

REQUEST FOR A DIRECT WORLD BANK DEVELOPMENT FRAMEWORK FOR SOMALILAND

Respectfully Submitted to

Mr. Ajay Banga
President, World Bank Group
The World Bank Group
1818 H Street NW
Washington, DC 20433
United States of America

Subject

**Request for Distinct Identification, Attribution and Institutional Treatment of World Bank
Development Projects Implemented in Somaliland**

And

**Replace the Subsidiary Arrangement with a Direct Somaliland–World Bank Framework for
Somaliland-Specific Development Projects**

Dear President Banga,

I am writing respectfully to request your consideration of an important institutional and development-accountability issue concerning World Bank projects implemented in Somaliland.

This request is not intended to challenge the World Bank's existing legal framework concerning Somalia, nor does it ask the World Bank to take a position on Somaliland's international political status.

Rather, it asks the World Bank to consider whether its project identification, implementation, reporting and public attribution can more accurately reflect the institutional reality that the Bank itself has documented in its own project records.

1. The World Bank's own documentation distinguishes Hargeisa and Somaliland

In the World Bank's AF4 consultation documentation for the Somalia Urban Resilience Project Phase II (P170922), the Bank states that the project was expected to expand to **Hargeisa, the capital city of Somaliland**.

The same document records that consultations commenced in Nairobi on **24 April 2024 with the Mayor of Hargeisa**, together with Hargeisa's Directors for Public Works and Administration and Finance.

The consultation record therefore did not treat the participant simply as an unidentified Somali municipal representative. It specifically identified the Mayor of Hargeisa and subsequently described Hargeisa as the capital city of Somaliland.

The Bank then conducted further consultations directly involving Hargeisa Local Government Directors and other Hargeisa stakeholders.

This demonstrates that, for purposes of project preparation and stakeholder engagement, the World Bank recognized the distinct institutional identity of Hargeisa and the Somaliland authorities with whom it needed to engage.

Reference:

World Bank, Somalia Urban Resilience Project – Phase II, AF4 Consultation Summary, Annex 6, P170922.

2. The Bank has documented Somaliland-specific implementation arrangements

The AF4 appraisal documentation goes further.

It describes the objective of strengthening the resilience of Hargeisa as the capital of Somaliland and improving the capacity of its municipal government, including investment in climate-resilient roads, pedestrian infrastructure and drainage.

The appraisal also contemplated a dedicated implementation structure for Hargeisa.

Most significantly, the document states that the Hargeisa implementation arrangements would be reflected in a **subsidiary agreement to be signed by the Somaliland Ministry of Finance Development and co-signed by Hargeisa Municipality**.

This is a very important institutional distinction.

The World Bank was not merely discussing Hargeisa as a geographic location. It was designing arrangements involving Somaliland's own Ministry of Finance Development and Hargeisa Municipality.

Reference:

World Bank, Somalia Urban Resilience Project – Phase II (P170922), AF4 Appraisal Document.

3. The legal documentation subsequently created a defined “Somaliland Subsidiary Agreement”

The World Bank's subsequent legal documentation provides further evidence.

The May 2025 amendment expressly defines:

“Somaliland” as the Recipient's territory of Somaliland.

It separately defines:

“Somaliland Subsidiary Agreement” as the agreement between the Recipient and Somaliland concerning the relevant project arrangements.

The same amendment separately identifies the relevant project component as:

“for Somaliland and Hargeisa Municipality.”

This is significant because the World Bank's legal architecture itself distinguishes the Somaliland arrangement from the arrangements concerning the Federal Member States and their municipalities.

Reference:

World Bank, Amendment Letter to the Second Additional Financing Agreement for P170922, dated 30 May 2025.

4. This creates a question of development attribution and institutional transparency

I fully recognize that the overarching World Bank financing relationship may, under the Bank's existing legal framework, remain with the Federal Republic of Somalia.

The concern is different.

When a project is physically and institutionally implemented in Somaliland, through Somaliland institutions and Hargeisa Municipality, the international presentation of that development activity solely under the broad “Somalia” designation can obscure an important part of the actual development architecture.

There is a distinction between:

- the legal entity that is the World Bank's formal financing recipient;
- the institutions that actually implement the project;
- the territory and population receiving the investment; and
- the government institutions responsible for implementation and accountability.

These should not necessarily be treated as identical for purposes of public development attribution.

