

Guidance: Somalia, October 2025.

b) Assessment of indiscriminate violence per region

COMMON ANALYSIS Last update: October 2025

The map below summarises and illustrates the assessment of indiscriminate violence per administrative region under Article 15(c) QD/QR:

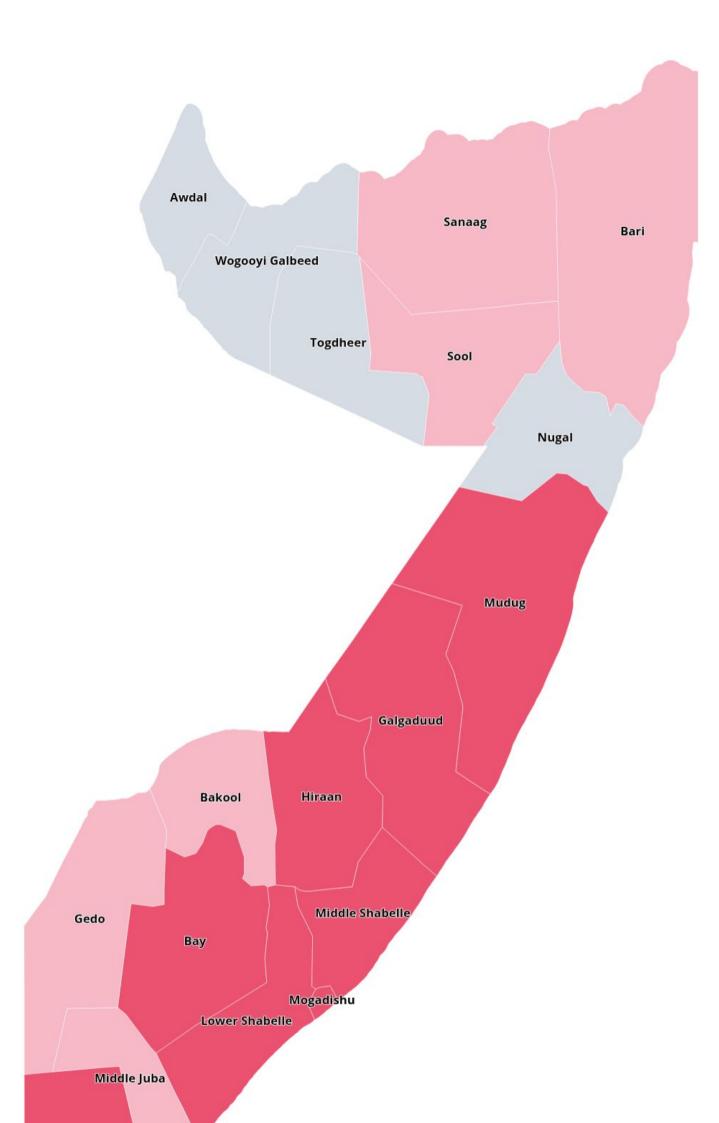


Figure 5: Level of indiscriminate violence in Somalia (based on information up to 31 July 2025)

- Mere presence would be considered sufficient in order to establish a real risk of serious harm under Article 15(c) QD/QR.

 Indiscriminate violence reaches a high level and a lower level of individual elements is required to establish a real risk of serious harm under Article 15(c) QD/QR.

 Indiscriminate violence is taking place, however not at a high level, and a higher level of individual elements is required to establish a real risk of serious harm under Article 15(c) QD/QR.

 There is no real risk for a civilian to be personally affected within the meaning of Article 15(c) QD/QR.
 - Mere presence
 - High level of indiscriminate violence
 - Indiscriminate violence not at a high level
 - No real risk

Mere presence

COMMON ANALYSIS Last update: October 2025

Areas where the degree of **indiscriminate violence reaches such an exceptionally high level** that substantial grounds are shown for believing that a civilian, returned to the relevant area, would, **solely on account of their presence there**, face a real risk of being subject to the serious threat referred to in Article 15(c) QD/QR. Accordingly, additional individual elements are not required in order to substantiate subsidiary protection needs under Article 15(c) QD/QR.

