeholder	Description	Key interests / concerns
Farming households	Smallholder farmers using irrigation canals and water points	Water availability, irrigation efficiency, construction disruption
Pastoralist communities	Livestock herders dependent on catchments and boreholes	Livestock watering, grazing access, equity with farmers
Women and women's groups	Women farmers, domestic water collectors	Water access, time burden, WUA participation, safety
Youth	Young men and women in project communities	Employment, skills training, decision-making participation
IDPs and returnees	Displaced persons settled in or near project areas	Access to water/land regardless of tenure, inclusion in benefits
Minority groups / clans	Groups with less political voice or historical marginalisation	Equitable access, non-discrimination, voice in WUAs
Downstream / canal users	Communities downstream of intakes and along canals	Continued water access, allocation fairness
Water User Associations	Existing or to-be-formed WUAs	Capacity building, governance, O&M responsibilities

3.3 Other interested parties

Table 4: Other interested parties (secondary and external stakeholders)

Stakeholder	Role / interest
Federal Government (MoAI / PIU)	Implementing agency; policy alignment; SEP and GRM management; AfDB reporting
State / regional authorities (FMS & Somaliland)	Coordination; regulatory compliance; disclosure support; grievance escalation
District authorities & focal points	Local coordination; site selection support; conflict resolution; meeting facilitation
Traditional / clan leaders	Community harmony; conflict prevention; legitimacy of decisions

Stakeholder	Role / interest
NGOs / CSOs and service providers	Coordination and complementarity; GBV referral, IDP protection, WASH, disability support, mediation (mapped in Annex 1)
Contractors	Community relations; local hiring; community and worker safety; site-level GRM
AfDB	Financier; safeguards compliance; supervision and recourse (IRM)
Private sector — agribusiness, agro-dealers, seed companies and processors	Input supply, seed multiplication, value addition and market linkage; co-investment in aggregation, storage and processing; participation in 4P arrangements; engagement in extension delivery
Financial institutions (banks, microfinance institutions, VSLAs)	Access to finance for producers and agro-enterprises; Sharia-compliant financing products; mobile money and financial-inclusion services for women- and youth-led enterprises
UN agencies and development partners (FAO, WFP, UN-Women, UNICEF, IFAD, EU, SIDA, FCDO)	Technical support and co-financing; alignment and complementarity with parallel programmes; safeguards and gender good practice; joint monitoring and learning
Regional bodies (IGAD / ICPAC)	Climate and early-warning information; transboundary water and regional trade considerations; regional technical cooperation
Research institutions and academia	Applied research, crop improvement and technology piloting; contribution to a credible, trusted extension system
Women's and youth producer associations (e.g. SAWA, SAYA)	Representation of women and youth agro-entrepreneurs; inclusion in project governance, cooperatives and producer structures

3.4 Disadvantaged, marginalized or vulnerable individuals and groups

OS7 requires differentiated measures and disaggregated data where vulnerable groups may be affected. The register below identifies vulnerable groups by state and district cluster so that outreach, accessibility and monitoring can be planned and verified at site level. Site-specific profiles are confirmed during inception and pre-construction and recorded in the disaggregated baseline maintained by the PIU.

Table 5: Vulnerable groups register by state and district

State / districts	Vulnerable groups present (indicative)	Priority differentiated measures
Somaliland — Caynabo, Zeylac, Salaxlay, Boorama	Female-headed households; women and girls; pastoralists; youth; PWD; elderly; minority clans	Women-only sessions; pastoralist-timed meetings; multi-use water points; female focal points
Puntland — Gaalkacyo, Qardho, Garoowe, Armo	Female-headed households; women and girls; pastoralists; youth; PWD; elderly; minority clans	Women-only sessions; pastoralist-timed meetings; multi-use water points; female focal points
Galmudug — Cadado, Xeraale, Gaalkacyo, Dhuusamareeb, Wisil, Hobyo	Women; pastoralists; youth; IDPs near water points; minority clans	Outreach to settlements; safe access for women; child/livestock safety; allocation transparency
Hirshabelle — Balcad	Women farmers; IDPs along Shabelle; minority/Bantu riverine communities; downstream users	IDP outreach; minority representation in WUAs; downstream-user consultation; Maay materials
South West State — Xudur, Marka, Qansax Dheere	Women; IDPs; minority clans; PWD; downstream canal users	Accessible formats; minority and IDP inclusion; canal-safety messaging; Maay/Somali
Jubaland — Luuq, Kismaayo, Dollow	Women; pastoralists; minority clans; downstream and upstream users; youth	Clan-sensitive facilitation; upstream/downstream dialogue; neutral venues
NorthEast — Ceerigaabo, Buuhoodle, Laascaanood	Women; pastoralists; minority clans; PWD; elderly; drought-displaced households	Pastoralist-timed meetings; women-only sessions; accessible formats; multi-use water points

Cross-cutting measures for all clusters include oral communication and visual aids for low-literacy audiences, use of Somali (and Maay where relevant), anonymous and accessible grievance channels, protection from retaliation, and monitoring of benefit distribution by gender, age, displacement status and clan.

3.5 Stakeholder representatives and representative structures

Engagement operates through, rather than around, existing governance and representative structures. At community level these are Water User Associations, traditional and clan leaders, women's groups and committees, youth representatives, and IDP settlement leaders. At district level, district administrations and designated focal points — including a female focal point in each district — represent the administrative interface. At state and national level, Federal Member State and Somaliland ministries and the MoAI PIU perform this role. Where representative structures risk excluding women, youth, IDPs or minority clans, the project uses direct outreach and separate sessions rather than relying on representation alone, and monitors for elite capture.

3.6 Stakeholder interests, concerns and priorities

Stakeholders are analysed by their interest in the project, their influence over it, the level of impact they may experience, their preferred engagement method and language, associated risks, and the differentiated measures required.

Table 6: Stakeholder influence–interest analysis matrix

Stakeholder	Impact	Interest	Influence	Preferred method / language	Key risks	Differentiated measures
Farming households	High	High	Medium	Community meetings; Somali	Disruption to irrigation; inequity	Sequencing, advance notice, allocation rules
Pastoralists	High	High	Low–Med	Meetings timed to mobility; Somali	Allocation favouring farmers; exclusion from WUAs	Multi-use water points; WUA inclusion
Women / women's groups	High	High	Low	Women-only FGDs; female facilitators; Somali; oral	Cultural barriers; time poverty; SEA/SH	Separate sessions, childcare, 30% WUA target, female focal points
Youth	Medium	High	Low–Med	Youth dialogues; interactive	Unmet job expectations; conflict	Youth WUA reps; ≥20% unskilled jobs; transparent hiring
IDPs / returnees	High	Medium	Low	Proactive outreach to settlements; Somali	Exclusion if tenure-based; discrimination	Non-land eligibility; IDP liaison; outreach
Minority clans	High	Medium	Low	Inclusive meetings; neutral venues	Elite capture; exclusion from leadership	Proportional representation; elite-capture monitoring
Persons with disabilities	Medium	Medium	Low	Accessible venues; home visits; accessible formats	Physical / communication barriers	Accessible design; assisted GRM access
Traditional / clan leaders	Medium	High	High	Early KIIs; in-person	Capture of process; conflict mediation gaps	Early continuous engagement with safeguards limits
District authorities	Low	Medium	High	Technical meetings; correspondence	Coordination gaps	Structured coordination; defined roles
Contractors	Medium	Medium	High	Inductions; site briefings	Conduct; SEA/SH; community relations	Contractual SEP obligations; CLOs; codes of conduct
NGOs / CSOs / service providers	Low	Medium	Medium	Partnership forums; referrals	Service gaps for GBV/IDP/PWD	Service mapping; referral agreements

3.7 Stakeholder areas of influence

Influence is distributed unevenly and does not align with impact. Traditional and clan leaders, district authorities and contractors hold high influence over engagement outcomes but experience low to moderate direct impact. Conversely, women, IDPs, minority clans and persons with disabilities experience high impact but hold low influence. This asymmetry is the principal reason the SEP applies differentiated measures, separate sessions and representation targets rather than relying on open community meetings alone, and monitors participation and benefit distribution in disaggregated form.

3.8 Stakeholder roles and potential contribution to project success

WUAs are central to sustainability: they convene meetings, maintain records, administer water allocation, collect fees and handle first-tier grievances. Traditional leaders confer legitimacy and mediate conflict. District focal points enable notification, facilitation and grievance receipt. Contractors deliver site-level community relations, local hiring and safety communication. NGOs and service providers supply GBV, protection, WASH and disability referral capacity the project itself does not hold. Private-sector actors, financial institutions and research institutions contribute extension delivery, market linkage and access to finance, which the May 2026 consultation identified as necessary for benefits to be realised and sustained.

3.9 Communication and participation needs of different stakeholder groups

Communication needs vary by literacy, language, mobility, gender norms and access to technology. The plan below identifies which languages and formats apply where, and how disclosure reaches low-literacy, pastoral, IDP and remote communities and persons with disabilities.

Table 7: Language and accessibility plan by state / district

State / districts	Primary language(s)	Accessibility measures
Somaliland — Caynabo, Zeylac, Salaxlay	Somali	Oral briefings; pictorial materials; pastoralist-timed meetings; radio
Puntland	Somali	Oral briefings; pictorial materials; pastoralist-timed meetings; radio
Galmudug — Xeraale, Cadado	Somali	Oral briefings; radio; visual aids; outreach to dispersed water-point users
Hirshabelle — Balcad	Somali; Maay dialect	Maay/Somali materials; oral briefings for riverine and IDP communities
South West State — Xudur, Janaale	Somali; Maay dialect	Maay-first materials; pictorial notices; accessible venues; home visits for PWD
Jubaland (Gedo) — Luuq, Dollow	Somali	Oral briefings; radio scripts; neutral venues; upstream/downstream notices
All clusters — persons with disabilities	As above	Information in accessible formats; home visits where mobility-constrained; assisted GRM access

Source basis: OS10 paragraphs 12-14; OS10 Borrower Guidance Note paragraphs 12-14 and Annex 1; Business Standard BS#06.4.

4. Previous Stakeholder Engagement

4.1 Engagement undertaken during project identification and preparation

Engagement to date has taken place at two levels. District-level consultations were conducted in all 24 project districts during ESIA preparation, using community meetings, separate women and men sessions, focus group discussions, key informant interviews and site walk-throughs, with 30–60 participants per location. In addition, the state-level ESIA reports each contain a dedicated public consultation chapter, and those chapters were reviewed and considered in compiling this SEP.

National-level consultation was carried out through two events in Mogadishu: the BBS Validation Workshop (10 February 2026) and the BBS Stakeholder Consultation Workshop (13 May 2026). Both were held in hybrid format so that partners unable to travel to Mogadishu could take part. The full proceedings of both events are recorded in their respective workshop reports.

