



Republic of Uganda

OFFICE OF THE PRIME MINISTER

**Northern Uganda Social Action Fund IV (NUSAF IV)
P179904**

Environmental and Social Management

Framework (ESMF)

FEBRUARY 2025

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ACRONYMS

AHA	Anti-Homosexuality Act
CAO	Chief Administrative Officer
CBP	Capacity Building Partners
CDD	Community Driven Development
CDO	Community Development Officer
CPCs	Community Procurement Committee
CPMCs	Community Project Management Committee
CMGs	Community Monitoring Groups
CWC	Community Watershed Committee
CSO	Civil Society Organization
DEC	District Executive Committee
DTPC	District Technical Planning Committee
DIST	District Implementation Support Team
DLG	District Local Government
EISM	Enhanced Implementation Support and Monitoring
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
ESIA	Environmental and Social Impact Assessment
ESMPs	Environmental and Social Management Plans
GOU	Government of Uganda
GPN	General Procurement Notice
LIPW	Labour Intensive Public Works
MSNUR	Minister of State for Northern Uganda Reconstruction
NHS	National Household Survey
NUSAF	Northern Uganda Social Action Fund
NUSAF3	The Third Northern Uganda Social Action Fund
OPM	Office of the Prime Minister
PC	Parish Chief
PDC	Parish Development Committee
	PIU Project Implementation Unit
SLP	Sustainable Livelihood Program
IG	Inspectorate of Government
M&E	Monitoring and Evaluation
MIS	Management Information System
MoFPED	Ministry of Finance Planning and Economic Development
MoLG	Ministry of Local Government

MoU	Memorandum of Understanding
RPF	Resettlement Policy Framework
SCC	Sub-County Chief
SCEC	Sub-County Executive Committee
SIST	Sub County Implementation Support Team
STPC	Sub-County Technical Planning Committee
STAAC	Strengthening Transparency, Accountability and Anti-Corruption
ToRs	Terms of Reference
TST	Technical Support Team
TWG	Technical Working Group
UBOS	Uganda Bureau of Statistics
VHTs	Village Health Teams
VMPP	Vulnerable and Marginalized People Plan

EXECUTIVE SUMMARY

A. Background

Over the last three decades, Uganda has undergone a significant socioeconomic transformation; however, the country's growth trajectory remains uncertain due to stalled economic transformation and the continuing impacts of the Corona Virus Disease (COVID-19), undesirable impacts of climate change, high global food and fuel prices among others. In addition, there are poverty levels among the population at 20.3% UNHS (2019/20) with regional such as Acholi (67.5%) and Karamoja (65.7%) being highest. Most of the rural poor are dependent on subsistence agriculture, which is highly vulnerable to weather shocks and displays low productivity levels. Yet the country is least adapted to climate change. With the youngest populations globally with up-to 50 % younger than 17 years. This puts the country at high risk. Thus, necessitates support in form of social protection.

In May 2024 and subsequently, following the enactment of the Anti-Homosexuality Act (AHA), 2023, additional consultations were undertaken focusing on inclusion and nondiscrimination to include in this document and its annexes were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals or groups in providing or receiving benefits in World Bank- financed projects and programs in Uganda. These measures are described in various sections of this document and Annexes 12, 13 and 14.

B. The Northern Ugandan Social Action Fund IV (NUSAF IV)

The proposed project will thus, support interventions that promote sustainable livelihoods and enhance poor and vulnerable households' resilience to shocks in Uganda. It will focus on interventions that strengthen shock-responsive social protection systems, livelihood investments that allow poor and vulnerable households to increase and diversify their incomes, accumulate assets and savings, and develop linkages to markets. The project will be implemented in the Northern and Eastern regions of Uganda, covering the nine sub-regions of Acholi, Busoga, Elgon, Bukedi, Karamoja, Lango, West Nile, Bunyoro and Teso.

C. Project Development Objective

Is to support sustainable livelihoods, to enhance social safety net for shock responsiveness and human capital development and strengthen social protection delivery systems.

D. Project Beneficiaries

The project beneficiaries will be poor and vulnerable households living in poverty and/or disaster-prone districts, selected based on criteria related to poverty prevalence, vulnerability profile of the district (to hazards especially droughts and floods) and human development and labour market indicators. The specific beneficiary households will be identified based on a mixed approach of using participatory community-based wealth ranking as well as Proxy Means Testing (PMT). The main targets will be the youth and women who will benefit from both component 1 and 2.

E. Project Components

Project Components include;

Component 1: Sustainable Livelihoods Enhancement (\$95m): of the Project will support beneficiaries through a phased program which will deliver a “bundle of services” to overcome multiple constraints to productive economic activities such as capacity building to develop soft skills, technical and business skills, mentoring, linkages to markets, support to integrate savings and loans systems, productive grants. This component will target vulnerable youth in urban areas and poor households in rural areas (selection based on transparent and poverty and vulnerability- based selection criteria, among others). The package of support will be sequenced and help beneficiaries gradually becoming self-sustaining and integrating into the market economy, in line with evidence and experience from economic inclusion programs and youth employment programs globally and in the region.

Component 2: Strengthening Safety Nets for Enhanced Resilience and Human Development (\$100m): of the Project will support implementation of climate-smart Labour-Intensive Public Works (LIPW) – in line with experience with NUSAF 3 - targeted to able-bodied persons in poor and vulnerable households to address consumption constraints and build resilience. LIPW will be implemented in districts that are disaster prone by scaling up the disaster risk financing mechanism tested in NUSAF 3 that allows support through LIPW to households in the event of a disaster and reduces negative impacts of shocks. This component will expand coverage from districts prone to droughts to include floods-prone districts. In addition, this component will introduce human development enhancement interventions to support labour-constrained households with caring responsibilities (pregnant and lactating mothers), through cash transfers and co-responsibilities focusing on health,

nutrition, and child cognitive development outcomes.

Component 3: Transformational Delivery Systems (\$30m): Will strengthen social protection systems in the country through the introduction of a dynamic national social registry, which will allow timely identification of poor households by various programs, an important innovation under the proposed project.

Component 4: Program Management, Controls and Accountability (\$25m): Will support project coordination, implementation, management, communication, monitoring and evaluation (M&E), social and environmental risk management, and fiduciary support (including corruption prevention).

F. Lessons Learned and Reflected from NUSAF 2 and 3

Safeguards management under NUSAF 2 and 3 was successful due to; i) well established and defined capacity and implementation structure from national, district, sub county and community level; ii) Safeguards Management Information Systems module; iii) resource allocation for operations and ESMP costs; iv) implementation of stakeholder Engagement and communication plan; v) clear land donation process; vi) implementation of health and safety requirements including incidences and vii) proper monitoring, reviews (including audits) and certification of completed sub projects for compliance.

The successor project will do the same and to ensure all ESF activities are adequately implemented and lessons, good practices and innovations are documented and disseminated.

G. Purpose of the NUSAF IV ESMF

This Environmental and Social Management Framework (ESMF) was selected as the most appropriate environmental and social instrument under the World Bank ESF for assessing, managing and monitoring environmental and social risks and impacts of the NUSAF Project, given that the full nature, scope and geographical locations of the sub-projects were not exactly known at the time of preparing this ESMF. The ESMF establishes processes and tools to be directly implemented by NUSAF IV, Technical Leads (National, District and Sub Counties) and communities in assessing the risks and impacts of sub-projects. This will facilitate the recommendation of appropriate mitigation and monitoring measures for each sub-component and/or activity.

The main purpose of this ESMF is therefore to establish procedures and methodologies for

environmental and social assessments, review, approval and implementation of investments to be financed under the Project, as the nature, scope and locations of activities become known during the implementation of the Project.

The ESMF describes the appropriate roles and responsibilities of NUSAF IV, Technical Leads, communities and other stakeholders, and outlines the reporting procedures on social and environmental issues. It describes the managing and monitoring processes of environmental and social concerns related to the project investments.

It further determines the training, capacity building and technical assistance required for NUSAF IV and Technical Leads to successfully implement the provisions of the ESMF; and provides practical information resources for implementing the ESMF.

It also lays out the Project's staffing and institutional arrangements clarifying the relations between NUSAF IV-TST as the key implementer (Safeguards Team), District Local Government (Technical leads DEOs, CDOs etc.), and the World Bank- including their roles and responsibilities in view of the implementation of the ESMF.

H. Approach and Study Methodology in NUSAF IV ESMF Preparation

The ESMF was prepared by a joint team of technical officers from line Ministries and Agencies that oversee the implementation of environmental and social safeguards requirements in government and donor funded projects. These included Office of the Prime Minister- DRDIP, the Ministry of Gender, Labour and Social Development (MGLSD), Ministry of Water and Environment, National Forestry Authority (NFA), Uganda National Meteorological Authority (UNMA), National Environmental Management Authority (NEMA) and External Resource Persons from District Local Governments in the area of Environmental and Social Safeguards. It was prepared in line with good international practices, the World Bank ESF standards, Health and safety regulation, GBV and VAC requirements, the National Environment Act of 2019 as well as other applicable policies, laws and regulations. The ESMF was prepared through:

- Document/literature review
- Content analysis from official government and donor reports
- Field Consultations with key stakeholders

- Disclosures through meetings, workshops and on websites (OPM, World Bank, among others) upon approval by the World Bank.

I. Identified Environmental and Social Risks and Impacts

Environmental health and safety risks

Based on initial scoping, the potential environmental risks and impacts of the project are anticipated to be substantial, given that the project will support activities associated with components 1 & 2. Activities under these components will generate possible negative impacts on natural environment or existing agricultural produce. The climate smart construction structures including soil and water conservation (terracing, tree growing, reforestation of river buffering areas, and construction of gulley control structure. etc.) if not well managed, could negatively impact rivers or lead to the degradation of soils. gulleys and irrigated land will need to be investigated in terms of the efficiency of water use, and it needs to be ensured that actual practices in construction of physical soil and water conservation structures do not result in additional challenges. A forward-looking perspective will consider the life cycle of the new interventions and ensure that they are resource efficient and sustainable. A broader perspective needs to consider the overall environmental and vulnerability context of the highland areas of Elgon, Karamoja and the Albertine regions. There are also risks related to waste management in livelihood activities as well as occupational health and safety (OHS) impacts arising from chemical hazards. Physical hazards (accident or injuries) from the LIPW activities and spread of communicable diseases such as Ebola, COVID-19 and HIV/AIDS; as well as community health and safety impacts (CHS) - air, soil and water contamination from earth disturbance.

Social risks

Based on initial scoping, the activities are anticipated to generate substantial social risks arising from implementation of different components; activities are site-specific, without likelihood of impacts beyond the actual footprint of the project. Specific project activities are expected to have substantive positive impacts on beneficiary communities. Social Risks related to Gender-based Violence and Violence Against Children; HIV/AIDS Concerns, COVID-19 and the Ebola spread, likelihood of excluding and discriminating against vulnerable or marginalized

individuals or groups following the enactment of the AHA in 2023, but also those vulnerable based on age, income, disability, ethnicity, etc. from project benefits and activities. Although all the Components 1:2:3 target vulnerable youth and poor households, failure to have clear screening and selection criteria could lead to exclusion of vulnerable or marginalized individuals or groups in the process, poor labour and working conditions such as; lack of employment contracts, summary dismissals, lack of gender-sensitive sanitary facilities, lack of meals and drinking water and exclusion or discrimination of vulnerable or marginalized individuals or groups from employment opportunities etc. -this ESMF provides step by step guidance on how the above Negative impacts resulting from components shall be mitigated. This guidance includes; screening and development of site specific environmental and social management plan (ESMP) for each subproject funded, mitigation measures implementation process, reporting, monitoring and evaluation. The risk rating and project design also takes into consideration of contextual factors such as the complex context of the post-emergency operation and aggravated vulnerabilities of intended beneficiary populations, including food insecurity, loss of life, non-discrimination, community cohesion and displacement caused by climate risks and vulnerabilities.

Service providers will also be recruited to provide capacity building on discrimination to all relevant stakeholders. In addition, the World Bank has hired an international firm which is already working with Ugandan CSO on ongoing World Bank financed projects to undertake an Enhancement Implementation Support and Monitoring (EISM) and strengthening of the GRMs to ensure they include an effective, safe, ethical, and confidential mechanism to receive, manage, refer and monitor grievances related to exclusion and discrimination. It will provide support for enhanced monitoring of the risk of exclusion or discrimination for individuals or groups who may be vulnerable or marginalized following the enactment of the AHA. NUSAF IV has been designed to also benefit from the services of the EISM firm once the Project becomes operational. Further details of the GRM support and enhanced monitoring from the Firm can be found in Annexes 13 and 14.

J. Legal and Policy Framework

The relevant policy frameworks, laws, and policies of Uganda, International and Regional Environmental instruments/obligations of Uganda are recognized and are included in this ESMF.

K. World Bank ESF standards applicable to NUSAF IV

Furthermore, the ESMF complies with the World Bank Environmental and Social Standards (ESSs) under the new Environmental and Social Framework (ESF), the World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines, and thematic/sectoral WBG EHS Guidelines. The ESS relevant for the Project are:

- a. ESS 1 (Assessment and Management of Environmental and Social Risks and Impacts)** as it sets out the borrower's responsibility for assessing, managing and monitoring ES risks and impacts throughout the Project's life cycle;
- b. ESS 2 (Labour and Working Conditions)** sets out the labor and working conditions, which the borrower is obliged to comply with through the development and implementation of labor management procedures, and which is relevant as the Project will employ community and contracted workers;
- c. ESS 3 (Resource Efficiency and Pollution and Management)** sets out requirements in regard to addressing resource efficiency and pollution prevention and management with the objective to promote sustainable use of resources. It is applicable, as the Project needs to ensure appropriate waste management in some of the activities and should aim for resource efficiency in the restoration of communal infrastructure.
- d. ESS 4 (Community Health and Safety)** addresses the health, safety and security risks and impacts on project-affected communities, with the objectives to avoid adverse impacts on health and safety of community members. Although the Project aims to improve the lives of previously affected communities, it needs to be ensured that Project activities do not pose any unintended negative consequences on communities.
- e. ESS 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement)**, aims to avoid involuntary resettlement, forced eviction, and aims to mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use. The ESMF has outline screening procedures and voluntary Land Donation protocol and procedure attached.
- f. ESS 6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources)** aims to protect and conserve biodiversity and habitats, promotes sustainable management of living natural resources, and supports livelihoods of local communities. The Project will implement activity-specific screening procedures for

biodiversity risks and impacts likely to occur from the activity.

- g. ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.** This standard is relevant as the project will be implemented in locations that have VMGs like the IK, in Karamoja. Implementation of activities under components 1 and 2 will involve communities in these areas and a. A VMGP will be prepared prior to commencement of activities in areas that have VMGs with specified timeline.
- h. ESS 8 (Cultural Heritage)** aims to protect cultural heritage from the adverse impacts of project activities and support preservation, as well as promoted equitable sharing of benefits from the use of cultural heritage. No major affection of any cultural heritage sites is anticipated under the Project; however, the Project may have to handle chance cultural findings, following Chance Find Procedures.
- i. ESS 10 (Stakeholder Engagement and Information Disclosure)** recognizes the importance of open and transparent engagement vis-à-vis project stakeholders and ensures an inclusive process is conducted throughout the lifecycle of the Project. This process has already commenced through the Stakeholder Engagement Plan (SEP), laying out all the different types of stakeholders, timings and modes of communication and consultation.

L. Institutional Roles and Responsibilities for Implementing the ESMF

Office of the Prime Minister, which is the main implementing Agency, shall establish and maintain a Project Implementation Support Team (PIST) at the Project Implementation Unit (PIU) with qualified staff and resources, including an Environmental Specialist, Social Development Specialist, and Gender Specialist, to support management of ESHS risks and impacts of the Project.

These PIU Specialists will be supervised by the Project Director and shall work closely with the decentralized structures at the district including the Environmental officers and community development officers as well as health persons at district. At the sub county level, the community development officers and health persons, and at the parish and community levels, the persons tasked with the responsibility of safeguards implementation are parish chiefs, community facilitators and as well as Village Health Teams (VHTs).

The PIU safeguards staff will adopt and implement the ESMF throughout Project implementation.

1. aAdopt and implement the ESMF for the Project consistent with the relevant ESSs.
2. Prepare, consult upon, adopt, disclose, and implement the sub-project site-specific environmental and social instruments, such as Environmental and Social Impact Assessments (ESIAs) and corresponding Environmental and Social Management Plans (ESMPs), as set out in the ESMF in a manner acceptable to the Association.
3. The proposed subprojects/ activities described in the exclusion list set out in this ESMF shall be ineligible to receive financing under the Project.
4. Environmental and Social staff will oversee the implementation of the monitoring plan.

M. Environmental and Social Risks Rating

The environmental and social risks rating for NUSAF IV is considered substantial

N. Procedures for Screening and Site-Specific ESIAs and ESMPs

Screening of sub-project activities and sites

PIU-Safeguards Team. The safeguards staff from PIU will provide districts and sub counties with necessary tools and templates to support screening process.

The Safeguards team will also train the district and sub county teams on the procedures for screening and as well as uploading of screening data to the project MIS systems.

The Sub- County Implementation Support Team (SIST) with guidance from the CDO and the DEO will constitute subproject appraisal teams, comprised of members of relevant line departments with knowledge in the subproject proposals received. After the desk appraisal, the Sub-County appraisal teams will undertake a field appraisal of each subproject at the respective sites to verify the magnitude of the environmental and social issues, the adequacy of mitigation measures provided; the cost of implementing mitigation measures, suggest modifications to be incorporated in the environmental and social components of the subproject (if any) and finalize the appraisal report. The report will be reviewed by the Sub- County Technical Planning Committee (STPC), endorsed by the Sub County Executive Committee (SEC) for onward submission by Senior Assistant Secretary (SAS) to the District Technical Planning Committee (DTPC).

The District Technical Planning Committees and District Environment & natural resources Committee & Social service committee will review the results and recommendations presented in the environmental and social screening forms and the proposed mitigation measures presented in the environmental and social checklists as a basis for making recommendations for subproject approval.

Recommendation for Subproject Approval: After analyzing the data contained in the environmental and social screening forms and after having identified the right environmental and social risk rating (which should largely remain substantial or lower) and the scope of the environmental and social work required, the Environment and social Focal Persons i.e., DEO and CDO will make recommendation to the District Technical Planning Committee whether: (a) no additional environmental work is required; (b) the implementation of simple mitigation measures will be adequate enough; (c) a project brief will be required, or (d) a full ESIA will be required.

Based on the results of the above review process, and consultations with the relevant stakeholders and potentially affected persons, including the Vulnerable and Marginalize Groups such as the IK, the DTPC will proceed to approve or reject a subproject.

The PIU-Safeguards team shall disclose all approved sub projects prior to disbursement in country and a copy of disclosure shall be sent to NEMA and World Bank safeguards team

Grievance Redress Mechanism (GRM)

NUSAF IV will establish a robust grievance and complaints mechanism for management of all project grievances. Grievance handling will, be at grassroots level, be anchored in Grievance Redress Committees (GRC), and ultimately linked to the Inspectorate of Government (IG) Community Monitoring Groups (CMGs). The CMGs and GRCs will be focal points and will initiate a response to such grievances that shall be based on prevention, detection, and consequence. These committees shall meet at least once every month and shall submit their reports to the Sub-County CDO through Community Facilitators and their respective Community Watershed Committees on monthly basis.

The grievance handling system will, depend on the severity and potential criminal liability of grievance, invoke referrals by the NUSAF IV grievance handling function to:

- refer the matter to the District Land Tribunal for land-related issues.

- The disciplinary regulatory system of the Ministry of Local Government (for Local Government employees at district level and below).
- The Inspector of Government (IG) for all levels of civil servants and elected government officials in accordance with the constitutional roles.
- The Police, Director of Public Prosecution (DPP), and the Judiciary as ultimately is the case with all Ugandan citizens in cases of criminal liability for collusion and corruption.

Like in NUSAF3, the STAAC implemented a GRM through SMS and other convenient media of communication like mobile phone calls. **A toll-free SMS Corruption reporting system called “Report 2 IG” will be used to report grievances as well in NUSAF IV.** The hotline **0414-347387** will allow citizens to report grievances to the IGG at no cost and at any time. The IG also has regional offices in Arua, Gulu Hoima, Soroti, Moroto, Mbale, Tororo, Jinja and Masindi.

O. Proposed 3-year ESMF implementation budget for NUSAF IV

Table 1: ESMF Implementation budget.

ITEM	,000 USD				
	Year 1	Year 2	Year 3	Year 4	Year5
Training of CDOs, DEOs, and NDOs in safeguards management (environment, social, vulnerability issues, GRM issues, monitoring and reporting etc.)	250,000	250,000	250,000	250,000	250,000
Facilitation of CDOs, NDOs and DEOs to screen sub-projects	200,000	200,000	200,000	100,000	50,000
Facilitation for extension workers (DVOs, DFOs, Community Animal Health Workers, agricultural extension staff etc.) to train beneficiaries and monitor implementation of safeguards (IPM and pesticide use, soil conservation, animal husbandry, etc.)	300,000	100,000	50,000	50,000	50,000
Environmental and Social Audit		300,000			300,000
Technical Back stopping and Compliance assessment, Monitoring & documentation of innovation & good practices	100,000	100,000	100,000	100,000	50,000
GBV and VAC action Plan activities	50,000	50,000	50,000	50,000	50,000
Cross learning and exchange visits for international good practice		300,000			
RPF activities including development of VMGPs & activities	725,000				

ITEM	,000 USD				
	Year 1	Year 2	Year 3	Year 4	Year5
Sub-totals	900,000	1,300,000	650,000	550,000	750,000
Total Budget Estimates (2.5% of the overall sub projects funds under component 1 and 2)					4,875,000

P. Disclosure

This ESMF will be disclosed by having an overview published in the local newspapers, on OPM's website and in the World Bank's in compliance with relevant Ugandan environmental regulations and the World Bank ESF procedures. OPM will also provide copies of the respective environmental screening reports for disclosure by the World Bank for public access.

Q. Conclusion

The overall environmental and social impacts of the NUSAF IV project are expected to be positive through alleviating pressures on the poor however if not well managed could lead to unsustainable exploitation of natural resources and environmental degradation. The community subprojects may involve limited degree of land take and displacement of other land-uses and/or livelihoods. Therefore, by their nature, the project components 1 and 2 have localized negative environmental and social impacts. For this reason, the project is rated as with substantial risks. The project ties in the twin goals of the World Bank group of alleviating poverty and promoting shared prosperity. The potential environmental and social impacts can be adequately managed by integrating environmental and social due diligence into the subproject cycle. This ESMF provides a step-by-step guidance on how to identify potential adverse environmental and social impacts from project activities, and how to plan, implement and monitor mitigation measures.

INTRODUCTION

1.1 Background

Following the World Bank Group's communications with the enactment of the AHA, the Government of Uganda issued five Circulars (see Annex 12). Of particular importance is the Circular on Uganda's Social Safeguard Policies issued on September 21, 2023, by the Ministry of Finance, Planning and Economic Development, to all Accounting Officers, Ministries, Departments and Agencies and Local Governments which states that:

- “All World Bank-financed projects [in Uganda] must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements.
- Under these projects, no one will be discriminated against or stigmatized, and the principles of nondiscrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank [financed] projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring [the Enhanced Implementation Support Mechanism] where applicable.
- Each project implementation entity shall develop comprehensive guidelines to address nondiscrimination.”

Considering this, further consultations were undertaken on nondiscrimination for the project environmental and social risk management documents including this ESMF to identify the additional risks and describes mitigation measures to address these risks. They include the implementation, monitoring, and reporting arrangements, and roles and responsibilities to assess the efficacy of the additional mitigation measures being implemented in some of the ongoing World Bank supported projects. They also include the risks identified in the public consultations on these documents involving the Government of Uganda and civil society organizations. Noteworthy is that the World Bank will provide support to the Government of Uganda, particularly its Project Implementation Units, to help them to implement the

additional mitigation measures for this project.

Over the last three decades, Uganda has undergone a significant socio-economic transformation. However, the country's growth trajectory remains uncertain due to stalled economic transformation and the continuing impacts of the Corona Virus Disease (COVID-19), undesirable impacts of climate change, high global food and fuel prices among others. In addition, there are poverty levels among the population at 20.3% UNHS (2019/20).

There are persistent disparities in poverty rates by location, with rural areas and the Northern and Eastern regions exhibiting the highest poverty rates. In 2019/20, the poverty rate in rural areas was 33.8 %, much higher than the urban rate of 19.8 %. The highest poverty rates are observed in Acholi (67.5 %) and Karamoja (65.7 %). Another important correlation of poverty is working in subsistence agriculture, with 77 % of poor households working in agriculture. Agriculture in Uganda is highly vulnerable to weather shocks and displays low productivity levels. The situation could further deteriorate as Uganda continues to be amongst the world's most vulnerable and simultaneously least adapted countries to climate change. Demography also plays an important role in poverty status. Uganda has one of the youngest populations globally as 50 % of the population is younger than 17. This is especially relevant given Uganda's high population growth rate and high correlation of poverty with household size.

The Northern Uganda Social Action Fund Project aims at supporting sustainable livelihoods, enhancing the poor and vulnerable households' resilience to shocks and strengthening shock-responsive social protection systems in Uganda.

In order to aid various stakeholders to identify and effectively manage potential environmental and social risks and impacts during the implementation of the proposed project; environmental and social due diligence instruments have to be prepared in accordance with international good practice as well as the World Bank Environmental & Social Framework (ESF) and Government of Uganda (GOU) requirements particularly the Social Safety and Health Safeguards Guidelines; and the Environmental and Social Safeguards Guidelines of 2020.

1.2 Northern Uganda Social Action Fund (NUSAF IV)

The Government of Uganda, through the Office of the Prime Minister, is in the process of

securing funds from the World Bank to implement the Northern Uganda Social Action Fund IV (NUSAF IV) Project. The project is a successor to NUSAF 3 which ended in the year 2020 (New Vision, 2022). The project will support Government's efforts in reducing poverty and addressing vulnerabilities of the communities by building on the achievements and components of NUSAF 3 including: (i) the Labour Intensive Public Works (LIPW) approach to address vulnerability and poverty (ii) the sustainable livelihood options - tapping on already existing community savings groups and mobilizing and supporting other poor households to form savings groups of their own (iii) the Strengthening Transparency, Accountability, and Anti-Corruption (STAAC) component (iv) a Disaster Risk Financing (DRF) to ensure rapid flow of funds in the case of a shock to effectively protect household welfare; and (v) the strengthening of social protection systems at the national level to ensure a timely response to shocks, such as climate change or the COVID-19 pandemic.

1.3 Social protection in Uganda

Governments all over the World recognize Social Protection as a crucial component of national development strategies for achieving inclusive, pro-poor and equitable growth. Social Protection has emerged as an important intervention for supporting the population to maintain a minimum acceptable level of consumption and live dignified lives. The GOU recognizes the contribution of social protection to National development and has taken steps to develop the sector over the last 20 years. This Commitment is manifested in the adoption of the National Social Protection Policy (NSPP) and the Programme Plan of Implementation (PPI) for the policy in 2015, among other frameworks. The commitment to develop the social protection sector is premised on the socio-economic benefits of investing in social protection including social care and support.

1.4 The project development objective (PDO)

The Project Development Objective (PDO) is to support sustainable livelihoods, enhance poor and vulnerable households' resilience to shocks, and strengthen shock-responsive social protection systems in Uganda.

The following indicators will track progress towards achievement of the PDO:

- Share of beneficiaries of livelihood support activities reporting increased income (%age, sex disaggregated).
- Share of safety net beneficiaries who no longer use negative coping strategy (%age, sex disaggregated).
- Number of districts covered by the National social registry where data of at least 75% of the targeted households are collected and processed OR *alternative indicator*: Establishment of a dynamic social registry (OR at intermediate outcome level).

1.5 May 2024 Inclusion of Mitigation Measures to the ESMF

In May 2024 and subsequently, following the enactment of the Anti-Homosexuality Act (AHA), 2023, additional consultations were undertaken focusing on inclusion and nondiscrimination to include in this document and its annexes were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals or groups in providing or receiving benefits in World Bank- financed projects and programs in Uganda. These measures are described in various sections of this document including section 6.3.2.12 and Annexes 12, 13 and 14.

1.6 Rationale for the ESMF

This ESMF was selected as the most appropriate environmental and social instrument under the World Bank ESF for assessing, managing and monitoring environmental and social risks and impacts of the proposed NUSAF IV Project, given that the full nature, scope and geographical locations of the sub-projects were not exactly known at the time of preparing the ESMF. The ESMF establishes processes and tools to be directly used by NUSAF IV Technical Teams (National, District and Sub Counties) and communities in assessing the risks and impacts of sub-projects. This will facilitate the recommendation of appropriate mitigation and monitoring measures for each sub-component and/or activity.

1.7 Objective of this ESMF

The objective of the ESMF is to assess and mitigate potential negative environmental and

social (E&S) risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements.

Specific objectives of the ESMF are to:

- a. Assess the potential environmental and social impacts of the Project;
- b. Establish clear procedures and methodologies at the subproject level, for screening, identification of environment and social impacts and for mitigation, monitoring and institutional measures;
- c. Develop Environmental and Social Management Framework Guidelines for the mitigation of the potential negative impacts and for monitoring compliance with the relevant Environment and Social Standards (ESSs) of the World Bank ESF and national requirements.
- d. Assess the capacity and training of the implementing agencies at the national and local levels, to implement the developed environmental and social management framework.
- e. Make information available to stakeholders and the public to foster consensus and project ownership or collective responsibility for socio-environment actions; and
- f. Establish the necessary funding requirements for the implementation of the ESMF.

In line with environmental and social requirements of GOU and the World Bank' Environmental and Social Framework (ESF), the ESMF shall be applied to the project activities/components. The ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures. Appropriate institutional arrangements for implementing the ESMF and capacity building needs have also been provided in the ESMF.

1.8 Methodology used to prepare the ESMF

The ESMF was prepared based on the following methodology;

- Document review.
- Consultations with key stakeholders.

1.8.1 Document Review

The key documents that were reviewed include the most recent NUSAF Project Aide Memoire, the NUSAF IV Project Appraisal Document (PAD), the World Bank NUSAF IV Environmental and Social Review Summary (ESRS), the NUSAF IV Environmental and Social Commitment Plan (ESCP). Other documents reviewed were; Uganda's Vision 2040, National Development Plan (NDPIII), Parish Development Model (PDM), State of Environment Report 2021, Uganda National Social Protection Policy (2015), the Constitution of the Republic of Uganda and other relevant policies and laws, The National Equal Opportunities Policy, Other documents included, World Bank reports; World Bank Managing Risks of Adverse Impacts on Communities from temporary projects induced influx (2016); Good Practice Note addressing Gender Based Violence in Investment Projects, Financing involving Major Civil Works (2018); Working together to prevent sexual exploitation and abuse; Recommendations for World Bank Investment Projects (2017). Reports and guidelines from Development Partners such as UNDP, UN Women and the United Nations High Commission for Refugees (UNHCR) were also reviewed. The team also reviewed related ESMFs from ongoing & just concluded sister projects like the Investing in Forests & Protected Areas for Climate-smart Development (IFPA-CD), generating growth Opportunities Women (GROW), the Albertine, NUSAF3 & DRDIP.

1.8.1 Consultations with key stakeholders

ESS 10 recognizes the importance of inclusive and meaningful engagement between the Borrower and project stakeholders as an essential element of good international practice. Early and effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. In keeping with the requirements of ESS10, OPM took cognizance of the existing World Bank (March 2020) and Ministry of Health 2020 guidelines in relation to stakeholder consultations.

The initial phase of this study saw meetings between the ESMF/RPF consultant meet with; district political and technical officials (District Chairpersons, Resident District Commissioners-RDCs and Chief Administrative Officers-CAOs), District technical Officers i.e. District Agricultural Officers (DAOs), District Environment Officers (DEOs), Community Development Officers (CDOs), District Engineers, Lands Officers and District Physical Planners, Extension Workers in the sampled districts that represented the proposed project area. Focus Group Discussions (FGDs) were also organized with members of

marginalized and vulnerable groups who were consulted in the process. Particular attention was paid to the needs of vulnerable or marginalized individuals or groups especially those below the poverty line, the elderly, women and children, child-headed families, the disabled, and others (people with special needs- PSNs). Additional consultations were held in January 2024 to specifically discuss the vulnerability of some individuals or groups to discrimination. Further details on these discussions are found in section 7.6. Annex 11 provides details of consultations done during the ESMF development process.

1.9 Relation of the ESMF to other safeguards instruments/documents

This ESMF will not be implemented in isolation. It will be complemented/used together with other environmental and social safeguards instruments for the NUSAF IV project which include the Stakeholder Engagement Plan (SEP), Resettlement Policy Framework (RPF), Labour Management Plan, Pest Management Plan, Vulnerable & Marginalized Groups' Plan, etc.

1.10 Overview of the project implementation arrangements

The implementation of the project will be mainstreamed into existing government structures at national and local government levels. Accordingly, all levels of governments will have roles in providing oversight and implementation support. Local authorities will be responsible for oversight and coordination of the project implementation at district, sub county and community levels. The community will have a leading role in the identification, prioritization and implementation of their prioritized project activities. The PIU will set forth the roles and responsibilities of all stakeholders of the project. In addition, the PIU will also include details of all operational and procedural steps regarding reviews and approvals of specific activities, flow of information, detailed description of project management and implementing bodies, procurement and financial management arrangements, reporting requirements, and manual amendment procedures.

1.11 Project Financing and duration

The NUSAF IV project will be funded through a US\$ 250 million equivalent grant and will operate over 5 years.

PROJECT DESCRIPTION

The proposed Project is called Northern Uganda Social Action Fund IV (NUSAF IV). The Project Development Objective is to support sustainable livelihoods, enhance social safety nets for shock responsiveness and human capital development & strengthen social protection delivery systems. The Project will be implemented through 4 major components, namely: Sustainable Livelihood Enhancement; Strengthening Safety Nets for Enhancing Resilience and Human Development; Transformational Delivery Systems and Program Management.

1.12 Description of project components

1.12.1 Component 1: Sustainable Livelihoods Enhancement (\$95M)

This component builds from the success made under NUSAF3 and shall continue supporting the Government of Uganda in implementing customized economic and social inclusion activities addressing the needs of the poor and vulnerable households in the subsistence economy (both in agriculture and low productivity services), especially in the Northern and Eastern regions of Uganda. While economic and structural transformation is the main driver of productivity growth and poverty reduction in most countries, the specific geographical challenges, increased impact of climate change, social instability affecting the northern districts and poverty traps are preventing this process to happen at a faster pace, and keeping people trapped in low productivity jobs in rural and increasingly also in urban areas. This component aims to alleviate constraints to poor and vulnerable households' productive inclusion in the market economy, through a phased program which will deliver a bundle of services to overcome multiple constraints. Due to the population's particularly young age structure, and the increasing rates of inactivity and underemployment among the youths, this component shall also focus on vulnerable youths including girls.