No such areas have been identified in Somalia.

High level of indiscriminate violence

Areas where 'mere presence' would not be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR, but where, **indiscriminate violence reaches a high level**. Accordingly, a **lower level** of individual elements (see <u>Serious and individual threat</u>) is required to show substantial grounds for believing that a civilian, returned to the area, would face a real risk of serious harm in the meaning of Article 15(c) QD/QR.

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The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.2.2</u>.; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Bay remains under the mixed control of FGS coalition and Al-Shabaab, although the group's influence in the area remains strong. The region's rural terrain is largely under Al-Shabaab's control. Urban areas were controlled by the FGS coalition, while the SNA regained control of previously Al-Shabaab controlled areas. In April 2025, Al-Shabaab resurfaced in rural areas of the region, temporarily lifting a decade-long blockade in several towns of Bay and Bakool regions. However, at the end of July 2025, key roads connecting these regions and the route to Mogadishu remained largely blocked.

ACLED recorded 756 security incidents in Bay region between 1 April 2023 and 31 July 2025 (an average of 6.3 incidents per week), resulting in 744 fatalities (representing approximately 60 fatalities per 100 000 inhabitants). Al-Shabaab was involved in almost all the recorded incidents. Such incidents included IED attacks striking SNA troops and security forces, ground raids against armed forces and using artillery to attack the capital city's airport and regional hospital. During the reference period, a notable increase in deadly clan violence was also recorded. Between 1 April 2023 and 16 March 2025, 23 722 individuals were newly displaced from Bay due to conflict or insecurity.

Despite the high number of fatalities, which includes also combatants, and looking at all the indicators, it cannot be concluded that mere presence in the region of Bay would be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR.

Based on the highly contested control of the region, the ongoing armed confrontations involving several actors, the number of security incidents as well as the nature of the violence, it can be concluded that indiscriminate violence in Bay region reaches a high level.

☐ Benadir/Mogadishu

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>1.2.2.</u>, <u>1.3.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Mogadishu remained under the control of FGS security institutions although Al-Shabaab maintained its capacity to carry out attacks in the region, through the agents of its Amniyat intelligence service agents. In September 2024, the group set up strategic bases in Mogadishu's northern outskirts, collecting taxes and administering justice. In March 2025, reports indicated a significant increase of Al-Shabaab's activity across several other suburbs. During the reference period, the Aden Adde International Airport areas, along with government and military facilities, were frequently targeted by the group with mortar attacks, coupled with IED targeted explosions and bombings.

ACLED recorded 955 security incidents in Benadir region between 1 April 2023 and 31 July 2025 (an average of 7.9 incidents per week), resulting in 962 fatalities (representing approximately 30 fatalities per 100 000 inhabitants). Al-Shabaab was involved in the majority of the recorded incidents, carrying out more than 160 attacks against civilians. For example, Al-Shabaab carried out complex attacks/suicide attacks against two busy hotels and a restaurant, targeting soldiers and civilians alike. Between 1 April 2023 and 16 March 2025, 1 952 individuals were newly displaced from Benadir due to conflict or insecurity. UNOCHA recorded 98 humanitarian access incidents in the region from April 2023 and over the year 2024 ranking first