4.2 Stakeholders consulted

District-level consultations reached farming households, pastoralists, women and women's groups, youth, IDPs and returnees, minority clans, downstream and canal users, WUAs, traditional and clan leaders, and district authorities.

The Validation Workshop convened 58 participants from federal and state ministries, Federal Member State agriculture ministries, UN agencies, civil society, the private sector and target communities. The Stakeholder Consultation Workshop convened 67 participants from more than 30 institutions, deliberately widening participation beyond government and technical partners to include private agribusinesses, banks and microfinance providers, women's and youth producer associations, regional bodies and donors.

4.3 Dates, locations and methods of consultation

Table 8: District-level consultation coverage

State	Districts	Approach used	Period
Somaliland	Caynabo, Zeylac, Salaxlay, Boorama	Community meetings, separate women/men sessions, youth participation, site walk-throughs, district authority meetings	25 Dec 2025 – 18 Jan 2026
Galmudug	Cadado, Xeraale, Gaalkacyo, Dhuusamareeb, Wisil, Hobyo	Community meetings, separate women/men sessions, KIIs with elders and water representatives	25 Dec 2025 – 18 Jan 2026
Hirshabelle	Balcad	Community meetings, FGDs, consultations with district administration and irrigation stakeholders	25 Dec 2025 – 18 Jan 2026
South West State	Xudur, Marka, Qansax Dheere	Community meetings, FGDs, KIIs, site walk-throughs (canal safety and access)	25 Dec 2025 – 18 Jan 2026
Jubaland	Luuq, Kismaayo, Dollow	Community meetings, FGDs, KIIs (water allocation, downstream users, access)	25 Dec 2025 – 18 Jan 2026
Puntland	Gaalkacyo, Qardho, Garoowe, Armo	Community meetings, separate women/men sessions, KIIs with elders and water committees, site walk-throughs	18 Jan 2026 – 24 Jan 2026
NorthEast	Ceerigaabo, Buuhoodle, Laascaanood	Community meetings, FGDs, KIIs with elders and pastoralist representatives, site walk-throughs	18 Jan 2026 – 24 Jan 2026

Table 9: National-level consultation and validation events

Event	Date, venue and modality	Participation	Purpose, process and outcome
BBS Validation Workshop	10 February 2026; RA Hotel, Mogadishu; hybrid	58 participants	Review and validation of the Project Preparation Report. Plenary presentations on project design, infrastructure feasibility, crop value chains, gender and youth inclusion, and environmental and social safeguards; thematic and geographic breakout groups; consensus-building session. Validated feasibility findings, the investment framework, institutional arrangements, the ESMP and the Gender Action Plan.
BBS Stakeholder Consultation Workshop	13 May 2026; NAC Hotel, Mogadishu; hybrid	67 participants from 30+ institutions	Broad-based consultation on the project's thematic pillars. Plenary presentation, moderated panel on irrigation, seed systems and value chains, four thematic working groups (irrigation infrastructure; climate-smart agriculture and seed systems; inclusive value chains; women and youth inclusion), report-back and synthesis.

4.4 Information disclosed or distributed

During district consultations the project disclosed the purpose, scope and expected footprint of works at each site, the anticipated environmental and social risks and proposed mitigation, employment expectations, and the proposed grievance arrangements. At the Validation Workshop the Project Preparation Report, feasibility findings, the multi-component investment framework, the institutional implementation arrangements, the ESMP and the Gender Action Plan were presented, together with the environmental and social safeguards assessment confirming the project's classification and the Operational Safeguards triggered (OS1, OS2, OS3, OS4, OS7 and OS10).

4.5 Issues, concerns and recommendations raised

District consultations raised equitable water distribution, local employment, women's participation in WUAs, farmer–pastoralist tensions, construction disruption, community and child and livestock safety, long-term sustainability, and IDP and minority inclusion. The safeguards session at the Validation Workshop recorded community concerns on local contracting, protection of water sources, excavation safety, the adequacy of consultation and accessible complaint channels.

The May 2026 workshop generated recommendations through four thematic working groups. Themes recurring across both national events were:

- **Water governance and cost recovery:** participants framed the core water problem as variability rather than absolute scarcity, and emphasised that infrastructure investment must be matched by WUA formation, local O&M capacity and transparent cost-recovery arrangements agreed with users before handover;
- **Equity and conflict sensitivity:** inequitable water distribution was identified as a driver of resource conflict, gendered inequity and displacement, reinforcing the “do no harm” approach, multi-use water-point design and attention to livestock corridors and downstream users;
- **Women's and youth inclusion:** participants called for quotas and leadership positions for women and youth in project governance and WUAs, tailored extension services, accessible and Sharia-compliant finance, and community awareness work to address restrictive social norms;
- **Extension, private sector and academia:** a credible extension system was seen to depend on collaboration between government, private agro-dealers and service providers, research institutions and universities;

- **Coordination and institutional capacity:** participants recommended systematic coordination with programmes financed by the World Bank, IFAD and the Green Climate Fund, adequate staffing of the project coordination structure, and clear federal–state liaison arrangements;
- **Accessible grievance channels:** the need for confidential, accessible complaint routes operational before works begin was raised at both events.

4.6 Borrower responses and commitments

The project's response to each issue raised is recorded in the stakeholder comments and response matrix at Annex 4, which consolidates issues from both district-level consultations and the two national events, with the corresponding commitment for each. These commitments are carried into the ESMP, contractor requirements and the engagement programme in Section 5 of this SEP.

4.7 How stakeholder feedback influenced project design and mitigation measures

Stakeholder feedback produced specific changes. Concerns over water allocation and farmer–pastoralist competition led to multi-use water-point design, inclusive WUA membership and allocation dialogue as design commitments. Concerns over women's exclusion led to a minimum 30 per cent women's participation target in WUAs, women-only sessions, female facilitators and female grievance focal points. Employment concerns led to local-hiring targets and transparent hiring criteria disclosed before mobilisation. Safety concerns led to demarcation, signage, barriers and controlled access requirements in contractor ESMPs. Concerns about complaint channels led to the requirement that the grievance mechanism be operational and publicised before works commence, with a confidential SEA/SH pathway and reprisal-risk protocol. The stakeholder register itself was broadened after the May 2026 workshop to include private-sector, financial-sector, research and regional stakeholders.

4.8 Outstanding matters requiring follow-up

- Confirmation of the grievance hotline number, email address and named focal persons, including female focal points, before works begin at each cluster;
- Completion and verification of district-level service-provider mapping and referral agreements prior to worker mobilisation;
- Site-specific verification of the vulnerable-groups register during inception and pre-construction;
- Establishment of standing thematic working groups and the schedule of annual review events confirmed at both national workshops;
- Confirmation of cost-recovery and user-fee arrangements with WUAs before handover at each scheme.

5. Stakeholder Engagement Programme

5.1 Engagement principles and approach

Engagement is differentiated by stakeholder category, culturally appropriate, and explicitly promotes inclusion, equitable participation and safe access to information and grievance mechanisms. It is continuous, adaptive and proportionate to the risks of a multi-site programme, and operates through existing governance structures rather than around them. Because the project comprises 136 sites with multiple high-risk construction activities, engagement is organised by phase and applied to each site cluster rather than as a single annual cycle.

5.2 Engagement activities during project preparation

- Pre-construction disclosure of scope, footprint, schedule, safety measures and grievance channels at least two weeks before works at each cluster;
- Inclusive community consultations, including women-only and vulnerable-group sessions;
- Confirmation of inclusive water-allocation arrangements and WUA governance;
- Verification of the vulnerable-groups register and service-provider mapping per cluster;
- Establishment and publicising of the grievance mechanism before any works begin.

5.3 Engagement activities during project implementation

- Contractor–community interface meeting at mobilisation, and toolbox and safety briefings;
- Works notifications before active works and during disruption periods, with advance notice of access changes and temporary water provision;
- Continuous grievance uptake, monthly grievance review and ongoing SEA/SH awareness;
- Site notice boards maintained with project information, schedules and grievance contacts;
- Transparent disclosure of employment opportunities and hiring criteria.

5.4 Engagement activities during project completion and closure

- Commissioning and handover meetings per site, confirming O&M roles and WUA governance;
- WUA meetings monthly in early operation, moving to quarterly, with allocation-rule reinforcement and downstream-user dialogue;
- Community validation meetings and final reporting back on how feedback shaped outcomes;
- Confirmation of continued grievance access after project closure.

5.5 Priority E&S issue for each engagement activity

Each engagement activity in the programme matrix at Section 5.18 and Annex 2 is linked to the priority environmental and social issue it addresses, drawn from Table 2. Pre-construction disclosure and consultation address water allocation, livelihood disruption and exclusion risk; mobilisation and works notifications address community health and safety and access disruption; SEA/SH awareness addresses risk linked to worker presence; commissioning and WUA engagement address allocation equity and long-term infrastructure safety; and pesticide messaging addresses agrochemical risk in riverine cropping areas.

5.6 Target stakeholder group

Target groups are specified for every activity in the programme matrix. Pre-construction disclosure targets all project-affected parties with dedicated sessions for women, youth, IDPs, minority clans, persons with disabilities and pastoralists. Mobilisation activities target affected communities and WUAs. Active-works communication targets site neighbours and water users. Commissioning targets WUAs, communities and downstream users. Monitoring and learning activities target all stakeholder groups and the AfDB.

5.7 Information to be disclosed before engagement

Before each engagement activity the project discloses the information stakeholders need in order to participate meaningfully: the purpose and agenda of the engagement, the scope and schedule of works affecting them, the risks and mitigation measures under discussion, employment opportunities and hiring criteria where relevant, and the grievance channels available. Disclosure precedes engagement by a sufficient interval — a minimum of two weeks for pre-construction disclosure — so that stakeholders can consider the information and prepare.

5.8 Engagement and consultation methods

Table 10: Methods and tools for engagement

Method	Purpose	Target groups	Frequency
Community meetings	Project updates, construction schedules, feedback	All community members	Before works; then quarterly per cluster
Women-only sessions / FGDs	Safe space for women and vulnerable groups; in-depth feedback	Women, youth, IDPs, minority clans	Min. annually per district; before works
WUA meetings	O&M planning, water allocation, inclusive governance	WUA members	Monthly (early O&M), then quarterly
Site notice boards	Project information, schedules, grievance contacts	Site visitors and neighbours	Continuous
Radio announcements (Somali)	Broad public information at key milestones	General public	Key milestones
Key informant interviews	Coordination, issue resolution, governance	Officials, elders, NGOs, water committees	Quarterly
Site walk-throughs	Confirm footprints, access, safety, sensitive receptors	Community representatives, contractors	Pre-construction and as needed
Printed / pictorial materials	Accessible information for low-literacy audiences	All, especially low-literacy and PWD	Before works and at updates

5.9 Notification methods

Stakeholders are notified of engagement activities through WUAs and traditional leaders, district administrations and focal points, site and district-office notice boards, Somali-language radio announcements, direct outreach to IDP settlements and dispersed water-point users, and SMS where contact details are available and consented to. Notification for pastoralist communities is timed around mobility patterns, and notification for women's sessions is issued through female focal points to reach women directly rather than through household heads.