1.12.2 Component 2: Strengthening Safety Nets for Enhanced Resilience and Human Development (\$105M)

Building on results and lessons learned from NUSAF3 and other similar programs in the region, the component shall support poor and vulnerable households through layered safety-net support. This will include Expansion of gender and climate-smart LIPWs to support able-bodied persons in poor and vulnerable households to address their consumption constraints and contribute to building resilience at local level against shocks. The LIPW shall provide beneficiaries from poor and vulnerable households a seasonal wage in return for their participation in gender and climate-smart LIPWs. The component will also support Labour-constrained households with caring responsibilities such as pregnant and lactating mothers with

children under 2 years through “cash plus interventions” to enhance health, nutrition, and child cognitive development outcomes. The component will further support scaling up disaster risk financing interventions to support more households and districts during times of shocks. The aim is to implement a mechanism for scaling up assistance to poor and vulnerable households in response to droughts, floods and landslides to develop a system to pre-arrange financing for the costs of this expansion.

1.12.3 Component 3: Transformational Delivery Systems (\$25M)

This component shall support the enhancement of social protection delivery systems to be shock-responsive and introduce digital delivery mechanisms. The strengthening of social protection delivery systems with a national outreach shall be an important innovation, which supports the objective of making a shift from a project to program approach. This component shall build on, and complement the work supported under NUSAF 3 and social protection systems strengthening ASA on development of national single registry and scaling up digital payments to social protection beneficiaries. This component will support setting up delivery systems that allow efficient and effective support to the poor and vulnerable households for delivery of social and economic inclusion programs as well as timely shock/crisis response support.

1.12.4 Component 4: Program Management, Controls and Accountability (\$25M)

The program management component shall support project coordination, implementation, management, communication, monitoring and evaluation (M&E), environmental and social risk management, and fiduciary support. Indeed, given fiduciary risks. This component shall support robust control and accountability functions, building on the previous Strengthening Transparency, Accountability, and Anti-Corruption (STAAC) interventions and further strengthen citizen engagement and risk management through engagement of institutions such as Inspectorate of Government (IG). Based on the experience of NUSAF3, a dedicated allocation will also finance a robust M&E function. This component will also include the support to the monitoring of environmental and social risks related to project implementation, and a robust citizen engagement and communications program to support outreach on the NUSAF IV program and to ensure full engagement of stakeholders to ensure impact of the program activities.

1.13 Project location

NUSAF IV Project is proposed to cover areas that have been reported to exhibit the highest poverty rates and these include the Acholi sub-region (67.5%) and Karamoja sub-region (65.7%). There are persistent disparities in poverty rates by location, with rural areas and the Northern and Eastern regions exhibiting the highest poverty rates. In 2019/20, the poverty rate in rural areas was 33.8 %, much higher than the urban rate of 19.8 %.

The project is proposed to cover the nine sub-regions and these include; West Nile Sub-Region, Acholi Sub-Region, Lang'o Sub-Region, Karamoja Sub-Region, Teso Sub-Region, Elgon Sub-Region, Bukedi Sub-Region, Busoga Sub-Region and Bunyoro Sub-Regions. The project shall cover 84 districts, 1,349 Sub counties/towns/divisions, 6,771 parishes and 45,197 villages. These are in Figure 1 below

1.14 Core beneficiaries

The project will target poor and vulnerable households living in poverty and/or disaster-prone districts. The project will use a two-tiered approach for targeting project beneficiaries. Firstly, it will select geographical areas based on an objective criterion related to poverty prevalence, vulnerability profile of the district (to hazard especially drought and floods), and human development and labour market indicators. Secondly, after geographical targeting is completed, potential households will be identified in the selected areas based on a mixed approach of using Proxy Means Testing (PMT) combined with participatory community-based wealth ranking and validation exercise to profile the households for delivery of most relevant interventions supported by the project.

This approach will build upon the best practices and lessons learned from various countries which have used objectively verifiable PMT tools for measurement of household welfare along with triangulation of data with other related databases, as well as NUSAF3's rich experience with community-based targeting systems. The overall targeting system will be guided by defining the roadmap for operationalization of dynamic social registry during preparation. Based on initial estimates and component financial allocations: under component 1; 100,000 beneficiaries will be supported with a full livelihood package and 1,500,000 beneficiaries will be supported under component 2 of safety nets for enhanced resilience and human capital development.

1.14.1 Component 1 beneficiaries

Vulnerable youths will benefit from activities under this component, as they will be the primary target group, given the unique demography of Uganda, and rising levels of inactivity and unemployment, as well as underemployment among them. They shall benefit from skills development and empowering interventions, as well as access to finance and markets. Women will also be a particular target group and the project will ensure they are equally represented among beneficiaries.

1.14.2 Component 2 beneficiaries

The project aims to support the poor and vulnerable households in disaster-prone areas through LIPW to enhance safety nets for resilience & human development. The component activities will support labor-constrained households with caring responsibilities such as

pregnant and lactating mothers with younger children with “cash plus interventions” to enhance health, nutrition, and child cognitive development outcomes. The target beneficiaries shall include; the elderly, the orphans, single mothers, child headed families, ill health (e.g., nodding disease syndrome, TB, HIV/AIDS), victims of civil wars, VMGs, Karamojong warriors, people affected by disasters (drought, landslides, floods), veterans (Ex-servicemen) and DRF beneficiaries based on trigger mechanism.

1.14.3 Component 3 beneficiaries

The project aims to Strengthen Social Protection Systems with a national outreach by setting up a national social registry and scaling up digital payments that allow efficient and effective support to the poor and vulnerable households for delivery of social and economic inclusion programs as well as timely shock/crises response support. The objective for this is easy identification of households in most needs to benefit from social sector programs in the country. The target beneficiaries for this component shall be those in the SAGE and other social protection systems e.g., the youths, the women, the elderly, the orphans, the single mothers, the widows, the PWDs.

The project will operate nationwide, covering 83 districts and 7 cities in Uganda, which is approximately 61.5% of the entire country. The distribution of project funds across the sub-regions will be determined based on more in-depth mapping of the vulnerability levels as well as other parameters as will be agreed upon.

1.15 Lessons learnt from NUSAF3 ESMF implementation

Safeguards management under NUSAF 2 and 3 was successful due to; i) well established and defined capacity and implementation structure from national, district, sub county and community level; ii) Safeguards Management Information Systems module; iii) resource allocation for operations and ESMP costs; iv) implementation of stakeholder Engagement and communication plan; v) clear land donation process; and vi) proper monitoring, reviews (including audits) and certification of completed sub projects for compliance.

The successor project will do the same and to ensure all ESF activities are adequately implemented, and lessons, good practices and innovations are documented and disseminated.

BASELINE ENVIRONMENTAL AND SOCIAL INFORMATION

1.16 Geographical population and land size

Geographically, NUSAF IV region has a population of about 21.8 million and 116,498 sq.km of land (Table 2), with West Nile and Bunyoro having the highest population, while Acholi and Karamoja region have the largest land area, which are communally owned. The population and land area are critical requirements for targeting beneficiaries and it is also used as a criterion for identifying the poorest and vulnerable households to be enrolled in the NUSAF IV project.

Table 2: Summary Population estimates and Land Area in NUSAF IV Sub regions.

Population Estimates per Region			Land Area	
Sub Region	# Millions	%	Sq. Km	%
Acholi	1.8	8	28,279	24.3
Bukedi	2.4	11	4,600	3.9
Bunyoro	2.6	12	9,443	8.1
Busoga	4	18	8,920	0
Elgon	2.1	10	4,198	3.6
Karamoja	1.1	5	27,597	23.7
Lang'o	2.4	11	13,742	11.8
Teso	2.2	10	12,864	11
West-Nile	3.2	15	15,774	13.5
Total	21.8	100	116,498	100

1.17 GDP growth and sub-regional poverty status

1.17.1 GDP growth in percentage

In the 2000s, Uganda was one of the fastest growing economies with annual growth above the average for sub-Saharan Africa. Uganda had a relatively moderate economic growth rate over the last decade while it has faced high level of volatility. The volatility of the economic growth

was largely attributed to its vulnerability to shocks mainly related to climate change & other natural occurrences (UNCTAD, 2020).).

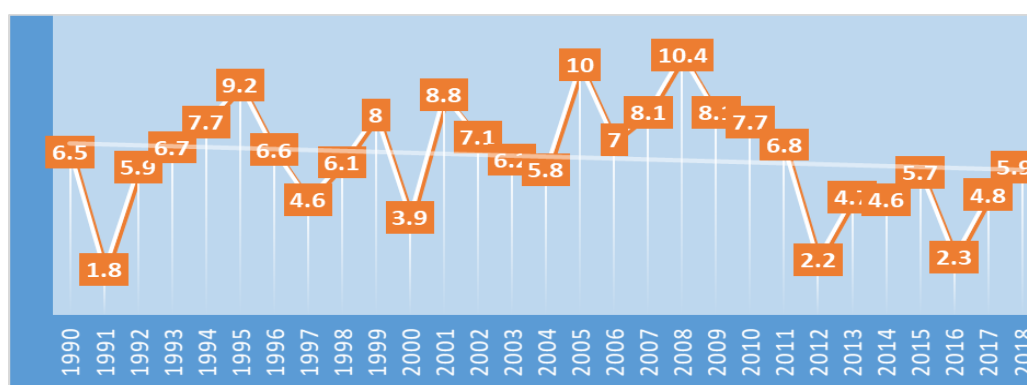


Figure 2: Real GDP growth in Uganda 1990-2018 (Annual % change).

Source: IMF World Economic Outlook (April 2018) National GDP per capita was at USD 858 in the year 2021.

1.17.2 Country poverty trends

Despite high levels of growth in the 2000s, poverty has risen unexpectedly recently. - and this has been attributed/ associated with frequent shocks and crisis such as Covid, climate and disasters that continue to affect the growth in the agricultural sector that supporting livelihood of > 78% of the population (within which 39% of the HHs (3.5 M) are in subsistence economy). Accordingly, to-date with the decline we see up-to 26% of the country's population live below poverty line, with a majority coming from the NUSAF IV sub regions. Further 44% of Ugandan population who are non-poor but vulnerable (UBOS 2020). 55% of households (22.7m) were highly vulnerable to poverty in 2020 (UNDP 2019). And an estimated 3.1 million people fell below poverty line in 2020 due to COVID-19 (IGC 2020).

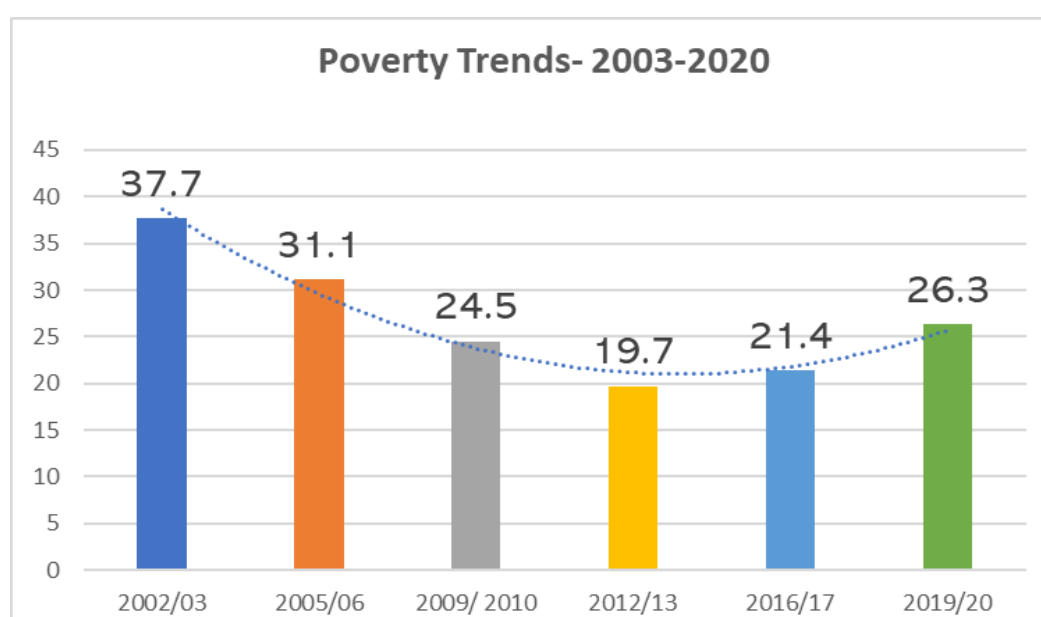


Figure 3: Poverty trends 2003-2020.

Source: World Bank- Uganda Economic Update, 2020. Major contributors to poverty status include Busoga (14.5%), Bukedi (10.4%), Acholi (10.3%) and Karamoja (6.5%), largely from NUSAF districts. Details on NUSAF regions poverty status are presented in the table 3 below.

Table 3: NUSAF IV Regions Poverty trend.

#	Sub Region	2012/2013	2016/2017	2019/2020	Remarks
1	Acholi	45%	33%	68%	Worsened
2	Lango	23%	16%	23%	Indifferent
3	Karamoja	74%	60%	66%	Chronic
4	West Nile	42%	35%	17%	Improving
5	Bunyoro		17%	10%	Better
6	Busoga		27.9%	31.3%	Worsening
7	Bukedi	29%	44%	35%	Indifferent
8	Elgon	26%	35%	13%	Fluctuating
9	Teso	21%	25%	22%	Indifferent

Source: World Bank- Uganda Economic Up-date, 2020

1.18 Bio-physical environment

1.18.1 Forest cover

One of the leading environmental challenges currently faced in Uganda is deforestation. According to National Forest Authority, September 2022 Uganda Forest cover reduced from 24% in 1990 to 8% 2019 of the total land covers majority of which was on private land (unprotected area). The unprotected land has been greatly opened for agriculture, settlement and industry among others and this has put the country at a big risk of climate change and other associated disasters/hazards.

Although the country has an established forestry and environmental management framework through Ministry of Water and Environment (MWE) that is supposed to avert the effects of forest degradation, substantial collaborative effort amongst stakeholders is required for effective implementation to avert degradation. Several tree planting initiatives have been undertaken countrywide with a view of increasing forest cover however, more effort is needed.

1.18.2 Biodiversity

The proposed nine sub-regions for the project contain unique and diverse ecosystems with wide variety of species of flora and fauna. The global recorded 11% of the of bird species such as shoebills, 7.8 % of global mammalian species, 19% of Africa's amphibians and 14% of African reptilians are within some of the proposed project area. Most of these species are threatened by extinction thereby, necessitating the need for increased species protection in these areas. Important biodiversity areas in the project area, include, Dodoth, Kadam, Jie and Bokora Kidepo valley, Mathenical and Moroto, in Karamoja, Lake Bisina wetland system, Opetet wetland systems, a Ramsar site in Teso, Mackson falls – Albert delta wetland system, in Masindi and Noya, in Bunyoro, and Lango, Ajai wildlife reserve and Mt Kei Forest reserve, in West Nile. These have species of conservation concern including Shea butter tree (*vitellaria paradoxa*) and *Tamarindus Indica*. Animals include Antelopes, bush buck's lion & leopards, Ostriches (*Ostruthio Camelus*)

1.18.3 Geology and Soils

Soil Condition: In NUSAF IV regions, soil organic matter is low to medium in most districts, and is declining due to increased erosion and poor land management practices (For instance in the Elgon high lands due to high land fragmentation), in Busoga, Bukedi, Teso, Karamoja-poor agricultural practices etc. Soil organic carbon and soil pH are key indicators of the status of soil health, the pH of most of the soils in the project area vary, owing to a climate gradient, with a range between 4.8 and 6.3. High soil pH is mainly in the Karamoja region, where conditions are generally dry; otherwise, the rest is low because of wet conditions.

Soil degradation is a major threat to food security in the project area. Major causes of soil degradation in the project area are nutrient depletion and soil erosion. And the degradation is facilitated by population growth in most of the districts (Due to in migration, influx of refugees etc.) and the associated effect on land ownership and fragmentation, land tenure, adoption of inappropriate land and soil management practices, and the low use of fertilizers and organic manure. The population explosion seems to out-match farmer's ability to find arable land. Enforcement of environmental laws and regulations on fragile ecosystems management, mapping of critical/ hot spots and as well as adequate sensitization of communities on sustainable use and adoption of environmentally sustainable strategies can support address the challenges.

1.18.4 Wetlands

Uganda is host to several wetlands of international importance and majority are located in NUSAF IV region. However, over the years, the country's wetland cover has reduced due to wetland degradation. Over 80% of Ugandans are involved in agriculture and 69% rely on subsistence farming and are heavily dependent on wetlands. As a result of the increased use of wetland areas, there has been an increase in the incidents of wetland degradation mainly by encroachers leading to a reduction in the total area under wetland coverage in Uganda.

Wetland coverage reduced from 15.5% in 1994 to 13% in 2017. Of the remaining wetland, 8.9% is still intact while 4.1% is degraded. Considering the cover at drainage basin level and in the sub region, wetland degradation was highest in Lake Kyoga (cover Teso, Lango, Bukedi, parts of Busoga) and Edward basins (42% and 34% respectively) and lowest in the Kidepo and Aswa basins (1% each). Further analysis showed that Mbale district had the most degraded wetlands with 99% of its wetlands are under threat while Bunyoro had the lowest %age of degraded wetlands. (NSOER 2018/19).

Labour Intensive Public works restoration activities (Soil and water conservation) are not expected to impact negatively on wetlands. However, livelihoods activities especially such as Horticulture sub-projects and others related to livestock farming and water facilities may be located close to or within wetlands. In addition, some contractors may use swamps along roads as water and sand sources for construction works. There is therefore a risk that they may aggravate the problem of wetland pollution or destruction, for example when construction waste is illegally dumped in swamps adjoining roads.

The beneficiaries under the NUSAF IV projects will have to acquire the relevant permits and approvals from the authorities such as wetland use permits from the DWRM and adhere to the provisions of the National Environment (Wetlands, Riverbanks and Lake Shores Management) Regulations, 2000.

1.19 Security

Increase in human population has also resulted in communities settling close to areas of high wildlife populations resulting in crop raiding, spread of zoonotic diseases, loss of property and attacks on humans often resulting in retaliatory killing of wildlife. The number of reported cases of Human Wildlife Conflict has increased in the recent years within the Kidepo, Murchison Falls Conservation Area (MFCA) and as well as Pian UPE wildlife reserve.

Registering the highest number. Species often associated with these conflicts include elephants, lions, hippopotamus, baboons and monkeys among others. These conflicts have implications largely on Household livelihoods, biodiversity conservation and the economy.

1.20 Air quality

The key contributors of air pollution in Uganda are particulate matter (PM 2.5), emission of gases like Nitrogen Oxides (NO_x), Sulphur Oxides (SO_x), Methane (CH₄) and others like black carbon (BC). Beside the key sources of air pollution in Uganda include emission from motor vehicles, unpaved roads, burning of waste, industries, and domestic emission and construction activities. Air pollution contributes to poor human health, which is characterized by respiratory diseases and morbidity. The national air quality monitoring network is yet being set up but presently NEMA has two stations where it collects data. The air quality data so far got is within the acceptable World Health Organization (WHO) guideline limits.

So, under NUSAF IV, aspects of air pollution resulting from agricultural, livelihoods and other labor-intensive public works activities will dully be taken care off in assessments/screening and mitigation measures will be provided for in the ESMPs

1.21 Climate

Uganda lies astride the Equator and its temperatures range between 15⁰C- 30⁰C. Precipitation is fairly reliable, varying from 750 mm in Karamoja in the Northeast to 1500 mm in the high rainfall areas on the shores of Lake Victoria, in the highlands around Mt. Elgon in the east, the Rwenzori Mountains in the south-west and some parts 35 of Masindi and Gulu (NEMA, 2018/2019). The annual average rainfall around Lake Victoria is from 1200 to 1500 mm, and is well distributed. To the north, the two rainy seasons gradually merge into one. Dry periods at the end of the year become longer, with annual rainfall ranging between 900 – 1300 mm, this restricts the range of crops that can be grown.

Although the climate is generally tropical, it is mild due to the high altitude, which modifies the annual mean temperatures that fluctuate between 160C and 290C. Depending on elevation and landscape, the mean temperatures over the whole country show great variation. The Inter-Tropical Convergence Zone (ITCZ) and the air currents such as the southeast and northeast monsoons influence the climate of Uganda. In most parts of the country, the seasons are fairly well marked—as rainy and dry seasons (NEMA, 2006). However, in areas adjacent to water bodies such as Lake Victoria, maritime conditions tend to modify the temperatures. The

variations in mean monthly and annual evaporation rates are much smaller than corresponding variations in rainfall, which are 10-20 per cent and 20-40 per cent in the southern and northern parts of the country respectively. The movement of the ITCZ is largely responsible for the variations in meteorological factors that determine evaporation.

1.21.1 Climate change vulnerability and risks in NUSAF IV sub-regions

Several districts in the NUSAF IV nine regions are susceptible to climate risks and hazards. This is due to climatic variabilities and climate change. Farmers are affected and as well as their economic assets for which they derive their livelihoods. To enhance farmers/households' resilience and build their capacity to withstand any shocks resulting from effects of disasters and climate risks, there is need to scientifically and systematically identify such risks and vulnerabilities in initial stages of the project. Environmental, climate change, disaster risk, social economic constraints, conflicts and tensions must form part of project risks that must be adequately analysed and managed for sustainable development. Moreover, the vulnerability and risk assessments done will support NUSAF IV project to identify areas under exposure to various risks and hazards – and adequately plan for mitigation measures. It is in this context that, NUSAF IV-ESMF details the risks and vulnerability anticipated within the project geographical scope and analysis are done to demonstrate the exposure levels in various geographical locations in line the National Vulnerability and Risk Atlas of Uganda.

1.21.2 Climate change

Uganda continues to experience the effects of climate change in the form of deteriorating snow cover on Mount Rwenzori, extreme weather events such as floods and landslides, all of which have destroyed property and claimed lives of many Ugandans as well as affected their associated livelihoods. Uganda launched its National Climate Change Policy in 2015 and submitted its Nationally Determined Contributions (NDCs) or proposed greenhouse gas emissions reductions to the United Nations Framework Convention on Climate Change in 2018.

The country has witnessed massive losses of natural vegetation and intensification of human activities. This situation is further aggravated by the overexploitation of natural resources, use of unsustainable harvesting and agronomic practices, and effects of climate change. Uganda has witnessed many environmental problems including frequent occurrences of landslides and floods causing deaths and loss of property, loss of biodiversity, low agricultural output, and reduced forest and wetland goods and services.

It is also critical to consider climate which is an atmospheric resource that is greatly affected by weather variability and climate change that subsequently impact on human well-being. Extreme weather conditions and climate events like floods and droughts have adverse effects on human livelihood capitals like food and income and thus affecting human well-being. Furthermore, rise in temperatures affects ecosystem functions and services such as loss of biodiversity species, increase in invasive species and total species extinction. Besides rise in temperature is a major cause of drought which hinder the regulating functions of ecosystems for environmental integrity, climate resilience, and disaster risk reduction and human livelihoods. For instance, according to UNICEF 2017 report, Uganda has one of the fastest changing climates in the world and temperatures are predicted to rise by an unprecedented 1.5 degrees in the next 20 years. Extreme climate events like floods and drought and weather variability such as rise in temperatures and rain storms do not only affect the environment but also have adverse impacts on agriculture and other livelihood assets (NSOER 2018/2019).

Table 4: Vulnerability and risks seasonal calendar.

Hazards	Short-dry season			Short-wet season			Long-dry season			Long-wet season		
	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
Drought							High	High	High			
	Moderate	Moderate	Moderate									
				Low	Low	Low						
Floods				High	High	High				Moderate	Moderate	
									Moderate			Moderate
	Low	Low	Low				Low	Low				
Landslides				High	High	High						
							Moderate	Moderate	Moderate			Moderate
	Low	Low	Low				Low					

Key: Hazard intensity



High



Moderate



Low

1.21.3 Hazards and risk

According to the National Risks and Vulnerability Atlas of Uganda (OPM, 2019). Hazards and risks are defined by seasons and months. The seasons are characterized by wetness and dryness. Table 1 below details the seasons and month.

1.1.1.1 Drought

The drought classification system developed by National Risk and Vulnerability Atlas of Uganda (OPM, 201) was used to define drought intensities resulting from Standard Precipitation Index (SPI) in Table 5 below.

Table 5: Standard Precipitation Index and drought intensity scale.

SPI Index	Drought Intensity Scale
2.0+	Extremely wet
1.5 to 1.99	Very wet
1.0 to 1.49	Moderately wet
-0.99 to 0.99	Near normal
-1.0 to -1.49	Moderately dry
-1.5 to -1.99	Severely dry
-2 and less	Extremely dry

Source: Adapted from McKee et al. (1993)

About 40% of Uganda (95,700 km²), is moderately susceptible to drought while 7% (16,600 km²), is very highly susceptible to drought (OPM, 2019). The most drought prone regions in the order of severity include Northern, Eastern and Western regions. The Eastern and Northern regions are most susceptible to drought hazard, with the highest number of districts prone, i.e., 34 and 30, respectively. The most drought prone districts are in the Karamoja sub-region and include Kaabong at 100% (7,284 km²); Moroto at 100% (3,546 km²); Kotido at 66% (3,629 km²); Napak with 30% (4,474 km²); Amudat with 26.8% (1,653 km²); Nakapiripirit with 21% (4,182 km²) Kitgum and Lamwo (in Acholi sub-region) at 19% (4,150.5 km²) of their total land area. Generally, in Uganda, within a year, the drought susceptibility increases from the earlier months of January and February and only begins to drop down towards the end of the year during the long-wet season of September to November.

1.1.1.2 Floods

The floods were measured using several parameters to determine the extent of damage and loss to earth ecosystem with depth of flood being most appropriate. There is no significant change in flood extents for less than 0.5 m depth with either scenario indicating almost equal flood extents of 5,113.5 km² (2.1%); 4,832.2 km² (2%) and 4,608.7 km² (1.91%) for five year and 10-year and 50-year return period respectively. Similarly, there is no significant change for the flood extents of 0.5-1.0m depth with either scenario indicating almost equal flood extents of

724.3 km² (0.3%); 725 km² (0.3%) and 778 km² (0.32%) for five-year and 10-year and 50-year return period respectively. Still, there is no significant change for the flood extents of 1.0-1.5m depth with either scenario indicating almost equal flood extents of 4,906.0 km² (2%); 4,908.6 km² (2%) and 4,907.9 km² (2%) for five-year and 10-year and 50-year return period respectively. However, the flood extents for deeper floods were larger for 50-year return period than for 10-year and 5-year return period. A total of 5,573 km² (2.3%) is prone to floods of 1.5-2.0m depth of 50-year return period which is larger than 4,694.9 km² (1.9%) flood extent for the same depth in the 5-year return period. Similarly, a total of 8,574.4 km² (3.6%) is prone to floods of more than 2.0m depth for 50-year return period which is larger than 4,497.1 km² (1.9%) and 2,939.9 km² (1.2%) flood extent for the same depth in the 10-year and 5-year return period respectively. Deeper flood extents are larger in long-term return period compared to short-term return period, which reflects the risk phenomenon, i.e., the most devastating extreme events occur less frequently.

Floods majorly occur in the months of April-May and September-November of each year (Table 44). The flash floods are characterized by water logging of crop fields, an increment of water-borne diseases (malaria, typhoid, cholera etc.), submergence of roads and houses etc.

At the regional level, the eastern and northern regions are more prone to floods of less than 2m depth for a 50-year return period include: Bulambuli (41.6%); Butaleja (30.2%); Ngora (29.1%); Katakwi (with 29.0%) and Bukedea (27.3%) and the most prone to floods of more than 2m flood depth are Ntoroko (16.9%), Bulambuli (13.7%), Katakwi (11.6%), Kumi (11.4%) and Bukedea (10.4%). The Northern region has the highest number of districts (31) affected by floods followed by the Western region (28); the Eastern (27) and Central regions (23).

However, Teso, parts of Bukedi and parts of Bugisu areas suffer from destructive floods than the other regions of the program. Overall, the Teso region is the most prone to catastrophic floods. Figure 3 presents the flood depth experienced in the different regions of Uganda for five-year return period floods. The Bukedi sub-region is the most prone to floods of less than 0.5m depth while the Lang'o and Teso sub-region are the most prone to floods of 1.5-2.0m depth.

With this information obtained from National Risk and Vulnerability Atlas of Uganda (OPM, 2019), the ground truthing shall therefore establish the zonation of the flooding areas within the country especially the sub-regions covered by NUSAF IV.

1.1.1.3 Landslides

5,793 km² (2.83%) of Uganda is highly susceptible to landslides. At the regional level, the Western and Eastern regions are the most susceptible regions to landslides. In the context of NUSAF IV, the Eastern region have the highest number of districts susceptible to landslides, i.e., 31 districts. Elgon region is the most susceptible landscape to landslides induced by both earthquakes and rainfall. The most prone districts include Kapchorwa with 96.6% (357 km²), Bukwo with 76.5% (530 km²), Bududa with 67.3% (303 km²), and Kween 55.6% (814 km²).

Elgon sub-region have landslides caused by all the three factors/trigger (i) no- triggering factors/conditional factors (ii) rainfall trigger factors; (iii) earthquake trigger factors and susceptibility intensities are categorized as high, moderate and low as illustrated in the map below. This makes the sub-region highly susceptible for landslide hazard.

1.21.4 Hazard exposure of the population

People are the most important elements-at-risk and in this document, population data is used to map out administrative units expressed as absolute number of people at risk depending on magnitude of exposure.

Regionally, the most exposed people to floods are in the Northern and Eastern of Uganda with 80 to 100% exposure. Over 80% of the population in the districts of Katakwi, Otuke, Kitgum and Nwoya are exposed to floods (*Refer to Figure 4*). Meanwhile the main landslide population exposure hotspots are in the Elgon sub-region of Uganda (Figure 5). Over 80% of the population in Bulambuli, Kapchorwa, Bukwo and Kween districts are highly exposed to landslides. The population in the Elgon sub- region are the most exposed to landslides. Accordingly, the population most exposed to drought is in arid and semi-arid areas of north-eastern Uganda. Exposure is highest in the districts of Kotido (100%), Moroto (100%), Napak (100%) and Nakapiripirit (100%), illustrated below.

1.22 Sub-regions background

1.22.1 West Nile sub-region

1.1.1.4 Hydrology

The specific runoff in the region decreases from west to east, corresponding to the rainfall pattern. The headwaters of most of the major rivers in the region originate from the boundary with the Democratic Republic of Congo and drain into the Albert Nile basin in the east. At the

hilly headwaters in the west, the stream network is dense and stream gradient steep but after the Rift Valley escarpment, the rivers become sluggish before joining the Albert Nile through extensive swamps. The major rivers are Ora (with major tributaries of Nyagak and Nyarwodo), Ala, Enyau/Oru, Kochi, Amua and Esia, Arua, Kweli, and Aringa.

1.1.1.5 Socio-economic aspects (Livelihood)

The West Nile sub-region is a largely rural area with a primarily agricultural economy. The main agricultural products grown in the region include crops such as maize, beans, and cassava, as well as a variety of fruits and vegetables. The region is also home to a number of small-scale farmers who raise livestock, including cattle, goats, and chickens. In addition to agriculture, the West Nile sub-region has a number of other economic activities. These include; small-scale manufacturing, trade, and tourism. The region is home to several small businesses, including shops, markets, and restaurants.

The West Nile sub-region has the potential to develop a more diverse and robust economy, but it faces several challenges. These include limited access to infrastructure, such as roads and electricity, and a lack of access to credit and other financial services. Additionally, the region has been affected by conflicts and instability in the past, which have hindered economic development.

1.1.1.6 Land use and tenure

Land tenure system in the region is largely a customary land tenure type apart from church missions, hospitals and schools, a number of which hold Freehold land tenure titles. Inheritance of land is usually passed on to a male heir and negotiations affecting land donations are always geared to the male head of the household after the clan head has given the go ahead. Agriculture (crop and animal farming) dominate the land use in the region with millet, cassava, sorghum, ground nuts and vegetables the dominant crops managed together with cattle and poultry.

1.1.1.7 Poverty status

According to UBOS (2020), the poverty rate in the West Nile sub-region was approximately 27%. The sub-region has a relatively lower poverty rate compared to the national poverty rate, which is approximately 33% in 2020. Poverty remains a challenge in the sub-region.

1.1.1.8 Access to social & economic services

In terms of health services, the region has only one referral hospital in Arua serving a total of 12 districts and beyond, within Uganda and across the border from the neighbouring countries of S. Sudan and Democratic Republic of Congo. The road network in the sub-region is quite lacking (Opendocs).). The road connecting Nebbi and Koboko towards the south Sudanese border is the only larger scale road in the West Nile Region, and as there is no alternative means of transport, there is a high vulnerability to trade and commerce (at regional scale). Besides, the only bridge crossing the Nile is in the southern part of the West Nile Region, near Pakwach, reducing the regions connectivity with other major urban centres in North Uganda, such as Gulu. The poor road network coupled with the rampant cross-border insecurity has made local trade between the sub-region and the neighbouring countries very difficult (The Cooperator News). In terms of education, the region is still poorly served. Schools largely exist in urban centres, while rural areas are poorly connected. In areas where schools are found, pupils move long distances to schools. This is worsened by the poor road network in the sub-region.

Overall, there is also increasing pressure on the limited existing service facilities due to high influx of refugees from the neighbouring countries.

1.22.2 Acholi sub-region

1.1.1.9 Hydrology

The Albert Nile flows along the western border of Acholi Sub-region and the Victoria Nile flows along their southern borders with Lango Sub-region. Achwa River flows through the middle of Acholi Sub-region and is a boundary between Gulu, Lamwo and Pader districts. Agago River branches off from Achwa River and runs through the middle of Pader and Agago districts. The area is drained by two wetland systems namely; Tochi and Achwa. Some parts of the area are characterised by season wetlands.

1.1.1.10 Socio-economic aspects (Livelihoods)

Agriculture is the backbone of the regional economy in Acholi Sub-region. The major source of household incomes is sale of crops. More than 80% of the population is estimated to engage in agriculture based upon the interviews with district offices in Acholi Sub-region. Crops grown include sim-sim, rice, sun flower, soya beans, ground nuts, beans, maize, vegetables, sorghum and millet as principal foods. Cotton was initially grown as a major cash crop however its production has reduced due to low prices. Commercial & trading activities are largely

limited to urban centres like Gulu city, Kitgum and other small growth centres across the region. Commercial activities include wholesale & retail shops engaged in trade, there are no large-scale factories and only a few small scale agro-processing industries such as grinding mills, making yoghurt and rice hullers, with minimal value addition that result into low employment opportunities.