amongst all regions. Despite the high number of fatalities, which includes also combatants, and looking at all the indicators, it cannot be concluded that mere presence in Benadir/Mogadishu would be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR. Given the number of security incidents and fatalities, the persistent presence of Al-Shabaab in the region and the nature of the attacks (e.g. attacks in public spaces), it can be concluded that indiscriminate violence is taking place in Benadir/Mogadishu at a high level. ☐ Galgaduud The analysis below is based on the following EUAA COI report and query: Security 2025, 2.5.1.; COI Update 2025, 2.; Country Guidance should not be referred to as a source of COI. Federal-aligned coalition forces, Al-Shabaab and Macawisley were the main actors in Galgaduud region, while different clan militias were also involved in clan clashes. Galgaduud is described as a longstanding battleground for control between government forces and Al-Shabaab. Federal-aligned forces captured areas, withdrawing however after a short period of time. Airstrikes, battles, explosions from landmines and other explosive de-vices, remote violence and violence against civilians have been reported. Al-Shabaab controlled the southern-central part of Galgaduud from the coastline up to north and northeast of Ceel Buur town. The remaining part of the region was under mixed, unclear or local control with the exception of the area along the border with Ethiopia, which was under the control of the federal-aligned coalition forces, along with the capital city. In January 2025 intense fights erupted in Masagaway and in February fights continued with Macawisley attacking Al-Shabaab. ACLED recorded 480 security incidents during the period from 1 April 2023 to 31 July 2025 (an average of 4 incidents per week), causing 2 719 fatalities (representing approximately 335 fatalities per 100 000 inhabitants). During 1 April 2023 to 16 March 2025, 11 203 people were newly displaced from Galgaduud. Humanitarian activities were restricted due to violent incidents. Despite the high number of fatalities, which includes also combatants, and looking at all the indicators, it cannot be concluded that mere presence in the region of Galgaduud would be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR. Based on the nature of violence, such as the use of landmines and other explosives, as well as the high number of security incidents, it can be concluded that the indiscriminate violence in Galgaduud region reaches a high level.

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.4.1.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

☐ Hiraan

In Hiraan region the main actors of armed conflicts were the FGS in coalition with ATMIS/AUSSOM, Al-Shabaab, Macawisley clan militias, and the Ethiopian National Defense Force (summer 2024). Actors in armed inter-clan conflicts, such as the Hawadle, the Abgaal, the Makane and the Habar Gidir, were also active.

Since late 2024, Hiraan has been the focal point of the Federal Government coalitions fight and the epicenter of the Macawisley clan militias fight against Al-Shabaab, which resulted in battles, explosives and in early 2024 airstrikes. Between April and July 2025, Al-Shabaab made significant gains in Hiraan. rising local resentment over the government's failure to support clan militias. Al-Shabaab used IED, suicide attacks and suicide car bombs, causing civilian casualties.

The north-eastern part of the region and the urban centres were under the control of the Federal Government coalition. Al-Shabaab fully controlled the area between South-West state border and the Shabelle River Valley. Other parts of the region were under mixed, unclear or local control. A counter-offensive against Al-Shabaab by Somali government forces together with local clan militias in April 2023 was initially 'promising', but later slowed down due to lack of forces, inter-clan conflicts and logistical difficulties. In February 2025 heavy fightings were reported along the Shabelle River.

From 1 April 2023 to 31 July 2025, ACLED recorded 567 security incidents (an average of 4.7 incidents per week), causing 1740 fatalities (representing approximately 345 fatalities per 100 000 inhabitants). Between 1 April 2023 and 16 March 2025, approximately 10 500 people were newly displaced from Hiraan. Al-Shabaab increased attacks on food and water resources as a punishment for clans cooperating with the government against the group.

Despite the high number of fatalities, which includes also combatants, and looking at all the indicators, it cannot be concluded that mere presence in the region of Hiraan would be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR.

Based on the highly contested control of the region, as well as the different kinds of violence used by the conflicting parties, including explosive weapons and suicide attacks, it can be concluded that indiscriminate violence in Hiraan region reaches a high level.

☐ Lower Juba

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.1.2.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

In Lower Juba, armed confrontations involved Al-Shabaab, Jubbaland forces, and the FGS, competing for the territorial dominance of the region. Small-scale counter-insurgency operations against Al-Shabaab, including airstrikes and ground operations took place in June and July 2023. Clashes intensified in 2024 and Al-Shabaab conducted coordinated attacks. Deadly clashes in Kismayo amid pre-election tensions were reported.

ACLED recorded 598 security incidents between 1 April 2023 and 31 July 2025 (an average of 5.0 incidents per week), resulting in 1 973 fatalities (representing approximately 170 fatalities per 100 000 inhabitants). A significant number of newly IDPs (50 650) was also reported, as well as 11 humanitarian access incidents, including the destruction of a school, a water and sanitary infrastructure.