5.10 Languages and communication formats

All engagement is conducted in Somali, and in the Maay dialect in South West State and riverine areas of Hirshabelle. Written materials are supplemented by oral briefings and pictorial formats for low-literacy audiences. Formats and language by cluster are set out in Table 7.

5.11 Consultation locations, dates and duration

Consultations are held at accessible, neutral venues within or adjacent to affected communities, with venue selection reviewed for safety and accessibility for women, persons with disabilities and minority clans. Dates are aligned with irrigation and seasonal calendars, pastoralist mobility and prayer times, and avoid clashing with peak agricultural labour periods. Community meetings typically run half a day; focus group discussions and women-only sessions run 90 minutes to two hours. The phased schedule at Section 5.18 sets out timing by cluster.

5.12 Information to be sought from stakeholders

Engagement seeks stakeholder input on the accuracy of identified affected parties and water uses; the acceptability and fairness of proposed water-allocation arrangements; the timing and sequencing of works relative to irrigation cycles; safety concerns at specific locations; barriers that would prevent particular groups from participating or benefiting; preferred communication and grievance channels; and, at commissioning, the workability of proposed O&M and cost-recovery arrangements.

5.13 Participatory planning arrangements

Stakeholders participate directly in planning through site walk-throughs that confirm footprints and access arrangements, WUA deliberation on allocation rules and O&M responsibilities, and participatory monitoring in which WUAs, women's and youth representatives and district focal points review engagement coverage, raise concerns and validate that issues raised have been addressed. Standing thematic working groups and annual review events, confirmed at both national workshops, provide the platform for continuing multi-stakeholder input during implementation.

5.14 Expected outputs and key performance indicators

Expected outputs are documented consultations with disaggregated attendance, disclosure records for every cluster prior to works, a functioning and publicised grievance mechanism, “you said / we did” feedback issued after each consultation round, and verified inclusion of vulnerable groups. Indicators and targets are set out in Section 10.1 and Annex 8.

5.15 Feedback and reporting-back arrangements

After consultations and decisions the project discloses consultation summaries, issues “you said / we did” notices showing how feedback influenced design or implementation, holds community validation meetings to confirm understanding, and tracks unresolved issues to closure through the grievance mechanism. Feedback is provided in the same languages and formats as the original disclosure.

5.16 Responsible implementing party

The MoAI Project Implementation Unit is responsible for delivery of the engagement programme, supported by the Social/GBV Officer, the supervision consultant's E&S specialist, community liaison officers, district focal points, WUAs and contractors. Responsibilities by position are set out in Section 9.

5.17 Schedule and estimated cost

The engagement programme runs over the 48-month implementation period, phased by site cluster as set out below. The indicative cost of PIU-managed engagement, grievance management and SEA/SH referral support is USD 89,000, with site-level engagement and community liaison officer costs embedded in works contracts. The budget is detailed in Section 11 and Annex 9.

5.18 Stakeholder engagement programme matrix

Table 11: Phased engagement schedule by site cluster

Phase	Priority issue	Stakeholder	Information	Method	Output/KPI	Responsibility	Timing/cost
Pre-construction	*Land access, crop and asset loss, compensation expectations; risk of exclusion of women, IDPs and minority clans*	*All PAPs; women, youth, IDPs, minority clans, PWD, pastoralists; district authorities*	*Scope of works; ESIA/ESMP and SEP non-technical summaries; entitlements; GRM access; employment criteria*	*Disclosure at district offices; inclusive community meetings; women-only and vulnerable-group sessions; Somali/Maay radio*	*≥1 consultation per site cluster; ≥30% female participation; consultation summaries disclosed; GRM operational before works*	*PIU Social/GBV Officer with district focal points*	*≥2 weeks before works, per cluster; PIU-managed (within USD 89,000 SEP budget)*
Mobilisation	*Contractor–community interface; labour influx and local hiring expectations; SEA/SH risk*	*Affected communities; WUAs; job seekers; contractor workforce*	*Works schedule and site boundaries; hiring process; code of conduct; GRM and SEA/SH referral channels*	*Contractor–community interface meetings; works notification; site notice boards; GRM launch sessions*	*GRM launched at 100% of sites; grievance contacts posted at every site; hiring criteria disclosed before recruitment*	*Contractor and PIU, with supervision consultant E&S specialist*	*At mobilisation, per cluster; embedded in works contracts*
Active works	*Construction safety, dust and noise, access disruption, canal crossings, water interruption*	*Site neighbours; water users; women and children; pastoralists; PWD*	*Advance notice of disruption; safety information; detour and access arrangements; grievance contacts*	*Safety briefings; advance access and disruption notices; site notice boards; community liaison officers*	*100% of disruptions notified in advance; grievances acknowledged within 7 days and resolved within 30 days*	*Contractor (community liaison officer) under PIU supervision*	*Ongoing; before each disruption; embedded in works contracts*
Commissioning	*Water allocation rules; O&M responsibilities; upstream–downstream equity*	*WUAs; affected community; downstream users; district authorities*	*Handover arrangements; allocation and scheduling rules; O&M roles and fees; continued GRM access*	*Handover meetings; O&M and allocation confirmation sessions; written and pictorial allocation summaries*	*Allocation rules agreed and disclosed at 100% of sites; WUA O&M roles confirmed in writing*	*PIU with WUA*	*At commissioning, per site; within SEP budget*
Operation & maintenance	*Sustained WUA functioning; inclusive representation; tariff and maintenance disputes*	*WUA members; community; women irrigators;*	*Allocation performance; maintenance plans and costs; complaint*	*WUA meetings; allocation reviews; complaint review*	*Monthly WUA meetings in early O&M, then quarterly; ≥30% women on WUA*	*WUA with district administration, supported by PIU*	*Monthly in early O&M, then quarterly; district and WUA resources*

Phase	Priority issue	Stakeholder	Information	Method	Output/KPI	Responsibility	Timing/cost
		minority clans	*outcomes; feedback on issues raised*	*sessions; "you said / we did" feedback notices*	*committees; 100% of complaints logged*		
M&E / learning	*Grievance trends; unresolved issues; whether stakeholder feedback influenced decisions*	*All stakeholder groups; AfDB; MoAI management*	*Engagement and grievance statistics; corrective actions; validation of reported outcomes*	*Engagement and grievance reporting; community validation meetings; quarterly and annual reviews*	*Quarterly engagement and GRM reports submitted on time; annual review completed; unresolved issues tracked to closure*	*PIU (M&E with Social/GBV Officer)*	*Quarterly, plus annual review; within SEP budget (Section 11, Annex 9)*

6. Information Disclosure and Communication

6.1 Information and documents to be disclosed

Full cleared environmental and social instruments are disclosed where required by the ISS, accompanied by non-technical summaries in Somali and other locally appropriate formats. The ISS requires disclosure of E&S documentation addressing risks, impacts, alternatives and E&S management cost before appraisal.

Table 12: Information to be disclosed and timing

Information	Timing	Method / location
ESIA/ESMP (full where required, plus non-technical summary in Somali)	Before appraisal; 30 days for review	PIU and AfDB websites; district offices; meetings
Stakeholder Engagement Plan	Before appraisal	PIU website; district offices
Grievance Redress Mechanism (standalone procedure)	Before works; ongoing	Meetings; notice boards; radio; handouts; district offices
Labour Management Procedures	Before appraisal	PIU website; contractor offices; sites
Site-specific works schedules	Minimum 2 weeks before works	Meetings; notice boards; leaders
Employment opportunities and hiring criteria	Before contractor mobilisation	Meetings; notice boards; leaders

6.2 Disclosure schedule

Disclosure is staged across the project cycle: full E&S instruments and this SEP before appraisal; works information at least two weeks before works at each cluster; advance notices, safety information and employment opportunities during construction; and O&M arrangements, allocation rules and continued grievance access during operation.

6.3 Disclosure locations and communication channels

Channels include community meetings, printed and pictorial materials, notice boards at sites and district offices, Somali-language radio announcements, digital platforms (PIU and AfDB websites), and hard copies kept for public access at district offices. Grievance contacts are posted at every site.

6.4 Languages and formats

Disclosure is in Somali, and in Maay in South West State and riverine Hirshabelle, with non-technical summaries, oral briefings and pictorial formats accompanying technical documents. Language and format by cluster are set out in Table 7.

6.5 Measures for persons with disabilities, low literacy or limited access

- Oral briefings and pictorial materials as the primary format for low-literacy audiences, with written materials as a supplement rather than the main channel;
- Accessible venues selected for community meetings, and home visits where mobility is constrained;
- Assisted access to the grievance mechanism for persons unable to attend meetings or complete written forms;
- Radio used to reach dispersed, pastoral and remote populations beyond the reach of meetings;

- Meeting times set around domestic and caregiving responsibilities so that women are able to attend.

6.6 Procedures for notifying stakeholders

Notification procedures follow Section 5.9. For disclosure specifically, the PIU confirms that notification has reached each affected community before the disclosure period begins, records the date and method of notification per cluster, and verifies through the supervision team that disclosure occurred before works.

6.7 Opportunities and channels for comments

Stakeholders may comment during the 30-day disclosure period for E&S instruments, at community meetings, focus group discussions and women-only sessions, through WUAs, traditional leaders and district focal points, and at any time through the grievance mechanism channels. Comments received outside formal consultation rounds are logged and answered through the same feedback procedure.

6.8 Contact information and process for requesting further information

Requests for project information may be made in person at the district administration office or PIU, by telephone or SMS to the project line, by email, or through a WUA or district focal point. The PIU acknowledges requests and responds within ten working days, in the requester's preferred language and format. Contact details are set out in Section 12 and posted at every site.

7. Measures for Vulnerable Groups and Prevention of Reprisals

7.1 Identified barriers to stakeholder participation

- Cultural and social norms limiting women's participation in mixed public meetings and decision-making;
- Time poverty and caregiving responsibilities that prevent women attending meetings held at conventional times;
- Low literacy, limiting the usefulness of written disclosure;
- Mobility of pastoralist communities, which places them outside fixed meeting schedules;
- Tenure-based eligibility assumptions that risk excluding IDPs and returnees;
- Elite and clan capture of consultation processes, marginalising minority clans;
- Physical and communication barriers for persons with disabilities;
- Insecurity constraining safe access to meetings in some districts.

7.2 Differentiated engagement measures

Vulnerable-group measures are converted into an implementation plan with a responsible party, timing, budget source, indicator and evidence requirement, so that they are verifiable rather than aspirational.