1.1.1.11 Land use and tenure

Agriculture is the dominant land use type in the sub-region. The Land tenure system in the sub-region is largely customary, with the exception of church missions, hospitals and schools a number of which hold Freehold land tenure titles. Inheritance of land is usually passed on to a male heir and negotiations affecting land acquisition is always geared to the male head of the household after the clan head has given the go ahead.

1.1.1.12 Poverty status

The Acholi Sub-region is among the most poverty-stricken regions in the country. The poverty level in the Sub-region stands at 64% (UBOS 2022). This means that the community the sub-region largely directly depends on the natural resources for their livelihoods. This has a direct impact on resource over exploitation and degradation of fragile ecosystems. The high poverty levels also limit the population from accessing better education and health services.

1.1.1.13 Access to social services

There is a low penetration of services in the Acholi sub-region, which is particularly severe in terms of access to health centers. For example, in Purongo sub-county (Nwoya District), one health center serves all five parishes within the sub-county, and in Pabit Parish (Purongo sub-county), some communities travel 60km to access the nearest health center located in Paraa. Access to primary schools is less problematic in terms of physical distance, although not all villages have their own schools.

1.22.3 Lang'o sub-region

1.1.1.14 Hydrology

The Lango sub-region is drained by a number of wetland systems which feed into Lake Kyoga. These are both permanent and seasonal wetlands. The wetlands are categorized into three major systems namely Olweny Wetland System, Okole Wetlands System, and Moroto Wetland System. The Olweny wetland system drains into Lake Kwanja in Dokolo District, the Moroto system drains into Aswa river system, while the Okole system drains into the Albert Nile.

1.1.1.15 Socio-economic (Livelihoods)

Agriculture is the major economic activity in the sub-region. Most farmers in the sub-region are small holders who grow mainly annual crops. The annuals include maize, sweet potatoes, beans, cassava and groundnuts. The livestock comprises goats, cows, sheep, and rabbits while poultry such as chicken, turkey, ducks are also reared. Subsistence and quasi commercial levels growing mainly sunflower, maize, sim-sim and cassava. There are also efforts at commercializing sunflower growing to extract oils and there are some areas in the district, which are taking on commercial fruit farming of oranges, mangoes and other fruit trees.

1.1.1.16 Land tenure/Land use

Land is a major factor that characterizes a fusion of household and national ‘asset politics. In Lango sub-regions, land is passed from father to sons, but the customary tenure systems grant women significant land rights. Everyone born of the clan on inherited land, whether male or female, has the right to use land. Despite women having significant land rights under customary tenure arrangements, the power of the clan authorities to enforce rules governing customary tenure have eroded over time, such that clan elders now often fail in their traditional duty to protect women, children and other Vulnerable and Marginalized Groups.

1.1.1.17 Poverty status

The Lango Sub-region is among the poorest areas in Uganda. According to UBOS 2019/2020, poverty levels in Lango increased from 16% in 2017 to 23% in 2020. This was attributed to high population growth in the sub-region. This has led to poor living conditions, characterised by sub-standard housing hunger, homelessness, inadequate childcare, insecurity and under resources facilities.

1.22.4 Teso sub-region

1.1.1.18 Hydrology

The surface water in this area constitutes mainly of rivers and wetlands. The major systems include Awoja and Omunyai. The streams include; Apeduru and Apapai which converge and eventually discharge into Lake Bisina. These rivers are used for domestic purposes, fishing and livestock. The rivers are surrounded by wetlands hence they are less at risk to human interference.

1.1.1.19 Socio-economic aspects (Livelihoods)

The sub-region is composed of one livelihood zone that supports local economy: Eastern

Central Low Land, Cassava, Sorghum and Groundnuts zone. The crops grown include cassava, sweet potatoes, sorghum, finger millet, peas, groundnuts and rice. Livestock such as cattle, goats, and sheep, chicken are also kept by smallholder farmers mainly for food and income, and oxen used for opening land. The Iteso ethnic groups are cultivators as well as cattle keepers from the old times. In addition to the traditional livelihood strategies, several off-farm activities have evolved including Boda Boda cycling, black smiths, fishing, charcoal burning, local brew (Ajono) trade, brick making, stone and sand quarrying among others. The staple foods are millet, maize and sorghum; other crops are oil seed crops (groundnuts, simsim and sunflower) with cotton as the major cash crop. Mixed agriculture (crops and livestock) is practiced; cultivation by oxen is the main agricultural technology. The use of crop residues is very common in the Teso System. Equally, the livestock industry has a promise within the region with the beef industry showing many opportunities.

1.1.1.20 Land use/tenure system

Agriculture is the main land use type in the sub-region. In Teso region, the most common mode of land ownership is customary system, which is almost the same as customary law in other parts of northern Uganda. Under customary tenure, the clan elders have the responsibility for administering land, but this includes the right to say who can sell land and to whom. This is because, they have the responsibility to protect the land for all the clan, and to make sure that everyone in the clan is given rights to land. The clan on its part has therefore the responsibility for overseeing the administration of all the land.

1.22.5 Karamoja sub-region

1.1.1.21 Hydrology

The drainage in the southern part of the region is dominated by deeply incised, sand filled, ephemeral channels flowing from east to west. These ‘sand rivers’, such as the Omanimani near Kangole, are a locally important source of water during the dry season when water can be found within a few metres of the surface. These channels feed into the southerly flowing Akokoro River via its tributaries, the Okok and Okere Rivers, leading through perennially swampy areas in its lower reaches and eventually draining to Lake Kyoga just to the southwest. Set on a large plateau, much of the Karamoja landscape is more than 1,000 m asl drains to the southwest or west. The Karamoja or Kapiri catchment mainly contributes to two seasonal rivers, River Okok and River Okere, which flow southwest into Akokorio River and drain into Lake Bisina. In the northern part of the Karamoja sub-region, particularly in Kaabong district,

two rivers, the Kidepo and Narus flow, in a western direction through the southern portion of Kidepo Valley National Park. The Narus River eventually flows into Kidepo River about 30km to the west of the Uganda border with South Sudan. These two rivers provide valuable water resources for Kidepo valley.

Many of the streams and rivers in the sub-region are seasonal and dominated by a base flow component for much of the year with a pattern of response, which correlates strongly with that of groundwater levels 10. Whereas the sub- region generally receives low rainfall, the intensity of rainfall events is high resulting in high surface runoff that lasts 24 hours or longer after rainfall has ceased. In the head waters, river flows commence soon after rainfall starts with peak flows occurring in the afternoon or evening. River flows across the Karamoja plains occur from around April to August with flow in later months being fed by shallow groundwater flow from adjacent areas. There is a lag time of a month for upland flows to reach the dambos downstream of the Teso- Karamoja border which flow from May to October again supported by shallow groundwater flow long after the main rains have passed. The downstream rivers are then fed for another one or two months after upstream flows have ceased. Total surface outflow has been approximated as only 5% of the total catchment rainfall.

1.1.1.22 Socio-economic aspects

Livestock farming is the major economic activity among the Karimajong. Many Karamojong households obtain a proportion of their annual income from livestock. According to UBOS, 2014, in 2014, 40% owned cattle, 49% owned sheep and 50% owned poultry. Traditionally, pastoralists lived in fenced hamlets called manyattas and, as a traditional adaptive response, travelled during the dry season to find water and grass to stock mobile enclosed cattle camps called kraals.

1.1.1.23 Land uses/Tenure system & vegetation cover

The typical Karamoja landscape is characterized by semi-arid savannah with seasonal grasses, thorny plants, occasional small trees and rocks out-crop mountains. Common perennial grass species include: *Themeda triandra*, *Panicum spp.*, *Setaria spp.* which were common at the margins of seasonally flooded areas. Livestock production is the major land use system in the sub- region. Livestock include cattle, sheep and poultry. Livestock being the major land use has greatly contributed to overgrazing making the area engulfed in *Acacia hockii* which is characteristic of long-term seasonal fires. At present, customary tenure has evolved into individualized and communal sub-tenures, each with distinct characters and resource rights

embedded therein for the individuals, households and the community at large. Gardens plots have definitive boundaries marked by a variety of features including trees, anthills, and rocks. However, the most common boundary markers are strips or bands (*ekikoru*) of uncultivated land between garden plots.

1.1.1.24 Poverty Status

Karamoja sub-region is one of the poorest regions in Uganda, with income poverty at 61% and food poverty at 70% (UNHS, 2016/17). The population is mainly rural, with livelihoods based on livestock and crop production, and of recent, a growing range of diversified livelihood activities. The region continues to have the highest food insecurity and malnutrition levels in Uganda, due to factors related to inadequate food, poor dietary diversity, structural poverty, limited livelihood options, poor hygiene and sanitation, and disease, with a recent overall improvement in safe water source access but low water use. The region also faces a predisposition to recurrent climate related shocks such as long mid-season dry spells / drought, erratic rainfall, that often causes floods / water logging, etc. There is pronounced vulnerability to other shocks such as food price increases, declines in livestock or crop production and market disruptions (IPC, 2021).

1.1.1.25 Access to social services

Health statistics for Karamoja are also significantly worse than other areas of the country. There is low access and utilization of basic health services- averaging 24% compared to the national rate of 72%. Household sanitation stands at 20.6% compared to a national average of 72%. Maternal morality and infant mortality rates are significantly higher than the rest of the country (750 vs 438 per 100,000 live births and 105 vs 54 per 1,000 live births respectively. In recent years in Karamoja there has been a rapid increase in the prevalence of HIV/AIDS (currently 5.3%, up from 3.5% in 2006). With that in mind, the status of health facilities in the area is still the poorest in the country, with areas poorly served with health facilities and yet the few that exist lack facilities/logistics.

In terms of water, sanitation & hygiene, the region is still lagging behind the national average, although the coverage continues to improve. Water coverage ranges from 26.4% in Kaabong, 45% in Kotido, 74% in Abim, 68.9% in Moroto and 56% in Nakapiripirit, as compared to 65% in 2009 nationally. The household latrine coverage is less than 10% on average, compared to the national average of over 68% in 2009. The low functionality of the Water and Sanitation Committees and water sources farther reduces the effective access to services. The poor

sanitation and latrine coverage in the area is largely putting the region at a higher risk of spread of diseases.

1.1.1.26 Protected areas

At the turn of the nineteenth century, livestock cohabited with wildlife in Karamoja. Large herds of buffalo lived in Dodoth, eland and zebras spread across the plains, and giraffes were common near Kadam. Topi and hartebeests were present in large numbers in Jie and Bokora. During the wet season, herds of elephants crossed the region north–south following the ripening of *Borassus* spp. fruits, returning to the hills around Kidepo in the dry season. This richness made Karamoja one of East Africa’s prime hunting areas during the 1920s and 1930s. However, by 1950, the wildlife population was in decline, which led to the conversion of most of the pastoral land of Karamoja to national parks and game reserves with now Kidepo National Park, covering 1,436 km²; three ‘controlled hunting areas’ were also established: Napak (196 km²), North Karamoja (10,820 km²) and South Karamoja (7,882 km²). These were followed in 1964 by three game reserves: Matheniko (1,573 km²), Bokora Corridor (2,145 km²) and Pian-Upe (2,152 km²).

The establishment of these restricted areas has overtime increased tension between the Wildlife Authority and the locals in the area as population increases. These human-animal conflicts have largely affected the communities in the sub-region often contributing to insecurity.

1.1.1.27 Gender dimensions /Gender based violence

Karamoja ranks third out of ten sub-regions for women’s civil rights, with some of the highest levels of equitable access to justice in the country. Karamoja is also the worst performing sub-region in Uganda in terms of discriminatory social institutions within the family. The level of gender-based violence in Karamoja is extremely high which sometimes analysts link to limited opportunities for male livelihoods and women’s growing economic role in the family, leading to an increase in alcoholism and domestic violence.

1.1.1.28 Vulnerable and marginalized people -The IK People

The World Bank’s ESS 7 policy safeguard calls for the identification of indigenous peoples. In as much as the Bank ESS 7 safeguard identifies these groups as indigenous, the Uganda Constitution refers to them as vulnerable and marginalised. The Ik community is a small minority ethnic group (possessing the distinct social and cultural characteristics identified in ESS7) in the Morungole Highlands, Kamion Sub County in Kaabong District in Karamoja Sub

region in the parishes of Kamion, Timu and Lokwakaramoe near the border with Kenya, along the escarpment between Timu forest in the South and Kidepo National Park on Uganda's northern frontier with Sudan. Kamion Sub- County is located approximately 20kms from Kaabong District headquarters and covers an area of approximately 74km². The IK are divided into 10 clans (Jigeta, Komokua, Telek, Ngidoza, Ilengik, Kadunkuny, Ngibongorena, Uzet, Nyorobat and Ngibonga). The Ik exist in a precarious situation on the top of the escarpments and whilst their physical isolation in the mountains helps to protect them from violence at the hands of raiding warriors, it serves to marginalize them from government services. Unlike the rest of the tribes in Karamoja, the Ik no longer keep livestock since it is a source of further insecurity from raiders. With the Ik located between these two dominant communities, each attack affects them as their land provides routes/pathways for raiders

1.1.1.29 Tourism

A key tourist attraction in Karamoja sub-region is Kidepo Valley National Park renowned all over the world for its unique biodiversity and beautiful sceneries and specific species like Cheetah, Ostrich and Elands. The unique culture of the Karamajongs and the IK people greatly attracts tourism in the region.

1.22.6 Elgon sub-region

1.1.1.30 Hydrology

Water resources within the sub-region comprises surface water (river and streams), ground water (shallow and deep wells, springs). Catchment for surface water is dominantly occurring on Mt. Elgon Forest reserve and peaks, so that is a continuous hydrological cycle. Groundwater comes from springs and it moves slowly downhill. In some places the ground water is near the surface of the ground and water comes out as a spring.

1.1.1.31 Socio-economic aspects (livelihoods)

The Mbale region has about 590 persons per square km, making it one of the most densely populated parts of Uganda. Most people are engaged in agriculture, which is the main economic activity employing more than 80% of the population. The major crops grown at high altitudes include banana, arabica coffee and Irish potatoes, while at lower elevations the dominant crops are maize, millet, cassava, beans and sweet potatoes, cabbage and tomatoes. The coffee is normally intercropped with bananas, maize and beans. The coffee- banana system is predominant in Elgon region. There is barley, maize, wheat and Irish potatoes especially in the Sebei districts. Livestock activities such as cattle rearing, poultry keeping, apiary, and pig

rearing are also common in the Sebei areas of Kapchorwa, Kween and Bukwo. Agriculture is the main economic activity in the Mbale region. Nearly 87% of all people in the region are employed in agriculture. Major crops grown include bananas, coffee, beans and maize. The crops are mainly grown in a banana coffee system. Coffee is mainly grown under *Cordia macrophylla* shade. Other coffee shade trees include *Albizia* species, *Grevillia*, *Eucalyptus grandis* woodlots are also found scattered over the landscape.

1.1.1.32 Land use/Land tenure systems & vegetation

The Mbale region is heavily cultivated, with little to no remnants of natural vegetation in the lower and mid elevation areas. Natural vegetation remains in the higher elevation areas, most of which fall within the Mt. Elgon Forest National Park. In the higher altitudes, the natural vegetation changes from montane, to grassland, bamboo then heath and moorland in that order. Mixed bamboo occurs at about 2,500-3,000m, which turns into open woodland dominated by *Hagenia abyssinica* and African rosewood, the heath zone 3,000- 3,500m characterized by giant heath with grassy swards of tussock grass. The Land tenure system in the sub-region is largely customary ownership a mixture of customary, lease hold.

1.22.7 Bukedi sub-region

1.1.1.33 Hydrology

Major wetlands within the region include Nambogo, Naboa Kakoli, Kamonkoli Namatala, Mpologoma, Tirinyi, Saala, Nansanga, Kimbiba and Bugiri Wetlands. These wetlands are the main life support systems as communities depend on them for agricultural production.

1.1.1.34 Socio-economic aspects (Livelihoods)

Majority of the population (91 %) are predominantly subsistence farmers growing mainly cassava, millet, rice, sweet potatoes, maize and beans for food crops and Robusta coffee and sugar cane as cash crops. The main livestock kept in the region include cattle, goats, sheep and poultry. Fishing activities along the lake shores and riverbanks is also another income generating activity. Other economic activities include sale of labour, cross border trading, and internal trade within gazetted markets, and during market days.

1.1.1.35 Land use and tenure

Land is owned under a customary free- hold system where pieces of land are owned in perpetuity, and hence the owner is able to sell off any of his /her piece of land if he/she so

wishes. Through generation of slicing and sharing family land and later exacerbated by emergence of land markets, where hundreds of thousands of land pieces have changed hands through sale, land fragmentation has occurred which has severely pressed limits on land productivity.

1.1.1.36 Areas with special risks (flooding)

The terrain of Bukedi sub region is relatively flat and most of the rivers from the Elgon sub region drain into the swamps within this region. This makes the region very susceptible to floods. There should be a deliberate effort to address this challenge, and the project should consider interventions while trying to improve the livelihoods of the local people.

1.22.8 Busoga sub-region

1.1.1.37 Hydrology

Lake Victoria is the main water body in Busoga Sub-region. The Lake is served with several River tributaries that feed the river Nile that drains from Lake Victoria. The sub-region is connected with a number of wetlands that drain into the river tributaries, which later drain into the lake

1.1.1.38 Socio-economic aspects (Livelihoods)

The local economy of the Busoga sub-region in Uganda is primarily agricultural, with staple crops such as cassava, sweet potatoes, and maize being grown in the area. Other important crops include sugarcane, rice, beans, and groundnuts. Fishing is also an important part of the local economy, with the region being home to several lakes and rivers. In addition to agriculture and fishing, the region is also home to several small businesses, including shops and markets. The region is home to several schools, hospitals, and other public services, which also provide employment for local residents. There are also some industries in the region, including food processing and light manufacturing, which provide employment for skilled workers.

1.1.1.39 Land use/tenure system

In the Busoga sub-region of Uganda, land tenure systems vary depending on the specific area and the local customs and practices. In some areas, land is communally owned and managed by community organisations or local governments. In other areas, land may be privately owned and inherited within families. There are also some areas where land is owned by the government and leased to individuals or organisations for agricultural or other purposes.

The land use patterns in the Busoga sub-region are shaped by a variety of factors, including the local climate, soil conditions, and the availability of water and other resources. Land is primarily used for agriculture, with staple crops such as sugarcane, cassava, sweet potatoes, and maize being grown in the area. Other important crops include rice, beans, and groundnuts. Land is also used for livestock farming, with cattle, goats, and sheep being common in the region. In addition to agriculture, land in the region is also used for forestry, fishing, and other natural resource management activities.

1.1.1.40 Access to social services

The region is served by a number of roads, which help to connect it to other parts of the country, and there are several airports and ports in the area. A good number of schools and health facilities exist in the sub-region especially in urban centres and major towns. These provide social services to the community in the sub-region.

1.22.9 Bunyoro sub-region

1.1.1.41 Hydrology

Bunyoro sub-region is endowed with watercourses, making fishing a major economic activity. Watercourses include Lake Albert and several wetlands, the most prominent ones being Kafu, Wambabya, Waki, and Kabale. Rivers in the sub-region include Waki, Hoima, Wambabya, Nguse and Kafu.

1.1.1.42 Socio-economic aspects

The economy of Bunyoro sub-region thrives on several economic activities, prominent among which is large scale commercial farming in tobacco, sugarcane, tea, cereals like maize, rice and ranching. The major economic activity in the proposed project area is subsistence crop farming favoured by good climate and fertile soils. Common crops include cassava, cotton, maize, millet, sesame (sim-sim) and pigeon beans. Other key occupations are fishing particularly on Lake Albert, within wetlands, rivers and ponds; Cattle rearing and retail trade. Commercial forestry is also planted on a small-scale household level basis.

1.1.1.43 Land use/tenure systems

The four land tenure systems in the region include public land, Customary, Freehold and Leasehold. Prevalent land use in the sub-region is a mix of subsistence farmland, settlement, forest reserves, wetlands and grassland. Due to hilly terrain, denser settlement and cultivated land is comparatively more in valleys than on hillsides.

1.1.1.44 Access to social services

In terms of transport network, the sub-region is well served with both tarmac and marram roads connecting the Bunyoro sub-region to West Nile, Acholi, Central, West and Southern Uganda. A number of feeder roads have also been constructed in the sub-region especially with the exploitation of oil. Bunyoro sub-region, like other regions in the country, has successfully implemented the Government Universal Primary Education (UPE) programme. According to UBOS (2017), Bunyoro sub-region had a literacy rate of 67.9% which was slightly lower than the national literacy rate of 72.2%. According to the Uganda Health Facility Master list of 2017, the region has 239 health facilities, and these are both private and Government owned facilities. These include general hospitals, health centre IV and health centre III', health centre II's- and private clinics.

1.1.1.45 Ecological resources

The Bunyoro sub region lies within the Albertine Graben which is classified as a high biodiversity zone in the western arm of the East African Rift Valley. The area is home to a wide variety of plant and animal species, including many that are found nowhere else in the world. The region is known for its diverse array of birds, including many species of endangered and threatened montane forest endemics. Other notable animals found in the region include primates such as chimpanzees as well as a variety of antelopes, reptiles, and mammals. The region is also home to several threatened plant species, including several species of endemic orchids. The high levels of biodiversity in the region are due in part to the diverse range of habitats found within the region, including montane forests, grasslands, swamps, and lakes. The vegetation in the region varies depending on the altitude, soil type, and amount of rainfall. The main types of vegetation found in Bunyoro sub region are montane forests, woodlands, grasslands, swamps and marshes.

1.1.1.46 Tourism

Key tourist attractions within the Bunyoro sub-region are Murchison Falls National Park renowned all over the world for its unique biodiversity, Chimpanzee in Budongo forest and Bugoma Forest. The Delta, a wetland area at the confluence of Albert Nile and Victoria Nile, is designated a Ramsar site of international importance as a migratory bird sanctuary. There are a number of people involved in tourism within the region, and this has greatly improved their livelihood.

POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

In this section the Uganda policies, legal, regulatory and institutional frameworks for environmental and social management are discussed, and the World Bank Environmental and Social Framework (ESF) are discussed).

1.23 Relevant Policy Framework

The relevant policy framework to the NUSAF IV Project is discussed below.

1.23.1 Uganda's Vision 2040

Uganda has envisaged a development perspective termed “Uganda Vision 2040” with the aspiration to transform the country from a predominantly peasant and low income to a competitive, middle-income country with a per capita income of approximately USD 9,500 by the year 2040. To this effect, the country's current development interventions are guided by the National Development Plan (NDP1) which ends in June 2015 and will be succeeded by the NDP2 starting in the FY 2016/17. The NDP2 will be the second of the six NDPs structured under the Comprehensive National Development Planning Framework (CNDPF) towards implementation of the Uganda Vision 2040. The NDP1 that runs from 2010/11 to 2014/15 was instrumental in instilling the culture and discipline for development planning and financing while the NDP2 prioritizes key development opportunities and fundamentals with the aims to increase overall competitiveness, create additional wealth and employment while emphasizing inclusive and sustainable growth. And NDP111 lay emphasis on promoting programs on natural resources, environment, climate change, land and water management to support address risks and shocks and subsequently build resilience through enhancement of natural resources for sustainable socioeconomic development. As such, E&S issues are critical to sustainable social economic development. The proposed NUSAF IV Project is in conformity to this vision, as it is designed to ensure that Environmental and social risks and concerns are mitigated.

1.23.2 The National Environment Management Policy, 1994

The key policy objectives include the enhancement of the health and quality of life of Ugandans and promotion of long-term, sustainable socio-economic development through sound environmental and natural resource management and use; and optimizing resource use and achieving a sustainable level of resource consumption. Regarding NUSAF IV, aspects of Environmental Assessment have been integrated into the project with the objective of ensuring

sustainability in the project

1.23.3 The National Environment Management Policy, 1994

The NUSAF IV Project will especially address Aspects of gender inequality in skilling interventions and management of enterprises as provided for under this policy Women should have equal opportunity as men for the available jobs at all levels of the project. The recruitment process will be carried out in conformity with this policy.

The NUSAF IV Project will contribute to the improvement in female entrepreneurship in distribution of products, and access to finance for equitable access to services and products provided under the project. It will also help in narrowing the gender gap in certain skills and enterprises.

1.23.4 The National Cultural Policy, 2006

The National Culture Policy, 2006 complements, promotes, and strengthens the overall development goals of the country. Its specific objectives include amongst others, the need to promote and strengthen Uganda's diverse cultural identities and to conserve, protect, and promote Uganda's tangible and intangible cultural heritage. This NUSAF IV ESMF outlines Chance Finds Procedures to ensure protection and conservation of any PCRs that will be encountered during project implementation.

1.23.5 The National HIV/AIDS and the World of Work Policy, 2007

It provides the principles and a framework for a multi-sectoral response to HIV/AIDS in Uganda's workplaces. As required by this policy, it is important that OPM-NUSAF IV and District Local Governments as the project implementing agencies have adequate measures to mainstream HIV/AIDS into the sub project interventions. – and provide clear framework for prevention of further spread of HIV and mitigation of the socio- economic impact of the epidemic within the world of work in Uganda.

1.23.6 The National Employment Policy (2011)

This policy is aimed at increasing productivity, competitiveness and employability of the labour force, especially the youth and other most vulnerable members of the labour force. It also aims at promoting and protecting the rights and interests of workers in accordance with existing labour laws and fundamental labour standards. Employment to the NUSAF IV Project will be carried out in line with this policy. Furthermore, no child labour will be practiced on

the sub projects.

1.23.7 The National Child Labour Policy, 2006

This policy is aimed at prohibiting employment of children. Children may be enticed to the sub projects under the NUSAF IV Project in search of employment opportunities. The NUSAF IV-TST and DIST will ensure child labour is not entertained in the project targets and clear guidance is provided to communities, implementing agencies, partners and or Service providers.

1.23.8 The Older Persons Policy, 2009

This policy is aimed at prohibiting employment of children. The policy recognizes that people reaching old age should continue enjoying dignified lives through active participation in economic, culture and political spheres. The NUSAF IV project will ensure to comply with this policy and lay emphasis on proper targeting to include all older persons not targeted in other government programs.

1.23.9 The Uganda National Youth Policy, 2001

This policy aims at enhancing the economic contribution of youth to development. Adherence to this policy shall be emphasize social inclusion in-line with the World Bank social sustainability pillar to ensure youth (Both male and females) in the project area are adequately targeted and not excluded in all project interventions.

1.23.10 The Persons with Disability Policy, 2006

This policy aims at promoting the rights of persons with disabilities. The rights of PWDs shall be upheld throughout the project components and entire project life. And the project shall regularly update the ministry of gender labour and social development on progress of this requirements

1.23.11 The National Equal Opportunities Policy, 2006

This policy developed under Article 21 of The Constitution of Uganda aims at ensuring equal access to opportunities and prohibits discrimination of any kind. The NUSAF IV project shall target all categories of persons, with Affirmative action given to vulnerable persons.

1.23.12 The National Social Protection Policy, 2015

This policy addresses the fact that social protection is a prerequisite for social development.

Social protection directly reduces poverty, supports excluded citizens in access to services and provides the foundation for productive lives.

The NUSAF IV project shall address these aspects through its interventions.

1.23.13 The National Land Policy, 2013

The goal of the policy is to ensure efficient, equitable and sustainable utilization and management of Uganda's land and land-based resources for poverty reduction, wealth creation and overall socio-economic development. The NUSAF IV Project shall address policy requirement to mitigate the impacts of investments (such as those that may be attributed to NUSAF IV Project) on land and other natural resources to deliver equitable and sustainable development; and protect the land rights of citizens considering such investments, including the rights of vulnerable groups.

1.23.14 The National Land Use Policy, 2011

The aim of the policy is to: "achieve sustainable and equitable socio-economic development through optimal land management and utilization".

The implementation of some NUSAF IV Project sub-projects may entail restrictions on the use of the land and this will be carried out in conformity with this policy.

1.23.15 The National Water Policy, 1999

This policy aims to manage and develop the water resources of Uganda in an integrated and sustainable manner. The water policy requires an integration of the water and hydrological cycle concerns in all development programs. The policy applies to the sub projects under the NUSAF IV Project that may be undertaken close to the water sources, posing risk of contamination or destruction of the community water sources. Implementation of NUSAF IV Project components will be done in conformity with this policy.

1.23.16 The Climate Change Policy 2013

The Climate Change Policy, 2013 promotes harmonized and coordinated approach towards a climate resilient and low carbon development for sustainable development. It promotes conservation of water, forests, wildlife and fisheries in climate change adaptation and mitigation measures.

The NUSAF IV Project shall promote activities that enhance reduced carbon emissions and degradation as well as reduction of negative environmental impacts and hence promote green

jobs and green technologies. NUSAF IV Project shall be implemented in conformity with this policy. The project will also promote implementation of technologies which aim at enhancing climate change adaptation and mitigation.

1.23.17 Forestry Policy, 2001

The Goal of the Policy is to ensure an integrated forest sector that achieves sustainable increase in the economic, social and environmental benefits from forests and trees by all the people of Uganda, especially the poor and vulnerable. NUSAF IV will support sustainable use and management of degraded forests in-line with the policies to ensure regeneration and enhancement of natural resources base. Hence this project shall uphold the provisions of this policy.

1.23.18 Uganda National Wetlands Policy, 1995

The Policy has established principles by which wetlands resources can be optimally used and their productivity maintained in the future and end existing unsustainable exploitative practices in wetlands. All proposed modifications and restorations on wetlands shall be subject to an ESIA, the result of which shall determine whether such restoration or modification shall proceed and if so to what extent. This ESMF has measures for controlling degradation of wetlands and controlling their siltation.

1.23.19 The National Environment Management Policy, 1994

The established the government first strategies for integrating Environmental concerns into the National Development Planning Process and established the National Environment Management Authority (NEMA) to regulate this process.

1.23.20 The National Action Plan on Gender Based Violence

Findings on the National Situation Gender Based Violence Analysis (2010) revealed that Uganda has much Gender Based Violence (GBV) which afflicts both females and males. The findings further indicated that, GBV issues in Uganda originate from institutionalized male dominance as opposed to female subordination, leading to unequal power distribution in the home and the society plus, resultant GBV violations based on male dominance and male superiority tendencies. Both males and females need to be given opportunities during planning and implementation, to ensure that no or Minimum impacts arise due to Project implementation. Therefore, the Action Plan on Gender Based Violence has specific actions that operationalize the Uganda National GBV Policy (2011- 2015) through:

- a. Reducing rates of GBV incidences reported by GBV Intervening stakeholders;
- b. Reducing rates of GBV in the Uganda households, institutions and communities due to increased female Empowerment and decreased subordination tendencies;
- c. Decreasing the influence of harmful and negative traditional values and beliefs at all levels;
- d. Decreasing root causes of GBV incidences, more specifically patriarchy/male dominance tendencies in the Uganda society;
- e. Increasing male involvement and participation in curbing GBV incidences at the household, institutional and community levels;
- f. Increasing coordination and collaboration networks on GBV interventions; and
- g. Increasing capacities for effective intervention provision by the GBV stakeholders.

The NUSAF IV project will develop GBV and VAC action Plan to guide all requirement and activities under this component.

1.24 The Legal Framework

The key legislative framework relevant to the planning and implementation of NUSAF IV Project is presented below.

1.24.1 The Constitution of the Republic of Uganda, 1995

The right to a clean and healthy environment is enshrined in Article 39 of the Constitution of Uganda, 1995 as well as integration of people in the development process. Article 21 of the Constitution of Uganda (1995) provides for the right to equality and freedom from discrimination. “ It states that: (1) All persons are equal before and under the law in all spheres of political, economic, social and cultural life and in every other respect and shall enjoy equal protection of the law”. To ensure NUSAF IV compliance with the Constitutional obligations on sustainability, this ESMF has been prepared which outlines mechanisms for environment and social assessment and mitigation measures included therein.

1.24.2 The National Environment Act, 2019

Schedule 10, section 113 (2) & (3), 126(2), (3) 176(1) and 181(2) of the Act makes it a legal requirement for every developer to undertake an environmental and social assessment for

projects listed in that schedule. In this case, agriculture amongst others, including large scale agriculture, use of new pesticides is some of the projects in the Third Schedule to the Act that require an ESIA to be conducted before they are implemented. This ESMF outlines some of the salient impacts in NUSAF IV as well as mechanisms for conducting further assessments on the project sub-components.

1.24.3 The Land Act, Cap 227

The Land Act vests land ownership in Uganda in the hands of Ugandans and that, whoever owns or occupies land shall manage and utilize the land in accordance with the Forest Act, Mining Act, National Environment Act, the Water Act, the Uganda Wildlife Act and any other law [section 43, Land Act]. The planned NUSAF IV has integrated Environmental Assessments in its ESMF in compliance with the Act provisions.

1.24.4 Land Acquisition Act, 1965

This Act makes provision for the procedures and methods of compulsory acquisition of land for public purposes whether for temporary or permanent use. The Act requires that adequate, fair and prompt compensation is paid before taking possession of land and property. The dispute arising from the compensation to be paid should be referred to the court for a decision if the Land Tribunal cannot handle. These provisions are meant to ensure that the process of land acquisition follows existing laws and that the affected persons receive fair, timely, adequate compensation. ***However, all NUSAF IV sub projects land shall use voluntary Land Donation through signing of the voluntary land consent forms (VLCs). All sub projects prior to their approval shall been screened against this criterion to avoid issues of compensation and shall be reflected in RPF.***

1.24.5 National Forestry and Tree Planting Act, 2003

The National Forestry and Tree Planting Act 2003 is the main law that regulates and controls forest management in Uganda by ensuring forest conservation, sustainable use and enhancement of the productive capacity of forests, to provide for the promotion of tree planting and through the creation of forest reserves in which human activities are strictly controlled. Specifically, the Act will provide guidance for Afforestation and other tree nursery subprojects considered under NUSAF IV.

1.24.6 The Occupational Safety and Health Act, 2006

The Act provides for the prevention and protection of persons at all workplaces from injuries,

diseases, death and damage to property. The ESMF provides for provision of safety gear for workers during implementation of NUSAF IV activities especially for value addition and processing facilities among other projects.

1.24.7 Historical Monument Act, 1967

The Act provides for the preservation and protection of historical monuments and objects of archaeological, paleontological, ethnographical and traditional interest. Section 10(2) requires that any person who discovers any such object takes such measures as may be reasonable for its protection. This implies that the NUSAF IV program will undertake the Chance Finds Procedures in addressing possible encounters of any archaeological resources during project implementation.