Despite the high number of fatalities, which includes also combatants, and looking at all the indicators, it cannot be concluded that mere presence in the region of Lower Juba would be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR.

Based on the number of security incidents and the nature of violence (attacks and armed clashes) and the rising number of IDPs, as well as the ongoing armed confrontations between several actors, it can be concluded that indiscriminate violence in Lower Juba region reaches a high level.
Lower Shabelle
The analysis below is based on the following EUAA COI reports and query: <u>Security 2025</u> , <u>2.2.3</u> .; <u>Country Focus 2025</u> , <u>1.4.2.</u> ; <u>COI Update 2025</u> , <u>2.</u> ; Country Guidance should not be referred to as a source of COI.
Lower Shabelle remains an Al-Shabaab stronghold as the group exercises control over most of the region's areas, including several checkpoints. By March 2025 Al-Shabaab had seized control of strategic locations and relative bridges in the region The group staged attacks against SNA, local government and ATMIS croops, using tactics such as hit-and-run attacks, IED attacks and ambushing small groups of soldiers. In June 2025 the SNA army and allied forces launched 'Operation Silent Storm', aimed at liberating areas under Al-Shabaab's control, however as of July 2025, this operation was only partially successful. Dozens of civilians were killed in the region due to drone strikes by the FGS, by patrolling ATMIS forces, and in artillery crossfire, as well as due to unattributed explosions. A notable increase of clan conflicts escalating into armed violence was also reported in mid-2024.
ACLED recorded 1 655 security incidents between 1 April 2023 and 31 July 2025 (an average of 13.8 incidents per week), resulting in 2 601 fatalities (representing approximately 163 fatalities per 100 000 inhabitants). Al-Shabaab was involved in 1 302 of the total security incidents. Between 1 April 2023 and 16 March 2025, 78 367 individuals were newly displaced from Lower Shabelle due to conflict and insecurity. UNOCHA recorded 28 humanitarian access incidents in Lower Shabelle region between April 2023 and over the year 2024. Al-Shabaab reportedly hindered humanitarian access in the region. An increase in child casualties due to mortar fire, unexploded ordnance and remnants of war was documented over the summer of 2023 and in early 2024 and mostly attributed to Al-Shabaab.
Despite the high number of fatalities, which includes also combatants, and looking at all the indicators, it cannot be concluded that mere presence in the region of Lower Shabelle would be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR.
Based on the strategic nature of the region, the significant number of incidents, and the nature of violence inflicted in the region as well as the high number of displaced persons, it can be concluded that indiscriminate violence in Lower Shabelle reaches a high level.
Middle Shabelle
The analysis below is based on the following EUAA COI report and query: Security 2025, 2.4.2.; COI Update 2025, 2.; Country Guidance should not be referred to as a source of COI.

The control of Middle Shabelle remained fragmented, with most of the region being under mixed, unclear, or local control shared between Al-Shabaab and the federal-aligned coalition forces. By mid-May 2025, al-Shabaab had managed to recapture most of the territory it had lost in Middle Shabelle since 2022 and by the end of July 2025 the group had deployed a significant number of troops and armored vehicles along a strategic road. However, at the end of June 2025, the SNA and allied forces managed to reclaim control of a zone long exploited by Al-Shabaab for recruitment and attacks, and still highly contested. Additionally,

violent conflicts have been reported between the Abgaal and the Hawadle clans.

The ongoing conflict between the federal-aligned forces and Al-Shabaab has led to a series of violent incidents, including targeted airstrikes on Al-Shabaab strongholds, battles over control of military bases and checkpoints, as well as the use of IEDs, suicide car bombings, remote violence, and attacks against civilians. From 1 April 2023 to 31 July 2025, ACLED recorded 600 security incidents (an average of 5 incidents per week), causing 2480 fatalities (representing approximately 245 fatalities per 100 000 inhabitants). In the period from 1 April 2023 to 16 March 2025, 66 238 individuals were newly displaced in Middle Shabelle. Al-Shabaab controlled a key road, disrupting the delivery of aid and daily supplies. In 2024, 14 humanitarian incidents were recorded.