Table 13: Implementation plan for vulnerable-group measures

Group	Measure	Responsible / timing	Budget source	Indicator / evidence
Women / female-headed households	Women-only sessions; female facilitators; meeting times around domestic duties; 30% WUA membership; female grievance focal points	PIU + contractors; throughout	SEP – vulnerable outreach; GRM	≥30% women participation and WUA membership; session records
Youth	Youth WUA representatives; ≥20% unskilled jobs; skills training; youth sessions	PIU + contractors; from mobilisation	SEP; works contracts	Youth participation and employment rate; attendance logs
IDPs / returnees	Outreach to settlements; non-land eligibility; IDP liaison where concentrated	PIU + district; from pre-construction	SEP – vulnerable outreach	IDP inclusion proportional to local population; outreach records
Minority clans	Proportional representation; elite-capture monitoring; clan-sensitive handling	PIU + traditional leaders; throughout	SEP; GRM	Representation in consultations and WUAs; grievance analysis
Persons with disabilities	Accessible venues and formats; home visits; assisted grievance access	PIU + contractors; design–operation	SEP – accessibility	Accessible venues used; PWD participation; home-visit logs
Pastoralists	Multi-use water points; WUA inclusion; mobility-timed meetings	PIU; design–operation	Project design; SEP	Pastoralist WUA representation; allocation records

7.3 Measures for effective participation of vulnerable groups

Participation is treated as the ability to influence decisions, not merely to attend. Measures therefore include representation targets in WUAs and producer structures, leadership training for women integrated into WUA governance, youth representation on WUA committees, and disaggregated monitoring of both participation and benefit distribution by gender, age, displacement status and clan.

Where monitoring shows a group is present but not influencing outcomes, the approach is adjusted through the adaptive management process in Section 10.

7.4 Safe and culturally appropriate consultation arrangements

Consultations use neutral, accessible venues; separate women-only sessions facilitated by women; meeting times set around domestic responsibilities, prayer times and pastoralist mobility; clan-sensitive facilitation in districts where clan tension affects participation; and oral, Somali or Maay-language delivery. In security-sensitive settings the project uses neutral venues and remote channels and adjusts scheduling and routing in coordination with local authorities.

7.5 Measures to prevent intimidation, discrimination and reprisals

Consistent with OS10 requirements for engagement free from intimidation and reprisal, the project applies a reprisal-risk protocol: neutral venues; secure communication channels; no public disclosure of complainant identity; independent monitoring where needed; and safe engagement arrangements for vulnerable groups. Anonymous complaints are accepted and investigated, and any indication of retaliation is treated as a serious incident and escalated immediately. The full protocol is set out in the standalone Grievance Redress Mechanism.

7.6 Confidentiality and protection of stakeholders

Personal information provided by stakeholders is recorded only with consent and shared only on a need-to-know basis. Complainant identity is never disclosed publicly. SEA/SH cases are handled exclusively through the confidential survivor-centred pathway, are never routed through traditional-leader review, and are recorded in a manner that captures the case without disclosing identity. Where disclosure could increase risk to a stakeholder, action is taken only with that person's consent.

7.7 Use of independent specialists, where necessary

The project engages independent specialists where internal capacity or impartiality is insufficient: independent mediation where a grievance involves the project or district authorities themselves; specialist GBV and psychosocial service providers for SEA/SH referral, mapped per district before worker mobilisation; and independent monitoring of engagement in security-sensitive or contested settings. Service-provider mapping is maintained at Annex 1.

8. Project Grievance Redress Mechanism

In line with the AfDB recommended structure, the project-level grievance mechanism is prepared as a separate procedure: the BBS Project-Level Grievance Redress Mechanism. This section summarises that procedure; the full mechanism, including forms, register, timelines and escalation arrangements, is set out in that document. The separate workers' grievance mechanism required under OS2 is addressed in the Labour Management Procedures and is distinct from the mechanism described here.

8.1 Scope and purpose of the grievance mechanism

The mechanism receives, records, assesses, resolves and reports on concerns and complaints from project-affected parties and other stakeholders, at no cost and without retribution. It covers all project activities and sites across the 24 districts and operates from before the start of works through construction, operation and handover.

The risks most likely to generate grievances, drawn from the state-level ESIA reports and the consultations are:

Table 14: Risks most likely to generate grievances

Risk	Where most acute	Likely grievance type
Inequitable water allocation and abstraction conflicts	Jubaland (Juba corridor), Hirshabelle (Shabelle), Galmudug	Allocation disputes; upstream/downstream complaints; farmer–pastoralist conflict
Construction disruption and community health & safety	All states; open canals, excavations, drilling, equipment movement	Safety incidents; child and livestock injury risk; access obstruction
Occupational health and safety and contractor conduct	All active work fronts	Conduct complaints; site safety; disputes with contractor staff
SEA/SH risk linked to worker presence	All states with worker influx	Handled exclusively through the confidential pathway (Section 8.19)
Exclusion of women and vulnerable groups	All states	Exclusion from consultation, employment or benefits; elite capture
Livelihood and access disruption during works	Riverine areas (Balcad, Janaale, Luuq/Dollow)	Loss of irrigation water during works; access to fields and water points
Catchment siltation and infrastructure safety	Dryland districts (Somaliland, Galmudug, South West)	Structure failure; hazard reporting; maintenance disputes
Pesticide and agrochemical risks	Riverine cropping areas	Incident reporting; contamination concerns

8.2 Applicable AfDB requirements

The mechanism is established and operated to meet the following AfDB requirements:

- OS10 paragraphs 28-31, requiring an accessible, proportionate and culturally appropriate mechanism, free of charge and without retribution;
- OS10 Annex 1, which sets out the required characteristics and procedural elements of a grievance mechanism;
- OS10 Annex 2, on the AfDB Independent Recourse Mechanism and its relationship to project-level mechanisms;
- OS5, where land acquisition, restrictions on land use or involuntary resettlement arise, requiring access irrespective of tenure status;
- OS7, requiring that vulnerable groups can access the mechanism through differentiated and culturally appropriate measures;

• OS2 worker grievance requirements, addressed separately in the Labour Management Procedures and not covered by this section.
The mechanism is also designed to satisfy the minimum review and clearance conditions in AfDB Business Standard BS#06.4, and is disclosed together with this Stakeholder Engagement Plan.

8.3 Relationship with other grievance and remedy mechanisms

Several mechanisms operate in parallel. Their relationship is set out below so that stakeholders are directed to the appropriate route and no complaint is lost between them.

Table 15: Relationship between grievance and remedy mechanisms

Mechanism	*Scope*	*Relationship to the project mechanism*
Project-level GRM (separate procedure)	*Concerns and complaints from communities and other stakeholders about project activities, impacts, benefits and conduct*	*Primary route for all community and stakeholder grievances*
Contractor / supplier arrangements	*Site-level concerns arising from contractor operations*	*Contractors receive and resolve matters at Level 2 under PIU oversight; all cases logged in the central project register*
Workers' grievance mechanism (OS2)	*Employment-related grievances of project workers, including contractor and supplier workers*	*Separate mechanism under the Labour Management Procedures; matters received here that belong there are referred without delay and the person informed*
Customary and traditional dispute resolution	*Community disputes handled by elders and clan structures*	*May be used at Level 3 with safeguards protecting confidentiality, non-discrimination, access for women, IDPs and minority clans, SEA/SH survivor choice and the right to external recourse; never used for SEA/SH cases*
Administrative and judicial remedies	*Statutory remedies available under Somali law*	*Available at any time; use of the project mechanism does not restrict or delay access to them*
AfDB Independent Recourse Mechanism	*Complaints that the Bank has not complied with its own policies*	*Available independently of the project mechanism at the complainant's choice (Section 8.17)*

8.4 Principles of accessibility, inclusion and proportionality

The mechanism operates on the following principles, which govern how every grievance is handled.

- **Proportionate.** Scaled to the nature, scale, risks and impacts of a Category 1 multi-site project across 24 districts.
- **Accessible and inclusive.** Multiple in-person and remote channels; usable by people who cannot read or write, cannot travel, or cannot speak publicly in mixed settings; available irrespective of land tenure, displacement status or clan.
- **Free of charge.** No fee is charged at any stage, and no complainant bears any cost of investigation or resolution.
- **Prompt and effective.** Published timelines apply at each level, and resolution is substantive rather than formal.

- **Transparent and culturally appropriate.** Procedures, channels, timelines and decision makers are publicly disclosed; engagement is in Somali and Maay and uses existing governance structures.
- **Discreet, objective, sensitive and responsive.** Complaints are handled without judgement, by persons without a conflict of interest in the matter, with particular sensitivity where the complainant is at risk.
- **Without retribution or reprisal.** No complainant, witness or representative may suffer disadvantage for raising a concern; retaliation is treated as a serious incident.
- **No restriction on judicial or administrative remedies.** Use of this mechanism is voluntary and does not waive, restrict or delay any legal right.

8.5 Persons eligible to submit grievances

Any individual, household, group or representative affected by or concerned about the project may submit a grievance, whether or not they hold land tenure and whether or not they have participated in consultations. Submissions may be made by a representative on a complainant's behalf, and anonymously.

8.6 Types of concerns and grievances covered

Covered matters include environmental impacts; social impacts; access to project benefits; water allocation and access; community, child and livestock safety; construction disruption; employment and local hiring; contractor conduct; and SEA/SH concerns, which are handled exclusively through the confidential pathway.

8.7 Grievance-submission channels

Multiple channels are provided so that no group is dependent on a route it cannot use. All channels are confirmed operational, publicised and posted before mobilisation at each cluster. The PIU confirms the hotline number, email address, named focal persons including female focal points, physical complaint points and the central register before works start.

Table 16: Grievance-submission channels

Channel	How it operates	Particularly serves
In person	To community liaison officers, WUA representatives, district focal points or the PIU office; recorded on the intake form on the complainant's behalf where they cannot write	All groups; people with low literacy
Anonymous submission	Through suggestion boxes, third parties, or by declining to give name and contact details through any channel	People fearing reprisal; sensitive matters
Telephone	Dedicated project line [number to be confirmed and publicised before works]	Remote and mobile populations
Text message (SMS)	To the same project line; response by SMS where preferred	Younger complainants; low-cost access
Mail / written letter	To the PIU or the district administration office	Formal or documented complaints
Email	[address to be confirmed]	Institutional stakeholders; literate complainants
Website	Project page on the PIU/MoAI site [to be confirmed]	Institutional and diaspora stakeholders
Suggestion / complaint boxes and grievance form	At each active site, district office and WUA meeting point; forms available in Somali and English, on paper	Anonymous and written complaints

Channel	How it operates	Particularly serves
Confidential female focal points	Trained female focal point in each district for sensitive complaints	Women; SEA/SH-related concerns

8.8 Anonymous and confidential complaints

8.8.1 Anonymous complaint channels

Anonymous complaints are accepted through every channel and are investigated on the same basis as identified complaints. A complainant may withhold name and contact details at intake, submit through a suggestion box, or ask a third party to submit on their behalf. No channel requires identification as a condition of acceptance.