1.24.8 The National Environment Act, 2019 and its associated regulations

The objectives of the Act include: to provide for the management of the environment for sustainable development; to provide for strategic environmental and social assessment; and to address emerging environmental management issues, among others. The Act through its respective Regulations addresses projects and subprojects that may be subjected to environmental and social assessments. This largely depends on the nature and scale of the projects and subprojects. Also, worth noting is that hazardous and non-hazardous waste may be generated from sub-project activities.

The waste issues in NUSAF IV will have to be addressed in line with the National (Waste Management) regulations of 1999.

1.24.9 Environmental Impact Assessment Regulations, 1998

The procedures for conducting ESIA are stipulated in the Regulations. The Regulations require environmental assessments to be conducted to determine possible environmental impacts, and measures to mitigate such impacts. At the end of the study, the environmental assessment report is submitted to NEMA to take a decision as to whether to approve or reject the project. The Guidelines also stipulate that the ESIA process will be participatory, that is the public will be consulted widely to inform them and get their views about the proposed project which in this case, has been undertaken to capture views of stakeholders for inclusion in the ESMF.

1.24.10 The National Environment (Audit) Regulations, S.I. NO. 47 OF 2020

The Audit Regulations apply to an environmental audit for a project or activity for which Environmental & Social Assessment has been undertaken and any other project or activity as may be prescribed by the Authority (NEMA). An Environmental Audit shall be undertaken to ensure compliance by the developer with the Act, regulations and standards made under the Act, conditions in permits and licenses and any other applicable law, environment management systems and the environmental management and monitoring plan by the developer. The ESMF provides for the need for compliance Audits of the NUSAF IV Program.

1.24.11 National Environment (Waste Management) Regulations, 1999

The National Environment (Waste Management) Regulations, 1999 apply to all categories of hazardous and non-hazardous waste and to the storage and disposal of hazardous waste and its movement into and out of Uganda. The regulations promote cleaner production methods and require a facility to minimize waste generation by eliminating use of toxic raw materials; reducing toxic emissions and wastes; and recovering and reuse of waste wherever possible. The Regulations oblige the Developer to put in place measures for proper management of waste. Thus, NUSAF IV will provide guidance on proper waste management procedures

1.24.12 The National Environment (Wetlands, Riverbanks and Lakeshores Management) Regulations, 2000

This law, consisting of 4 Parts, describes management policy and directions for important wetlands, riverbank and lakeshore areas that exist in Uganda. Any development projects, within those registered areas need ESIA studies and permission to be granted by NEMA in accordance with Regulation 34 of this law.

1.24.13 The National Environment (Noise Standards and Control) Regulations, 2003

The National Environment (Noise Standards and Control) Regulations, 2003 Section 7 of these regulations requires that no person shall emit noise more than permissible noise levels, unless permitted by a license issued under these Regulations. Section 8 imparts responsibility onto the owner of a facility to use the best practicable means to ensure that noise do not exceed permissible noise levels. The project is obliged to observe these Regulations by instituting measures for minimizing noise in the project such measures include proper maintenance of equipment and providing workers with PPEs.

1.24.14 The National Environment (Standards for Discharge of Effluent into Water or on Land) Regulations 1999

The National Environment (Standards for Discharge of Effluent into Water or on Land) Regulations 1999, together with National Environment (Waste Management) Regulations of 1999 were put in place to ensure sustainable use of environment and natural resources across the country. Amongst others, under these Regulations, the standards for effluent or waste before it is discharged into water or on land shall be as prescribed in the Schedule of the Regulations.

1.24.15 The Constitution of the Republic of Uganda, 1995 – As amended

This is the supreme law of the country and it, among other things, calls upon the Government of Uganda to promote Sustainable development and public awareness of the need to manage, promote and protect the rational use of natural resources, in a balanced and sustainable manner for present and future generations.

The NUSAF IV Project ESMF outlines the mechanisms for Environmental and Social Risk Assessment and mitigation measures to ensure that the project follows constitutional obligations.

1.24.16 Employment Act, 2006 and its associated regulations- Sexual Harassment Regulations, 2012, Employment (Employment of Children) Regulation

Provides for the recruitment, contracting, deployment, remuneration, management and compensation of workers. Section 32 of the Act prohibits employment of children under 12 years. A child of 12-14 years can only be employed for light work under supervision of an adult and not during school hours. The Act also prohibits employment or work, which is injurious to a child's health, dangerous, hazardous or otherwise, unsuitable.

Labour conditions and relations during the implementation of NUSAF IV Project will be governed by the employment Act. In accordance with the Act and World Bank ESS2, NUSAF IV Project implementing partners shall ensure that children below the legal age requirements are not employed. Even underemployment for light works that are possible under the sub project, beneficiaries shall ensure that children do not work beyond permitted working hours and for a permitted time. The most important consideration is that any piece of work should not jeopardize the health and wellbeing of a child. It is worth noting that there is no conflict between the Employment Act and ESS2. Both emphasize that work should not jeopardize the health, education, and morals of a child. The sub projects shall be implemented in line with

this Act to ensure that every employer with more than 25 workers has a Sexual Harassment Policy, workers are given written employment particulars with clear terms and conditions, are protected from Sexual harassment, etc.

1.24.17 The Occupational Safety and Health Act, 2006 and its associated regulations

This Act consolidates, harmonizes and updates the law relating to occupational safety and health. Section III of the Act provides for duties, obligations and responsibilities of employers. Section VI of the Act provides for duties, rights and responsibilities of workers.

Potential hazards associated with the activities of some sub projects under the NUSAF IV project may jeopardize the safety and well-being of workers and project host communities. Therefore, project Implementing agencies, project beneficiaries and workers will have a duty to uphold safety and health standards in the workplace and the communities in which they operate. It shall be ensured that the equipment and technologies brought into the country comply with the desired safety and health standards.

1.24.18 Other Labour Laws; Labour Arbitration and Settlement Act as Amended, 2020, The labour Unions Act, 2006

These acts provide for the right to associate, collective bargaining, mediating, reconciliation and arbitration of labour disputes, monitoring compliance with the labour standards. The principals stipulated in these labour laws shall be upheld throughout the NUSAF IV project and within all its sub projects.

1.24.19 The National Social Security Fund Act, Cap 222

This law provides for membership payments of contributions and payment of benefits out of the fund to contributing members. It caters for all employees between the age of sixteen years and fifty-five years of age. The principals stipulated in this Act shall be upheld throughout the project and within all its sub-projects. Enterprise shall be encouraged to save for its employees.

1.24.20 The Occupational Safety and Health Act, 2006 and its associated regulations

The Act upholds the constitutional right of freedom of persons with disabilities. It provides for the promotion of all fundamental and human rights. The NUSAF IV Project shall have affirmative action for Women with Disabilities to ensure that they equitably access the available opportunities.

1.24.21 Domestic Violence Act, 2010 and its associated regulations

This Act addresses domestic violence, in the context of any attack against someone. It provides for the protection and relief of victims of domestic violence, as well as punishment of perpetrators. It gives the procedures to be followed in the protection and compensation of victims of domestic violence. The procedures outlined in this Act shall be followed to prevent domestic violence and to address any cases that may arise in that regard.

1.24.22 Penal Code Act, 120

This Act makes provisions on defilement and Rape. This makes defilement and Rape criminal offences and prescribes punishments. The project shall ensure that there are no acts of defilement and rape associated with the project and its sub projects

1.24.23 The HIV/AIDS Prevention and Control Act, 2014

This Act makes provisions for prevention and control by public and private institutions. It provides for the prevention of stigma and discrimination. The NUSAF IV Project shall ensure that in the process of its implementation does not expose anyone to HIV infection. Stigma and discrimination shall be avoided in the project and sub projects.

1.24.24 Institution of Traditional or Cultural Leaders Act, 2011

This Act operationalizes Article 246 of Uganda's Constitution on the institution of traditional and cultural leaders. Traditional and cultural leaders shall be considered as key stakeholders to ensure that traditions and cultures of Uganda are positively upheld in the NUSAF IV project.

1.24.25 Equal Opportunities Commissions Act, 2007

This Act establishes the EOC to effect and ensure that Article 32 (3) of Uganda's Constitution is upheld.

The provisions of this Act shall be considered and applied in allocation of resources under the NUSAF IV project and its sub projects. Thus, the project shall promote equity and social inclusion.

1.24.26 The Children (Amendment) Act, 2016

Provides for the rights and protection of children. It sets the minimum age for employment (in light, non-hazardous work) at sixteen years of age. The provisions of this Act shall be upheld to ensure that children's health, welfare and education are not negatively impacted by the

NUSAF IV project and its sub projects.

1.24.27 The Public Health Act, Cap 281

The objective is to provide local authorities with administrative powers to take all lawful, necessary and reasonable measures to prevent the occurrence of, or deal with, any outbreak or prevalence of any infectious, communicable or preventable disease and to safeguard and promote public health. The NUSAF IV Project Implementing Agencies shall put in place measures to protect the public's health during project implementation. Of particular significance is the issue of transmission of the COVID-19 pandemic in addition to other communicable diseases.

1.24.28 The Workers Compensation Act, Cap 225

This law provides for compensation to be paid to workers (or their dependents) for injuries suffered and scheduled diseases incurred in the course of their employment. Workers that are injured or ill due to employment during the implementation of the NUSAF IV Project, will need to be compensated in line with this Act. And in line with the project requirements.

1.24.29 The Water Act, Cap 152

This law provides for the management of water resources and the protection of the water supply. It regulates public and private activities that may influence the quality and quantity of water available for use and establishes the Water Policy Committee to maintain an action plan for water management and administration. It gives general rights to use water for domestic use, firefighting or irrigating a subsistence garden.

Water may need to be abstracted for use in some of the sub project activities and so such use will be governed by the provisions of this Act.

1.24.30 The Local Government Act, 1997

This Act provides for the decentralized governance and devolution of central government functions, powers and services to local governments that have their own political and administrative set-ups. The respective district local governments in the host project districts will be consulted and involved in the implementation and monitoring of the sub projects within their areas.

1.24.31 The Historical Monuments Act, Cap 46

The main goal of the reservation and Protection of historical monuments and objects of

archaeological, paleontological, ethnographical and traditional interest. It requires that any person who discovers any portable object during an Excavation shall surrender such objects to the Minister who shall deposit them in the museum. Archaeological, paleontological, ethnographical, traditional and historical monuments may be discovered as part of project construction activities and particularly where excavation work is involved. These shall be handled in line with the provisions of this Act.

1.24.32 The Uganda Wildlife Act, 2019

The main goal of the Act is the conservation and sustainable management of wildlife. The Act defines and regulates activities that are undertaken in conservation areas and those that involve the utilization of wildlife or wildlife products, or that impact on wildlife or a wildlife conservation area. There is a possibility that NUSAF IV project activities might be undertaken in areas within and around protected areas although efforts will be made to avoid this scenario. Nevertheless, the provisions of the Wildlife Act will be followed to ensure that the activities of these sub projects, communities, refugee settlements and public institutions that are within and around such protected areas such as wildlife and forest reserves are in accordance with the legal requirements.

^{124.33} The Refugee Act, 2006

The Act provides for the legal standards and protection of Refugees in Uganda. Some sub projects of the NUSAF IV Project may be undertaken close to or within the refugee settlements and their host communities. Because of their vulnerable status, refugees will be deliberately targeted through this project.

^{124.34} Employment Act 2006

This Act spells out general principles regarding forced labour, discrimination in employment, sexual harassment and provisions to settle grievances. It further provides that, a child under the age of twelve years shall not be employed in any business, undertaking or workplace. The Project implementers are required to not engage any child workers at the Project site during the Project lifecycle and to also ensure that there is no forced labour under the Project. This Act will regulate labour conditions for the project activities both during its implementation and operation.

1.25 International Environmental instruments/obligations for Uganda

The key international conventions and treaties ratified by GOU that are applicable to the planning, implementation and monitoring of the NUSAF IV Project are discussed in Table 1 below.

Table 6: International Environment Instruments/Obligations applicable to Uganda.

Convention	Objective	Obligations of member states & Relevance to NUSAF IV Project
Convention on Elimination of all forms of Discrimination Against Women (CEDAW) 1979	This Conventions advocates for the rights of women everywhere, including their economic rights.	The NUSAF IV project will contribute to the realization of the economic rights of women by an all-inclusive targeting criterion for all Project beneficiaries
The Sustainable Development Goals (SDGs)	The United Nations' 17 Sustainable Development Goals (SDGs) aim to achieve decent lives for all on a healthy planet by 2030.	The NUSAF IV project shall contribute to the achievement of SDGs; no. 1 through empowerment of women & youths to access employment & the Safety Nets; SDG 2 through promoting CS LIPW by promoting food security. the Nutri-Cash component aims at improving nutrition and reducing hunger, this also addresses SDG3, since the target for the Nutri-Cash are the Pregnant women, lactating mothers and children under 2 years; SDG no. 5 shall be triggered since the NUSAF IV project aims to empower women & youths to access employment. This shall translate into SDG 10 by reducing inequality. NUSAF IV project shall address SDG 13 by promoting Climate Smart LIPW interventions. These will include terracing, tree growing, restoration of degraded forests, hills & wetlands, among others. the project shall indirectly address the rest of the SDGs.

Convention	Objective	Obligations of member states & Relevance to NUSAF IV Project
Convention on the Rights of Persons with Disabilities, 2006	This Conventions advocates for the rights of Persons with Disabilities, including the right to participate in economic activities and processes at all levels	The NUSAF IV project will ensure that women with disabilities are effectively mainstreamed in the activities covered under the project
International Covenant on Economic Social and Cultural Rights, 1976	This Convention provides for the right to social and economic rights including right to work, right to social security, right to cultural identity, right to health and education, etc.	The NUSAF IV project will ensure that women with disabilities are effectively mainstreamed in the activities covered under the project
UN Convention on the Rights of a Child,1990	This Convention highlights the fundamental rights of a child – it protects the child from child labour, promotes their right to health and education. It also refers to the rights of children in decision making.	The NUSAF IV Project shall uphold the provisions of this Convention in promoting the rights of children and protecting children from abuse.
Convention on Biological Diversity, 1992	The three main goals of the convention are conservation of biodiversity; sustainable use of biodiversity; and fair and equitable sharing of the benefits arising from the use of genetic resources.	Some sub-projects under the NUSAF IV Project may be implemented in protected areas. The PIT will use the screening form provided in this ESMF to screen off and avoid funding such subprojects. Where avoidance will not be possible, the PIT will ensure that the subprojects sign MOUs with the relevant authorities such as the UWA, NFA etc.
Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)	This convention seeks to ensure that international trade in species of wild fauna and flora does not threaten their survival in the wilderness.	Sub-projects that undermine CITES will not be funded under the NUSAF IV project. These will be screened off/out using the screening form provided in this ESMF

Convention	Objective	Obligations of member states & Relevance to NUSAF IV Project
Convention on Wetlands (Ramsar, Iran, 1971)	The Convention on Wetlands of International Importance, called the Ramsar Convention, is an intergovernmental treaty that provides the framework for national action and international cooperation for the conservation and wise use of wetlands and their resources.	Subprojects that are located in wetlands that are protected under the Ramsar convention will not be funded under the NUSAF IV project. They will be eliminated at the screening stage using the screening form provided in this ESMF.
The African Convention on the Conservation of Nature and Natural Resources, 1968	Encourage conservation, utilization and development of soil water, flora and fauna for the present and future welfare of mankind, from an economic, nutritional, scientific, educational, cultural and aesthetic point of view.	The PIT will ensure that adequate provisions are made in the subproject ESMPs to ensure compliance with this convention.
The World Heritage Convention, 1972	The primary mission of the Convention is to identify and protect the world's natural and cultural heritage considered to be of Outstanding Universal Value.	Destruction of cultural heritage sites is not expected under the NUSAF IV project. However, in case of any chance finds, a chance finds procedure has been included in this ESMF under annexes.
The Stockholm Declaration, 1972	The objective of the declaration is to coordinate global efforts to promote sustainability and safeguard the natural environment.	The declaration will be relevant in the management of environmental and social risks of NUSAF IV Project.
East African Community Protocol on Environment and Natural Resources, 2006	The objective of this protocol is to provide for EAC joint effort to co-operate in efficient and sustainable use and management of natural resources and promote adaptation to climate change.	The protocol will be relevant in promoting efficiency and sustainable use and management of the natural resources in a way that promotes adaptation to climate change.
The Nile Basin Cooperation Framework Agreement, 2010	Objective of the agreement is to achieve sustainable socioeconomic development through the equitable utilization of, and benefit from, the common Nile Basin water resources.	The PIT will ensure that subprojects under NUSAF IV comply with this treaty/agreement. Provisions will be made in the subproject ESMPs.

Convention	Objective	Obligations of member states & Relevance to NUSAF IV Project
OAU Convention, 1969	Specifies the aspects of the Refugee problem in Africa. Who a refugee is, who is excluded from international protection, when refugee status ceases, the rights of refugees, their obligations and administrative matters.	The convention will be relevant for the sub projects under rural communities, refugee and host communities
The Paris Agreement	The Paris Agreement requires all countries both developed and developing to make significant commitments to address climate change through decreasing global warming described in article 2 of UNFCCC.	Some sub projects under the NUSAF IV Project will be critical for reversing the effects of climate change. Examples are tree growing, soil & water conservation, restoration of bare hills wetlands, riverbanks and lake shore nursery establishment projects, etc.
The various ILO Conventions on; Labour Inspection (C81), 1947; Equal Remuneration (C100), 1951; Asbestos (C162), 1986; Fundamental principles and Right at Work; Freedom of association and effective recognition of the right to Collective Bargaining; Elimination of Discrimination in respect of Employment and Occupation	Uganda has ratified 30 of 119 ILO Conventions. The Conventions address the rights of workers in various sectors and economic activities.	To ensure compliance with the ILO conventions, a Labour Management Plan (LMP) will be developed. Provisions on labour management will also be included in the subproject ESMPs.

1.26 World Bank Group EHS Guidelines and ESS Standards

World Bank ESF standards

In October 2018, the World Bank launched ten (10) Environmental and Social Standards (ESS) designed to help ensure that programs proposed for Bank Financing are environmentally and socially sustainable and thus improve decision-making.

Each of the ESF standards were analysed against the national laws and requirements and details of recommendations are explained in section 3.5 below.

Table 7: ESF applicability table.

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
1.	ESS1: Assessment and Management of Environmental and Social Risks and Impacts	i. To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs. ii. To adopt a mitigation hierarchy approach. iii. To adopt a mitigation hierarchy approach. iv. To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and	Y	i. The project will support activities under Components 2 and 3 that are likely to generate environmental health and safety risks and impacts. Component 2 will provide funds to women to transition from micro to small enterprises, and from small to medium enterprises, which could result in small-scale civil works, while Component 3 will finance demand driven enabling infrastructure and facilities including childcare facilities, common production facilities (e.g. milling, pasteurization, storage, cooling, printing, and packaging), upgraded input and craft markets and trading centers as well as water, electricity, and digital access points. While all the activities are expected to carry relatively moderate E&S impacts due to the limited scope of the works, there are inherent risks

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
		opportunities resulting from the project. v. To utilize national environmental and social Institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate. vi. To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.		such as those related to ESHS, labour issues, GBV/SEA risk is anticipated arising from construction works to be undertaken under component 3 at existing government facilities, social exclusion, and inadequate stakeholder engagement and a security risk in some parts of the country. ii. In the short term, the project activities may be affected by the ongoing COVID-19 pandemic, which requires the project activities to apply the relevant disease preventive measures. iii. Component 4 covers Project Management, Policy Innovation, and Evidence Generation and details of activities for each of these aspects shall undergo an E&S scoping. As a recommendation, the project will recruit dedicated Environmental & Environmental Specialist, Social Development Specialist, and Gender Specialist, Specialist, Social and other staff Development specialists, and a Gender Specialist at NUSAF IV-PIU prior to disbursement, preferably 6 months prior to disbursements and implementation of activities, and thereafter maintain these positions throughout Project implementation.
2.	ESS2: Labour and Working Conditions	i. To promote safety and health at work. ii. To promote the fair treatment, non-discrimination and equal opportunity of project workers.	Y	i. The project will involve direct workers, contracted workers, and primary supply workers. All labour will likely be locally hired. Categories of workers employed (community workers and contracted workers) shall include; vulnerable workers such as women, persons with disabilities, children (of working age (18 years), in

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
		iii. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. iv. To prevent the use of all forms of forced labour and child labour. v. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. vi. To provide project workers with accessible means to raise workplace concerns, procedures, and continuous		accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. ii. The project will adhere to Uganda's Labor Laws and the Bank's standards concerning labour conditions and Occupational Health and Safety (OHS), including child labour. Requirements will be noted in the LMP. The project presents occupational health and safety risks that may arise from the construction and equipping of public facilities. To ensure the health and safety of workers during the construction and operational phases of the project, the Borrower has developed a Health, Safety, and Environmental (HSE) plan as part of the ESMF, in line with World Bank Group General Environment, Health, and Safety (EHS) Guidelines. iii. The project LMP will also outline a workers' GRM. iv. The standards explained in the LMP will also be included in site- specific ESMPs. These plans will include procedures on Investigation and reporting incidences and non – compliance, Emergency preparedness and response
3.	ESS3: Resource Efficiency and Pollution Prevention and	i. Training and awareness to workers. energy, water and raw materials. ii. To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.	Y	i. Due to the nature and relatively low scale of the activities, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction. These risks include the normal impacts of civil works (i.e., generation of solid waste, dust and noise generation, air emissions from vehicles, soil erosion, pollution from construction wastes, and water

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
	Management	iii. To avoid or minimize project-related emissions of short and long-lived climate pollutants. iv. To avoid or minimize generation of hazardous and non-hazardous waste. v. To minimize and manage the risks and impacts associated with pesticide use.		use) and in instances where fumigation is conducted for the disinfection of COVID-19 this could pose a risk to the environment and population depending on the disinfectants being used. The implementation of mitigation measures, which are proposed in this ESMF and ESMPs (including those proposed in WB General Environmental and Health Safety Guidelines (EHSGs) such as dust suppression where Applicable and vehicle and truck Maintenance shall be applied to min Minimize the impact of air emission emissions during construction/rehabilitation, and residual impacts are expected to be limited in scope and duration The noise generated from the use of construction machinery and truck movements are expected to be short-term. During the operational phase, depending on the nature of support and enterprises developed, there could be the generation of wastes and Provision of waste management procedures have been incorporated into management procedures have been incorporated into the project ESMF. Waste Management Plans will be developed as part of the ESMPs.

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
4.	ESS4: Community Health and Safety	i. To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances. ii. To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams. iii. To avoid or minimize community exposure to project-related traffic and road safety risks, disease and hazardous materials. iv. To have in place effective measures to address emergency events. v. To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.	Y	i. During the construction phase, the communities may be exposed to construction and transport vehicles, dust emissions, noise, and potential construction site and material handling-related accidents. The risks are expected to be avoided and/or mitigated through adopting best practices in line with General EHSs. A risk hazard analysis and mitigation plan, proportionate to the risks identified, will be developed and included in the site specific ESMPs. ii. Adverse social impacts such as gender-based violence (GBV), sexual exploitation, and the transmission of communicable diseases such as HIV/AIDS on affected communities may also occur because of project activities. The country has been hit by the COVID-19 pandemic which is affecting the entire country and spread to both urban and rural communities. This might affect project activities, which requires the project activities to apply the relevant disease preventive measures provided for by the Ministry of Health and World Health Organization. The client will be required to comply with the community health and safety requirements as stipulated in WBG EHS guidelines. iii. The potential risks and mitigation measures for impacts on beneficiaries have been analyzed in this ESMF and will be detailed in site-specific ESMPs.

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
5.	ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement and Land Donation	i. To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives. ii. To avoid forced eviction iii. To mitigate unavoidable adverse social and economic impacts from land acquisition or iv. Restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) Assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. v. To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.	Y	i. Physical and economic displacement is not anticipated under the project since the public facilities to be constructed under Component 3 will be located on local government/district land. ii. A Resettlement Policy Framework (RPF) will be developed to clarify resettlement principles, organizational arrangements, and design criteria to be applied to sub-projects or project components to be prepared during project implementation. iii. The ESMF will have voluntary land donation protocol and procure o NUSAF. iv. Projects that require Compensation for loss/replacement costs will not be funded under NUSAF IV. v. The implementers will ensure all the consent forms are disclosed publicly and copies stored by the district land office and copies archived in NUSAF IV project office.

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
		vi. To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant. vii. To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.		
6.	ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	i. To protect and conserve biodiversity and habitats. ii. To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. iii. To promote the sustainable Management of living natural resources. iv. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	Y	i. Given the nature and scope of the project activities, there is minimal impact envisaged on the biodiversity, since the Proposed projects are likely to be undertaken in the urban settings where the habitats may already be altered or destroyed. ii. For any facilities to be established in virgin areas, however, potential impacts on biodiversity (flora and Fauna) will be assessed, and proposed mitigation measures included in the ESMPs. This ESMF provides guidance on screening and mitigation measures to ensure that project activities do not alter or cause the destruction of any critical or sensitive natural habitats.

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
7.	ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	i. To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ii. To avoid adverse impacts of projects on Indigenous Peoples or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts. iii. To promote sustainable Development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate and inclusive. iv. To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples affected by a project throughout the project's life cycle. v. To recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples, and to provide them with an opportunity to adapt to changing conditions in a	Y	i. The IK communities on Mt. Timu in Kaabong district, the Tepeth on Mt. Moroto in Moroto district & Mt. Kadama in Nakapiripiriti and the Benet on Mt. Elgon in Kapchorwa district are considered and meet the conditions of SSAHUTLC under ESS7 and are present in the NUSAF IV operational area. And may be affected by project activities. – and as such, The VMGP shall be prepared and adopted prior to implementation of activities in areas that have Vulnerable and Marginalize Groups and implemented throughout Project implementation period. ii. The SEP includes provisions for consultation with the VMG communities which is provided for under ESS10. iii. To obtain the Free, Prior and Informed Consent (FPIC) if affected VMG in the three circumstances described in this ESS.

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
		manner and in a timeframe acceptable to them.		

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
8.	ESS8: Cultural Heritage	i. To protect cultural heritage from the adverse impacts of project activities and support its preservation. ii. To address cultural heritage as an integral aspect of sustainable development. iii. To promote meaningful consultation with stakeholders regarding cultural heritage. iv. To promote the equitable sharing of benefits from the use of cultural heritage.	Y	i. As the project will finance some limited civil works, some excavation and movement of earth can be expected. The activities to be financed by the projects are small scale and very limited in scope and the potential impact on known and unknown physical and cultural resources is likely to be minimal. ii. At this stage in project preparation, the presence of culturally significant sites associated with the project cannot be determined. The project will avoid impacts on cultural heritage and where such avoidance is not possible, will identify and implement measures to address these impacts in accordance with the mitigation hierarchy. A chance find procedure has been included in the ESMF and will be included in subsequent ESMPs.
9.	ESS9: Financial Intermediaries	i. FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects, and monitor portfolio risk, as appropriate to the nature of intermediated financing.	Y	
10.	ESS10: Stakeholder Engagement and Information Disclosure	i. To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in Particular project-affected parties. ii. To assess the level of Stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project	Y	i. The project assessment and implementation procedures should promote and allow for meaningful and culturally appropriate consultation and participation, including that of host communities at the different levels, including the right to public information and disclosure. Likewise, ESS 10 recognizes the importance of open and transparent engagements between stakeholders which allows project teams to respond to concerns and grievances raised by affected communities through an established Grievance Redress Mechanism (GRM).

S. N	Environmental and Social Standard	Objectives	Applicability Y/N	Reason
		design and environmental and social performance. iii. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them. iv. To ensure that appropriate project information on Environmental and social risks and impacts are disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.		ii. A Stakeholder Engagement Plan has been developed in addition to consultations already undertaken to date.
		v. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.		

1.26.2 World Bank Group Environment, Health and Safety Guidelines

The World Bank Group EHS General Guidelines (IFC) in Table 6 will apply to the NUSAF IV Project:

1. Environmental

- Air Emissions and Ambient Air Quality
- Energy Conservation
- Wastewater and Ambient Water Quality
- Water Conservation
- Hazardous Materials Management
- Waste Management
- Noise
- Contaminated Land

2. Occupational Health and Safety

- General Facility Design and Operation
- Communication and Training
- Physical Hazards
- Chemical Hazards
- Biological Hazards
- Radiological Hazards
- Personal Protective Equipment (PPE)
- Special Hazard Environments
- Monitoring

3. Community Health and Safety

- Water Quality and Availability
- Structural Safety of Project Infrastructure
- Life and Fire Safety (L&FS)
- Traffic Safety
- Transport of Hazardous Materials
- Disease Prevention
- Emergency Preparedness and Response

4. Construction and Decommissioning

- Environment
- Occupational Health and Safety
- Community Health and Safety

1.26.3 Comparison of the World Bank ESS and the National requirements.

Comparison between ESF objectives and national laws and requirements is provided in Table 8 below.

Table 8: Comparison between ESF objectives and national laws and requirements

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
<u>Objectives of ESS 1 are:</u> To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs. To adopt a mitigation hierarchy approach to: Anticipate and avoid risks and impacts; Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; Once risks and impacts have been minimized or reduced, mitigate; and Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible. To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged	Constitution (1995) requires GOU to ensure environmental protection & provides Ugandans a right to a clean & healthy environment. National Environment Management Policy (1994) calls for sustainable development that maintains and enhances environmental quality & resources to meet needs of present & future generations. NEA 2019 (section 110-4) requires ESIA for projects likely to have environmental impacts. Projects needing a full ESIA are stipulated in Schedule 5 (substantial to high-risk projects) and those requiring Project Briefs are in Schedule 4. Also requires monitoring and audits. The NEA (2019) (section 5.2(j) explicitly requires the application of the mitigation hierarchy in ESIA (avoid, minimize, restore, offsets), Section 49(3) of the NEA requires a proponent to have and implement an environmental Management	No significant gaps between scoping of key environmental and social and national laws.	Scoping of key environmental and social risks and impacts of the Project has been undertaken and appropriate mitigation measures identified, as laid out in this ESMF. The ESCP is already prepared and has been disclosed on prior to appraisal mission This ESMF aims to address the biophysical and socio- economic issues associated with the Project and utilized broad stakeholder consultation in the preparation of the Project, and follows the implementation of the SEP. NUSAF IV further promotes sustainable development and prescribes the requirement of activity-specific ESMPs, where applicable. This Project will apply waste management guidelines in all relevant activities. This project shall institute an effective mechanism for dealing with any hazard or disaster arising out of natural calamities or any situation resulting in general displacement of people or serious

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project. To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate. To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.	System”. Additionally, the National Environment Management Act 2019, defines the Environmental Management Agency (with the participation of all stakeholders) as the responsible agency for the implementation of the Act. It further defines the environmental management principles for the country, including the consideration of people and their needs. It sets out environmental standards that should be complied with, including waste management and hazardous substances management.		disruption of their normal life. Through ensuring proper assessments are done and project implementation is based on such
ESS 2: Labour and Working Conditions			

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
<u>The Objectives of ESS 2 are:</u> To promote safety and health at work. To promote the fair treatment, non-discrimination and equal opportunity of project workers. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. To prevent the use of all forms of forced labor and child labor. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. To provide project workers with accessible means to raise workplace concerns.	The Occupational Safety and Health Act, 2006; The Act aims at reducing occupational accidents, by prescribing a comprehensive safety and health management system required at all work places. Occupational Safety and Health Act of 2006 consolidates, harmonizes and updates the law relating to occupational safety and health. National Industrial Policy 2008 provides strategies for OHS. Workers Compensation Act, 2000 provides for the provision of financial compensation for work related injury or illness.	No significant gaps between labour & working standards of world bank & government Uganda regulations While a minimum wages Act is in place, there is lack of enforcement of the Act.13. There have been bans on protest and limitations to the ability to organize.14	The Project includes low- scale construction work, including in rebuilding community infrastructure and irrigation systems. Sub-component activities will employ community workers and contracted workers. Both groups will be subject to the Project LMP, GRM and will apply the World Bank Group Environment, Health and Safety Guidelines. These are all in compliance with ESS 2. The Subprojects will also lay emphasis to evaluate and include mechanisms for assessment, management and coordination of OSH and community safety. The project has followed ESS2 and developed labour management procedures with relevant provisions to bridge the gap. - and provide GRM for community and contracted workers
ESS 3: Resource Efficiency and Pollution Prevention and Management			
The Objectives of ESS 3 are: To promote the sustainable use of resources, including energy, water and raw materials. To avoid or minimize adverse impacts on human health and the environment	The Constitution provides for a right to a clean and healthy environment. Environment Management Act (1996) Environmental Management (Waste Management and Sanitation) Regulations (2008) NEA 2019, Section 5 (d) includes the principle that there	Lack of air quality standards that have remained in draft form. Pollution remains a significant problem throughout Uganda (air, soil, water and noise).	The project will follow provisions of ESS3 on resource efficiency in its activities to ensure compliance with the requirements. World Bank Group EHS Guidelines will be applied

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
by avoiding or minimizing pollution from project activities. To avoid or minimize project-related emissions of short and long-lived climate pollutants. To avoid or minimize generation of hazardous and non-hazardous waste. To minimize and manage the risks and impacts associated with pesticide use.	shall be “optimum sustainable yield in the use of renewable natural resources” 2011 ESIA Guidelines for water resources related projects assist planners, developers, practitioners safeguarding water resources through ESIA. Public Health Act Cap 281 requires every local authority to take measures for preventing any pollution dangerous to public health.	As with most other safeguards, adherence to best practice is relatively good for bank or donor funded projects, and those of stock- exchange listed companies, but poor when it comes to smaller proponents, many government projects and where contractors from some countries are involved.	
ESS 4: Community Health and Safety			

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
The Objectives of ESS 4 are: To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances. To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams. To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials To have in place effective measures to address emergency events. To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.	Public Health Act Cap 281 requires every local authority to take measures for preventing any pollution dangerous to public health.	No significant gaps & working standards of World Bank & government Uganda regulations	The project shall identify community health and safety risks and mitigation measures in its environmental and social screening process and the labour management procedures
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
The Objectives of ESS 5 are: To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives. To avoid forced eviction. To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) Assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure. To conceive and execute resettlement	Given the various land tenure systems in the country. The constitution of republic of Uganda 1995, The National Land Policy, 2013 etc. provides for land acquisition procedures in the country.	There are no gaps between the ESS 5 and the Constitution of the Republic of Uganda, 1995, Land policies and other regulatory frameworks applicable to Land acquisition processes Physical and economic displacement is not anticipated under the project since the public facilities to be constructed under Component 3 will be located on local government/district land	Physical and economic displacement is not anticipated under the project since the public facilities to be constructed under Component 3 will be located on local government/district land. The ESMF has a Land Donation protocol and process. And Projects that require Compensation for loss/replacement costs will not be funded under NUSAF IV.