5. Our request is therefore practical, not accusatory

We respectfully request that the World Bank consider establishing, for future projects implemented in Somaliland, a clearer and more consistent framework for **separate identification and attribution of Somaliland-specific development activities**, while preserving whatever overarching legal financing structure the Bank considers necessary.

Specifically, we respectfully request consideration of the following:

1. **Separate identification:**
World Bank project documents should clearly identify Somaliland-specific components as such, rather than leaving them identifiable only through subsidiary documents.
2. **Transparent financing attribution:**
Financing allocated to projects implemented in Somaliland should be separately identifiable in project financing tables and public reporting.
3. **Institutional attribution:**
Somaliland institutions responsible for implementation, including the Somaliland Ministry of Finance Development and relevant municipalities, should be clearly identified in project documentation.
4. **Separate results reporting:**
Development results achieved in Somaliland should be separately reported so that the investment, outputs and beneficiaries are clearly attributable to the territory and institutions where implementation actually occurred.
5. **Public communications:**
World Bank announcements, project summaries and completion reports should clearly identify Somaliland where the project is specifically implemented there.
6. **Future project design:**
Where a project is exclusively or substantially implemented in Somaliland, the Bank should consider whether a separately identified Somaliland project component, financing window or implementation framework would provide greater transparency and accountability.
7. **Direct institutional consultation:**
The World Bank should continue its practice of consulting directly with the relevant Somaliland authorities when projects concern Somaliland, as it has already done in the preparation of AF4.

6. Why these matters

This request is fundamentally about **accuracy, transparency, accountability and respect for the institutions responsible for delivering development outcomes.**

The World Bank's own documentation demonstrates that it already recognizes that the institutional arrangements required for Somaliland are different enough to require direct consultations, Somaliland-specific implementation arrangements and a defined Somaliland Subsidiary Agreement.

We therefore respectfully ask whether the same institutional clarity can also be reflected in the way those projects are identified, financed, reported and communicated internationally.

Development assistance should be accurately attributable to the institutions and communities where the development actually takes place.

When a road is built, a drainage system constructed, municipal capacity strengthened, or urban resilience improved in Hargeisa, the public record should make clear where that investment occurred, which institutions implemented it, and which population benefited from it.

This is particularly important for Somaliland because development attribution has consequences beyond terminology. It affects institutional accountability, public understanding, historical records, development statistics and how international partners understand who is actually implementing and benefiting from development programs.

7. A constructive request to the World Bank

We are therefore not asking the World Bank to alter its position on the international political status of Somaliland.

We are asking the Bank to consider whether its **development and institutional documentation can more accurately reflect the distinction that the Bank itself has already documented operationally and legally.**

The Bank has already demonstrated flexibility by developing arrangements specifically adapted to Somaliland.

We respectfully ask that this same principle of institutional clarity be extended to the public identification and attribution of future development assistance.

We would be grateful if your office could request the relevant World Bank departments to review this matter and provide clarification on:

- the Bank's policy for identifying Somaliland-specific projects;
- how Somaliland financing and development results are currently recorded;
- whether Somaliland-specific project identification can be strengthened in future operations; and

- whether a more distinct Somaliland implementation and reporting framework can be established for future World Bank-supported programs.

We make this request in the spirit of constructive engagement and with full respect for the World Bank's mandate, policies and legal framework.

Somaliland's Objection to the Subsidiary Arrangement

The objective is simple: **that World Bank development assistance should be accurately identified, transparently reported and properly attributed to the institutions, territory and communities where it is actually implemented and received.**

Somaliland respectfully but firmly **condemns** the treatment of Somaliland-specific development projects as **subordinate components** of projects presented internationally as **Somalia projects proposed by Somalia and approved by the World Bank.**

This is not merely a matter of terminology. It creates the impression that Somaliland's development priorities, institutions and resources are subordinate to the Federal Government of Somalia.

Somaliland therefore rejects the principle of placing its development relationship with the World Bank beneath Somalia through a “Subsidiary Agreement.”

We respectfully request that future Somaliland-specific projects be governed through a **direct Somaliland–World Bank agreement or other legally appropriate direct framework**, with Somaliland's financing, institutions, responsibilities and development results separately and transparently identified.

This request does not ask the World Bank to determine Somaliland's political status. It asks only that the Bank's development architecture accurately reflect the institutional reality it has already documented.

Thank you for your consideration of this matter.

Yours respectfully,

[Name]

[Title / Organization, if applicable]

[Contact Information]