8.8.2 Confidential handling procedures

Where a complainant is identified, their identity is disclosed only to those who need it to investigate and resolve the matter, and never publicly. Files containing identifying information are held securely by the PIU Safeguards Officer. Where disclosure of identity could increase risk to the complainant, no step that would reveal identity is taken without their express consent.

8.8.3 Protection of personally identifiable information

Personal details are recorded only with consent and only to the extent needed to provide feedback and resolve the matter. Sex, age and vulnerability status are recorded optionally and used only in aggregate for disaggregated reporting. Contact details are not shared with contractors or third parties without consent.

8.8.4 Security of personal data and private communication channels

Records are kept in a register with restricted access. Where a complainant is at risk, communication uses a channel they nominate as safe, and correspondence avoids identifying the subject matter. Case files relating to SEA/SH are held separately from the general register (Section 8.19).

8.8.5 Public communication of anonymous grievance resolutions

Where a matter raised anonymously has been resolved and the resolution is of general interest — for example a change to works scheduling or a safety measure — the outcome is communicated publicly at community meetings and on notice boards, in terms that do not identify or allow identification of the complainant.

8.9 Grievance registration and database

All grievances are recorded on the standard intake form and logged in a central grievance register maintained by the PIU. Each grievance is assigned a unique reference number on receipt in the format BBS-GRM-YYYY-NNN, which is given to the complainant and used in all subsequent correspondence. SEA/SH cases are never entered in the general register.

Grievances received at site or district level are transmitted to the PIU for central registration within three working days of receipt, so that the register captures all cases regardless of where they were raised or resolved. The register records status (open, closed or escalated), the level at which the matter sits, action taken, and the date and method of feedback to the complainant. The PIU Safeguards Officer reviews open cases monthly.

Grievance records and supporting materials — intake forms, correspondence, investigation notes, acknowledgement and closure forms — are retained for the duration of the project and handed over to MoAI on closure as part of the project record. SEA/SH files are retained separately under restricted access.

8.10 Grievance-handling procedure

Grievances progress through eight steps, applied within the five-level resolution structure below. Where a grievance is found to be outside the scope of the project, the complainant is told so promptly, given the reason and, where possible, directed to the appropriate body; such cases are still logged.

Table 17: Grievance-handling steps

Step	*What happens*	*Responsible*
1. Receipt	*Grievance received through any channel; recorded on the intake form; reference number assigned; anonymous submissions accepted*	*CLO / WUA representative / district focal point / PIU*
2. Acknowledgement	*Receipt acknowledged to the complainant with the reference number and indicative timeline*	*Receiving officer*
3. Assessment and referral	*Category and severity assigned; conflict of interest checked; matter referred to the appropriate level, or to the workers' mechanism or SEA/SH pathway if it belongs there*	*PIU Safeguards Officer*
4. Investigation	*Facts established with the parties concerned; site visit where needed; further information requested from the complainant if required*	*Assigned officer at the relevant level*
5. Proposed response	*Corrective action and any remedy proposed, with the responsible party and date*	*Assigned officer*
6. Resolution	*Response communicated to the complainant and, where accepted, implemented and verified*	*Assigned officer; verified by PIU*
7. Communication with complainant	*Complainant informed of the outcome and of the right to escalate, seek mediation or pursue external recourse if not satisfied*	*Assigned officer*
8. Closure and recordkeeping	*Closure form completed; satisfaction recorded; register updated; supporting records filed*	*PIU Safeguards Officer*

8.11 Five-level resolution structure

Resolution follows a five-level structure: receipt and logging; site-level resolution through dialogue; district-level review with safeguards limiting the role of customary mechanisms; PIU review and corrective action; and external recourse at the complainant's choice.

Table 18: Five-level grievance resolution process

Level	Description / procedure	Responsible	Timeframe
1. Receipt	Log grievance on standard form into central register; acknowledge to complainant; anonymous complaints accepted	Community liaison officer / WUA / district focal point	Acknowledge within 48 hours
2. Site resolution	Resolution through dialogue among complainant, contractor and community; record outcome	Contractor + community liaison officer	Within 7 days
3. District	Escalated grievances reviewed at district level; where traditional leaders are involved, safeguards protect confidentiality, non-discrimination, women/IDP/minority access, SEA/SH survivor choice and right to judicial or IRM recourse	District focal point + elders (with safeguards)	Within 14 days
4. PIU	Unresolved grievances reviewed by PIU; corrective action and feedback to complainant	PIU Safeguards / Social Officer	Within 14 days of escalation
5. External	AfDB Independent Recourse Mechanism or judicial system, at complainant's choice	Complainant choice	Per IRM / judicial procedures

8.12 Published processing and resolution timelines

The following timelines are published at every site and district office and communicated at consultations, so that stakeholders know what to expect.

Table 19: Published processing and resolution timelines

Stage	Timeline	Note
Acknowledgement of receipt	Within 48 hours	Where a complainant is anonymous, acknowledgement is posted publicly at the point of receipt
Site-level resolution (Level 2)	Within 7 days	Applies to matters capable of resolution at the work front
District-level review (Level 3)	Within 14 days	For matters escalated from site level
PIU review (Level 4)	Within 14 days of escalation	For unresolved or serious matters
Feedback to complainant on outcome	Within 5 working days of decision	In the complainant's preferred language and format
External recourse (Level 5)	Per IRM or judicial procedures	At the complainant's choice, available at any time

Where additional investigation or time is required, the complainant is informed before the original deadline expires, given the reason and given a revised date. SEA/SH matters follow the survivor's pace and are not bound by these timelines where doing so would compromise the survivor's wishes or safety.

8.13 Roles, responsibilities and decision-making authority

Responsibility for receiving, deciding and verifying grievances is assigned by position, so that every case has an identified decision maker.

Table 20: Grievance roles and decision-making authority

Position	Responsibility	Decision authority
PIU Environment / Social / Safeguards Specialist	*Custodian of the mechanism; central register; assessment and referral; Level 4 review; reporting to management and the AfDB*	*Decides Level 4 outcomes and corrective actions*
PIU Social / GBV Officer (female)	*Confidential SEA/SH pathway; oversight of female focal points; service-provider mapping and referral agreements*	*Decides SEA/SH referral and handling, with survivor consent*
Supervision Consultant E&S Specialist	*Verification that contractor-level matters are resolved and corrective actions implemented*	*Recommends; does not decide*
Community Liaison Officers	*Receipt and logging; Level 2 resolution at the work front; feedback to complainants*	*Decides Level 2 outcomes with the contractor*
District Focal Points (including female focal point)	*Receipt and logging; Level 3 facilitation; liaison with leaders within safeguards limits*	*Facilitates Level 3; refers upward where unresolved*
Water User Associations	*First contact for water-related matters; receipt and referral*	*Resolves routine allocation matters within agreed rules*
Contractors	*Site-level resolution; corrective action; cooperation with the mechanism as a contractual obligation*	*Implements corrective action at site level*

The mechanism is governed by the PIU, which reports to the project Steering Committee and to the AfDB. A grievance review is held quarterly, bringing together the PIU Safeguards Officer, the Social/GBV Officer, the supervision consultant and district focal points to review open cases, trends and systemic issues. Coordination with Federal Member State and district authorities occurs through the same coordination meetings used for stakeholder engagement.

Contractor obligations to receive, record, resolve and report grievances are embedded in bidding documents, contracts and Contractor ESMPs, alongside the requirement to assign community liaison officers, including female CLOs, and to maintain consultation and grievance records. The PIU verifies contractor compliance through the supervision consultant, and all contractor-level cases are logged in the central register. Non-compliance carries contractual consequences.

No person may investigate or decide a grievance in which they, their employer or their immediate relatives have an interest. Where a grievance concerns the conduct of a contractor, the contractor does not decide the outcome. Where a grievance concerns the PIU or district authorities themselves, it is referred to independent mediation or escalated to Level 5.

8.14 Communication with complainants

Communication with complainants follows the arrangements below at every stage.

- Acknowledgement of receipt within 48 hours, with the reference number and indicative timeline;
- Progress updates where a matter remains open beyond its published timeline, with the reason and a revised date;
- Requests for additional information where needed, and the complainant may provide further information at any time;

• Decisions and proposed resolutions communicated in the complainant's preferred language (Somali, including Maay) and format — in person, by telephone, by SMS or in writing — as recorded at intake;
• Where confidentiality or complainant safety requires it, communication through a channel the complainant nominates as safe, avoiding identification of the subject matter;
• Every communication of outcome states the right to escalate, seek mediation, or pursue administrative or judicial remedies if not satisfied.

8.15 Appeals, referral and mediation

A complainant who is not satisfied with a proposed resolution may appeal by informing any receiving officer, in person or through any submission channel, within 30 days of being informed of the outcome. No form or written submission is required and no reason need be given. Appeals from Level 2 are heard at Level 3 by the district focal point, and appeals from Level 3 at Level 4 by the PIU Safeguards Officer; an appeal is never decided by the person or body whose decision is being appealed.

Where a grievance remains unresolved after PIU review, or where the complainant does not accept the outcome at that level, the PIU informs the complainant of the options available: independent mediation, the AfDB Independent Recourse Mechanism, or administrative and judicial remedies. The case remains open in the register until the complainant confirms the matter is concluded or elects an external route.

Independent mediation is offered where a complainant is not satisfied with the proposed resolution, or where a matter involves the project authorities themselves and internal review would not be seen as impartial. Mediation is voluntary, conducted by a neutral third party acceptable to both sides — a respected community figure without an interest in the matter, a district-level mediator, or an independent specialist engaged by the project — and provided at no cost to the complainant. Mediation does not remove the right to appeal or to pursue external recourse.

8.16 Access to administrative and judicial remedies

Use of this mechanism is voluntary and does not waive, restrict, replace or delay any right a complainant has to pursue administrative or judicial remedies under Somali law, at any stage and at any time. Nothing in the procedure requires a complainant to exhaust the project mechanism before approaching an administrative body or a court. A complainant may approach the courts whether or not they have used or exhausted this mechanism. This is stated to complainants at intake, repeated when any outcome is communicated, and included in all public disclosure of the mechanism.

8.17 AfDB Independent Recourse Mechanism

The African Development Bank maintains an Independent Recourse Mechanism (IRM), through which people who believe they have been or are likely to be adversely affected by a Bank-financed project may raise concerns that the Bank has not complied with its own policies and procedures. The IRM provides both problem-solving and compliance-review functions.

The IRM is independent of the project and of the project mechanism. A complainant may approach it directly, without first using the project mechanism and without the project's involvement or permission. Approaching the IRM does not require the complainant to withdraw a grievance lodged with the project.