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.			
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
The Objectives of ESS 6 are: To protect and conserve biodiversity and habitats. To apply the mitigation hierarchy⁴ and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	Policies such as the Uganda Wildlife Policy, 2014; The Uganda Forestry Policy, 2001 and legislation right from the Constitution (1995), National Environment Act, 2019 The Uganda Wildlife Act, 2019, National Biodiversity Strategic Action Plan II (2015-2025), the National Policy for the Conservation and Management of Wetland Resources 1995, provide for biodiversity conservation and the sustainable use of natural resources.	Implementation is variable—good in the case of donor or Bank funded projects, but modest to poor otherwise. Even though screening of projects is undertaken by NEMA at an early stage to identify potential biodiverse areas, political interference puts certain natural habitats at risk especially wetlands and forests.	The Project should adhere to World Bank Standards as well as government of Uganda laws and policies in implementation of activities,
ESS 7: Indigenous Peoples/Sub-Saharan African Historically underserved Traditional Local Communities			

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
The Objectives of ESS 7 are: To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. To avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when	The Constitution of the Republic of Uganda, 1995 and The Uganda Social Protection Policy 2016 for recognition and inclusion of vulnerable and Marginalized groups in all government programs in-line with the world bank social inclusion pillar under the sustainability frameworks.	There are no gaps between the ESS 7 and the Constitution of the Republic of Uganda, 1995, the social protection policy and other regulatory frameworks applicable to the concept of Vulnerable marginalized groups	The IK communities on Mt. Timu in Kaabong district, the Tepeth on Mt. Moroto in Moroto district & Mt. Kadama in Nakapiripiriti and the Benet on Mt. Elgon in Kapchorwa district are the VMGs identified as satisfying the World Bank's policy for the identification of Vulnerable and Marginalized people in Uganda in NUSAF IV project area Social assessment was done to inform this ESMF and additional assessment will be done to inform the development of the Vulnerable and Marginalized Group Framework (VMGF)- for implementation in the IK area as was in NUSAF3 To take extra step to emphasize the CDD design aspects that take already considerations of social inclusiveness as core aspect in beneficiary and interventions targeting Transparent participatory community entry and

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
			engagements in selected areas of including in the selection, design, and implementation processes. Equity in IPF distribution (Indicative Planning Figures). Careful screening of activities of all subprojects for a preliminary understanding of the nature and magnitude of potential impacts, exploring alternatives to avoid or minimize any adverse impacts as detailed in the ESMF, VMGF and RPF; Training of selected community-level facilitators, Community Development Officers etc. in participatory approaches and the vulnerable and marginalized people (IK) issues to achieve social inclusion Ensure all eligible sub- projects financed are based on the needs and priorities of the IK.

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
ESS 8: Cultural Heritage			
<u>The Objectives of ESS 8 are:</u> To protect cultural heritage from the adverse impacts of project activities and support its preservation. To address cultural heritage as an integral aspect of sustainable development. To promote meaningful consultation with stakeholders regarding cultural heritage. To promote the equitable sharing of benefits from the use of cultural heritage.	The Constitution of the Republic of Uganda, 1995. The National Cultural Policy, 2006; Recognizes the cultural heritages and its requirements to protect all areas of archaeological, historical, architectural, geological and paleontological value or scientific interest. Such sites cannot be altered, excavated or damaged and material on them cannot be removed without the written consent of the Executive Director of the National Museums and Monuments of Uganda. The law requires that any monument or elic discovered must be reported in writing to the Executive Director of the National Museums and Monuments	There are no significant gaps between ESS8 and national laws, policies and regulatory frameworks (Historical Monument Act, 1967, The National Cultural Policy, 2006 etc.,)	No major affection of any cultural heritage sites is anticipated under the Project; however, the Project may have to handle chance cultural findings, following Chance Find Procedures.
ESS 9: Financial Intermediaries			

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
The Objectives of ESS 9 are: To set out how the FI will assess and manage environmental and social risks and impacts associated with the subprojects it finances. To promote good environmental and social management practices in the subprojects the FI finances. To promote good environmental and sound human resources management within the FI.	N/AA	N/AA	N/AA
ESS 10: Stakeholder Engagement and Information Disclosure			
The Objectives of ESS 10 are: To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the	Access to Information Act (2005). The Act sets out that members of the public have a right to access information held by public bodies.	While the Act spells out right to information held by public bodies, the ESS recognizes the importance of open and transparent engagement vis-à-vis project stakeholders by the borrower.	The Project commits to recognize the right to information, even were held by the borrower. This process has already commenced through the Stakeholder Engagement Plan (SEP), laying out all the different types of stakeholders, timings and modes communication and consultation. The Plan further includes Project Grievance Redress Mechanisms. The Plan will be disclosed prior to project appraisal.

ESS Objectives	National laws and requirements	Gaps	Recommendations/Remarks
project life-cycle on issues that could potentially affect them. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.	Rural District Councils Act (29:13), The Rural District Council has a variety of powers, including the conservation of natural resources, control of bush, animal diseases, sewerage works, pollution, and effluent or refuse selection, collection and disposal etc.		

1.27 Overview

Throughout the planning, design and implementation of the project, various stakeholders shall be identified and their views sought on specific matters to ensure that the project actions meet their needs and aspirations. During the planning and design phases, engagements with stakeholders (DLGs, MDAs, opinion leaders, religious leaders, CBOs NGOs & CSOs as well as community members) were done for the project's social acceptance and sustainability. To date, stakeholder engagements are guided by ESS 10 -Stakeholder Engagement and Information Disclosure. The Republic of Uganda guidelines on the Social, Safety and Health Safeguards also places emphasis on stakeholder engagements as a core component of project management. Besides consultations done during preparation of this ESMF, the NUSAF project shall conduct other extensive stakeholder engagements at all stages of the project cycle planning, implementation, monitoring and evaluation including Ministries, Departments and Agencies (MGLSD, MoLG, Local Governments, NPA, MWE, NEMA, NFA, MAAIF, MOFPED) among others. Other stakeholder engagements will include CSOs working with VMGs, private sector representatives, community-based organizations, faith-based institutions, religious institutions and traditional institutions will also be consulted. In addition, some Development Partners working on the issues social protection such as the UNICEF, WFP, FAO as well as other development partners will be consulted.

Stakeholder Engagement and Information Disclosure under the ESF recognizes the importance of open and transparent engagement with project stakeholders and vulnerable or marginalized individuals or groups. Success of any project is hinged on the level and quality of stakeholder engagement, which is to be an inclusive process expected to occur throughout the project life cycle. Engagement is more useful when introduced in the early phases of project development and is mainstreamed into all levels of decision-making. To this end, a Stakeholder Engagement Plan (SEP) was prepared as part of the NUSAF IV Project ESMF. Stakeholder engagement will be allocated adequate resources for extensive consultations in the 9 sub regions of the NUSAF IV project and consequently towards implementation of the environmental and social mitigation measures identified by the stakeholders as well as its proposed strategies for prevention and mitigation, along with relevant NGOs/CBOs, and the WB-provided Enhanced

Implementation Support and Monitoring (EISM) service providers. GOU-Office of the Prime Minister and Ministry of Finance, Planning and Economic Development have committed to address adverse effects.

1.28 Goals of Consultation process

The primary goals of the consultation process are to:

- Ensure transparency and involvement of stakeholders in assessing and managing the potential environmental and socioeconomic impacts of the NUSAF IV;
- Help manage risks, concerns and public expectations through ongoing dialogue with stakeholders;
- Improve decision-making, and build understanding by actively involving key project stakeholders in two-way communication. Through this process, the implementing agencies will better understand the concerns and expectations of stakeholders, and the opportunities to increase project value to the local community.

1.29 Objectives of stakeholder consultations

The consultations with stakeholders and communities are intended to achieve the following objectives to:

1. Provide information about the project and to tap stakeholder information on key environmental and social baseline information in the project area;
2. Provide opportunities to stakeholders and project beneficiary communities with focus on vulnerable groups and vulnerable or marginalized individuals or groups to discuss their opinions and concerns respectively;
3. Solicit the stakeholders' views on the project and discuss their involvement in the various project activities;
4. Discern the attitudes of the community and their leaders towards the project so that their views and proposals are taken into consideration in the formulation of mitigation and benefit enhancement measures;

5. To identify specific interests of and to enhance the participation of vulnerable or disadvantaged individuals or groups, such as the poor, the elderly, women and children, child-headed families, the disabled, and others;
6. To inform the process of developing appropriate management measures as well as institutional arrangements for effective implementation of the Project.

1.30 Engagement with stakeholders

1.30.1 Some of the preliminary key stakeholder concerns and views

Table 9: Preliminary key stakeholders.

Issue raised	Consultant's remarks/proposed measures
Ms. Rita Okello Wange – Principal Inspectorate Officer-Inspectorate of Government (IG) Under Transparency Accountability and Anti-Corruption, IG has undertaken a number of initiatives to sensitize and empower the communities to report corruption and maladministration tendencies through media channels and seminars; The Inspectorate has instituted avenues such as e-mails, Report 2 IG using Short Message System (SMS), telephone calls on 0414347387 (hot line) and other general lines, physical reporting to any of the 16 IG Regional Offices spread thought the country. Report2IG uses a short code 6009. This short code is the number to which all complaints or reports are sent. It is TOLL FREE for all mobile networks. With your mobile phone, simply type the keyword "CORRUPT" and SMS to 6009 and follow the prompts. You will receive a Complaint reference number which will be used to follow-up the complaint.	A systematic way for capturing information and data on appeals and complaints has to be strengthened in NUSAF IV important mechanisms to ascertaining transparency and accountability in terms of whether project beneficiaries who have grievances are able to register them, and if the registered, whether concerned committees and/or authorizes take necessary action and on time. There is also need for strengthening the mandate of the Community monitoring groups in capturing and resolving grievances and complaints. This can be through continuous refresher training, increase facilitations of CMGs and encouragement of other government and world bank programs to use and also extend support were necessary to enable them to deliver their mandate

Issue raised	Consultant's remarks/proposed measures
Complaints can also be filed online at http://www.igg.go.ug/complaints/ The Community Monitoring groups established in every parish also act as first line to support registration and resolving of complaints and grievances raised by stakeholders. Where they cannot resolve then they escalate the grievance through project grievance redress system to IG regional and or national office for further handling and redress. However, in adequate facilitation remains a challenge. And thus, make them not fully commit to their work	
Issue raised	Consultant's remarks/proposed measures

Issue raised	Consultant's remarks/proposed measures
Eng. Orijabo Albert – Assistant Commissioner Water Resources Management. Directorate of Water Resources Management. Ministry of Water and Environment - NUSAF IV needs to integrate cross-cutting issues into the project designs early enough and they should be integrated even in the BoQs for works; - The Environmental Management Specialist and Social Development Specialist for NUSAF IV should be in place right from the beginning of the project to support NUSAF IV project safeguards Implementation - NUSAF IV should not assume the districts will monitor and enforce compliance on safeguards without allocating facilitation. The DEOs have challenges of resources and any additional load should be matched with resources; and - If the DEOs and CDOs are to follow up works, they should be brought on board in the project early enough not much later in the project.	- Cross-cutting issues including environment, gender, HIV/Aids, waste management to be included in the budgets. - NUSAF IV Secretariat to recruit as part of effectiveness safeguards team to provide guidance on safeguards implementation for the project but also work with line ministries relevant to the project - Adequate budget allocation as was in NUSAF3 must be maintained to facilitate onsite and offsite ESMP activities and as well as a contingency budget at the event of crisis such as Ebola, covid etc. - The design of water related projects must be consulted upon and approved by ministry of water and environment and implementation to be monitored and supervised with the support of the ministry.
Caro Brenda Lorika: Former Environmental and Social Safeguards Specialist NUSAF-3 Environmental Health and Social Sustainability is very critical in NUSAF IV project. NUSAF3 came into effect under the NEA 1995, The National Social Protection Policy 2016, NDP2 and SDGs among other critical policies and frameworks NUSAF3 also followed the WB safeguards operations policies	This is a good practice that must be strengthened further in NUSAF IV. OPM will have to closely work with MAAIF and MWE to strengthen the Afforestation, crop production and veterinary extension services systems to address the beneficiaries' demands of extension services. OPM will have to recruit at least four staffs to manage safeguards requirements (EHSS) Capacity building Initiative must be undertaken in this NUSAF IV

Issue raised	Consultant's remarks/proposed measures
which strive to ensure sound environmental and social sustainability. In compliance with WB and GOU requirements, an Environment and Social Management Framework, Resettlement Policy Framework and Vulnerable and Marginalized Peoples Plan were prepared to support address the adverse environmental and social impacts. The project developed an Environmental and social management system (ESMS) as core part of NUSAF3 project cycle- to provide systematic steps and operational tools for managing the environmental and social outputs of projects implemented. Decentralized environmental and social management structures were established with key technical expertise of environmental, health safety and social development at districts, sub county and at community level (CFs) to support implementation of safeguards requirements Budget allocation was done between 2- 5 % for each sub project investments. With infrastructure related projects and public works taking the highest at 5% while livelihoods largely at 2%. The MIS system was established and with safeguards module where all safeguards' outputs would be reported. Challenges Given the geographical scope and only having one specialist at the center unlike in other projects. This was so tasking. In some instances, the Desk Officers would not support	South to South Learning for knowledge and experience sharing to strengthen safeguards implementation in districts Emphasis on GBV and VAC and other social risks management and lessons documented for future scale up Safeguards documentation need to be enhanced for purpose of show casing innovations and good practices to other projects Strengthen the coordination and collaboration with other actors and projects for harmonized implementation and reporting Strengthen the grievance redress mechanism to include strict guidelines on reporting on incidences Provide budge for ESMP activities (Health safety, social and environmental) activities and provide percentage for each aspect.

Issue raised	Consultant's remarks/proposed measures
technical staff in doing their work and prompt reporting. Limited allocation at the national levels for safeguards capacity building activities that made it difficult for the specialist to carry out refresher trainings on key safeguards issues	
Issue raised	Consultant's remarks/proposed measures
Lokongo Peter Pauline, District Natural Resources Officer, Napak District, Sarah Bisikwa District Natural Resources Officer Manafwa, Emmy Senior Environment Officer Kaabong District and Bako Florence Senior Environment Officer Nakapiripirit District & Lomongin Emmy Environment Officer Kaabong District The project Institutionalized and MIS system to enable reporting on progress of ESMP activities. However, some of the DEOs could not easily access the system due to user rights. And thus, this would cause unnecessary delays in some cases	Safeguards MIS requirements need to be brought up front and all DEOs and CDOs trained, given user right at the onset so it is easy to upload necessary safeguards data. Also targets needs to be set prior to ESMP implementation to ease reporting and results measurements
Mr. Ojok Bran, NUSAF Desk Officer, Yumbe District The selection criterion for group members depends on the level of discrepancy of community members. There are communities in Yumbe where everyone is too vulnerable hence every community member is eligible for selection. But in some instances, verbal and assertive members end up being beneficiaries even when they do not qualify.	There is a need for defining clear criteria in the selection of beneficiaries and but also while allowing flexibility to the community to identify poor in a participatory manner keeping community situation and ground realities in mind. Under NUSAF IV, at the community-level, beneficiaries will be selected for inclusion in the Project through a community-based targeting process that will be facilitated by the CDO and other key actors based on eligibility criteria that are established at the national level. The selection of beneficiaries for Component 1&2 will be carried out through a two-step process including geographic identification of the poorest districts and

Issue raised	Consultant's remarks/proposed measures
	community-based targeting to reach the poorest and most vulnerable. To facilitate this process, the NUSAF IV project will focus on few geographic areas with higher level of poverty, exposure to climatic hazards such as drought and flood.
Ayesiga Mukama NUSAF Group, Kigwera sub county Headquarters, Buliisa District Most NUSAF decisions are taken at district level without directly involving the targeted beneficiary communities. District leaders often waste a lot of resources on workshops and seminars yet these do not directly benefit the community.	One of the components NUBSP will adopt from NUSAF 3 is Transparency, Accountability and Anti-Corruption Programme (TAAC). The TAAC program is intended to promote good governance at all levels of Project implementation. The program is implemented independently by the Office of the IG. As part of the TAAC program, the Inspectorate of Government will continue to use both enforcement and preventive/proactive measures. Enforcement measures will include investigation of complaints against corruption, as well as enforcement of the Leadership Code. The IG will be one of the first ports of call for the social accountability committees (SACs) in the communities.

1.31 Critical Issues raised during ESF-NUSAF successor consultations by Technical, Political and Opinion leaders in Karamoja Region

Table 10: Critical issues raised during ESF-NUSAF

SN	Sector	Issue for NUSAF IV attention
1.	Security Sector	- Insecurity issues in Karamoja needs to be holistically and sustainably managed as this will affect NUSAF IV implementation by communities. Cordon and search carried out now at disarmament exercise at wee hours has continued to scare many communities' able-bodied members and a majority no-longer stay in their homes. - The Project Director/OPM to work out appropriate modality with ministry of defense and ministry of security to solve this problem. This will include sensitization of the communities jointly by the district local governments, defense and security personnel during the project launch and throughout project implementation for the purpose of peaceful disarmament without affecting project implementation. The District Security Officer and The Residence District Commissioners will also regularly back stop and as well monitor sub project implementation, including participating in sensitization meeting at community levels. <i>This will support in addressing ESS4 requirements community health and safety (security of the beneficiaries)</i> - Human animal conflicts in Kaabong, Karenga, Nakapiripirit, Nabilatuk, Napak and Moroto requires attention by UWA and Districts. UWA shall work with local governments in ensuring clear management and compensation measures are implemented for the affected beneficiaries, so their livelihood protected.
2.	Education Sector	- The project to have special consideration to promote food production in schools to support feeding and contribute to education out comes (retention, girl child participation, enrolments, nutrition, performance, etc.) - The Project Director to work with ministry education to provide infrastructures especially dormitories, fences and vocational hubs to support children stay in schools as many are exposed and have turned out to rustling as a way of livelihoods

SN	Sector	Issue for NUSAF IV attention
3.	Health Sector	• Health structures to be considered in the NUSAF successor specifically to address issues of health and safety under safeguards and support GBV and VAC referrals and support the VHTs programs. • Health sector to support the nutrition component implementation to cover pregnant, lactating, children under two, critically sick (HIV and other illnesses), the elderly and Persons with severe disabilities • Health systems strengthening to be part of the nutrition component either supported by government or development partners in partnership with NUSAF <i>(ESS4 Community health and safety)</i>
4.	Water and Hygiene Sector	• The Project to promote water for production (Irrigation and livestock use) in all districts • Support needed to safe water for drinking and domestic use • Support needed through LIPW on desilting already existing valley tanks and water ponds • Promote rainwater harvesting technologies at household levels • Support for establishment and training of Water user committees on O&M of facilities • Support to waste management specifically in the urban and growth centers <i>(ESS 3 Resource efficiency and pollution management)</i>

SN	Sector	Issue for NUSAF IV attention
5.	Production Sector	• Production on and off farm activities be informed by agricultural zoning of wet and dry areas. This will enable communities to maximize production and results in the end • Settlement Development Initiatives to be promoted at sub county level (Each per sub country) for integrated and large-scale projects • Need to promote / establish Animal health clinics to-support animal health challenges faced by livestock farmers and extension staff attached as well as community animal health workers identified and trained to manage. This can be for business • Under savings, the commercial officers provided with clear modules to support savings component and also a reporting module developed through MIS to track households' savings from livelihood and public works participants • Marketing component strengthened to enable farmers have one stop center where all products can be accessed by traders but also through digital means particularly for livestock farmers • Promotion of high value crops and cash crops in all NUSAF IV targeted sites and guided by potential value chains available for each district • Pest management procedures and technologies need to be developed to manage army worms and locusts that tend to destroy crops at early stage subsequently affect yields and lead to food insecurity (ESS 3 Resource efficiency and pollution management) • Storage facilities should be prioritized for the project for easy bulking of farmers products • Need for the project to consider Investments in pastures and hay management for farmers doing dairy and bull fattening. • And apiary for export as there is very high potential in Amudat, Nabilatuk, Napak, Moroto and Kaabong under the IK
6.	Roads Sector	• NUSAF IV to support access roads and bridges to enhance accessibility for farmers and service providers in the project area. Many community access roads and bridges are very much in bad state. E.g., Lokeriaut Settlement Based Development Initiative (SBDI) can't be accessible during wet season due to the river crossing in the area which requires abridge. Similarly, to all site which SBDI model will be implemented.

SN	Sector	Issue for NUSAF IV attention
7.	Natural Resources Sector	• The project to promote agroforestry technologies that brings in both climate change and address disaster and food security challenges • The project to promote regeneration and assisted regeneration of degraded ecosystems through area closures for indigenous species in degraded fragile ecosystems such as river banks, wetlands, reserves etc. This will support maintenance of indigenous species • Promote the growing of indigenous species than exotic species through establishment of sustainable green houses in every sub county • Tree plantation done with landlords to guarantee O& M and sustainability. And clarity of benefit sharing between landlords and communities defined • Massive tree planting program as core responsibility must be embedded in NUSAF IV program so each benefiting household as a requirement plant up-to 5 assorted trees (fruits and shed) and nurtured for at least 6 months before they access funding. An assessment shall then follow for successful households to be included in the project • LIPW and DRF components to continue under NUSAF IV. However, they must be targeted on critical assets such as desilting of valley tanks, community access roads, sites of up-to 100 acres tree plantations, sand dams, fruit plantations, and as well as used to support works on the SBDI sites • Sustainable energy technologies to be thought through and promoted in Karamoja to address issues of charcoal burning and high fuel wood consumption. • Address <i>(ESS 3 Resource efficiency and pollution management)</i>

SN	Sector	Issue for NUSAF IV attention
8.	Finance and Administration Sector and general project operations	• The scope of implementation structures needs to be enhanced to accommodate all critical sectors for NUSAF IV • There is need for clarity on roles and responsibilities for each implementing entity including political stakeholders • The CAO to appoint a coordinator from administration who will work with technical focal points attached to components • CFs recruitment be the responsibility of the sub county and requirements/qualifications should be in-line with components • The CAO and CFO both sign on the fund authorization document for controls • Auditors to advice the CAO and CFO on beneficiaries' access to funds from banks after physical audit report is produced every month. • Operations funds to be disbursed according to quarterly agreed upon activities with clear codes for each entity • Timely disbursement of sub projects funds latest by second quarter of every FY to facilitate proper planning, implementation and accountability of project funds. The experience under NUSAF3 saw lots of funds swept back which subsequently affected implementation and accountability of funds. • Digital payment models should be studied including SAGE models to inform the NUSAF IV beneficiary cash payments • Social registries must be updated and used as data base for targeting to minimize targeting errors of exclusion. • Urban and growth centers to have separate menu from the rural areas and should include Waste management facilities, value addition, packaging and processing facilities, access roads, market • infrastructure, urban agriculture and physical planning with tree planting of ornamental trees on road reserves.

SN	Sector	Issue for NUSAF IV attention
9.	Community Based Sector	• Skilling the youth and women through vocational training centers and mentorship for 1) Soft skills of life (behaviours, goals, vision decision making, personal development to develop personal goals both soft and long term individual goals) and 2)work readiness skill to prepare the to the world of work and specifically on income, vision e.g., carpentry, crafts, welding, events management, ware/storage management, etc. (financial literacy ability to budget and save, VSCL, meet plans in the soft skills) • Enhance the CDOs mobilization role and mind set change activities to support smooth uptake and sustainability of NUSAF interventions. This should be in-line with the PDM pillars • Enhanced targeting processes managed by the CDOs
10.	Planning Units, ICT and communications	• The planning unit to provide and as well verify data provided for planning in-line with UBOs data and National planning statistics • Planning unit to oversee monitoring and Evaluation activities. For knowledge management, learning, visibility and replication of innovations and good practices • Intensify communication for development and with a focus on beneficiaries who are direct project stakeholders (use of social media, radios, TV shows) where these categories go speak on behalf of the project • Create a technical working group for this team to manage and dissemination of results systematically and accurately in various products to the project stakeholders

SN	Sector	Issue for NUSAF IV attention
11.	Safeguards compliance Sector	• ESMP funds clearly provided for and contingency budget embedded to cater for un-anticipated crisis. Each of the component (health safety, environmental and social risks management) have clear budget codes • ESMPs developed with clear and measurable targets. This should also be uploaded into the MIS • DEOs and CDOs to implement Capacity building activities under safeguards and support communities to implement the onsite activities • Local Environment Committees and Grievance Redress Committees established in all parishes to support in monitoring the implementation of Safeguards on site and off sites activities done at community levels in-line with the National Environment Act 2019 and manage complaints and grievances at community levels • NEMA role in monitoring of environmental and safeguards activities need to be strengthened • Complaints and grievance management a responsibility of the Community development officer. This same team to support IG on STAAC component. (ESS 10 requirements) • Vulnerable and marginalized groups plan need to be developed and monitored on as was in NUSAF3 and disclosed. Address ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities • GBV and VAC action plans be developed and financed and implementation assigned to the gender and probation officers • PWD and Disability inclusion shouldn't be given special consideration in the project, targets set and progress tracked and reports shared with ministry of gender • Physical cultural resources need to be gazetted improved and protected for ecotourism and promotion of Karamoja cultural heritage (ESS8 requirements on cultural heritage) • VHTs to work with the safeguards and health to support health and safety requirements including management of incidents /accidents and reporting on this on monthly basis (ESS2 on labor and working condition & ESS4 community health and safety) • UWA and NFA to have discussions and sign MOUs with communities utilizing NFA and UWA lands.

1.31.1 Issues for Consultation

The project, its intended objectives, the location, enhancement mechanisms, its ownership as well as the need of public consultation and the ESF requirements were discussed to the stakeholders consulted in the selected districts across the 9 regions. Views were gathered. The CDOs and DEOs will have to refine and clearly indicate the issues that have to be pointed out and discussed during consultations in project planning, implementation and in monitoring and evaluation once NUSAF IV project implementation is rolled out to districts.

1.31.2 Consultation during Mobilization and Sensitization

At this stage, OPM and Local Governments (LGs) will undertake awareness creation among the key stakeholders of the Project at national, district and sub county and community levels. CSOs/NGOs may also be recruited to carry out consultations with vulnerable or marginalized individuals or groups following the enactment of AHA. The awareness campaigns will help to create a good understanding of Project objectives, access criteria, implementation modalities and inspire stakeholders to actively participate in Project implementation.

The awareness creation will be done through electronic, print and traditional media, workshops, seminars and community meetings as an ongoing undertaking. The sensitization and mobilization campaigns are expected to initially stimulate community interest in the project support as well as promote effective stakeholder participation, transparency and accountability in Project implementation throughout the subproject cycle.

The communities will express their interests in Project support in form of subproject interest forms (SPIFs) that shall be distributed free of charge. The distribution of sub- project interest forms will be the responsibility of the Sub County Chiefs, Community Development Officers, and Community Facilitators and or any other officers assigned the task. The SPIFs will be made available in public places e.g., sub-county headquarters, places of worship, trading centres, etc. The Sub- County Focal Person shall receive all SPIFs and register them in the SPIFs register to be opened in each the sub-county.

1.31.3 Consultations on ToRs for ESIA and Voluntary Land Donations

The intent of public consultation during scoping is to ensure that the ESIA takes full account of the priority concerns of project-affected people and other relevant stakeholders and identifies the full range of potential impacts. Once the ToRs for the ESIAs are available in draft

form and before they are finalized, the respective implementing agency will have to obtain stakeholders' inputs on the ToRs and particularly to check that no issue of concern to stakeholders has been omitted in the scopes of assessments in the final ToRs.

The Consultant will assemble appropriate materials, (maps, graphs, drawings, simulations, models, key environmental figures) disclose them in a manner acceptable to Bank policies (timely prior to consultation, in a form and language that are understandable, in locations accessible with reasonable effort to the groups being consulted) and organize venues which will enable the affected population to participate without excessive undue efforts. Suggested venues would be near the project sites ensuring accessibility to all affected people.

After finalization of the ToRs, the respective implementing agencies will meet with representatives of the key stakeholders to review the final draft ToRs and receive feedback on any issues they feel are missing.

Terms of Reference for the follow-on ESIAs will be reviewed and adjusted depending on the outcomes of this phase and will be final after this stage. However, what we need to note is that since this project is social protection project and given the nature of its activities. The ESIA may not be necessary. Rather the project will use the screening procedures, ESMP process and as well as the VLD procedures and protocol.

1.31.4 Ongoing Consultations

The World Bank also requires that the consultation process is ongoing during the construction and operation phases of the project. To this effect, OPM will be required to maintain long term and mutually beneficial open dialogue with local authorities and the public through its Social and Environmental Safeguards Specialists and Officers during implementation. A key role of this post consultation will be to ensure that local stakeholders have an opportunity to raise questions, comments or concerns and that all issues raised are answered promptly and accurately.

Therefore, disclosure of information will also continue throughout project construction and operation. The primary emphasis here will be to assure stakeholders that the environmental and social mitigation, monitoring and management practices established in the RAP, ESIA and ESMPs are being implemented and the environmental and social standards and guidelines required by Government of Uganda and the World Bank are being met through a comprehensive monitoring and reporting process.

In that regard, the implementing agencies will have to maintain Environment and Social Registers of written records with respect to environmental and social impacts from the NUSAF IV. In addition, an annual report containing information relating to the monitoring program will be prepared by the implementing agencies and submitted to NEMA and the World Bank.

1.31.5 Consultation of Special Groups

Most of the target beneficiaries include widows, Orphans, People living with HIV/AIDS Ex-combatants, former abductees, female headed households, child mothers, unskilled and unemployed youth, youth, Elderly, Child head families, Persons with disability and Landmine victims. Interest in the NUSAF IV will therefore vary among different vulnerable groups (and individuals) in the community, and they may be affected differently. It will be important to keep this in mind during the consultation process, and in some cases, it may be more appropriate to consider the needs and priorities of sub-communities rather than those of a whole village. The consultative and communication strategy has to place a special emphasis to ensure the participation of vulnerable groups in decision making throughout NUSAF IV planning, implementation and evaluation.

Given the social setup of the Vulnerable Groups, ethnic minorities and disadvantaged groups, consultation will require time and an effective system of communication amongst interested parties to ensure that it adequately deals with their needs, priorities, and preference. This will be best achieved through discussions in focus groups specific to each category. Where participation of certain group of people in community meetings is difficult, due for example to geographical distance or social segregation, other methods such as door-to-door visits, structured and unstructured interview, separate community meetings or other participatory techniques will be considered. Local languages should be used, and efforts should be made to include all community members.

People with disabilities are amongst the world's poorest of the poor and vulnerable in countries even where the World Bank has invested in several development projects. This is because sometimes PWDs are not systematically consulted and therefore excluded in the planning and implementation of projects. There are several PWDs in the NUSAF IV program areas and the consultation of PWDs will be critical to guide subproject designs to ensure their inclusion.

During NUSAF3, PWDs were consulted, particularly those in leadership positions. However, the consultation was inadequate because it did not take care of the information needs of the

deaf and the visually impaired. To be effective there is a need for sign language interpretations services and information in Braille as may be applicable. The NUSAF IV Implementation Manual should clearly provide details on consultation of PWDs.

1.31.6 January 6, 2024: Additional Consultations on Non-Discrimination

In January 2024, additional consultations were undertaken on the project to specifically discuss vulnerability of some individuals or groups to discrimination.

During the consultations, key issues raised relating to NUSAF IV included:

- The possibility for discrimination of vulnerable or marginalized individuals or groups from access to finance and other project benefits,
- The need to ensure that the mapping of CSOs includes those with experience in dealing with discrimination,
- The need for a strategy to ensure that recruitment for contracts is competitive and based on merit,
- The possibility of hostility towards and stigmatization of individuals or groups based on their vulnerability.

The approach to managing these issues and other issues raised during the consultations are found at section 5.2.4 and Annexes 13 and 14 of this ESMF. A summary of these additional consultations is posted on the World Bank website under Uganda Consultations on <http://www.worldbank.org/en/country/uganda/brief/consultations>.

1.32 PARTICIPATION OF VULNERABLE GROUPS

1.32.1 Identification of Vulnerable Groups

A social assessment with focus on potential vulnerability covering all affected groups will be performed to ensure effective consultations and culturally appropriate benefits for each group. As part of this analysis, project preparation will assess the vulnerability of different groups in particular project contexts (in terms of potential exclusion from project benefits, negative

project impacts, and the need for specific culturally compatible mechanisms for participation, e.g. for women, the widowed, the disabled, the elderly, and others.), and will incorporate adequate measures to address such vulnerability in project design.

1.32.2 Barriers to Participation

Key social challenges that the participating communities might face include: (i) gender disparities in access to livelihood and educational opportunities; (ii) limited access to social services, especially education, health services due to the remote nature of its target communities, and (iii) recurring conflicts over natural resources, particularly related to water management and land tenure arrangements. Each of the vulnerable groups in the project areas confronts a different set of problems that it must overcome in order to fully participant in the project as below:

- a. Women in general face the highest risk of exclusion because of cultural biases, attitudes, and social status as they are treated as inferior and socially excluded from decision making and other civic engagements because society accords them little worth.
- b. Disabled people confront physical barriers that prevent them from taking advantage of the services that may be available in their community, which, in turn, may make it more difficult for them to participate or benefit from the project. They also tend to be victims of social stigma that further limits their opportunities and isolates them.
- c. War-affected populations, whether widows, ex-combatants, returning internally displaced people (IDPs), or families that stayed in their village throughout the conflict, confront a shared reality of a community whose social and economic infrastructure and social fabric has been destroyed by war and must be rebuilt from the bottom-up.

1.32.3 Guidelines for Inclusion

Impacted Communities are best placed to identify their priority needs, implement subprojects and manage investments. The local communities hosting refugees are better able to plan for and effectively implement investment sub-projects. However, the process of mobilization and planning process needs to be inclusive and participatory to ensure that all social groups,

including women, youth, and other vulnerable or marginalized individuals or groups following the enactment of the AHA are involved in the process; a sensitive facilitation to ensure that their voices are expressed and there is no elite capture; planning is led by local governments, involves multi- stakeholders and takes into account other ongoing and/or proposed projects and programs to avoid duplications and ensure synergies; and there is downward accountability to the community. Guidelines for including Vulnerable Groups include:

- a. Identify subgroups, especially those at risk of exclusion;
- b. Structure project rules and procedures to promote their participation;
- c. Determine participatory techniques that can help facilitate their involvement (where existing systems of social organization are highly inequitable, new groups may need to be created to enable excluded groups to participate);
- d. Ensure that intermediaries (NGOs, local government, etc.) working with communities have expertise in working with these groups and using participatory techniques;
- e. Investigate how local institutions can be made more responsive and inclusive of these groups;
- f. Include specific indicators related to these groups in monitoring and evaluation systems and involve all stakeholders in monitoring and evaluation.