Despite the high number of fatalities, which includes also combatants, and looking at all the indicators, it cannot be concluded that mere presence in the region of Middle Shabelle would be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR.

Based on the highly contested control of the region, as well as the high number of different kinds of security
incidents, including explosives and suicide attacks, it can be concluded that the indiscriminate violence in
Middle Shabelle reaches a high level.

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.5.2.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

In Mudug region, the main actors were the federal-aligned coalition forces and Al-Shabaab. The region is also characterized by distinct clan dynamics; the northern part is predominantly controlled by the Darod clan (Majerteen-Omar Mahmoud sub-clan), while the southern part is dominated by the Hawiye clan (Habar Gidir Sa'ad sub-clan).

Xarardheere town, historically a stronghold for Al-Shabaab fighters, was liberated in May 2024. As of February 2025, federal-aligned forces have regained control over key areas in southern Mudug, that had remained under prolonged Al-Shabaab control. Illustrative security incidents included battles, explosions and remote violence, violence against civilians and a drone strike.

Mudug's central part is fully controlled by federal-aligned coalition forces. Al-Shabaab fully controlled an area stretching from the border with Galgaduud region to towns of Ba'adweyne, Amara and Qey'a. Northern Mudug remained under the control of 'Autonomous armed forces (unionists)'. The unionists and the federal-aligned coalition forces had mixed control over Gaalkacyo city.

In the period from 1 April 2023 to 31 July 2025, ACLED recorded 262 security incidents (an average of 2.2 incidents per week), causing 1 894 fatalities (representing approximately 129 fatalities per 100 000 inhabitants). 30 787 people were newly displaced from Mudug due to conflict and insecurity, during the period from 1 April 2023 to 16 March 2025.

Southeastern Mudug is suffering from severe economic hardship, with many people being unable to secure food and water. Host communities remained overburdened. Due to security incidents, the access to humanitarian help was restrained. School education was also disrupted.

Despite the high number of fatalities, which includes also combatants, and looking at all the indicators, it cannot be concluded that mere presence in the region of Mudug would be sufficient to establish a real risk of serious harm under Article 15(c) QD/QR.

Based on the highly contested control of the region the high numbers fatalities, as well as the increased number of security incidents and IDPs, it can be concluded that the indiscriminate violence in Mudug region reaches a high level.

Indiscriminate violence not at a high level

COMMON ANALYSIS Last update: October 2025

Areas where indiscriminate violence is taking place, however **not at a high level**. Accordingly, a **higher level** of individual elements (see <u>Serious and individual threat</u>) is required in order to show substantial grounds for believing that a civilian, returned to the area, would face a real risk of serious harm in the meaning of Article 15(c) QD/QR.

The areas assessed as belonging to this category as well as the main elements leading to this assessment are highlighted below.

O Bakool

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.2.1.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Control over Bakool region remained mixed between FGS coalition and Al-Shabaab. The group controlled large rural areas, obstructing humanitarian aid, imposing taxes and recruiting children to its ranks. Most of the region's towns, including the capital, remained under the control of FGS. In April 2025, Al-Shabaab temporarily lifted a decade-long blockade in several towns of Bay and Bakool regions. However, at the end of July 2025, key roads connecting these regions and the route to Mogadishu remained largely blocked.

ACLED recorded 321 security incidents in Bakool region between 1 April 2023 and 31 July 2025 (an average of 2.7 incidents per week), resulting in 600 fatalities (representing approximately 110 fatalities per 100 000 inhabitants). Al-Shabaab was involved in 277 of the total security incidents. Notable incidents included an ambush staged by Al-Shabaab against Ethiopian troops and airstrikes targeting the group's positions. Between 1 April 2023 and 16 March 2025, 20 284 individuals were newly displaced from Bakool due to conflict and insecurity. Furthermore, nine humanitarian access incidents were reported in the region from April 2023 and over the year 2024, and in August 2024, Al-Shabaab blocked main supply routes, leaving the town dependent on airlifts and smuggling.