Information on the IRM — what it does, who may approach it, and how to contact it — is included in grievance-mechanism disclosure materials, posted at project sites and district offices, and communicated at consultations. Where a complainant asks how to reach the IRM, the PIU provides current contact details and, if requested, assistance in preparing a submission, without seeking to influence whether the complaint is made.

8.18 Measures for vulnerable groups and accessibility

The measures below ensure the mechanism is usable by those most likely to need it and least likely to be able to use a conventional complaints process.

Table 21: Grievance-mechanism accessibility measures by group and barrier

Group	Barrier	Measure
Women and female-headed households	*Social norms restricting public complaint; risk of exposure*	*Trained female focal point in every district; women-only sessions as an uptake point; option to submit through a woman; confidential handling*
Persons with low literacy	*Cannot complete written forms*	*Oral submission accepted through every in-person channel; receiving officer completes the form on the complainant's behalf and reads it back; pictorial information materials*
Persons with disabilities	*Physical and communication barriers*	*Home visits where mobility is constrained; assisted access; accessible venues for in-person uptake; submission through a representative*
Pastoralists	*Mobility; distance from fixed points*	*Telephone and SMS channels; uptake through WUA representatives and at water points; meetings and uptake timed to mobility patterns*
IDPs and returnees	*Assumption that eligibility depends on tenure; fear of discrimination*	*Explicit statement that eligibility does not depend on land tenure or residency status; proactive outreach to settlements*
Minority clans	*Elite and clan capture of local processes*	*Multiple channels that bypass local gatekeepers, including direct submission to the PIU; monitoring of grievance patterns by group; neutral venues*
Youth	*Low standing in customary structures*	*SMS channel; youth representatives as uptake points; direct submission routes*
All groups	*Language*	*All channels operate in Somali, and in Maay in South West State and riverine Hirshabelle; forms available in Somali and English*
All groups	*Cost*	*Free of charge at every stage, including any cost of investigation, mediation and referral*

8.19 SEA/SH and GBV-sensitive procedures

Given the risk of sexual exploitation, abuse and harassment associated with worker presence across project sites, a dedicated confidential pathway operates alongside — and separately from — the general mechanism. It applies to SEA/SH, gender-based violence, child labour and modern-slavery concerns.

- Confidential and safe reporting. Reports may be made to a trained female focal point in any district, to the PIU Social/GBV Officer, or anonymously through any channel. SEA/SH cases are never entered in the general register, never routed through traditional-leader or community review, and never discussed at community meetings; case files are held separately under restricted access.

• Relevant technical expertise. The pathway is managed by the PIU Social/GBV Officer, who is female and holds GBV or social work experience. Female focal points are trained in survivor-centred handling before works begin in their district, and specialist clinical, psychosocial and legal services are provided through mapped external providers rather than by project staff.
• Minimising the reporting burden on survivors. A survivor is asked only what is necessary to offer referral and support, with no requirement to repeat an account to multiple people, provide evidence, or identify the alleged perpetrator; where the survivor does not wish the project to act, that decision is respected.
• Gender-sensitive services and remedial provisions. Immediate referral is offered to medical, psychosocial and legal services under a district service-provider map with named focal points and referral agreements established before construction begins, under a survivor consent protocol with no pressure to report to police. Where an allegation concerns a project worker, the matter is also addressed through the contractor's code of conduct and disciplinary process without disclosing survivor identity.
• Minimising reprisal risk. Strict confidentiality is maintained, with information shared only on a need-to-know basis and only with survivor consent; anonymous reporting is accepted; and reporting to management and the AfDB records the number of cases referred only, without details that could identify a survivor.

8.20 Prevention and handling of retaliation and reprisals

Consistent with OS10 requirements for engagement free from intimidation and reprisal, a reprisal-risk protocol applies across all grievance handling.

• Zero tolerance for retaliation, abuse and discrimination against any person who raises a concern, provides information or supports a complainant, whether by project staff, contractors, community members or authorities;
• Confidentiality of at-risk complainants, whose identity is never disclosed publicly and internally only to those who need it;
• Safe communication channels, neutral venues and secure correspondence that avoids identifying the subject matter where a complainant is at risk;
• Investigation and remedial action wherever retaliation is alleged or suspected; any indication of retaliation is treated as a serious incident, escalated immediately to the PIU and reported to the AfDB;
• Action only with the complainant's consent where any step could increase risk to them, including where this means the project takes no further action on the underlying matter;
• Independent monitoring of engagement and grievance handling in security-sensitive or contested settings.

8.21 Public disclosure and awareness raising

Disclosure of the mechanism is treated as a standing obligation rather than a one-off activity.

• The mechanism, its channels, timelines, governance and decision makers are disclosed before works begin and remain available throughout;
• Submission channels and locations — hotline number, email, complaint points and named focal persons including female focal points — are posted at every active site, district office and WUA meeting point;

• Disclosure covers the whole project area of influence and is issued online where applicable, in Somali and Maay, through notice boards, radio, printed and pictorial handouts and community meetings;
• Grievance-mechanism information is integrated into every engagement activity under this SEP — every consultation, disclosure session and works briefing states where and how to complain, the timelines, and the confidential SEA/SH pathway;

Awareness is verified rather than assumed: awareness of the mechanism among stakeholders is monitored annually as an indicator under this SEP, and low awareness in any cluster triggers renewed outreach.

8.22 Recordkeeping, data protection and public reporting

The PIU maintains the central register together with intake forms, correspondence, investigation notes, acknowledgement and closure forms for every case, retained for the duration of the project and handed to MoAI on closure.

Personal data is collected only with consent, limited to what is needed, held with restricted access, and not shared with contractors or third parties without consent. SEA/SH files are held separately under the Social/GBV Officer.

A summary record documenting the number and categories of grievances received and how they were responded to is made publicly available quarterly at district offices and through project reporting, with confidentiality safeguards: no complainant is named or identifiable, and SEA/SH cases appear as a number only.

8.23 Monitoring, reporting and review of effectiveness

All cases are tracked in the register by status, level, category and resolution date. Open cases are reviewed monthly by the PIU Safeguards Officer and at the quarterly grievance review, and performance is reported quarterly to project management and the AfDB. Effectiveness is reviewed at least annually as part of the ESMP and SEP review and during AfDB supervision; review considers not only volume and closure rates but whether the mechanism is reaching those who need it, so that a low grievance count from a cluster with high-risk works is treated as a possible sign of inaccessibility rather than of an absence of problems.

Performance is measured against the following indicators:

• Grievances logged in the central register — 100% of those received (monthly);
• Grievances acknowledged within 48 hours — 100% (monthly);
• Grievances resolved within the level timeframe — at least 80%, with SEA/SH cases per protocol (monthly);
• Grievances open at period end and grievances escalated to Level 3 and above — monitored for trend (quarterly);
• Complainants reporting satisfaction with the outcome and average time to resolution (quarterly);
• Awareness of the mechanism among stakeholders (annually);
• Clusters with functioning uptake confirmed before works — 100% (per cluster, before works).

Grievance trends are analysed by category, location and affected group and used to adjust project practice — for example revising works scheduling where disruption complaints cluster, reinforcing safety measures where safety complaints recur, or renewing outreach where a group is absent from the register. Findings feed the annual SEP review and, where they indicate systemic issues, the project's organisational and operational arrangements.

8.24 Staffing, capacity and resources

The mechanism is staffed by the PIU Environment/Social/Safeguards Specialist as custodian, the PIU Social/GBV Officer (female) for the confidential pathway, community liaison officers including female CLOs at each active cluster, and a district focal point and female focal point in each district, supported by WUA representatives at scheme level.

Required expertise comprises safeguards and OS10 experience at PIU level; GBV and survivor-centred case handling for the Social/GBV Officer and female focal points; local language and community facilitation for CLOs and focal points; and access to independent mediation and specialist legal, medical and psychosocial services through external providers. Training on grievance intake and handling, SEA/SH prevention and response, confidentiality and non-retaliation, and inclusive access is delivered to PIU and supervision staff, district focal points, WUAs, community liaison officers and contractors before works begin in each cluster, with semi-annual refreshers.

Investigation of site-level matters requires travel across dispersed districts. Transport and case-related investigation costs are provided for in the budget so that investigation is not constrained by distance and no cost falls on a complainant.

8.25 Budget for grievance management

Costs of operating the mechanism are met from the PIU-managed budget established under this SEP, with site-level costs embedded in works contracts. The mechanism is free of charge to complainants at every stage.

Grievance-specific lines total approximately USD 53,000 over four years: mechanism operation, comprising the hotline and the register and tracking system, USD 18,000; grievance committee meetings and documentation, USD 10,000; and SEA/SH technical and specialist support, comprising service mapping and a survivor support and referral fund, USD 25,000. Communication and awareness costs sit within the SEP information line, and personnel, investigation, transport, mediation, monitoring and reporting costs are absorbed within project management, works contracts and PIU operation. These lines form part of the USD 89,000 PIU-managed SEP and grievance budget set out in Section 11.

8.26 Forms, register and annexes

The standard instruments used to operate the mechanism are issued with the separate BBS Project-Level Grievance Redress Mechanism and comprise:

- Grievance intake / registration form and grievance register (log);
- Grievance acknowledgement form and grievance closure / resolution form;
- Appeals record and periodic reporting template;
- Contact directory of focal points, including female focal points, and the published grievance procedure prepared for public display.

Source basis: OS10 paragraphs 21(h), 28-31 and 36-38; OS10 Annexes 1 and 2; OS5; OS7; OS2; AfDB Business Standard BS#06.4. Full procedure, including forms, register and reporting templates, issued separately as the BBS Project-Level Grievance Redress Mechanism.

9. Institutional and Implementation Arrangements

9.1 Borrower's organizational arrangements

Engagement is delivered through a multi-level structure mirroring Somalia's federal governance. At national level the MoAI Project Implementation Unit provides overall coordination, disclosure, grievance management and AfDB liaison. At state level, Federal Member State and Somaliland ministries responsible for agriculture and irrigation, water, environment and local government coordinate and provide regulatory oversight. At district level, district administrations and focal points facilitate notification, consultation and dispute resolution. At community level, WUAs, community liaison officers, traditional leaders and community committees lead routine engagement and first-tier grievance handling.