1.32.4 groups

Non- Discrimination of vulnerable or marginalized individuals or

Inclusion and nondiscrimination refer to disadvantaged and vulnerable individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, economic disadvantages, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. Inclusion and nondiscrimination risk criteria: To help determine the risk of inclusion and nondiscrimination for the Project, the following five risk criteria were applied:

- I. Presence of disadvantaged or vulnerable or marginalized groups (e.g., refugees) in the project area.

- II. Higher concentration of disadvantaged and vulnerable individuals or groups in the project area (mainly urban areas).
- III. Project benefits directly relevant to disadvantaged or vulnerable individuals or groups (i.e., health, education, or service providers).
- IV. Reported incidents of violence against disadvantaged or vulnerable individuals or groups in the project area.
- V. Project activities conducive to discrimination or harassment (i.e., employment, application process for services, in-person receipt of services).

Based upon these criteria the Project risk rating is considered Substantial as risk Criteria 1,2, 3 and 5 related to components I, 2 and 3.

Risk and mitigation measures on non-discrimination of vulnerable or marginalized individuals or groups are described in section 6.3.3 and in more detail in Annexes 13 and 14 on the Enhanced Implementation Support and Monitoring (EISM).

1.32.5 Working with Stakeholders

The degree to which OPM will be able to collaborate, share information, and synthesize efforts will determine, to some extent, the success of project interventions in the proposed project areas. Engaging stakeholders will help OPM to:

- a. Identify and prioritize community development needs and opportunities for integration in design of subprojects;
- b. Identify potential positive or negative impacts that the project may further leverage or help to mitigate;
- c. Encourage community members' involvement in project design, implementation, and monitoring;
- d. Identify and evaluate potential partners to implement the project; and
- e. Monitor project impacts and ensure that the project meets community expectations. Experience of already existing NGOs and other agencies, including MOGLSD and local structures in the project areas will be invaluable to OPM. Therefore, OPM needs to work with these NGOs to implement the project

1.32.6 Gender Considerations

Emergency interventions and life-saving strategies have a greater impact when there is understanding of different gender impacts, and of men and women's different needs, interests,

vulnerabilities, capacities and coping strategies. The equal rights of men and women are explicit in the Humanitarian Charter. Rights and opportunities for both men and women should be enhanced and not compromised by aid interventions. Increased protection from violence, coercion and deprivation in emergency situations, particularly for women and girls, but also for specific risks faced by men and boys, are essential to effective emergency relief.

It is also important to pay attention to the impact of programmes on women's roles and workloads, access to and control of resources, decision making powers, and opportunities for skill development, in order to make sure that interventions support and do not diminish the role of women. Excreta disposal is a sensitive socio-cultural issue, and, in many societies, there are particular cultural beliefs relating to excreta disposal practices and facilities. In some cases, the sharing of facilities by people of different gender is a taboo, even within family groups. Latrines should be segregated by sex.

1.32.7 Disability Considerations

Disasters and armed conflict are major causes of disability. Millions of children are killed by armed conflict, but three times as many are seriously injured or permanently disabled whether from amputations, head injuries, untreated stress or other trauma. In some emergency situations, up to 20% of the affected population may be disabled. Disasters not only create disability but destroy the existing infrastructure and services that were meeting their needs.

Access to sanitation for people with physical impairments is often extremely difficult in emergency situations. Most excreta disposal facilities provided in emergencies are inaccessible for physically disabled people, this may force them into unhygienic practices such as open defecation and lack of handwashing and, consequently, their health is often at increased risk. Families struggling for their survival are often too busy to consider the needs and health of disabled members. Consultation with disabled people and their families is an essential part of the assessment and programme design process. Many features that improve accessibility and usage for disabled people also benefit elderly people, pregnant women, young children and people who are sick, including those living with HIV/AIDS. In general, the following aspects of design and operation should be considered:

- f. ensure easy access to latrines by locating them closer to households with disabled people, where possible avoiding steps, steep inclines and slippery surfaces, and providing handrails;
- g. provide bigger cubicles for physically disabled people and construct handrails and raised pedestals where necessary;
- h. ensure door handles and locks are not situated so high that people with limited reach

and children – cannot use them;

- i. provide easily accessible handwashing facilities that are simple to operate and provide support to facilitate handwashing if required; raise awareness among staff and family members to avoid overprotection, pity, teasing or rejection, and to ensure that appropriate support is provided.

1.33 Environmental and Social Risk Classification-ESRC

The World Bank ESF 2018 classifies all projects (including projects involving Financial Intermediaries (FIs) into one of four classifications: **High Risk**, **Substantial Risk**, **Moderate Risk** or **Low Risk** (Table 10). In determining the appropriate risk classification, the following parameters were taken into consideration:

- the type of project;
- its location;
- sensitivity of the project;
- scale of the project;
- The nature and magnitude of the potential environmental and social risks and impacts; and
- The capacity and commitment of the Developer/Borrower (including any other entity responsible for the implementation of the project) to manage the environmental and social risks and impacts in a manner consistent with the ESSs.

Table 11: Summary of project categorization based on ESF 2018

Aspect	High Risk	Substantial Risk	Moderate Risk	Low Risk
Project type, location, sensitivity, scale	Complex large to very large scale in sensitive location(s).	Not as complex; large to medium scale not such sensitive location.	No activities with high potential for harming people or environment; located away from sensitive areas.	Few or no adverse risks and impacts.
Nature & magnitude of risks & impacts, available mitigation	Mitigation unproven: unable to entirely address significant risk; high residual value.	Mitigation more reliable: significant risks but possible to avoid or address.	Easily mitigated: site specific, low magnitude risks.	Nothing to mitigate-no further assessment after screening.
Borrower capacity and commitment	Challenges and concerns about record of accomplishment regarding E&S issues, significant stakeholder Engagement capacity,	Some concerns about borrower track record, engagement capacity but readily addressed.	Sufficient borrower experience, record of accomplishment, Stakeholder engagement capacity.	Minimal or negligible risks to and impacts on human populations and/or the environment

Aspect	High Risk	Substantial Risk	Moderate Risk	Low Risk
	commitment, track record concerns.			
Context of risk relevant to ES measures	Significant effects on ability to mitigate risk - significant contextual risks outside project control impacting E&S performance and outcomes.	Some effects on ability to mitigate risk-known and reliable mechanisms to prevent or minimize, enforcement could be weak in some respects.	No effects on ability to mitigate risk – no contextual risks with effects on E&S performance	Negligible risk.

Based on available information regarding the planned Emergency Locust Control Program and its envisaged project activities, the proposed Project is classified as **Substantial Risk Project** on account of:

1.34 Environmental and Social Risk Rating

1.34.1 Environmental Health and Safety Risks

The environmental risk rating for this project is Substantial. The project will support activities under components 1 and 2, and to a lesser extent component 3, with a potential to generate adverse environmental impacts on the human population and biophysical environment if not well-managed. While the precise nature of the activities under Component 1 is not yet defined, the component will support customized economic inclusion activities addressing the needs of poor and vulnerable households in the subsistence economy (both in agriculture and in low-productivity services) while Component 2 will involve labour-intensive public works (LIPW) including terracing, tree planting, reforestation of river buffering areas in flood prone areas and enhancing freshwater storage through construction of rainwater harvesting ponds, small check dams in drought prone areas. Details of the activities under Component 1 and potential types of sub-projects are not yet known at this stage but the project has prepared an exclusion list to exclude large-scale infrastructure projects and any projects that could have adverse impacts on ecologically sensitive areas and known cultural heritage sites. The proposed activities under Component 2 may have associated adverse site-specific risks and impacts including (i) occupational health and safety (OHS) impacts arising from chemical hazards (handling, storage and disposal of agrochemical containers in case of use of agrochemicals), physical hazards (accident or injuries) from the LIPW activities, spread of communicable diseases such

as Ebola, COVID-19 and HIV/AIDS; (ii) community health and safety impacts (CHS) - air, soil and water contamination from earth disturbance, spread of communicable diseases; (iii) environmental impacts - surface and groundwater pollution, pest resistance, habitat degradation and soil disturbance leading to the introduction of alien and invasive plant species, and (iv) impacts on known and unknown cultural heritage sites. Potential adverse impacts associated with Component 3 activities are limited to the risk of spread of communicable diseases, and road accidents during the data collection and registration exercise and training. This project does not foresee significant adverse risks and impacts, and it does not pose any long term or irreversible impacts or risks. Although most of the environmental, health and safety impacts will be of low-intensity, minor, largely site-specific, and readily managed, the environmental risk rating is assessed as substantial due to the wide geographical spread of the proposed project areas across the Northern and Eastern regions of the country.

1.34.2 Social Risks

The project is likely to generate substantial risk arising from implementation of different components this would include (i) elite capture possibility by those in key positions and the project missing out the intended beneficiaries if not carefully implemented and well monitored, (ii) a risk of exclusion of key intended categories of beneficiaries of the project, considering that these categories are the most vulnerable and disadvantaged groups of the society putting them at a risk of being excluded or discriminated based on age, gender, ethnicity, disability, etc. from project benefits or activities of potential beneficiaries in the process. (iii) arguments over land and conflict between individuals and families, project activities are community demand driven and for some of the activities this requires land. NUSAF 1,2 and 3 was implemented in the Northern and Eastern Regions where communal land ownership is widespread and the project depended on land donation mostly from community owned land. Now that the scope for NUSAF IV has broadened to Busoga Region and Albertine Region, and in these regions communal land ownership is not widespread, land donation might be mostly at the individual or family level that might deprive individuals or families of land for cultivation for domestic consumption if criteria to be included in the RPF is not followed, (v) COVID-19 and the Ebola transmission remains a major risk to the community and the LIPW activity might lead to the spread of the viruses among communities and put the communities' health at a risk. In some cases, participants in LIPW may have to compromise between the risk of potentially getting the virus or not having the cash to survive on. LIPWs will put communities at a risk of incidents and sometimes fatal accidents if precautionary measures and

trainings are not done for communities prior to taking part in works and monitored throughout the process and (vi) because of digitalization with new processes and systems in place the intended beneficiaries might be left out as most of them do not read and write.

1.34.3 Sexual exploitation and abuse/sexual harassment (SEA/SH) risk rating

The project poses a risk of GBV/SEA, especially the implementation of components 1 and 2. Under component 1, savings and other activities that generate income to women and component 2, under LIPW where cash is earned for works done is a potential source for intimate partner violence. With increased incomes among women puts them at a risk of GBV – through intimate partner violence for cash gained by women through the project. This risk is also associated with Component 2, which involves the Labor- Intensive Public Works and with women earning cash (iv) and a risk of transactional sex by supervisors in exchange for work opportunities on the project. A GBV Action plan will be prepared for the project and a Gender specialist hired for the project to support implementation to the Action plan and support in addressing GBV related risk

1.35 Potential Impacts and Mitigation Measures

Based on initial scoping activities, the potential environmental risks and impacts of the Project are anticipated to be substantial, given that most of the interventions are livelihood and Labour-Intensive Public Works (LIPW) largely on farm and in areas experiencing severe degradation and climate risks and disasters. The project will not affect any new habitats or new ecosystems through its interventions as reflected in the exclusion list.

The purpose of the ESMF is to set out the action plan of environmental and social management measures to be implemented by the technical leads, communities and contractors. These will be partly based on site-specific ESMPs and or (ESIAs if any done) that will be carried out (see below). These measures aim to achieve the avoidance, minimization or mitigation, of adverse environmental and social impacts of the Project and to ensure compliance with the ESSs. Risks and impacts, as well as mitigation measures will be refined once site-specific environmental and social assessments have been conducted

1.35.1 Beneficial impacts

Component 1: Youths and women empowerment & employment creation through support to groups and individuals. The project will promote asset creation and household income enhancement through livelihoods support activities. This will support beneficiaries

smoothing of their consumption needs, basic needs and services. Other facilities like market linkages and value addition will further improve income levels. The various training and skilling of youths and women will improve skills levels and expand opportunities for gainful employment. Financial literacy programs, business management trainings will improve beneficiary knowledge and linkage to Financial Institutions and Services. These coupled with mind-set change programs will help to sharpen the minds of the beneficiaries towards positive attitudes to development. The group approach will promote social cohesion, social stability, harmony and peaceful co-existence.

Component 2: The Component seeks to promote CS-LIPW, aiming at addressing the impacts of Climate Change and variability. This couple with Disaster Risk Financing will enhance household resilience to climate related shocks and disasters. This will promote human dignity. The CS-LIPW interventions will promote sustainable management of environment & natural resources, thereby increasing their productivity and benefits to humanity. CS-LIPW activities will provide an opportunity for the unskilled and vulnerable (unable-bodied) communities to earn money, which will smoothen their consumption, support diversification & re-investment. The project will promote enhanced health, nutrition & child cognitive development among the Pregnant, Lactating Women/mother and they're under 2-year babies (PLWU2). This will be integrated with awareness on nutrition, antenatal & postnatal care. This will reduce effects of malnutrition, ill-health and stunted growth. The Nutri-Cash program will promote birth and citizen registration.

Component 3: The component will enhance appropriate targeting systems at all levels to reduces risks of duplication/double targeting, wrong targeting and promote equal opportunities for the Poor, Vulnerable and Marginalized Groups. The digital payment platforms will enhance citizen documentation for service access, ensure the right beneficiaries are reached, promote financial inclusion and minimize fraud and corruption tendencies. The beneficiary profiling will provide a database for accurate targeting and equal opportunities for subsequent programs and opportunities.

1.35.2 **Adverse Impacts**

The NUSAF IV project is expected to have substantial impacts on the biophysical and socio-economic environment specifically during the planning and implementation phase. This is because the Project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment. As such, the potential risks and impacts and

issues are likely to have the following characteristics: (i) predictable and expected to be temporary and/or reversible; (ii) low in magnitude; (iii) site-specific, without likelihood of impacts beyond the actual footprint of the Project; and (iv) low probability of serious adverse effects to human health and/or the environment. The Project's risks and impacts can be easily mitigated in a predictable manner.

1.1.1.47 Air Quality

Livelihood and Labour-Intensive Public Works (LIPW) especially physical soil and water conservation activities that will include digging trenches, terraces, ponds etc. and livelihood value addition facilities like the milling machines, storage facilities etc. will generate air emissions and dust. Vehicular traffic emissions from project vehicles movements etc. will bring about air pollution by increasing the fossil fuel emissions into the atmosphere. The LIPW physical construction activities are mainly going to be through manual labor and use of hand-held equipment with limited use of mechanized machines whenever necessary.

Activities in Component 1 and 2, as shown below are likely to lead to air quality impacts.

Light upstream watershed rehabilitation through slope protection, Rehabilitation and creation of check-dams, stone bunds, biological measures (trees and grasses), terracing, Revitalize design and operations of irrigation schemes.

Reconstruction of conservation structures (storm drains, contours, terraces, waterways and water diversion structures, Reclamation of gullies by constructing gabions and supporting structures Desilting of weirs, Revitalization of irrigated land, Vegetation clearing and grass cutting along roads Clearing side drains and culvert inlets/outlets, Excavation of new drainage paths, Earth filling of embankment and pavement repairs Earthworks such as irrigation canal excavations.

Mitigation:

- Ensure beneficiaries at work Use personal protective clothing like dust masks on construction crew.
- Construction sites to be water-sprayed on regularly up to three times a day, especially if these sites are in sensitive receptors, such as residential areas or institutions (hospitals, schools etc.).
- All the vehicles and (machinery if any used) should be operated in compliance with relevant vehicle emission standards and manufacturer's specification to minimize air pollution.
- Use non-mechanized (motorized) equipment as much as possible

1.1.1.48 Impacts on Flora and Fauna

Removal of vegetation during excavation works is likely to lead to loss of plants and animal habitats. The biodiversity that may be affected includes insects, small mammals, reptiles and birds. This impact is expected to be insignificant since most of the proposed activities are livelihoods and onsite rehabilitation works on labor intention public works and not new works and therefore the project sites are unlikely to affect ecological sensitive flora and fauna. And if any then the exclusion list will be applied during the screening.

Activities in component 1 and 2, as shown below are likely to lead to flora and fauna impacts through disturbance and clearings due to the use of construction equipment such as excavators, trucks, generators etc., light upstream watershed rehabilitation through slope protection, water harvesting ponds, Rehabilitation and creation of check- dams, stone bunds, biological measures (trees and grasses) etc.

New water points. Revitalize design and operations of irrigation scheme, Reconstruction of conservation structures (storm drains, contours, terraces, waterways and water diversion structures, Reclamation of gullies by constructing gabions and supporting structures Desilting of weirs, Revitalization of irrigated land, Vegetation clearing on farmlands, and clearing side drains and culvert inlets/outlets, new drainage paths, Earthworks such as irrigation canal excavations.

Mitigation:

- Re-plant vegetation as much as possible once work is completed.
- Spare the vegetation that must not necessarily be removed such as or replace the trees.
- Minimize the amount of destruction caused by machinery by promoting non-mechanized methods of construction.
- The Contractor where applicable should ensure that the employees on site are aware of the company procedures for dealing with spills and leaks from oil storage tanks e.g., using dispersants or adding biological agents to speed up the oil breakdown for the construction machinery through induction and safety training (the contractor will propose a method of clean-up which will be subject to approval).
- Provide a waste management plan.
- Provision of dustbin and sanitation facilities to prevent seepage into the natural environment.

1.1.1.49 Soil Erosion

Activities in component 2 such as Movements and mechanized activities using motorized equipment including materials delivery etc. are likely to lead to soil erosion. Specifically, activities related to the following may exacerbate soil run off during construction.

Light upstream watershed rehabilitation through slope protection (Rehabilitation and creation of check-dams, stone bunds, biological measures (trees and grasses). Removal of debris, desilting of weirs/dams, light reinforcement of riverbanks.

New water points, revitalize design and operations of irrigation scheme, Reconstruction of conservation structures (storm drains, contours, terraces, waterways and water diversion structures, Water harvesting ponds, Reclamation of gullies by constructing gabions and supporting structures Desilting of weirs, Revitalization of

irrigated land, Vegetation clearing and grass cutting along roads Clearing side drains and Earthworks such as irrigation canal excavations

Mitigation:

- Apply same mitigation measures as under 5.9.2.2

1.1.1.50 General component 1 and 2 Waste Impacts

During implementation phases of the different projects under component 1 and 2 livelihoods (on farm the restoration of communal irrigation schemes in support of agrarian livelihoods under sub component 2.2. may entail application of pesticides and fertilizers) and 2 LIPW activities on soil and water conservation will generate waste- including among others cement bags, used wrapping materials, wood, glass, pesticides cans, etc. If improperly disposed, general wastes could result in pollution of water bodies, soil and impact on flora and fauna.

Mitigation:

- Develop waste management plan for construction wastes Provide (see Annex 7 in this ESMF)
- Waste disposal receptors on site (bins)
- Develop Integrated Pest Management Plan (see annex 6 project IPMP) to guide pesticide application Provide training to farmers on pesticide application
- Provide PPE to farmers for use during pesticide application
- Provide training and orientation to workers on waste management.
- Reduce-Re-use and Recycle wastes whenever possible

1.1.1.51 Invasive Tree Species

Under component 2, afforestation and tree nurseries will be established by the project as part of livelihood restorations and providing food and cash assistance for the most vulnerable. Inadequate selection of tree species for the woodlots, restoration sites and nurseries could lead to proliferation of invasive tree species which could have adverse impacts on the environment.

Mitigation:

- Ensure trees selected for the nurseries are local species approved by Forestry Department

1.1.1.52 Community Health and Safety Risks

Labor Intensive Public Works beneficiary /workers will be exposed to safety hazards arising from LIPW activities with respect to the various labour-intensive construction activities under the components 2. The labour-intensive works will expose targeted beneficiaries to occupational risks due to handling of machinery, and manual handling, etc. Construction activities of vegetation clearing, excavation, materials delivery may generate dust that will pollute the air and this may affect the respiratory system. Construction sites (terraces, water ponds, nursery establishments, woodlots areas, etc.) may be a source of both liquid and solid wastes. Similarly, the construction activities may lead to community health and safety risks.

Mitigation:

- Contractor/ Lead Local Artisan to risk assess the project activities, develop and implement relevant C-ESMP in-line with the project instruments below:
 - I. An Occupational Health and Safety Management Plan
Management and Safety of Hazardous Materials
 - II. Traffic and Road Safety Plan
 - III. Labor influx strategy
 - IV. GBV and Child Protection Action Plan
Employment plans
 - V. GRM;
 - VI. Stakeholders' engagement and communication plan;
 - VII. Emergency Preparedness and Response Plan
- Ensure through routine training and induction to all workers and the community on the project risk and the controls developed to manage them;
- Ensure that all construction equipment (on farm and construction) are in good working conditions and to manufacturer's specifications to prevent occupational hazards.
- Cordon off working areas with a reflective tape to ensure safety of pedestrians and provide crossing areas for access to cut off businesses and structures.
- Appointing experienced and trained occupational health and safety staff (e.g. Village Health **Teams**)

etc.), first aiders etc.,

- Provide beneficiary workers with appropriate personal protective equipment (PPE). Provide a waste management plan
- Fence off the site to avoid unauthorized access to the project site (s) and hence potential injuries. Provide clean toilets for workers

1.1.1.53 Hazards

Terraces, value addition, ponds, nursery and irrigation structures if poorly constructed and designed could lead to hazards including falling into the pit if the structure gives ways. This can lead to injury or loss of life. Also on construction sites, agricultural farms accidents can arise during work by beneficiaries inform of cuts etc.

1.1.1.54 Labor Influx

Mitigation:

- Ensure all constructed structures (terraces, ponds, irrigation facilities, etc. are well constructed with the required strength
- PPE should be provided to all workers
- First aid kit provided onsite
- Health worker and or Village Health team assigned to each sight to support on administration of first aid.

The Project is expected to stimulate minimal in-migration. Several features of the Project could prompt in-migration. Works related to construction of storage and value addition facilities, irrigation facilities etc. are also likely to act as a magnet for people and are likely to attract some in-migrants.

Mitigation:

The following restorative measures are agreed upon.

- Preparation of Influx Management Plan by contractor/Lead Local Artisan
- Preparation of Labor and Recruitment Plan by contractor/Lead Local Artisan in-line with the project LMP
- Preparation of a “code of conduct for workers

1.1.1.55 HIV & AIDS Impacts

Engagement of large number of beneficiaries on LIPW sites from various households and locations within the watersheds may lead to behavioral influences which may increase the spread of diseases such as Human Immuno-Deficiency Virus (HIV), Acquired Immune Deficiency Syndrome (AIDS) and other Sexually Transmitted Infections (STIs).

Mitigation:

- Sensitize workers and the surrounding communities on awareness, prevention and management of HIV/AIDS through beneficiaries training, awareness campaigns, multimedia and workshops or during community Barraza's. Provide information, education and communication about safety and health.
- Provide an on-site clinic to provide Voluntary Counselling and Testing (VCT) services to LIPW beneficiaries together with their supervisors

1.1.1.56 Social Exclusion and Discrimination

There is a risk that vulnerable or marginalized individuals or groups may be excluded from project activities and benefits, and that project impacts may fall disproportionately on them.

Mitigation:

- The mitigation measures to manage this risk are described in section 6.3.2.12. Non-Discrimination of Vulnerable or Marginalized Individuals or Groups and in detail in Annexes 13 and 14.

1.1.1.57 Gender Equity, Sexual Harassment

The LIPW works will be undertaken at watershed level, and other activities on livelihood will be done at group levels. The numbers involved are so high and the risk of sexual harassment on women is likely to be high. Large targets of beneficiaries in LIPW and livelihoods projects are predominantly younger males and females. Those who are away from home at work are typically separated from their families and act outside their normal sphere of social control. This can lead to inappropriate and criminal behavior, such as sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community.

This risk is also associated with Component 2, which involves the LIPW and with women

earning cash (iv) and a risk of transactional sex by supervisors in exchange for work opportunities on the project. There is also a risk of discrimination against vulnerable or marginalized individuals or groups from employment opportunities.

Mitigation:

- Prepare and Implement a GBV Action Plan
- Ensure all site supervisors / contractors and workers sign codes of conduct
- Training on GBV

1.1.1.58 Non-Discrimination of Vulnerable or Marginalized Individuals or Groups

There is a potential risk of vulnerable or marginalized individuals or groups being excluded from project benefits. This refers to all vulnerable individuals or groups who by virtue, for example, of their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, economic hardships, and/or dependence on unique natural resources may be more likely to be adversely affected by the project impact and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/groups is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so.

The following section relates to vulnerable or marginalized individuals or groups as referred to in the Executive Summary Background and the Introduction.

The Government of Uganda notes that discrimination of any person contravenes Article 21 of the Ugandan Constitution. The Republic of Uganda (the "Borrower") has committed to uphold the Bank's policy requirements for non-discrimination on all World Bank financed projects. The measures outlined below are intended to ensure that mechanisms exist to identify potential discrimination and to promptly remediate its impacts. Specifically, these mitigation measures will ensure that:

- An individual or groups with concerns or grievances would be afforded appropriate avenues to submit their grievances or concerns including through the grievance mechanism corresponding to World Bank financed project.
- .
- An individual or group with concerns or grievances would access a hotline (0800 333125) which has been established by the EISM service provider, hosted and operated

by a local NGO to specifically receive grievances related to discrimination and exclusion from all World Bank and IFC financed projects.

Risks

The following risks were identified during the portfolio review, stakeholder engagement meetings and the January 2024 consultations with CSOs:

- (i) Limited capacity of project teams in assessing and addressing vulnerable or marginalized individuals or groups -related risks
- (ii) Vulnerable or marginalized individuals or groups may decline to take part in consultations for fear of being reported.
- (iii) Project teams may not be equipped to adequately address complaints related to discrimination, particularly as complaints may be challenging to address without causing harm to the parties involved.
- (iv) Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries.

Mitigation Measures

The following mitigation measures are proposed to manage the risks of exclusion and discrimination

- These mitigations will be implemented by the PIST with the support of an Enhanced Implementation Support and Monitoring (EISM) firm which has been hired by the World Bank and IFC with a strong track record of providing implementation support and monitoring project performance and knowledge of the Ugandan context. This entity is expected to work with local NGO/CSOs and country-based development partners in implementing these mitigation measures.

Specifically, the firm will:

- Assist project teams to enhance existing project-level grievance mechanisms and develop and operate an independent mechanism that would identify, manage, and monitor cases of discrimination.
- Assist the WB in strengthening the capacity of Project Implementation Units, workers, and contractors, subcontractors, and service providers.
- Ensure contracts, codes of conduct, hiring procedures, whistle-blower protection protocols, and other measures, as needed, are in place to require remediation of cases of discrimination.
- Develop a strong data management system and process that secures personal data and

information in a manner that is safe, ethical, and confidential.

- Where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the Bank, propose appropriate remediation, and follow up on agreed actions to resolve the case.
- Support the WB/IFC to monitor the efficacy of the agreed measures to mitigate the impacts on WB/IFC financed operations.

A more detailed explanation of the enhanced implementation support this organization will provide is found at Annex 13.

Additional mitigation measures to be implemented by PIUs/PIST with the support from the entity listed above include:

- Develop training, sensitization and Information, Education and Communication materials on the obligations of project participants to ensure inclusion and non-discrimination of individuals or groups who are vulnerable or marginalized, and to ensure they have access to appropriate expertise to help them do that.
- Recruit service providers to provide capacity building on non-discrimination to all relevant stakeholders.
- Undertake targeted consultations with external stakeholders, including as appropriate NGO/CSOs, local governments, security services and other stakeholders to ensure there is broad understanding of the obligations of project participants to ensure non-discrimination under the project.
- Enhance the project Grievance Redress Mechanism to include an effective, safe, ethical and confidential referral pathway to ensure vulnerable and marginalized individuals or groups are comfortable reporting incidents of discrimination or exclusion and that such grievances are addressed quickly, efficiently and appropriately.
- Facilitate the monitoring of the implementation of all measures to promote non-discrimination under the project by supporting the World Bank-financed entity to ensure all measures are implemented and all reported incidents are shared with the Bank and addressed in a timely fashion.

1.36 Procedures to Address Environmental and Social Issues

This section defines steps, actions and responsibilities for screening, assessing and managing

environmental and social risks and impacts of subprojects in line with the national legislation and World Bank standards.

1.36.1 The ESIA Process

In compliance with the National Environment Act (NEA) No.5 of 2019 and the Bank Standards, particularly ESS1, environmental and social assessment for NUSAF IV subprojects shall be closely integrated with the project's economic, financial, institutional, social, and technical analyses during the selection, siting, and design of the Project. In addition to integrating environmental and social aspects in the aforementioned, risks and impacts that could occur during implementation will be mitigated, monitored and reported.

The responsibility to integration of environmental and social aspects into the subproject shall be of the subproject proponent and will be verified by OPM.

This will involve applying the appropriate level of ESIA to the subproject, aligned to identification, preparation, appraisal, approval and implementation of the subproject. The ESIA process in Uganda, illustrated in Figure 5, will be applied in a manner that ensures compliance with the applicable Bank Standards as described in the ESF. The process involves:

1.1.1.59 Screening and risk classification.

Preparation of ESMPs /Project Briefs (for subprojects with low or moderate risk classification and that do not require detailed ESIA as guided by Schedules 5 & 6 of the NEA 2019);

Detailed environmental and social impact study for projects with substantial to high-risk classification; and require full ESIA under NEA);

Decision making by NEMA (and lead agencies) and for NUSAF IV, decision making includes review and clearance by OPM-NUSFA and the Bank before submission to NEMA.

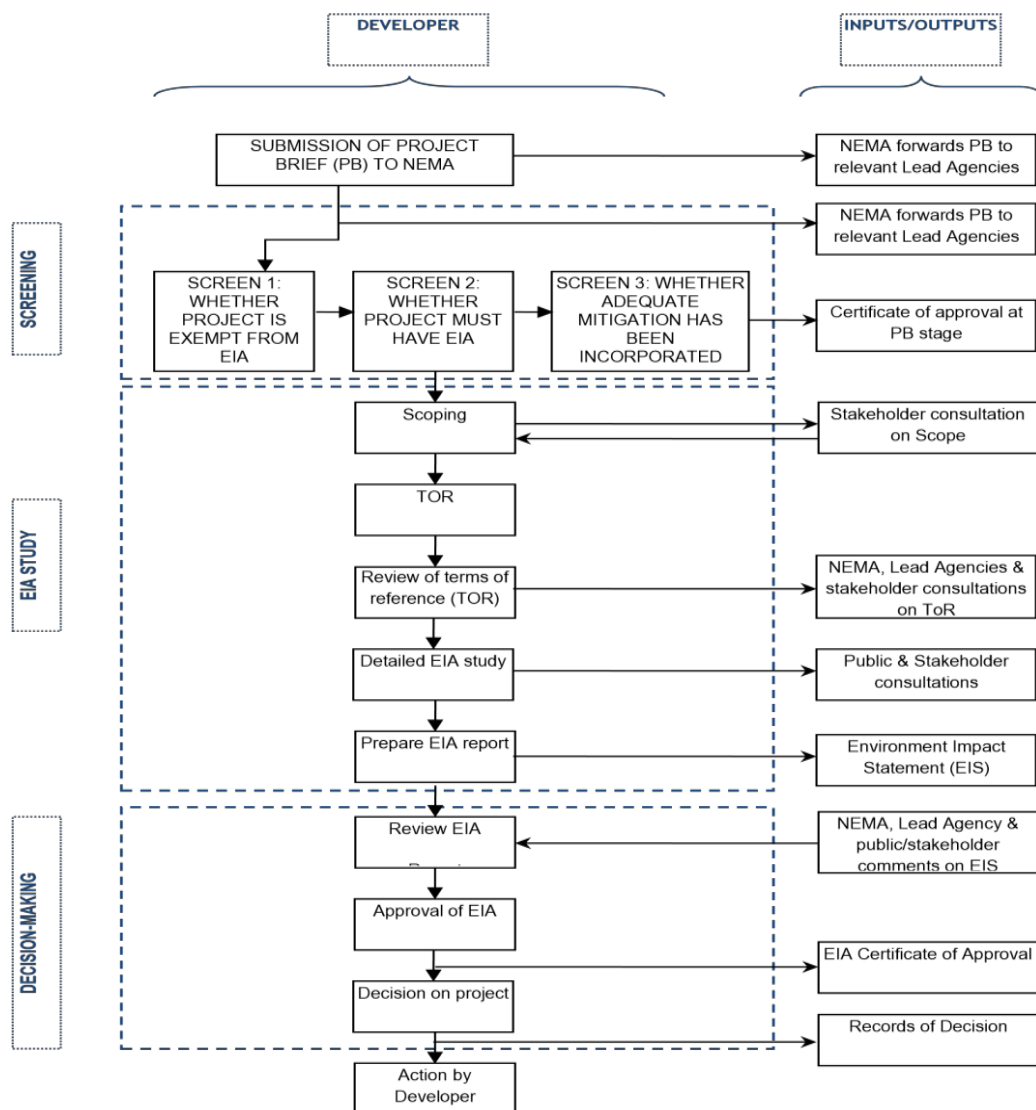


Figure 4: The ESIA process in Uganda.

1.1.1.60 Environmental and Social Screening

The objective of screening is to determine the extent to which a project is likely to affect the environment, community and its surrounding. --and therefore, be able to determine the level of assessment required. NUSAF IV subprojects shall be screened in line with the NEA 2019, VMGP, SEP, VLD requirements and the World Bank ESS 1.

1.1.1.61 Exclusion Criteria

The Project will exclude the following types of activities as ineligible for financing under the Project: The DEC and DTPC will ensure that no project under exclusion is (let's use another word which is more fitting).

- Sub-projects involving significant conversion or degradation of critical natural habitats or ecologically sensitive areas.
- Sub-projects involving the use of unsustainably harvested timber or fuelwood
- Sub-projects supporting commercial logging in forested areas.
- Subprojects requiring use pesticides that are not on the approved list of agro-chemicals
- Drainage of traditional wetlands for agricultural use.
- Construction or rehabilitation of seasonal dams with adverse downstream affects.
- Sub projects requiring new or significant expansion of disposal facilities which may result in pollution contamination to nearby water sources.
- New or significant expansion of disposal sites requiring involuntary public participation.
- Closing of gaps, culverts etc. in existing roads which may affect water flow significantly.
- Projects that require Compensation for loss/replacement costs will not be funded under NUSAF IV
- Sub projects that may likely exclude the participation of VMG
- Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.
- Activities that may involve involuntary resettlement or land acquisition (other than voluntary land donation) or impacts on known cultural heritage are not eligible.