Despite the ongoing conflict between SNA and Al-Shabaab and taking into consideration the number of security incidents mainly involving warring parties, which followed relatively stable patterns in comparison to the reference period of the previous guidance, it can be concluded that indiscriminate violence takes place in Bakool however not at a high level.

O Bari

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.6.2.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI

In Bari region, armed confrontations involved Al-Shabaab, the ISS, and autonomous unionist forces. Al-Shabaab and ISS maintained a presence in key mountain ranges and parts of Bari, while most urban centers remained under autonomous unionist control, with some areas contested between actors. Violence included clashes between ISS, Al-Shabaab, and Puntland forces, car bomb attacks, suicide bombings, and airstrikes.

ACLED recorded 376 security incidents during the period from 1 April 2023 to 31 July 2025 (an average of 3.1 incidents per week), causing 1 241 fatalities (representing approximately 101 fatalities per 100 000 inhabitants). Between 1 April 2023 and 16 March 2025, 15 778 individuals were newly displaced from Bari due to conflict or insecurity.

Civilians experienced extortion by ISS, business attacks, and restricted access to livelihoods. Notable reported incidents include hospital closures, farmer displacement, and attacks on humanitarian workers and facilities.

Based on the number of security incidents and fatalities as well as the nature of violence, it can be concluded that indiscriminate violence takes place in Bari region, however not at a high level.

O Gedo

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.1.1.</u>; <u>COI</u> Update 2025, 2.; Country Guidance should not be referred to as a source of COI.

Gedo region remained a hotspot of armed confrontations involving Al-Shabaab, FGS, Jubbaland forces, and Ethiopian troops. Violence stemmed from political tensions between FGS and Jubbaland.

As of July 2025, control of the Gedo region remained fragmented among various actors. Al-Shabaab held large rural areas, while urban centers were divided between Jubbaland regional forces and the FGS coalition. Some areas experienced mixed control. Ethiopian forces seized key airports in late 2024, intensifying the conflict's complexity and strategic importance. Violence included Al-Shabaab attacks on military bases, clan clashes, IED road attacks, and FGS—Jubbaland armed confrontations. As of mid-July 2025, the FGS planned a new military deployment to some of these locations, with the reported objective to bring the entire Gedo region under the direct control of Villa Somalia. After days of intense fighting, Somali government forces regained full control of a key town, while causing widespread destruction and civilian deaths.

ACLED recorded 295 security incidents between 1 April 2023 and 31 July 2025 (an average of 2.5 incidents per week), resulting in 214 fatalities (representing approximately 22 fatalities per 100 000 inhabitants). Between 1 April 2023 and 16 March 2025, 94 452 individuals were newly displaced from Gedo region due to conflict or insecurity. Humanitarian workers and infrastructure were targeted in several attacks

Despite the ongoing armed confrontations between several actors and taking into consideration the number of security incidents and fatalities as well as the nature of the violence, including attacks on military bases, it can be concluded that indiscriminate violence takes place in Gedo region however not at a high level.

O Middle Juba

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.1.2.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Middle Juba region remained an Al-Shabaab stronghold as the group has kept control of virtually the entire region despite several operations conducted against them by SNA, Jubbaland forces, U.S., and Kenyan forces. Violence included ground offensives, targeted airstrikes, and public executions. Notable incidents reported involved airstrikes killing Al-Shabaab commanders and civilians.

ACLED recorded 72 security incidents during the period from 1 April 2023 to 31 July 2025 (an average of 0.6 incidents per week), causing 415 fatalities (representing approximately 96 fatalities per 100 000 inhabitants). Between 1 April 2023 and 16 March 2025, 52 217 individuals were newly displaced from Middle Juba due to conflict or insecurity.

Despite the increase of fatalities and the large number of IDPs and given the relatively low number of security incidents as well as the stable control of Al-Shaabab, it can be concluded that indiscriminate violence in Middle Juba is taking place, however, not at a high level.