9.2 Roles, responsibilities and authority

Table 22: SEP roles, named positions and mobilisation

Entity / position	Responsibilities & qualifications	Coverage	Mobilisation / reporting
PIU — Environment / Social / Safeguards Specialist	Overall SEP implementation; disclosure; grievance management (Levels 3–4); SEP updates; AfDB reporting. Minimum: social science degree with safeguards/OS10 experience	Project-wide	From inception; reports to PIU Coordinator
PIU — Social / GBV Officer (female)	SEA/SH pathway; female focal point oversight; service mapping; vulnerable-group inclusion. Minimum: GBV/social work experience	Project-wide	Before works; reports to PIU
Supervision Consultant — E&S Specialist	Verify contractor engagement; verify disclosure occurred; support grievance resolution. Minimum: E&S supervision experience	All work fronts	From mobilisation; reports to PIU
Community Liaison Officers (CLOs)	Community liaison; local-hiring coordination; site-level grievance (Level 2); works notifications. Minimum: local language and community experience; including female CLOs	≥1 per active district cluster	At contractor mobilisation
District Focal Points	Meeting facilitation; grievance receipt (Level 3); liaison with leaders within safeguards limits	Each district; female focal point per district	From pre-construction
Water User Associations	Ongoing community engagement during O&M; first contact for water issues; grievance receipt	Each scheme	From WUA formation / strengthening
Contractors	Site-level community relations; CLOs; works notifications; employment disclosure; grievance cooperation; community-safety communication	Each contract lot	From mobilisation; reports to supervision / PIU

9.3 Designated stakeholder-engagement personnel

The PIU Environment/Social/Safeguards Specialist is the designated officer accountable for stakeholder engagement across the project. The PIU Social/GBV Officer, who is female, is the designated officer for the confidential SEA/SH pathway and for oversight of female focal points. A female focal point is designated in each district. Contact details for designated personnel are set out in Section 12.

9.4 Responsibilities of contractors, supervision consultants and other parties

Contractor obligations are embedded in bidding documents, contracts and Contractor ESMPs and comprise: assignment of community liaison officers, including female CLOs; minimum notice periods and works notifications; transparent employment disclosure and local-hiring targets; cooperation with the community grievance mechanism and site-level uptake; maintenance of consultation and grievance records; a SEA/SH code of conduct; and community-safety communication. Non-compliance carries contractual consequences. The supervision consultant verifies that contractor engagement and disclosure have occurred before works proceed.

9.5 Coordination and reporting arrangements

Coordination occurs through district and state coordination meetings, standing thematic working groups established following the national workshops, and AfDB supervision missions. The PIU reports quarterly on engagement and grievance performance to project management and the AfDB, and conducts an annual SEP review.

9.6 Staffing, expertise and capacity-building requirements

Training is provided to PIU and supervision staff, district focal points, WUAs, community liaison officers and contractors on inclusive facilitation, grievance intake and handling, SEA/SH prevention and response, vulnerable-group inclusion and pest-management messaging. WUA capacity building covers inclusive water allocation, operation and maintenance and complaint handling, and is delivered before operation with semi-annual refreshers.

9.7 Third-party specialists, where required

Third-party specialists are engaged as set out in Section 7.7: independent mediators, specialist GBV and psychosocial service providers, and independent monitors in security-sensitive settings. Partnerships with NGOs, CSOs and service providers are maintained so that referral pathways remain functional; the service-provider map is maintained at Annex 1 and verified per district before worker mobilisation.

10. Monitoring, Evaluation, Reporting and Updating

10.1 Stakeholder-engagement monitoring indicators

Monitoring verifies that engagement is implemented as intended, reaches vulnerable groups, and translates feedback into action. Indicators are disaggregated by sex, age, displacement status and clan where appropriate, and reported in quarterly E&S reports to the AfDB.

Table 23: SEP monitoring indicators

Indicator	Target	Frequency
Community meetings held per district	≥1 per cluster per quarter; ≥1 per year minimum	Quarterly
Women's participation in consultations	≥30%	Per event
Vulnerable-group consultations conducted	≥1 per district per year, plus targeted sessions	Quarterly
Disclosure materials distributed / posted	All sites before works	Before works
Grievances received and logged	100% logged in register	Monthly
Grievances resolved within timeframe	≥80% within level timeframe; SEA/SH per protocol	Monthly
Feedback (“you said / we did”) issued	100% of consultation rounds	Quarterly
Grievance-mechanism awareness among stakeholders	Increasing trend	Annually

10.2 Grievance-mechanism performance indicators

Grievance performance is monitored on the number received, acknowledged within timeframe, resolved within timeframe, open at period end and escalated; the number of SEA/SH cases referred, recorded as a number only; average time to resolution; complainant satisfaction; and breakdown by category. The reporting template is set out in the standalone Grievance Redress Mechanism.

10.3 Monitoring responsibilities

The PIU Environment/Social/Safeguards Specialist is responsible for monitoring and reporting, supported by the Social/GBV Officer for vulnerable-group and SEA/SH indicators, the supervision consultant for verification at work fronts, and district focal points and WUAs for participatory monitoring at community level.

10.4 Stakeholder feedback on project E&S performance

Stakeholders participate directly in monitoring engagement quality and grievance performance. WUAs, women's and youth representatives and district focal points review engagement coverage, raise concerns and validate that issues raised have been addressed. Findings feed adaptive management.

10.5 Internal and external reporting

Engagement and grievance performance is reported quarterly to project management and to the AfDB as part of quarterly E&S reporting, and annually through the SEP review. Reporting distinguishes performance by state and district cluster so that gaps are visible at the level at which they can be corrected.

10.6 Reporting back to stakeholders

Reporting back follows the feedback procedure in Section 5.15: consultation summaries are disclosed, "you said / we did" notices are issued, community validation meetings are held, and unresolved issues are tracked to closure through the grievance mechanism.

10.7 Review and updating of the SEP

The SEP is a living document. Annual review is the baseline. In addition, the SEP, stakeholder register and vulnerable-groups register are updated promptly whenever any of the following triggers occurs:

- Design changes or changes to interventions at any site;
- Addition of new sites or work fronts;
- Changes in the security situation affecting access or safe engagement;
- Major or recurrent grievances, or a serious incident;
- Any SEA/SH incident or allegation;
- Any resettlement or livelihood impact emerging, which would also trigger OS5 review;
- Community conflict or escalating tensions, for example over water allocation or clan disputes;
- Changes in the risk profile of any vulnerable group.

Validation occurs at district inception meetings, scheme-level verification by WUAs and district focal points, and contractor mobilisation. Updates are logged with a date and reason in the SEP version control.

10.8 Disclosure of updated versions

Updated versions of the SEP are disclosed through the same channels as the original — PIU and AfDB platforms, district offices and community meetings — with a summary of what changed and why, communicated in Somali and in accessible formats. Where an update changes engagement or grievance arrangements affecting a specific cluster, that cluster is notified directly.

Source basis: OS10 paragraphs 36-38; OS10 Borrower Guidance Note Annex 1; Business Standard BS#06.4.

11. Budget and Resources

The budget is built on site and state-level costing consistent with the project ESMP and Somali field conditions. It is integrated into the PIU operational budget and works contracts over the 48-month implementation period and reflects inclusivity, decentralisation, practicality, flexibility and transparency.

11.1 Information and communication costs

Covers translation into Somali and Maay, pictorial and printed materials, notice boards and Somali-language radio announcements, provided as a lump sum with periodic updates.

11.2 Stakeholder-engagement activity costs

Covers community consultations across the states, and targeted vulnerable-group outreach including transport, female facilitators and accessibility provision for persons with disabilities.

11.3 Grievance-mechanism operational costs

Covers the hotline, suggestion boxes, the grievance register and tracking system, and grievance committee meetings and documentation.

11.4 Monitoring and evaluation costs

Covers participatory monitoring, quarterly reporting, the annual SEP review and community validation meetings; these are delivered by PIU and district staff and are absorbed within the engagement and grievance lines below.

11.5 Personnel and specialist-support costs

PIU safeguards and social personnel are funded under the project management budget. Specialist support for SEA/SH service mapping, survivor referral and independent mediation is budgeted separately below. District focal point and community liaison officer support is provided through the engagement and works-contract lines.

11.6 Total budget

Table 24: Indicative SEP and grievance-mechanism budget

Activity	Basis	Frequency	Indicative cost (USD)
Community meetings (5 states × 4 per year)	80 meetings × $400	Quarterly per cluster	32,000
Information materials, radio, notice boards, translation (Somali/Maay, pictorial)	Lump sum plus updates	One-time plus updates	4,000
Grievance-mechanism operation (hotline, suggestion boxes, register/tracking)	Hotline 4 × $2,500 + system $8,000	Continuous	18,000
Grievance committee meetings and documentation	4 years × $2,500	Quarterly	10,000
SEA/SH service mapping and survivor support / referral fund	Mapping $9,000 + 4 × $4,000	Setup plus continuous	25,000
Subtotal — PIU-managed SEP / GRM / SEA-SH			89,000

Activity	Basis	Frequency	Indicative cost (USD)
Contractor site-level engagement and CLOs	Lump sum across lots	Continuous	Embedded in works contracts
Total — PIU-managed SEP budget (4 years)			89,000

Site-level community engagement delivered by contractors, and WUA and O&M training, are funded under works contracts and the ESMP training budget respectively. Exact figures are refined during annual work planning.

11.7 Sources of financing

The PIU manages the central SEP and grievance budget from the project management allocation; district teams implement community engagement and documentation; contractors fund site-level engagement through works contracts. The AfDB reviews budget execution during supervision. Beyond the project, SEP costs will be integrated into MoAI and district routine budgets, with WUAs maintaining low-cost communication tools and the grievance mechanism institutionalised within local governance.

12. Contact Information

Contact details below are confirmed and publicised before works begin at each cluster, and posted at every site and district office. Placeholders marked [to be confirmed] are completed by the PIU prior to disclosure.

12.1 Project contact details

Item	Detail
Implementing agency	Ministry of Agriculture and Irrigation (MoAI), Federal Republic of Somalia
Project	Beero oo Barwaaqee Soomaaliya (BBS) Irrigation Project
Office	BBS Project Implementation Unit, MoAI, Mogadishu
Telephone	[to be confirmed]
Email	[to be confirmed]
Website	[to be confirmed]

12.2 Stakeholder-engagement contact

Item	Detail
Designated officer	PIU Environment / Social / Safeguards Specialist
Telephone / email	[to be confirmed]
District focal points	Designated in each of the 24 project districts, including a female focal point per district; names and numbers posted at district offices

12.3 Grievance-mechanism contact

Item	Detail
Grievance hotline (phone / SMS)	[to be confirmed and publicised before works]
Grievance email	[to be confirmed]
In person	Community liaison officers, WUA representatives, district focal points, PIU office

Item	Detail
Confidential SEA/SH pathway	PIU Social / GBV Officer (female) and trained female focal points — [contact to be confirmed]
AfDB Independent Recourse Mechanism	Information provided in grievance-mechanism disclosure materials

12.4 Process for requesting project information

Requests may be made in person, by telephone or SMS, by email, or through a WUA or district focal point. The PIU acknowledges the request and responds within ten working days in the requester's preferred language and format. Where a request cannot be met in full, the reason is given and any part of the information that can be released is provided.