- Construction of dams

1.1.1.62 The Screening Process

The PIST shall design templates/forms and train the district safeguards teams led by the respective District Environment & Community Development Officers, on how to appropriately use and apply them. The district safeguards teams shall screen sub-projects after identification to prepare a site specific ESMP, which shall be submitted to the PIST for review prior to approval of the sub-project. At the PIST level, the Environment & Social Safeguards Specialists shall review and approve the ESMP as part of the sub-project approval process prior to disbursement of funds for implementation. It is important to note that the review and clearance of the sub-projects shall be overseen and cleared by the OPM E&S specialists and the World Bank until the district safeguards teams demonstrate that they have sufficient capacity to do so. Subsequently, there will be post reviews for the cleared sub projects. In case of absence of the ESMP or lack of approval of thereof, the sub-project shall not be approved for funds disbursement, hence consideration of the sub- project for implementation.

Upon receipt of the funds by the districts and on ward disbursement to sub- projects, the district safeguards teams shall support beneficiary communities in implementation of the ESMP activities and monitor compliance. The monitoring shall be done together with the PIST Safeguards team as part of successful project completion.

The project will prepare guidelines for backyard gardening to be approved by the bank prior to implementation of such activities and should guide the process of back yard gardening. Simple screening tools will also be developed and used for the same purpose and effective and efficient measures put in place that meet required standards.

Table 12: E&S risk classification according to World Bank's Environmental and Social Framework

Aspect	High Risk Projects	Substantial Risk Projects
Project type, location,	“Complex large to very large scale in “Not as complex; large to medium scale not sensitive location(s) “. Such sensitive location “.	
Sensitivity, scale		
Nature & magnitude of risks & impacts, available mitigation	Mitigation unproven: unable to entirely address significant risk; high residual value.	Mitigation more reliable: significant risks but possible to avoid or address.
Borrower capacity and commitment	Challenges and concerns about track record regarding E&S issues, significant stakeholder engagement capacity, commitment, track record	Some concerns about borrower track record, engagement capacity but readily addressed.

	concerns.	
Context of risk relevant to ES measures	Significant effects on ability to mitigate risk - significant contextual risks outside project control impacting on E&S performance and outcomes.	Some effects on ability to mitigate risk – known and reliable mechanisms to prevent or minimize, enforcement is weak in some respects, some stakeholder engagement concerns but readily addressed.
Aspect	Moderate Risk Projects	Low Risk Projects
Project type, location, sensitivity, scale Nature & magnitude of risks & impacts, available mitigation Borrower capacity and commitment Context of risk relevant to ES measures	“No activities with high potential for “Few or no adverse risks and impacts. Harming people or environment; located away from sensitive areas “. Easily mitigated: site specific, low No further assessment after screening but magnitude risks. Some basic EHS measures are often necessary. Sufficient borrower experience, track Minimal or negligible risks to and impacts on record, stakeholder engagement capacity. human populations and/or the environment	
	No effects on ability to mitigate risk – no contextual risks with effects on E&S performance	Negligible risk.

1.36.2 Preparation of Project Briefs

NUSAF IV sub projects shall prepare specific project briefs if required by NEA 2019 and the E&S risk classification for the subproject as per the World Bank’s Environmental & Social Framework. The Brief shall provide essential project information to guide integration of environmental and social aspects into the design and decision making as well as help integrate environmental and social aspects into individual subproject design. The report shall include the following key information:

a). Contact details of development; Characteristics of project; Project description; Reasons for project; Background of the project; Project site; Baseline data; Physical form of the development; Construction practices; Operation; Analysis of alternatives; Other large projects within the area of influence of the proposed project; Characteristics of the potential impacts; n) Nature, extent and magnitude of impacts; o) Probability of impacts; Duration frequency and reversibility of impacts; Mitigations measures proposed; and Trans-boundary nature of the impacts.an ESMMP including implementation arrangement and capacity of the subproject proponent.

The details of environmental and social baseline and risks to be assessed are contained in the National Environment (Environmental and Social Assessment) Regulations, 2020 and ESS1 (Environmental and Social assessment of the ESF).

The proponents of the sub-projects will be required to demonstrate that environmental and social aspects have been integrated into the design and included in the ESMMPs. A screening checklist that will be used for the subjects has been included as Annex 3.

1.36.3 Scoping and terms of reference (ToR)

The purpose of scoping is to determine the extent/coverage of work to be undertaken in assessing the environmental and social impacts of the proposed project. It identifies the critical environmental and social impacts of the project for which in- depth studies are required, and elimination of the insignificant ones. The scoping exercise should involve all the project stakeholders so that consensus is reached on what to include or exclude from the scope of work. It is also at this stage that project alternatives are identified and taken into consideration. The contents of the scoping report are the same as the project brief, however, more detail is likely to be needed. This may involve some preliminary data collection and field work. Scoping and preparation of terms of reference for NEMA consideration will be undertaken where the sub-project screening determines a full ESIA is required.

Scoping and preparation of terms of reference will be undertaken for each subproject at preparation stage by its proponents, reviewed by the OPM –PIST and finally cleared by the Bank. This shall be until the district safeguards teams have demonstrated that they have sufficient capacity to do so, otherwise, the process shall be overseen by the OPM E&S Specialists. The prepared Terms of Reference shall be reviewed and cleared the OPM E&S specialists and the World Bank. Subsequently, there will be post reviews for execution of the cleared TOR.

1.36.4 Environmental and social impact study

According to the National Environment (Environmental and Social Assessment) Regulations, No.143 of 2020, Environmental and Social Impact Study refers to the detailed study conducted to determine the possible environmental impacts of a proposed project and measures to mitigate their effects. The ESIS process contains the following key stages:

Scoping and ToR;

Preparation of the Environmental and Social Impact Statement (ESIS); Review of ESIS and

Decision on project; and Environmental and Social Monitoring. In preparing an ESIS, relevant information is collected on issues of real significance and sensitivity. The baseline shall be collected on all relevant aspects and impacts covered by the ESIA Regulations 2020 and the Bank's ESS1-ESS10. These are then analysed, mitigation measures developed for the adverse impacts and compensatory measures recommended for unmitigated environmental impacts. Measures aimed at enhancing beneficial or positive impacts are also proposed.

The ESIS shall also contain an environmental and social management monitoring plan (ESMMP) (See section 5.4.8 below for more information). The ESIA process shall take into account of the following steps;

1.36.5 Review of Project Brief/ESIA and Decision on Project

The Developer is required to submit online copies of the ESIS to NEMA for review and consideration for approval. NEMA as required by the NEA, 2019, forwards a copy of the ESIA to the relevant Lead Agencies for comments. NEMA in consultation with the Lead Agencies (in this case including the local governments, shall review the contents of the ESIA, paying particular attention to the identified environmental and social impacts and their mitigation measures, as well as the level of consultation and involvement of the affected stakeholders in the ESIA process. In this review, the level to which the ToR set out for the study is addressed shall be considered. In deciding about the adequacy of the ESIA, NEMA shall take into account the comments and observations made by the Lead Agencies, local governments, other stakeholders and the general public. NEMA may grant permission for the project with or without conditions or reject the ESIS with reasons. If the project is approved, the Proponent will be issued with an Environmental and Social Certificate of Approval.

The subproject proponents, after preparing Project Briefs in line with national legislation and ESF, will submit them for review by OPM-NUSAF IV PIST. When satisfied with the quality of the Project Brief, the OPM will submit to the Bank for clearance before submission to NEMA.

1.36.6 Public consultations and disclosure

The NEA, 2019 and ESS1 require stakeholders to be engaged throughout the project implementation cycle. As part of the engagement, public consultations will take place during the environmental and social screening process, and the input from the public consultations will be reflected in the design, mitigation and monitoring measures. Consultations will also be undertaken during the scoping period and the preparation of the terms of reference of the Environmental and Social Impact Assessment. This is supposed to be done by a Registered ESIA practitioner.

1.36.7 Environmental and social management and monitoring plan

Project Briefs/ESIS as part of standard content will contain Environmental and Social Management and Monitoring Plans (ESMMPs) and this section provides guidance and format for their (ESMMPs) development.

The ESMMP matrix that includes a column for code/number (for ease of reference), impact/risk, mitigation measures/actions written in a succinct manner, Key Performance Indicators, monitoring frequency, responsibility for implementation, responsibility for monitoring, and cost will be prepared. In ESMMP, in addition to the matrix above should include institutional arrangements and capacity for ESMMP implementation and monitoring (focus on Executing agency i.e., OPM-NUSAF IV TST (WB, MoGLSD, MWE, NFA, NEMA, among others), Service providers sub-project beneficiaries. An ESIA documents the findings and is submitted to NEMA by the developer.

ESMMP for NUSAF is intended to ensure efficient environmental and social management of its activities. The ESMMP translates recommended mitigation and monitoring measures into specific actions that will be carried out by the proponent. The main components of an ESMMP are described in table below, which reflects practice at the World Bank. Ideally the ESMMP should contain the following:

- a) Summary of the potential impacts of the proposal;
- b) Description of the recommended mitigation measures;
- c) Statement of their compliance with relevant standards;
- d) Allocation of resources and responsibilities for plan implementation;
- e) Schedule of the actions to be taken;
- f) Program for surveillance, monitoring and auditing; and
- g) Contingency plan when impacts are greater than expected.

The ESMP should contain commitments that are binding on the subproject proponent. It provides a basis for a legal contract that prescribes responsibilities of the proponent. The ESMMPs establish environmental and social performance standards and requirements for those carrying out the works or providing supplies. The NEA 2019 requires developers to implement an environmental and social management and monitoring system for the operational phase of the project, and the ESMPs provide the foundation for meeting this requirement. Before start of any subproject works, the Contractor/service provider engaged by subproject owners shall be required to develop the Contractor's/service provider's ESMMP to guide implementation and monitoring of the proposed mitigation measures, for example, those intended to address the environmental impacts resulting from climate change related disaster events.

Table 13: Components of ESMMP

Components of ESMMP	
ESMMP Component	How to address
Summary of impacts	The predicted adverse environmental and social impacts for which mitigation is required should be identified and briefly summarized.
Description of mitigation measures	Each mitigation measure should be briefly described with reference to the impact to which it relates and the conditions under which it is required (for example, continuously or in the event of contingencies). These should be accompanied by, or referenced to, project design and operating procedures which elaborate on the technical aspects of implementing the various measures.
Description of monitoring Program	The monitoring program should clearly indicate the linkages between impacts identified, measurement indicators, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions.
Institutional arrangements	Responsibilities for mitigation and monitoring should be clearly defined, including arrangements for coordination between the various actors responsible for mitigation.
Implementation on schedule and reporting procedures	The timing, frequency and duration of mitigation measures should be specified in an implementation schedule, showing links with overall project implementation. Procedures to provide information on the progress and results of mitigation and monitoring measures should also be clearly specified.
Cost estimates and sources of funds	These should be specified for both the initial investment and recurring expenses for implementing all measures contained in the ESMP, integrated into the total project costs, and factored into loan negotiations.

Source: adapted from World Bank, 1999

The Environment and Social Management Plans developed in accordance with this ESMF will contain specific provisions on the management of non-discrimination of vulnerable or

marginalized individuals or groups following the enactment of the AHA. These provisions are consistent with recent GOU measures to ensure non-discrimination in accordance with Article 21 of the Ugandan Constitution, including circulars issued by the GOU included in Annex 12. The purpose and objective of these provisions is to ensure that in accordance with World Bank policies and Article 21 of the Ugandan Constitution: (i) project impacts do not fall disproportionately on individuals or groups who, because of their particular circumstances, may be vulnerable or marginalized; (ii) there is no prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be vulnerable or marginalized; (iii) Bank financed operations are implemented through their respective life cycles in a manner that is aligned with the non-discrimination principles embedded in applicable Bank requirements.

To facilitate the implementation of the provisions for non-discrimination that cover vulnerable or marginalized individuals or groups, the Project Operation Manual (POM) specifies and details how the mitigation measures will be implemented. The POM clearly lays out how the project will ensure non-discrimination of individuals and groups. Furthermore, it specifies the timelines and roles and responsibilities to implement the different mitigation measures.

The POM also provides detailed information on how exactly the project will support and interact with the World Bank Enhanced Implementation Support and Monitoring. The POM, with the additional information on nondiscrimination and inclusion included, will be redisclosed once completed.

1.36.8 Environmental and Social Monitoring

Monitoring is the continuous and systematic collection of data in order to assess whether the environmental objectives of the project have been achieved. `Good practice demands that procedures for monitoring the environmental and social performance of proposed projects are incorporated in the ESIS. The purpose of monitoring is to:

- a) Provide information that the predicted impacts from a project are within the engineering and environmental acceptable limits;
- b) Provide an early warning information for unacceptable environmental conditions;
- c) Ensure that the mitigation measures proposed in the environmental and social management plans are implemented satisfactorily; and
- d) Assist in identifying additional mitigation efforts needed or where alteration to the adopted

management approach may be required.

To aid the implementation of identified mitigation and monitoring strategies, an environmental and social monitoring and management plan will be developed. It will describe the various environmental and social management strategies and programmes to be implemented. It will also identify the management roles and responsibilities for ensuring that monitoring is undertaken, results are analysed and any necessary amendments to practices are identified and implemented in a timely manner.

The monitoring plan shall provide for monitoring of both the implementation of mitigation measures & environmental quality. It shall contain a schedule for inspecting and reporting upon the implementation of the sub-project and associated mitigation measures identified in the ESIS.

The monitoring plan shall also identify the key indicators of environmental and impact. Further, the plan shall provide a schedule for monitoring each indicator and for reporting the monitoring results to NEMA or the Local Authority.

The data collected during monitoring is analysed with the aim of:

- a) Assessing any changes in baseline conditions;
- b) Assessing whether recommended mitigation measures have been successfully implemented;
- c) Determining reasons for unsuccessful mitigation;
- d) Developing and recommending alternative mitigation measures or plans to replace unsatisfactory ones; and
- e) Identifying and explaining trends in environment improvement or degradation.

The OPM and PIST will develop a standard set of indicators applicable to all subprojects, and some optional ones that may be applicable to unique/ specific subprojects for example; those addressing the concerns of the poor and VMGs as well as the climate risk/ disaster prone areas.

In addition, the World Bank will provide assistance for Enhanced Implementation Support and Monitoring (EISM) of the risk of exclusion or discrimination for vulnerable or marginalized individuals or groups. Further details of this support are found in Annexes 13 and 14.

Monitoring has to be undertaken daily, weekly, monthly and quarterly depending on the activity/parameter being monitored. The Community Project Management Committees (CPMCs) and the Community Watershed Committees (CWCs) Community Monitoring Groups (CMGs) and Community Facilitators (CFs) will be responsible for monitoring the implementation mitigation

measures under the guidance of the district safeguards teams. Where contractors will be engaged to offer services, they will also be required to carry out daily, weekly and monthly monitoring of implementation of safeguards mitigation measures. The CPMCs and the contractors in each capacity will prepare monthly monitoring reports which they will submit to the district safeguards teams. Based on the monthly reports from the committees and the contractors, the district safeguards teams will prepare quarterly monitoring reports and submit them to the TST safeguards team. The TST E & S specialists will then prepare quarterly reports and submit them to the World Bank safeguards specialists.

1.37 Introduction

World Bank ESS10 as well as GoU Social, Safety and Health Safeguards Implementation Guidelines of October 2020 require that concerns and grievances of project-affected parties related to the environmental and social performance, as well as general project implementation modalities should be received, addressed and responded to in a timely manner. Additionally, ESS 7 emphasises that a grievance mechanism should be culturally appropriate and accessible to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. Accordingly, the project will establish a clear and transparent grievance redress mechanism that receives documents, assesses and resolves various categories of grievances / complaints within stipulated time frames. The mechanism will also have linkages and referral pathways to relevant existing mandated entities and offices in resolution of sensitive and unique cases.

The objective of the grievance mechanism is to enhance project efficiency through clear and transparent means of receiving and resolving grievances / complaints that may result from direct and indirect consequences of the NUSAF IV Project activities in a timely manner. The mandated stakeholders will leverage existing Local Grievance Redress Mechanisms, local leaders and other relevant existing structures at parish, sub-county, district and national levels. These will be assessed in terms of adequacy and further modified as well as strengthened as deemed appropriate.

The GRM will handle complaints arising from activities and implementation of the proposed NUSAF IV Project as well as the losses and damages caused by construction works, and any direct or indirect environmental and social impacts. Efforts will be made to ensure that the robust and equipped GRMs are in place by the time Implementing Agencies start preparation of ESIA, these mechanisms shall continue to function until the completion of all construction activities and the defect liability period ends. Affected communities and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines and contact persons through aggressive publicity campaigns including Print and electronic media, relevant local media, verbally, and through booklets and information brochures during consultations meetings and other stakeholder engagement activities.

1.38 Specific purpose of NUSAF IV-GRM

The specific purposes of NUSAF IV-GRM will include the following:

- a) Resolve project related grievances including environmental and social grievances in a timely, appropriate and cost-effective manner.
- b) Build trust among project staff, communities and stakeholders in general.
- c) Promote community empowerment and participation in project decisions that affect them.
- d) Ensure proper documentation, prompt, fair and transparent resolution of grievances.
- e) Provide feedback mechanism to project affected persons on resolution of their grievances.

The design of NUSAF IV-GRM will be guided by the principles that among others make it Legitimate, predictable, Accessible, Equitable, Transparent, Harmonized, Engagement and Dialogue, provide Continuous learning, Process Simplicity, Objective, Fair, Independent, Confidential and Independent).

1.39 Anticipated Grievances in NUSAF program

Anticipated grievances for the NUSAF IV project will include those related to the following categories:

- a) General complaints in relation to general implementation
- b) Fraud and corruption-related
- c) Gender Based Violence and Violence Against Children
- d) Incidents

Details of specific examples under each category are further illustrated as follows:

1.39.1 General complaints in relation to general implementation

- Poor Waste Management and contamination;
- Wrongly recorded personal or community details;
- Crop damage;
- Group conflicts
- Land related
- Exclusion
- General Worker's welfare related
- Delayed implementation
- Procurement related
- General damage to community resources and Assets

- Etc.

1.39.2 Gender Based Violence and Violence against Children

- Sexual Exploitation and abuse;
- Abuse and neglect in family
- Child labour
- Psychological Aggression
- Corporal punishment
- Trafficking
- Family wrangles;
- Economic exclusion
- Infanticide
- Rape (Gang rape, male rape-sodomy and marital)
- Forced early marriage
- Domestic Violence
- Female genital mutilation.
- Etc...

1.39.3 Incidents

- Accidental death fatality
- Loss of body part in an accident
- Contamination and pollution
- Damage to ecological resources.
- Accidental fire
- Poisoning
- Trafficking and forced labour
- Natural Calamity (Earthquakes, mudslides, floods) etc.

1.39.4 Fraud and Corruption

- Soliciting for bribes
- Charging informal fees
- Deliberate provision of wrong/incorrect info by beneficiaries
- Inclusion of ghost workers especially under LIPW
- Multiple enrolments
- Etc...

The Implementing Agency (OPM) will establish and implement an effective GRM, and Grievance Redress Committees (GRCs) established, trained and equipped as per appropriate structure with the objective of helping to ensure that the aggrieved affected communities and third parties to avoid resorting to the judicial system as much as possible. The project's GRM will include four successive tiers of extra-judicial grievance review and resolution. The first and second tiers are the Grievance

Resolution Committees (GRCs) at village/parish and sub-project levels. The third and the fourth tiers are the GRM Focal Persons at the district and the PIU offices.

The GRM have referral pathways to support escalations, complainants that may not be satisfied with one level and handling of unique/sensitive/specialized cases such as those of criminal nature, capital offenses. Referral ways will be relevant mandated public entities and offices such as; Police, Labour Office, Probation and Social Welfare, IG, Judicial Offices, etc., depending on the nature of the referred case. Judicial and administrative redress will as much as possible be avoided to avoid time wastage.

GRM Structure and Composition of the Grievance Resolution Committee (GRC) Process.

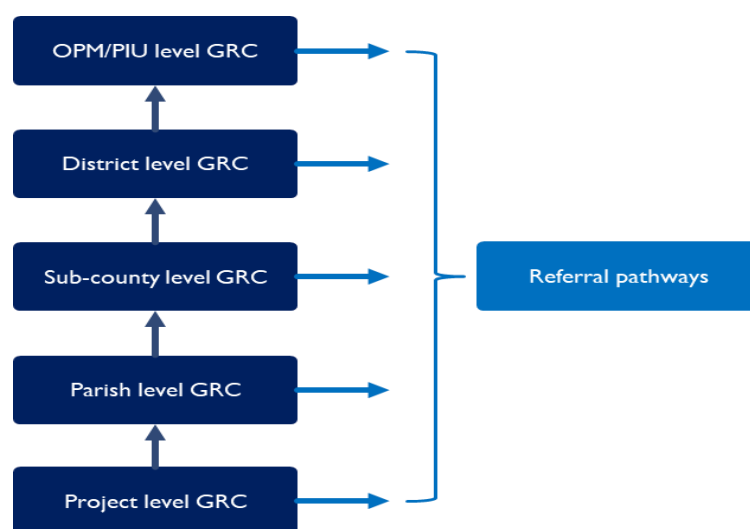


Figure 5: GRC level and referral pathways

GRCs will be established at all levels (Village/Parish, Sub- County, District and OPM levels) with an office.

Based on experience with existing GRMs of various other projects, composition of these committees will be of a reasonable number of 5- 6 members with representation from relevant offices and structures at respective levels based on project design. Where there are already existing GRCs by other programmes, these will as much as possible be utilised and further strengthened, and where they are missing, new ones will be established and strengthened. GRCs are expected to work on voluntary basis, but the project is expected to offer reasonable facilitation to facilitate assessment and resolution of grievances such as; transport, stationery, communication, etc.

The Committee will be constituted through a participatory, transparent and democratic and gender sensitive election process where participants (stakeholders present/proposed beneficiaries) shall be

nominated, seconded and shall be voted for to respective office positions. And since the project will categorically target women, the Committee will emphasize having a reasonable number of women elected as its executive and in the leadership positions.

1.40 The two-stage grievance resolution process

The resolution of grievances will be a two-stage process.

- a. The first stage will involve the following main steps:
 - i) Receipt of grievances and recording/documentation
 - ii) Screening and assessment of grievances
 - iii) The GRC hearing procedure.
- b. The second stage will involve the following steps:
 - i) Appeals, escalations and referrals;
 - ii) Closure of grievances and feedback
 - iii) Grievance records and documentation updating
 - iv) The GRC handbook and disclosure.

The steps above are detailed as hereafter.

1.40.1 First stage

1.40.1.1 Receipt of grievance

Any aggrieved individual, group or entity can lodge a grievance or complaint verbally, writing by filling a grievance form, use of phone (SMS or calling), email, etc. as deemed appropriate and convenient. Anonymous grievances will also be accommodated. Grievances will be logged with the GRC and at all respective level and immediately recorded by the secretary in the GRM Logbook/Register book to be provided to all GRCs. An example of a grievance log will be provided in the Stakeholder Engagement Plan. Details of grievances or complaints logged verbally will be captured as per the particulars of the grievance logbook. The secretary of the respective GRC will review the received grievances, categorised and record them in a Grievance Register, then give an acknowledgement of receipt to the complainant for reference and follow up. To simplify the process of lodging a grievance, a variety of grievance log-in-channels will be used such as a dedicated phone number, web sites, e-mails, in-person, anonymous, suggestion box, among others.

During SE exercises or meetings organised in each project-affected area, Community Development Officers will explain to local communities the alternative ways of lodging a grievance. The GRM

procedures will be disclosed through the Project's website and will also be advertised on billboards/posters in each community and at the entrance of the service provider's yard. Information material on GRM will also be made available at the information desks in districts covered by the project.

To ensure that all grievances are captured, the Implementing Agency will explain how the grievances received by district GRC members may be channeled through the Project's GRM. Training will be conducted for all GRC members on their roles and responsibilities and the implementing agency shall regularly monitor to ensure no grievances are missed.

1.40.1.2 Screening and assessment of grievances

All grievances will be registered, reported and tracked by the Implementing Agency in the Grievance Register by a Grievance Focal Point who is responsible for receiving, logging, referring and following up on grievances. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to prevent similar grievances or occurrences. The status number and trends of grievances will be discussed during weekly E&S meetings during the construction phase.

1.40.1.3 The GRC hearing procedure

A local GRC will be established at village/parish, sub-counties and district levels with an office. Once a grievance has been logged, the corresponding local GRC will be engaged to define a solution to the grievance. At this stage the grievance is reviewed in an informal (oral) way and the GRC members make and sign the minutes on the matter. If at Stage 1 the PAP's complaint is not resolved, the PAP is informed about grievance resolution procedures of Stage 2. The PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. Timeframe for resolving the stage 1 grievance is 30 days. Special provisions will be made for any complaints of a confidential nature. Complaints on GBV and VAC shall be received and referred immediately to service providers. The GRC shall convene whenever necessary (but at least once a month) and shall include the six members as defined in section 6.2 above.

Secretaries of the GRCs shall be responsible for creation, coordination, and documentation. Members of the GRC will be invited in accordance with the types of complaints to be addressed. The meeting will start without the complainants by reviewing all PAP or other person's complaints received since the last GRC meeting, and to propose a solution to all grievances within the past one month. Necessary assessments and reference will be made to support evidence based and amicable resolution. Relevant members of the public or purported witnesses may be co-opted as deemed

necessary. Then, the GRC will welcome the complainants whose grievances had been reviewed during the previous meeting to discuss proposed resolution.

For each grievance, the GRC will determine whether additional investigations are warranted. If so, additional information will be collected before the next GRC meeting and such information will be provided to the PAP before the meeting. The GRC will then inform the PAP about the date, time and place of its review meeting, and invite the affected persons accordingly.

The GRC will receive the complainant(s) and discuss with them the solution(s) to the grievance(s) that have been logged. The Committee shall draw up and sign the minutes of their discussion on the matter. If the grievance is satisfactorily resolved, the PAP will also sign the minutes in acknowledgement of the agreement. In cases where the project has agreed to put in place additional measures, the details will be specified, with a timetable for delivery, in the minutes of the meeting. If the grievance remains unresolved, the Stage 2 escalation process will be explained to the PAP. Stage 3 shall be handled by the implementing agencies' heads of department together with other relevant stakeholders.

1.40.2 Second stage

1.40.2.1 Appeals, escalations and referrals

If the complainant is either not satisfied or the case is beyond the jurisdiction of the respective GRC, the necessary appeals and referrals to the upper / next level GRC or relevant public mandated office will be allowed and supported appropriately. The respective GRC assists him/her in lodging an official grievance in accordance with the procedures of Stage 2 (where the plaintiff should be informed of his/her rights and obligations, rules and procedures of making a grievance, format of grievance, terms of grievance submission, etc.).

1.40.2.2 Closure of grievances

A grievance will be considered "resolved" or "closed" when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or has been implemented to the satisfaction of the complainant, a complaint closure form will be signed by both parties (Representative of the GRC and the complainant), stating that the complainant considers that his/her grievance is closed. The

grievance will then be archived in the Project Grievance database.

In certain situations, however, the Project may “close” a grievance even if the complainant is not satisfied with the outcome.

1.40.2.3 Grievance records and documentation update

OPM, through the PIU, will nominate a GRM Focal Point Person who will be responsible for management of a grievance database to keep a record of all grievances received. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by the Service provider or other relevant party; the outcome; and how and when this decision was communicated to the complainant.

Periodic monitoring reports will provide information on grievance management. Periodic grievance monitoring and reporting will occur quarterly, bi-annually and annually. Desired analytics of the reports will be guided subsequently.

1.40.3 GRM handbook and disclosure

OPM, as the Implementing Agency, will develop a handy but comprehensive GRM Book with sufficient details of the background, purpose, objectives, principles, structure, grievance redress process, legal and institutional frameworks, roles and appropriate responsibilities plus monitoring and evaluation framework on operationalization of the GRM. The GRM will be disclosed as early as possible and maintained throughout the Project lifecycle. It will be disclosed in a culturally manner in English and other languages in respective districts in an understandable format to all affected communities, stating the following information:

- Anyone can raise complaints, grievances, concerns, ask questions or make comments or suggestions related to the Project;
- Anyone can contact the GRM focal point using the GRM focal point’s contact details provided;
- the GRM focal point is responsible for receiving complaints, grievances, concerns, questions, comments, suggestions, and for responding to the person on a non- anonymous basis or generally via the Project’s website on an anonymous basis;
- the GRM focal point will confirm receipt of the complaint, grievance, concern, question, comment, suggestion, either providing a preliminary answer or confirming the expected timing to provide an answer; and by using this grievance mechanism, the complaint, grievance, concern, question, comment, suggestion with respect to the Project development will be received by the Project proponent which will endeavor to answer the complaint, grievance, concern, question, comment, suggestion and engage with the complainant and the project’s other relevant parties to mitigate any complaint, grievance, concerns, or incorporate

any comment, suggestion in the Project development to the extent possible.

The local government and all stakeholders will also be advised on the GRM so that they can communicate the step-by-step process to the Project affected people.

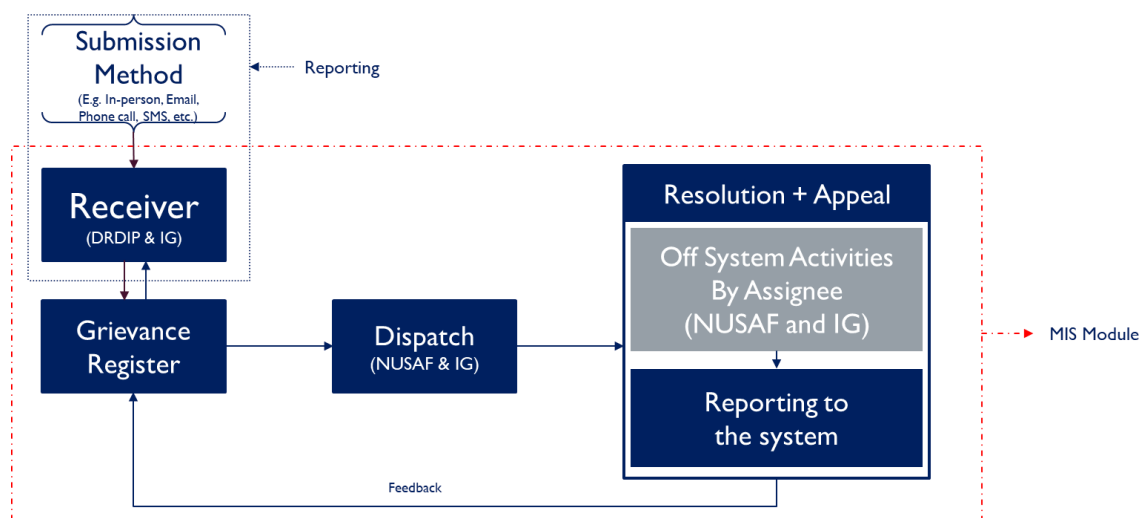


Figure 6: GRM process flow

1.41 . Mechanism under NUSAF program

1.41.1 Workers' GRM

The NUSAF IV Project Implementing Agencies will provide a grievance mechanism for workers to raise reasonable workplace concerns. Workers' grievances can be raised via email, suggestion box, anonymously, during toolbox meetings, or by contacting site emergency numbers or designated person, among others. The Implementing Agency will inform the workers of the grievance mechanism at the time of hiring and make it easily accessible to them. The mechanism will use an understandable and transparent process that provides feedback to those concerned without any retribution. The mechanism will not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective bargaining powers. The later though should as much as possible be avoided and only last option because it is expensive and time consuming.

Once a worker's grievance has failed to be addressed at first level or in case of dissatisfaction on part of complainant, it is then escalated to the next level or referred to an appropriate public office such as labour office. It should be noted that in compliance with existing national laws, some categories of grievances and crimes though to be still recorded in NUSAF IV Logbooks, will be

directly reported to the Justice Law and Order sector. This includes the police, the Directorate of Public Prosecution, and the courts of law, among others.

All workers and service providers shall be oriented and sign the Codes of Conduct (CoC) and shall be bound by the clauses therein. Awareness raising and trainings shall be undertaken prior to the signing of the CoC and throughout the Project life cycle. Such awareness creation will ensure that all the requirements in CoC are clearly understood by all workers. This CoC shall prohibit workers from engaging in SEA, GBV, VAC and other criminal acts while employed under the project. In case of transgressions, appropriate sanctions will be applied if a worker is confirmed as a perpetrator such as formal warning, reprimand, suspension from duty, termination or referral to the police or other authorities as warranted.

Detailed GRM for workers shall be included in the LMP prior to effectiveness date

1.41.2 The WORLD BANK'S Grievance Redress Service (GRS)

1.41.2.1 GRS Definition and Purpose

The GRS is the World Bank's easy way to provide PAPs and communities an avenue to bring their complaints directly to the attention of Bank Management. The project-level GRM will remain the primary tool to raise and address grievances in Bank-supported operations except issues that cannot be resolved at the project level.

Thus, grievances that are brought directly to the project team or to the country office should be addressed at the project level, unless the complainants specifically refer to the GRS in their complaint, or Task Team or Bank Management considers that referring the case to the GRS adds value. Complaints that are being addressed at the project-level can always be referred to the GRS at a later stage, especially if successful resolution (perceived or actual) was not possible (escalation).

The GRS facilitates corporate review and resolution of grievances by screening and registering complaints and refereeing them to the responsible Task Teams/Managers. The GRS undertakes the follow functions within defined time frame:

- a) Receives complaints from stakeholders
- b) Evaluates and determines their eligibility and category
- c) Refers complaints to appropriate Task Teams/Managers
- d) Follows up with Task Teams to ensure complaints are resolved

- e) Refers PAPs to the Borrower or other parties where appropriate.

1.41.2.2 Submitting a Complaint to GRS

Complaints may be submitted by one or more individuals, or their representatives, who believe they are adversely affected directly by an active (i.e., not closed) Bank-supported operation (IDA). A complaint may be submitted in the English or local language. Processing complaints not submitted in English will require additional processing time due to the need for translation.

A complaint can be submitted to the Bank GRS through the following channels:

By email:

grievances@worldbank.org; By

fax: +12026147313

By mail: The World Bank, Grievance Redress Service, MSN MC
10- 1018, 1818 H St NW, Washington, DC 20433, USA and/or

Through the World Bank Uganda Country Office in Kampala –
Plot 18 Prince Charle Drive Kololo, P.O. Box 4463, Kampala (U);

Tel: +256 414 3022 00.

The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported operation. This should be supported by available documentation and correspondence where possible and appropriate. The complainant may also indicate the desired outcome of the complaint, i.e., how it may be resolved. The complaint should have the identity of complainants or assigned representative/s, and address/ contact details.