O Sanaag

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>1.3.</u>, <u>2.7.2.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Sanaag is part of the Somaliland-Puntland contested areas. The western part of the region was controlled by the Somaliland administration with the remaining areas being largely under mixed control. Al-Shabaab maintained its presence in the northern part of the region. The conflict dynamics in Sanaag involved also clans in land, resources and inter-clan disputes, and fightings against Somaliland's forces. In July 2025 the SSC-K state formation process sparked clashes between SSC-Khatumo forces and Puntland security forces. ACLED recorded 72 security incidents in Sanaag between 1 April 2023 and 31 July 2025 (an average of 0.6 incidents per week), resulting in 129 fatalities (representing approximately 30 fatalities per 100 000 inhabitants). Illustrative incidents included violent clan disputes and fightings between clan militias and the Somaliland police forces. Between 1 April 2023 and 16 March 2025, 22 608 individuals were newly displaced from Sanaag due to conflict or insecurity. UNOCHA recorded 12 humanitarian access incidents from April 2023 and over the year 2024. Due to violent clashes displaced populations were left in dire humanitarian situation, while the humanitarian operations, business activities and schooling were reportedly completely disrupted.

Although conflicts between the various armed actors persisted, taking into consideration the nature of violence and that the numbers of recorded security incidents followed relatively stable patterns in comparison to the reference period of the previous guidance, it can be concluded that indiscriminate violence in Sanaag is taking place, however not at a high level.

O Sool

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>1.3.</u>, <u>2.7.1.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Sool is part of the Somaliland-Puntland contested areas. Control over the region's areas was divided between the autonomous armed forces of SSC-Khatumo (for the newly established autonomous administration of SSC-Khatumo, see Security situation in Somalia) and the Somaliland administration, with certain districts being under mixed control. Clan militias were also involved in the conflict.

ACLED recorded 140 security incidents in Sool between 1 April 2023 and 31 July 2025 (an average of 1.2 incidents per week), resulting in 340 fatalities (representing approximately 62 fatalities per 100 000 inhabitants). Somaliland military forces and SSC-Khatumo militia were involved in 56 of the recorded incidents, causing 255 fatalities. Illustrative incidents included an attack to a health facility and deadly clan violence. At district level, Laas Caanood recorded the most security incidents (59), followed by Buhodle (53) and Caynabo (14).

Between 1 April 2023 and 16 March 2025, 54 077 individuals were newly displaced from Sool due to conflict or insecurity. UNOCHA recorded 21 humanitarian access incidents in Sool between April 2023 and over the year 2024, including the damage of hospitals and the injuries of health workers.

Despite the ongoing conflicts between armed actors and considering the reduced number of recorded security incidents and nature of the violence, it can be concluded that indiscriminate violence in Sool region is taking place, however not at a high level.

No real risk

COMMON ANALYSIS Last update: October 2025

Areas where, **there is no real risk** for a civilian to be personally affected within the meaning of Article 15(c) QD/QR. This may be because the criteria for **an armed conflict** within the meaning of this provision **are not met**, or because **no indiscriminate violence is taking place**.

The areas assessed as belonging to this category as well as the main elements leading to this assessment are highlighted below.

O Awdal

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.8.1.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Al-Shabaab had no control of any territory in Awdal region. The entire region was reported to be under the control of the 'Somaliland administration (separatist)' and has generally been characterised by relative stability in the latest years. In September 2023, Gadabursi clan chiefs stated their desire for the Awdal region to secede from Somaliland. However, as of April 2025, no further information on this subject could be found.

Violence included clashes between protesters and security forces after the killing of an off-duty Somaliland police officer, by Somaliland police forces. Between 1 April 2023 and 31 July 2025, ACLED reported 7 security incidents (0.1 per week) and one fatality (approximately 0 fatalities per 100 000 inhabitants) and the number of newly IDPs (8) remained low.

Considering the generally stable control exercised by the Somaliland administration as well as the low number of security incidents and civilian fatalities, it can be concluded that in Awdal region there is no real risk for a civilian to be personally affected by indiscriminate violence.