13. Annexes

Annex 1. Stakeholder register and mapping

Annex 1.1 — Stakeholder register (template, with sample entries)

Stakeholder (group)	Category	Location	Key interest or concern	Influence / Interest	Engagement method & frequency	Focal point
Water User Associations — Balcad canal schemes	Project-affected — primary	Hirshabelle / Balcad	Quality of canal rehabilitation, water allocation, O&M roles	Influence: Medium / Interest: High	Community and WUA meetings; monthly during construction	PIU Social/Safeguards Officer — [contact TBC]
Female-headed households and women's groups	Vulnerable group	Somaliland / Caynabo, Zeylac	Safe water access, inclusion in decisions, GBV-safe facilities	Influence: Low / Interest: High	Women-only sessions; at each consultation round	PIU Gender/Social Officer — [contact TBC]

Annex 1.2 — NGO / CSO and service-provider map

Organisation (type)	Service area / sector	Presence in Somalia	Relevance & referral role for BBS
IOM (UN agency)	CCCM; GBV & MHPSS; disability inclusion; PSEA/AAP	Nationwide; 2,700+ IDP sites	Co-leads the CCCM Cluster and GBV/MHPSS working groups; entry point for protection, PSEA and disability-inclusion referrals
UNFPA (UN agency)	GBV response — clinical management of rape, psychosocial support, case management; dignity kits	Nationwide (GBV AoR lead)	Survivor-centred GBV/SEA clinical and case-management referral; maintains GBV referral pathways
UNHCR (UN agency)	Protection; CCCM; durable solutions for displaced	Nationwide	Protection and IDP referral; housing, land and property support
ACTED (INGO)	Protection mainstreaming; GBV risk mitigation; CCCM; WASH/sanitation	Incl. Laascaanood, Buuhoodle, Kismaayo, Baidoa, Afgooye	GBV risk mitigation and referral in IDP sites overlapping the NorthEast, Jubaland and South West clusters
Alight (INGO)	GBV protection; psychosocial support; case management	Multiple regions	Specialist GBV case-management referral partner
GECPD (national NGO)	GBV awareness and survivor support; women's and girls' empowerment	Gaalkacyo; Puntland and Galmudug	Local GBV referral and women/girls outreach for the Galmudug and Puntland clusters
Norwegian Refugee Council (INGO)	WASH; IDP/returnee assistance; support to persons with special needs; ICLA legal aid	Nationwide; drought- and flood-affected areas	WASH co-delivery; disability/PSN support; legal aid and HLP referral
COOPI (INGO)	WASH; food security; livelihoods; protection	Bay and Gedo (Baidoa, Dollow, Belet-Hawa)	Livelihoods/WASH peer and protection referral in the Gedo (Jubaland) cluster
CARE International (INGO)	WASH; agriculture; sanitation and hygiene; women's economic empowerment	Nationwide	Agriculture and WASH peer; women's empowerment programming
Mercy-USA (INGO)	Water/WASH; health; nutrition	Multiple regions	WASH peer and community health/nutrition referral
FAO SWALIM (UN technical programme)	Water and land information; groundwater and flood monitoring	Nationwide	Technical data on water resources and flood risk to inform site selection and safeguards
Somalia Protection Cluster / GBV AoR	Inter-agency referral SOPs; GBV service-provider lists	Nationwide	Source of district-level referral pathways and updated GBV service-provider lists

This map is indicative and compiled from publicly available information; provider presence and services change frequently. Before works begin in each district the PIU Social/GBV Officer will verify which providers are operational, record named focal points and contact details, and put referral agreements in place. Where no formal provider is present, the nearest available or mobile/remote provider will be identified.

Annex 2. Detailed stakeholder engagement programme

The phased engagement programme by site cluster is set out in Table 11 (Section 5.18). Methods, purpose, target groups and frequency are set out in Table 10 (Section 5.8). District-level work plans elaborating these into dated activity schedules are prepared at inception for each cluster and maintained by the PIU.

Annex 3. Records and evidence of consultations

Consultation coverage is recorded in Table 8 (district-level) and Table 9 (national-level events). Evidence retained by the PIU for each consultation comprises: date, location and method; attendance registers disaggregated by sex and vulnerability status; issues raised and responses given; photographs where consent was given; and the signed participant lists for the two national workshops, which are held with the respective workshop reports.

Annex 3.1 — Consultation log fields (to be maintained per event)

Field	Detail to record
Event reference	Sequential reference per district and cluster
Date and duration	
Location and venue	Including note on accessibility and neutrality of venue
Method	Community meeting / women-only session / FGD / KII / site walk-through
Facilitator(s)	Including whether female facilitator present
Attendance	Total, disaggregated by sex, age group, displacement status and vulnerability
Language used	Somali / Maay / other
Information disclosed	Documents and materials presented or distributed
Issues raised	Recorded verbatim where possible
Responses given	Including commitments made and by whom
Follow-up required	Action, responsible person and due date
Feedback issued	Date and method of “you said / we did” feedback

Annex 4. Stakeholder comments and response matrix

The matrix below consolidates issues raised through district-level consultations and the two national events, with the project's response to each.

Issue raised	Project response
Equitable water distribution	WUA strengthening with inclusive governance; transparent allocation protocols; downstream-user consultation
Local employment	Transparent hiring; local-hiring targets (80%+ unskilled); ≥20% youth; skills training
Women's participation in WUAs	Minimum 30% women; women-only consultations; female facilitators and focal points
Farmer–pastoralist tensions	Multi-use water-point design; inclusive WUA membership; allocation dialogue

Issue raised	Project response
Construction disruption	Phased works; advance notice; temporary water provision; safe crossings
Community / child and livestock safety	Demarcation, signage, barriers, controlled access; rapid corrective action
Long-term sustainability	WUA capacity building; O&M training; appropriate technology
IDP and minority inclusion	Non-discriminatory access; proportional representation; outreach; elite-capture monitoring
Water variability, storage and flood management (Validation Workshop; Stakeholder Workshop, Group 1)	Design emphasis on water harvesting and storage, flood-mitigation structures and riverbank stabilisation; data monitoring and planning to inform allocation; phased works sequenced around seasonal water needs
Operation, maintenance and cost recovery for water infrastructure (both workshops)	WUA formation and capacity building before handover; local O&M training; transparent cost-recovery and user-fee arrangements agreed with users; exploration of public–private partnership co-financing models
Women's representation in water governance (Validation Workshop; Stakeholder Workshop, Group 3)	Leadership training for women integrated into WUA governance structures; minimum representation targets; women-only consultation sessions and female facilitators; monitoring of women's participation in water-allocation decisions
Quotas and leadership roles for women and youth in project governance (Stakeholder Workshop, Group 3)	Representation targets in WUAs, cooperatives and producer groups; deliberate inclusion in project governance structures; disaggregated monitoring of participation and benefit distribution
Access to finance for women- and youth-led agribusiness (Stakeholder Workshop, Groups 3 and 4)	Linkage to Sharia-compliant financing, microfinance institutions, VSLAs and mobile money services; agribusiness incubation and business development support; engagement of participating banks and financial institutions as project stakeholders
Access to quality seed, inputs and extension services (Stakeholder Workshop, Group 2)	Seed system strengthening including decentralised seed testing, agro-dealer registration and quality assurance; formation of farmer groups for service delivery; extension delivered jointly by public, private and academic providers
Post-harvest losses, market access and value-chain infrastructure (Stakeholder Workshop, Group 4)	Aggregation centres sited near key transit routes; solar-powered cold storage prioritised for horticulture; support to processing, packaging and quality control; facilitation of formal agreements between producer cooperatives and buyers
Role of the private sector, research institutions and academia (both workshops)	Universities, research institutions, agro-dealers and service providers engaged in extension delivery, technology piloting and value-chain co-investment through 4P models
Coordination with other programmes and donors (Validation Workshop)	Active coordination with initiatives financed by the World Bank, IFAD and the Green Climate Fund; standing multi-stakeholder technical working groups and annual review events
Institutional capacity and federal–state liaison (Validation Workshop)	Project coordination structure staffed with procurement, financial management and M&E specialists; designated liaison arrangements between federal and Federal Member State ministries; state-level focal points
Farmer–pastoralist competition and conflict sensitivity (both workshops)	“Do no harm” and conflict-sensitive planning around water and land access; multi-use water-point design; consideration of water catchments along livestock corridors; inclusive WUA membership
Local contracting, employment and skills (Validation Workshop ESS session)	Transparent local hiring and local contracting where feasible; training of local youth in maintenance of solar pumps and irrigation equipment; skills training linked to value-addition and post-harvest handling
Excavation safety and protection of water sources (Validation Workshop ESS session)	Demarcation, signage, barriers and controlled access at work sites; water-source protection measures specified in contractor ESMPs; erosion, dust, noise and waste controls with regular monitoring
Accessible and confidential complaint channels (both workshops)	Multi-tier grievance mechanism operational before works commence, with confidential and accessible entry points, a dedicated SEA/SH pathway and a reprisal-risk protocol

Annex 5. Information-disclosure schedule

The disclosure schedule is set out in Table 12 (Section 6.1). The PIU maintains a disclosure record per cluster recording the document disclosed, date, method, location and the officer responsible, which the supervision consultant verifies before works proceed.

Annex 6. Grievance-mechanism procedures

The full grievance procedure is issued as a separate document: the BBS Project-Level Grievance Redress Mechanism. It is summarised in Section 8 of this SEP. That document contains the procedure, principles, submission channels, handling steps, timelines, roles, appeals and mediation arrangements, SEA/SH provisions, reprisal protections, disclosure arrangements and monitoring provisions.

Annex 7. Grievance-submission form and grievance register

The grievance intake and registration form, grievance register, acknowledgement form, closure and resolution form and periodic reporting template are provided in the annexes to the standalone BBS Project-Level Grievance Redress Mechanism.

Annex 8. Monitoring indicators and reporting arrangements

Stakeholder-engagement monitoring indicators are set out in Table 23 (Section 10.1). Grievance-mechanism performance indicators and the quarterly reporting template are set out in the standalone Grievance Redress Mechanism. Reporting arrangements are described in Section 10.5.

Annex 9. Detailed budget

The indicative budget is set out in Table 24 (Section 11.6). Detailed annual costings are prepared during annual work planning and reviewed by the AfDB during supervision.

References

African Development Bank (2023). Integrated Safeguards System (ISS): Operational Safeguards (OS1, OS2, OS5, OS7, OS10) and Guidance.

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African Development Bank (2001). Handbook on Stakeholder Consultation and Participation in ADB Operations. OESU.

Federal Republic of Somalia, Ministry of Agriculture and Irrigation (2026). BBS Irrigation Project — Environmental and Social Impact Assessment (Draft) and ESMP.

BBS Project — Labour Management Procedures; Project-Level Grievance Redress Mechanism; Pest Management Plan; Gender Analysis (project annexes).

Provisional Federal Constitution of Somalia (Articles 43, 44, 45) and relevant national policies (Water, Climate, Gender, Agriculture, Pesticide).

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