O Nugal

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI reports: <u>Security 2025</u>, <u>2.6.1.</u>; <u>COI Update 2025</u>, 2.; Country Guidance should not be referred to as a source of COI.

Al-Shabaab had no reported presence in Nugal. The region was largely under 'autonomous armed forces' control, with some mixed/local control near the Galmudug-Puntland border. Increased security measures were noted in Garowe in August 2024 due to suspected Al-Shabaab infiltration. Violence included clashes between government forces and opposition clan militias over electoral disputes.

ACLED recorded 58 security incidents in Nugal region between 1 April 2023 and 31 July 2025 (an average of 0.5 incidents per week), resulting in 65 fatalities (representing approximately 10 fatalities per 100 000 inhabitants). A significant number of fatalities was the result of clashes linked to political opposition. Between 1 April 2023 to 16 March 2025, 48 200 individuals were newly displaced from Nugal region due to conflict or insecurity. Moreover, 29 humanitarian access incidents were reported in the region from April 2023 and over the year 2024, including an attack on humanitarian supplies and the delay in the processing of imported aid supplies. Also, school closings and local businesses and transport services facing disruptions were reported.

Considering that Al-Shabaab had no reported presence in Nugal and that security incidents and fatalities were mostly associated with political disputes, it can be concluded that in Nugal region there is no real risk for a civilian to be personally affected by indiscriminate violence.

O Todgheer

COMMON ANALYSIS Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.8.3.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Al-Shabaab does not control any territory in Todgheer region. The entire region is reported to be under the control of the 'Somaliland administration (separatist)'.

Violence included clashes between Somaliland forces and clan-based militias and inter-clan fights. On 15 May 2025, protests erupted in the capital of the region against the planned release of SSC-Khatumo prisoners. Security forces violently suppressed the demonstrations, resulting in at least six deaths, over 30 injuries, and the temporary arrests of hundreds of people, who were later released. ACLED recorded 24

security incidents in Todgheer between 1 April 2023 and 31 July 2025 (an average of 0.2 incidents per week), resulting in 18 fatalities (representing approximately 2 fatalities per 100 000 inhabitants). Newly displaced individuals due to conflict or insecurity were on the rise compared to previous years (7 712). The region experienced significant food aid looting.

Considering the generally stable control exercised by the Somaliland administration as well as the low number of security incidents and civilian fatalities, and despite the rising number of new IDPs, it can be concluded that in Todgheer region there is no real risk for a civilian to be personally affected by indiscriminate violence.

O Wogoyi Galbeed

Common analysis
Last update: October 2025

The analysis below is based on the following EUAA COI report and query: <u>Security 2025</u>, <u>2.8.2.</u>; <u>COI Update 2025</u>, <u>2.</u>; Country Guidance should not be referred to as a source of COI.

Al-Shabaab does not control any territory in Wogoyi Galbeed region. The entire region is reported to be under the control of the 'Somaliland administration (separatist)'. Violence included clashes between Somaliland forces, Gacaan Libaah militia and clan militias.

Notable incidents reported involved the killing of one person in election-related clashes in Baliguabadle, the killing of nine soldiers by Gacaan Libaah militia in Saaxil and the deaths of a police officer and a civilian by Ethiopian forces near the Ethiopian border. Between 1 April 2023 and 31 July 2025 ACLED reported 18 security incidents (0.1 per week), resulting in 27 fatalities (approximately 2 per 100 000 inhabitants). Furthermore, newly displaced individuals number (7) remained stable and low.

Considering the generally stable control exercised by the Somaliland administration as well as the low number of security incidents and civilian fatalities, it can be concluded that in Wogoyi Galbeed region there is no real risk for a civilian to be personally affected by indiscriminate violence.

Please note that in areas where there would be 'no real risk' for a civilian to be affected by indiscriminate violence within the meaning of Article 15(c) QD/QR, depending on personal circumstances, an applicant may still be exposed to a risk of persecution or a risk of serious harm under Article 15(a) or (b). Hence, this assessment of 'no real risk' should in no way be misconstrued as the designation of 'safe areas' for return or any other purposes.

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