Issues pertaining to fraud and/or corruption will be referred to INT – the Bank’s official mechanism of handling integrity issues of transparency and accountability. These include cases of possible fraud, corruption, collusion, coercion and obstruction in World Bank-funded projects.

1.41.2.3 Freedom from Retaliation

Bank policies provide for the participation of PAPs in project preparation and implementation. Complainants who use the GRS MUST NOT be subjected to any form of retaliation, abuse or any kind of discrimination since they exercised their right to complain to the GRS.

1.41.2.4 GRS Review Process

a) Registration of Complaints

After receipt of a complaint, the GRS immediately logs the complaint, and a notification of receipt will be sent to the complainant. Within 10 business days: The GRS reviews and evaluates the complaint, determines the eligibility and type of complaint according to the categories in the table below, registers it and forwards it to the appropriate Task Team/Managers, which is noted in the online system. GRS will notify the complainant of the eligibility determination of the complaint:

- If the complaint is eligible, the complainant will be notified that the Task Team has been assigned the case with a case number and the expected time frame in which s/he will be contacted.
- If the complaint is unclear, the complainant will be requested to submit additional information or provide clarifications to allow a decision on registration.
- If the complainant is not eligible, the complainant will be notified of this decision and referred to relevant institutions where appropriate and the case will be closed.

b) Review of issues raised and Formulation of Proposal

Within 30 business days after registration the Task Team will respond to the complainant. For Type I complaints (information requests) the Task Team will provide the requested information in line with the Bank's Access to Information policy. For Type II (minor and medium impacts) and III (serious issues of corporate relevance, harm, and complex policy issues) complaints the Task Team will propose to the complainant how the issue raised in the complaint will be addressed, including a proposed time frame. The proposed time frame for Type II should not exceed 60 days and for Type III 180 days. If Task Team needs more time, it will justify the additional time required. If the review by the task team reveals that the issues of concern raised in the complaint are not related to the Bank-supported project or any aspects thereof it will advise the complainant accordingly and refer the complainant to relevant government authorities to which the complaint should be addressed.

The specific proposal to address the issue or the recommendation to refer it to the borrower will be cleared by the relevant managers. The same applies to notifications that the concern is not related to the Bank project and hence the Bank has no means to address it. If the complainant accepts a specific proposal to resolve the concerns, the Task Team implements according to proposed process and proposed timeframe. The Complainant may provide input on all or parts of the initial proposal.

If the complainant rejects the proposal and/or the issue cannot be resolved through this process, the

complainant will be informed by the GRS that the complaint is closed without resolution. The complainant will be referred to other options for remedy if appropriate such as responsible country authorities, relevant local/national grievance redress mechanisms or the World Bank Inspection Panel, if the complaint relates to noncompliance and harm.

Acceptance of the proposal should be reached within 30 business days after the initial proposal has been presented to the complainant. For extraneous circumstances, request for extension can be submitted if both parties agree for an additional 30 days business at a time.

c) Implementation of Proposal

Once the proposal is accepted, the Task Team implements the proposal. The Task Teams will update the status and progress of the implementation of the proposal in the GRS log and will keep the complainant informed of such progress until resolution of complaint. The Task Team may request support and advice through the GRS at any point. Such support and advice can be provided by other Bank Global Practices where required and as appropriate.

1.41.2.5 Overall Mechanism

The monitoring plan will include indicators to be monitored, guidelines, responsible persons or institutions, the resources required to carry out the monitoring activities and timelines (quarterly) when the monitoring exercises will be conducted. The arrangements for quarterly monitoring of the resettlement and compensation activities would fit the overall monitoring programme of the entire NUSAF.

The arrangements for monitoring the voluntary Land Donations will also fall under the overall responsibility of LGs. The LGs will institute an administrative reporting system that:

- a) alerts project authorities to the necessity for land donation in the project activities design and technical specifications;
- b) provides timely information about the land donation for each sub project;
- c) reports any grievances that require resolution, and
- d) documents timely completion of VLD process;

1.41.3 Specific Tasks of the Go Will

- a) Set up a systematic process of recording grievances in a register (“Grievance Book”) as well

as electronically. The register shall be located in the Sub County implementation team office, community and shall be accessible to residents.

- b) Both written and verbally communicated grievances shall be recorded.
- c) The grievance mechanism will include provisions for confidentiality, including a toll-free number for complaints related to discrimination or exclusion of vulnerable or marginalized individuals or groups.
- d) Suggested categories are grievances regarding:
 - a. Replacement structure or land, and procurement of construction materials;
 - b. Agriculture and crops;
 - c. Livelihoods; and
 - d. Valuation process and payment of compensation.
- e) A database shall be prepared for recording and keeping track of the grievances and how they were resolved. The database shall be a ‘living’ document, updated weekly. It should also record the status of each grievance (date opened/in-process/closed). Access to making entries into the database should be restricted to the implementation team, but the general community should be able to use “Grievance Book”/ register to see the status of their complaints.
- f) Grievance procedure shall be communicated to the people, the process for recording their complaints and the timelines for redress. Communication shall be done through a community meeting involving the resettled community. Pamphlets outlining the procedures and commitments of the grievance mechanism should be distributed to all households. For vulnerable or marginalized individuals or groups following the enactment of the AHA, the Project will refer the grievances to the EISM which shall collaborate with NGOs/CSOs to enhance access to the grievance mechanism.
- g) Grievances shall be raised at the regular implementation team meeting for discussion. Some resolutions will require coordination/ interaction with the local authorities, which the GO should follow up, while some would require intervention from OPM.
- h) Provide a regular update on the status of grievances via the database, including reasons for delay, if any. This update shall be provided on a weekly basis. Also, clearly define grievances that will not be entertained by the GO. These could be related to issues other than

those linked to the resettlement and rehabilitation process.

2 ESMF IMPLEMENTATION FRAMEWORK

The government shall mainstream implementation of the NUSAF project into existing structures at the national and local levels. This shall avoid duplication, help ensure sustainability and increase efficiency of project implementation. However, given gaps in institutional and technical capacity identified, the project shall augment existing implementation capacity with additional institutional structures and capacity building support to ensure smoothen implementation and delivery of the “wrap around support” to the targeted beneficiaries.

The government shall establish a Project Steering Committee (PSC) to oversee and coordinate implementation of the project at the policy level. The Permanent Secretary of the OPM shall chair the PSC and have overall responsibility for project coordination. The PSC shall consist of the permanent secretaries or their representative from the implementing Ministries & agencies (the Ministry of Finance, Planning and Economic Development (MFPED) and the MLG, the MWE, MAAIF, MTCI), the Executive Directors of PSFU, NEMA, NFA, NITU, NIRA, NPA, UIA, etc.

The PSC shall have the following main roles and responsibilities: (a) coordinate policy actions among public institutions to facilitate project implementation and promote the growth of the youths & female led enterprises; (b) provide guidance to the Project Technical Committee (see below) and program management teams; (c) oversee the financial risks during implementation and suggest mitigating measures; (d) oversee the project’s grievance redress mechanism and support resolution of safeguard-related complaints as required; and (e) act as the main focal point for interaction with development partners and other stakeholders on behalf of the project. In addition, the PSC shall host two annual meetings with the World Bank team to review the project results, discuss key issues, and agree on key milestones over the following six months. The review meeting shall be based on a technical review conducted and led by the World Bank team in collaboration with the PTC. The OPM shall act as the secretariat for the biannual project review meeting and will also be responsible for organizing the meeting, including inviting additional organizations or agencies to the meeting as necessary.

The government shall also establish a Project Technical Committee (PTC) to coordinate implementation of the project components at the technical level. The PTC shall be called the Project Implementation Support Team (PIST) chaired by a Director of NUSAF from OPM and shall comprise the key staff responsible for implementation of each component and sub-components.

The PIST shall coordinate preparation of and revisions to the Project Operations/Implementation Manual (PIM), monitor project implementation, address any technical issues and challenges that impact implementation of the project, endorse consolidated technical and financial management reports, provide technical guidance on implementation, and escalate to the PSC any policy issues requiring high-level attention. The responsibilities of all implementing MDA are highlighted below.

2.1 Office of the Prime Minister

Responsibility – The institutional arrangement used to implement the NUSAF 3 project will be used to implement the NUSAF successor. The Office of the Prime Minister (OPM) shall be the implementing agency of the project and shall work with a wide range of institutions at central, district and sub-county levels to deliver the project. The OPM shall continue to be supported by a Project Implementation Support Team (PIST) headed by a Project Director and a Project Operation Specialist, Components Specialists, Environment Specialist, Social Safeguards Specialist, Monitoring & Evaluation Specialist, and a Finance Management Specialist. These shall have staff under them at Officer levels, who will sit at the Project Management Unit and regional offices. The exact composition and number of staff will be reviewed following further elaboration of the design but it is expected that the team shall have a cost-effective structure and more practical presence. The Permanent Secretary, Office of the Prime Minister shall have overall responsibility for the coordination, accounting for the project resources and ensuring successful implementation of the Project.

At national level, OPM shall take overall responsibility for overseeing progress in implementing the ESMF and assessing the effectiveness of mitigation measures against agreed indicators and parameters. OPM will consolidate and review monthly reports submitted by the districts.

Safeguards Capacity – NUSAF IV shall recruit one Environmental Safeguards Specialist and one Social Safeguards Specialist and engage consultants based on need on GBV/VAC and Health and safety in addition to the Environment Officer and a Social Safeguards Officer to manage ESF issues. The main role of the Environmental Safeguards Specialists and Social Safeguards specialist is to provide technical advice on environmental and social management and mitigation planning and ensure that the ESMF is fully implemented. The Environmental Safeguards Specialist and the Social Safeguards Specialist shall report directly to the Project Director NUSAF – OPM.

2.2 Inspectorate of Government

NUSAF IV shall strengthen the existing collaboration arrangement with the office of the Inspectorate of Government (IG). Ensuring the independence of the IG will form part of the guiding principles of this collaborative arrangement. The IG shall conduct NUSAF IV specific IEC, oversight, grievance response and, where necessary, investigations. The IG under the TAAC shall undertake grievance handling especially in regard to corruption.

The IG will liaise with the PS-OPM, Chief Administrative Officers and Sub-county Chiefs to ensure effective implementation of the TAAC Program at national, district and sub-county levels respectively.

Under this arrangement, the IG will submit six-monthly reports to OPM, with copies to the MFPED, Parliament and the World Bank. These NUSAF IV TAAC reports shall also be tabled in the PSC. To maintain the independence of the IG, there shall be under the TAAC support program an arrangement under which the IG shall receive financial support directly from MFPED. The project shall follow guidelines as laid down under the Local Government Good Governance and Anti-Corruption Strategy, the National Anti-Corruption Strategy and other measures aimed at fighting corruption.

2.3 Ministry of Gender, Labour, and Social Development

While the OPM shall be responsible for the overall coordination, resources management and implementation of the project, the Ministry of Gender, Labour, and Social Development (MGLSD)'s mandate as the government agency responsible for Social Protection (SP) sector policy making and overall coordination of SP interventions. As a result, the MGLSD is leading the preparation of a national Policy and framework that includes Income generating related opportunities for Households to which this Program shall contribute to building the foundation for the direct income support program. The MGLSD shall work together with NEMA in developing guidelines, policies, sector norms and standards to support the NUSAF IV safeguards team in the successful implementation of the ESMF.

2.4 Ministry of Health

Mandate and Responsibility -Health governance in Uganda is spearheaded by the MoH and shared with other ministries, health development partners, district leadership, providers (public and

private), and representatives of civil society organizations (CSOs). The MoH is tasked with the role and responsibility of delivering on the health goals and objectives of government. The Ministry shall develop policies, regulations & guidelines that promote sound health & safety consideration during the implementation of the NUSAF IV Project activities. Such shall include review and/or amendment of existing legal frame works as well as providing timely alerts on disease outbreaks and awareness on disease control and prevention.

Health and safety activities will be clearly highlighted in the Environmental and Social Management Plans (ESMP) for each sub-project, where applicable.

2.5 Ministry of Agriculture, Animal Industry and Fisheries

Mandate and Responsibility– MAAIF is responsible for policy formulation, planning, setting standards on irrigation, aquaculture and water for livestock. OPM will have to closely work with MAAIF to strengthen the afforestation, crop production, Marketing and veterinary extension services systems to address the beneficiaries’ demands of extension services. The above is critical because of the need for training of the beneficiaries of NUSAF IV to ensure sustainability. OPM shall work with MAAIF to ensure districts & beneficiary communities capacity to implement safeguards is enhanced through provision of required guidelines to support sectors activities under the Ministry.

2.6 Ministry of Works and Transport

Mandate and responsibility – The mandate of this Ministry is to promote an adequate, safe and well-maintained transport infrastructure, an efficient and effective communications system, safe housing and buildings, and to contribute to the socio-economic development of the country. With regards to NUSAF IV, the Ministry of Works & Transport will develop and provide guidelines on implementation of safeguards on works related sub-projects to ensure compliance with the law. The Occupation health & safety requirements for construction related sub-projects, requiring the respective District Engineers will work closely with OPM to implement any infrastructure related issues.

Capacity – The Environment, Gender equality, HIV/AIDS and Occupational Health and Safety issues are part of the standards any facility constructed, as it is required by the Government of Uganda through the NDP. The Ministry of Works and Transport (MoWT) has an Environmental

Liaison Unit (ELU) responsible for these areas. In addition, guidance on environmental issues will be provided by the DEOs in line with the decentralized system of government in Uganda.

2.7 The National Environment Management Authority (NEMA)

Mandate and Responsibility - NEMA is specifically mandated by the National Environment Act (NEA) 2019 as the principal agency in Uganda charged with the responsibility of coordinating, monitoring, supervising, and regulating all environmental management matters in the country. One of the key institutional mandates of NEMA include among others ensuring the observance of proper safeguards in the planning and execution of all development projects including those already in existence that have or are likely to have significant impact on the environment. The role of NEMA will be to review and approve environmental impact assessments and Project Briefs as well as monitoring project implementation in accordance with the National Environment Act and the respective regulations.

Safeguards Capacity – NEMA has adequate technical capacity to monitor the NUSAF IV through its Department of Environment Compliance and Monitoring in addition to the District Environment Officers in the respective project areas that will be able to report any cases of noncompliance. NEMA Environmental Inspectors do capture social issues/complaints during their inspections where feasible. However, NEMA is constrained by the small number of staff it has and, in most cases, does not monitor projects they deem of low-moderate environmental and social impacts. In addition, they are also resource constrained since they do not have enough funds to take care of projects monitoring and compliance follow up. Overall, NEMA captures both environmental and social issues either through the mandatory annual compliance audits or through monitoring reports by the respective District Environment Officers who are gazetted Environment Inspectors. Therefore, there is need for close coordination between the DEOs and CDOs to fully integrate social issues into the monitoring reports prepared by the DEOs.

2.8 Local Government Administration Structures

The following institutions will be involved in screening and implementation of mitigation measures, monitoring and evaluation of subprojects within the district:

- District Executive Council (DEC)
- District Technical Planning Committee (DTPC)
- The Sub County Technical Planning Committee (STPC)
- Parish Development Committee (PDC)

- Community Project Management Committee (CPMC)
- IGG Regional Office

Implementation - At District level, the Chief Administrative Officers will be in charge, as the Accounting Officers and overall Coordinators of the project. Building on the positive experience from NUSAF3 project implementation, the districts will assign an officer (civil servant) who will be a full-time focal person for the NUSAF IV and will be supported by the District Community Development Officer, District Engineer, and District Environmental officer, among others. Multi-sectoral Technical Planning Committees (TPC) at the district and sub-county levels and the Parish Development Committee will ensure that the project's activities are: appropriately planned, approved and integrated into the budgets and work programs of the respective local governments and line ministry's technical agencies. The role of districts and sub-counties will be outlined in a Memorandum of Understanding between the OPM and Districts. The livelihoods component will be further supported by the creation of an implementation support team at sub-county level to support implementation at sub-county parish and community level. This team will be led by the CDO and comprises of Parish Chiefs, Parish Development Committee members, LC1, Extension staff and community facilitators. Key partnerships will include those with SACCOs, MFIs and banks,

business entities that promote the marketing of agricultural produce and other organizations and programs providing financial literacy or business development services.

The Role of the DEOs and CDOs will also be to ensure that NUSAF IV subprojects are implemented in accordance with NEMA conditions of approval. They will also attend the monthly site inspection meetings for the project and be able to point out issues of concerns. Specifically, the CDOs will oversee implementation of compensation aspects and other social issues such as complaints.

Safeguards Capacity—Every district has a designated District Environment Officer whose responsibility is to monitor all environmental affairs of the district including compliance of activities with their jurisdiction. In addition, every district has a Community Development Officer who is responsible for mobilizing communities to participate in projects as well as coordinating and reporting on the impact of projects (positive and negative) on the communities. District Land Tribunals are also in place for some of the project districts to handle land related issues of the NUSAF IV. However, the districts (specifically the DEOS and CDOs) will require facilitation to monitor project implementation as provided for in the ESMF budget.

2.9 The Role of the NGOs

Involvement of NGOs in the project areas to deliver capacity building services is important to ensure participation of vulnerable groups. Capacity building at the community level will involve helping communities to conduct participatory needs assessments to identify, prioritize and plan projects and to choose members to represent them as part of the community level project coordination. NGOs could also perform an ombudsman role or serve as a steward of the ‘rules of the game’. If a particular group feels that it was not being treated fairly or the project components have not been implemented, it could contact an appointed NGO to share its grievance. The NGO will, in turn, make sure that the NUSAF IV operating norms are being respected.

Public consultation and information dissemination, for them to be effective and meaningful, in turn requires adequate community mobilization to ensure all stakeholders are well informed and have their voices heard. Vulnerable groups have to be mobilized to encourage their active participation in consultation and information dissemination processes. Where such groups lack capacity, local NGOs will be engaged to help mobilize them to carry out consultation and information dissemination.

2.10 Role of Office of Chief Government Valuer

The application of the valuation exercise on ground will be done in the presence of at least two local council leaders with the participation of the affected persons. Values assigned to assets must be based on the market rates approved by the respective districts. Where this is not possible, the Chief Government Valuer (CGV) will be engaged to do this. If a Government Valuer handles this process, the depreciation cost will not be imputed and the consent of the affected person on the outcome of the process must be sought in order to arrive at agreements on the total profile of losses and compensation.

3 CAPACITY BUILDING

3.1 Introduction

The OPM shall have responsibilities for implementing the NUSAF IV project. As part of this project, NUSAF IV shall move towards the establishment of two fully staffed PIST members specialists dedicated to the implementation of the project safeguards to ensure effective coordination.

The measures adopted under the NUSAF 3 project's institutional capacity shall continue into the proposed NUSAF IV Project and directly benefit NUSAF IV Project implementation, ensuring that the OPM staffs' capacity for implementing the NUSAF IV Project shall be strong from the beginning of the project.

OPM has low capacity for the implementation of World Bank-funded projects and provision of overall coordination of project activities. A NUSAF IV Project Implementation Support Team shall be established and adequately staffed to supervise, monitor, and report on all project activities.

Although the OPM has managed environmental and social risks and impacts on previous and/current World Bank funded projects such as Development Response to Displacement Impact Project (DRDIP), and others, a systematic capacity building of the relevant staff in the institution on the new Environmental and Social Framework (ESF) requirements shall be necessary. This is partly because some of these projects were designed under the old Environmental and Social Safeguards policies of the World Bank.

Capacity building for M&E. The project will provide support to strengthen capacity for M&E of the NUSAF IV-PIST and of the DIST and SIST. Specifically, the project will finance consultants who will work with the OPM to prepare a detailed M&E and reporting system plan, provide on-the-job and other training for project M&E specialist and M&E officers.- and provide other capacity support required to establish and operate an effective M&E system. The project will also finance follow-on training and workshops with M&E specialist to ensure that normal staff turnover does not disrupt the M&E effort. Therefore, for effective implementation of the NUSAF IV Project, it is important for staff from the OPM to undertake capacity building and training on national laws and regulations on environmental and social risks and impacts management; environmental and social management systems; World Bank's ESF and Environmental and Social Management Systems (ESMSs) for

World Bank projects.

3.2 Environmental and Social Capacity Building Plan

3.2.1 Personnel from: OPM and other MDAs closely associated with the NUSAF IV Project

To augment the capacity of the OPM to deliver high-quality interventions to beneficiaries, the project will finance the eligible operational costs of a Project Implementation Support Team (PIST). OPM shall establish Project Implementation Support Team (PIST) drawing on government and technical personnel that shall, at a minimum, consist of the following professional staff:

- (a) Project Director
- (b) the Project Manager,
- (c) the Components Specialists,
- (d) Finance Management Specialist,
- (e) communication specialist,
- (f) Procurement specialist,
- (h) Environment Safeguards
- (i) Social Safeguards Specialist,
- (j) M&E specialist, among others.

These costs shall be financed through Component 4a including externally recruited staff to augment internal OPM capacity. The team will be assigned to work at OPM depending on the implementation responsibilities led by the Director and Project Manager.

At the district level, the project shall work closely with the district level administration structure and those of refugee settlements. The district implementation support teams will consist of designated government staff and contract staff, depending on the capacity and need of the district. The district implementation team shall be led by the Chief Administrative Officer (CAO) to ensure ownership and sustainability. The project shall use the district structure that includes the departments of community development, production, natural resources, planning etc. These departments shall be supported through project resources to allow them carry out their responsibilities under the project.

It is also recommended that prior to commencement, a 2-3-day workshop is held in Kampala targeting OPM and other MDAs closely associated with the project. The workshop as detailed below will aim at providing attendees with the basic approach to implementing the guidelines provided in the ESMF combined with the use of appropriate tools, such as the screening forms, ESMP templates and ESMF Annual. Reporting Form. Refresher courses should be held as needed during the course of the project. The trainings shall be organized by OPM (being the lead implementing agency) with support from the World Bank.

The details of the capacity building needs, and the Training Format are presented in Table 14.

Table 14: Capacity Building Needs and Training Schedule

Aspect	Key issues to be addressed	Mode of engagement	Stakeholders	Responsible entity	Timing	Deliver timeframe	Timing	Estimated cost (USD)
World Bank ESF	World Bank Environment and Social	Training	Technical personnel from: OPM PIST and other relevant MDAs (MWE, MGLSD, NEMA, NFA	World Bank	Prior to Commencement, of project activities and once the relevant staff are in place.	One week	2 times of project lifetime (i.e., prior to project start & in the middle of project lifetime).	100,000
EHS	ESHS requirements, including those specified in ESMMPs and Project contracts	Training	Service providers, Commercial Financial Institutions (CFIs) and supervision/ verification consultants	OPM	During project implementation	One month	2 times every year on assumption that the project can engage new service provider every after 6 months	200,000
Good International Industry Practices (GIIPs)	Improve knowledge on GIIPs in ESHS Safeguards	Training	OPM PIST	World Bank	During project Implementation	One week	2 times of project lifetime (i.e., prior to project start & in the middle of project lifetime)	100,000

Aspect	Key issues to be addressed	Mode of engagement	Stakeholders	Responsible entity	Timing	Deliver timeframe	Timing	Estimated cost (USD)
Discrimination of Vulnerable or Marginalized Individuals or groups	Improve knowledge on discrimination and exclusion	Training and Sensitization	OPM PIST	World Bank/ EISM	During project Implementation	Two weeks	2 times of project lifetime (i.e., prior to project start & in the middle of project lifetime)	150,000

3.2.2 Proposed training format for ESMF implementation

The training modules below are proposed to form part of the training program to ensure awareness of how to effectively implement the ESMF under NUSAF successor project:

3.2.2.1 Module 1

Introduction

- Objective of the ESMF
- Key stakeholders with a role in the ESMF
- Relevant legislative and regulatory acts and World Bank ESF
- Baseline Environmental and Social Conditions
- Structure and role of Project Implementation units and relevant governmental authorities

3.2.2.2 Module 2

Summary of guidelines for the subprojects

- Environmental and Social Screening and Impact Assessment
- Stakeholder Consultations and Engagement
- Environmental and Social Impacts and Mitigation Measures
- Monitoring and Reporting
- Grievance Redress Mechanism
- ESMP & ESMS

3.2.2.3 Module 3

Capacity Building and Implementation Budgets

- Capacity building requirements
- Budgeting for the implementation of EMPs, ESMS, VGMPs, and other safeguard management plans
- Q&A session

3.2.3 Training of service providers, consultants and those implementing the sub-projects

The training will also cover some of the safeguards areas of specific interest, including but not limited to: Development & Implementation of Contractor's ESMP, Environmental and Social Management Systems, Health and Safety Management Systems (both Occupational and Community Health and Safety), management and use of Auxiliary Facilities (e.g. Camp and Equipment Yard, Borrow Areas), environmental and social due diligence, Labour influx management and use of Code

of Conduct, Child abuse/defilement, Grievance Redress Management, and so on. A proposed format for a 2-day training module is provided below.

3.2.3.1 Module 1

Awareness raising

- Environmental & Social awareness and the importance of effective mitigation
- Sound Practice for Environmental and Social mitigation measures
- Compliance with WB ESF and local legislation on OHS, ESMP, SEP, RAP, and VMGMP
- Stakeholder engagements
- SEA, GBV and VAC
- Non-discrimination of vulnerable or marginalized individuals or groups due to ethnicity, age, disability, AHA etc. See specific training session and role of EISM in Annexes 13 and 14.
- Contract management requirement.

3.2.3.2 Module 2

Technical training

- Development/Implementation & scope of Service providers' ESMPs
- Environmental, Health & Safety Management onsite
- Acquisition & management of auxiliary facilities and construction materials sites
- Labour influx management and child abuse
- Grievance Redress Mechanism, Process and Committees
- Implementation of the ESMP (contract clauses)
- Monitoring and Reporting of ESMPs, SEPs, RAPs, and VMGP
- Climate change
- Biodiversity

3.2.4 Training of Safeguards staff

During the implementation of the project and as part of capacity building for support towards the Implementation of this ESMF and its associated tools, it is recommended that the safeguards specialists undergo the World Bank ESF training and the following internationally recognized training:

- a) ISO 45001:2018 Occupational Health and Safety Management System (Lead implementers)

- b) ISO 14001: Environmental Management System (Lead Implementer).
- c) Quality Management System 9001 (Lead Implementer and Auditors).
- d) Labour Management practices by ILO.
- e) NEBOSH International General Certificate in Occupational Health & Safety
- f) Land acquisition and management related courses, focusing on Voluntary Land Donation which the project will use
- g) SEA, GBV and VAC training
- h) Stakeholder engagement related training.
- i) Attend international conferences on climate change, biodiversity, impact assessments to share and learn best practices for replication in the project implementation.

4 RESULTS MONITORING AND EVALUATION ARRANGEMENTS

The monitoring and evaluation of the implementation of this ESMF will be integrated into the Project Monitoring and evaluation.

4.1 Monitoring and regular reporting

- a. Objectives and design. The objective of the M&E system is to track the project's implementation progress and achievement of expected outcomes to enable the government (national and sub-national) and Bank teams to address issues as they arise. An integrated web-based data collection platform will be established at the OPM into which data on implementation progress and outcomes will be entered to track implementation of project interventions and their outcomes. The OPM will contract a consulting firm to design and develop the integrated data platform, which will include an interface that allows the persons responsible for M&E at all implementing agencies to enter monitoring data as they collect.
- b. The OPM will lead the overall M&E efforts. The ministry already has an experienced M&E specialist on its staff, who has been responsible for leading the efforts to track NUSAF3 and DRDIPs implementation progress and outcomes. This person will serve as the Coordinator of the M&E team. Staff with specialized skills in (a) survey design, implementation, and analysis; (b) operations and maintenance of management information systems; and (c) data manager; and (d) others as needed will comprise the M&E team at the OPM.
- c. M&E teams will be established as members of all PIST at both the national, DIST and SIST levels. They will be responsible for collecting and sharing information presented in the results framework in accordance with the procedures laid out in the M&E monitoring plan, and entering the data into the integrated data platform. Data from each implementing agency will be aggregated with the data of others and used as the basis of quarterly progress reports.

- d. Data generation and reporting. The data to track the key performance indicators come from;
- i. project-specific surveys and questionnaires,
 - ii. project service providers (women's entrepreneurship platform managers, trainers, revolving fund managers, facility managers);
 - iii. local governments (district plans);
 - iv. and sector service providers (agriculture, trade, energy and water companies);
 - v. consultant reports; and
 - vi. supervising engineers' reports on construction progress., the implementing agencies, and from project-specific data collection efforts. The PIST shall submit quarterly project progress reports to the World Bank, and to other stakeholders within 45 days of the end of each quarter. Under the leadership of the Director, the Project's PIST and DIST will conduct joint twice-yearly supervision missions with the Bank's task team during which they will discuss the findings of the progress reports and agree on actions to address issues raised in the reports. The government and World Bank will prepare a comprehensive midterm review of the project implementation and results in 2025/2026.

4.1.1 Third Party Monitoring

To enhance and strengthen World Bank financed project activities in the Uganda Portfolio, monitoring of inclusion and non-discrimination of vulnerable or marginalized individuals or groups following the enactment of AHA in all projects will have Third Party Monitoring. Third-Party Monitoring will be overseen by the EISM firm in collaboration with NGOs/CSOs. Third-Party Monitoring will monitor whether the mitigation measures for vulnerable or marginalized individuals and groups are being adequately implemented; propose corrective actions and measures when required; undertake community stakeholders' outreach and sensitization and provide referral to counseling services when needed.

As part of the Third-Party Monitoring a Hot line has been established for the Project, as stated earlier. Several Development Partners and CSOs have expressed interest in expanding their Hotlines to cover vulnerable or marginalized individuals or groups issues. TORs will be prepared and will be shared with these Hotlines and other interested Development Partners.

4.1.2 Project Operation Manual

As indicated earlier, to facilitate the implementation of the provisions for inclusion and nondiscrimination that cover vulnerable or marginalized individuals or groups, the Project

Operational Manual (POM) as well as this ESMF specify the how to implement the guidelines. The POM clearly lays out how the projects guidelines will ensure inclusion of vulnerable or marginalized individuals or groups.

The POM provides detailed information on how exactly the mitigation measures will be implemented. Furthermore, it also specifies the timelines and roles and responsibilities to implement the different mitigation measures. The POM also provides detailed information on how exactly the Third-Party Monitoring will be implemented. The Project Operation Manual is a living document that will be updated from time to time as needed.

Monitoring, evaluation and reporting on environmental and social issues will form part of the overall sub-project implementation processes and LG reporting systems. Communities will keep records of all activities done in their respective communities and submit the same to the local governments for consolidation. The District Environment Officers will work with the communities to capture and report on environmental and social issues monthly. The monitoring reports will then be compiled and sent to OPM Safeguards Specialists for review and who will then prepare a consolidated quarterly monitoring report and share it with the Bank.

Table 15: Monitoring Plan for NUSAF IV Key Performance Indicators

Project Phase	Proposed Actions/Mitigation Measures	Location	Indicators	Frequency	Responsibility	Time Frame
Planning Phase	Capacity Needs Assessment for National District, settlement & Sub-county level Teams	National District & Sub-county level in the implementing districts	No. of assessments conducted	Once	NUSAF IV TST, NEMA & MGLSD	Year 1 of project
	Capacity enhancement for NUSAF IV TST & relevant MDA Safeguards Teams in implementing ESF	PIU	Proportion of staff trained & able to support implementation	Once	NUSAF IV-TST	Year 1 of project
	Capacity Building for both district & Sub-county level safeguards teams	District & Sub-county level	Proportion of targeted personnel trained. Proportion of staff in LG able to satisfactorily implement issued requirements.	Twice	NUSAF IV TST, NEMA & MGLSD	Year 1 & year 2 of the Project
Implementation Phase	Conduct environment & social screening of proposed sub-projects & development of respective ESMPs	Community level	Proportion of sub-projects screened	Quarterly	District & Sub-county safeguards teams	Year 1 to year 5

Project Phase	Proposed Actions/Mitigation Measures	Location	Indicators	Frequency	Responsibility	Time Frame
	Monitoring implementation measures	Site specific Community level	Proportion of monitoring visit Quarterly reports produced Proportion of requirements complied with. Identified corrective actions successfully implemented	Quarterly	NUSAF IV TST & District Safeguards Team and contractors	Year 1 to year 5
	Profiling & Documentation of best practices	Site specific/community level	No. of stories captured	Quarterly	NUSAF IV Communications Team	Year 1 to year 5
	Knowledge Transfer Learning Exposure visits	District specific	Proportion of visits conducted	Bi annual	NUSAF IV TST & District Safeguard teams	Year 2 to year 4
	Discrimination and exclusion of vulnerable or marginalized individuals or groups	District specific and site specific	Implementation of mitigation measures	Monthly and quarterly	NUSAF IV TST & District Safeguards Team and EISM	During lifetime of project

4.2 Evaluation and learning

With support from Component 4, the Project will use various mechanisms to implement an evaluation and learning agenda. This will include potential pilots that will enable the GOU and the Bank to better understand and improve project implementation and outcomes as well as additional studies and surveys that tackle broader institutional and structural constraints preventing women, youths and other Vulnerable & Marginalized Groups from expanding their enterprises. In addition, the Project will conduct an outcome evaluation of the project outcomes. GOU and the World Bank will also conduct a Mid Term Review (MTR) for the Project, during which the target values will be reviewed, and any required Project design adjustments will be discussed and made. The exercise will also assess the level of implementation and compliance/conformity of the ESMF to the World Bank Environment and Social Standards as well as the laws and policies of Uganda. An impact evaluation will provide rigorous evidence of the program's impact and will help promote the project to a wider audience of stakeholders.

4.3 Sustainability

The project aims to support the vulnerable youths and women empowerment through provision of employment and entrepreneurship skills to transform their livelihoods through job creation as well as shifts from micro and small enterprises to larger more profitable firms, which should enable many to sustain their operations. Improvements in entrepreneurship skills through training, mentoring, establishment of business networking opportunities, and increased access to finance is expected to increase the overall profitability of firms. Assistance with creating market linkages through market assessments and value chain analysis during project implementation is further expected to increase firm success.

Financial inclusion and savings groups: participants shall be targeted into existing groups which shall serve for peer-to-peer exchange and learning as well as provide a facility for risk management in the event of shocks and as a mechanism for borrowing in support of livelihood investments. The project shall leverage, when possible existing informal savings groups especially those created and operational from NUSAF3 and which operate as accumulated savings and credit associations groups. Efforts shall be made to engage with women-led groups. Linkages with the open credit market to assist groups and participants access other credit facilities shall be explored.

Mentorship: Mentors/Community Facilitators, supported by the project will guide beneficiaries

through the program as they graduate to sustainable livelihoods and resilience. Mentors will visit beneficiaries regularly and help link beneficiary households to project activities and other services.

Financial support is a bridge to more formal financial sector services. The financial support will act as “bridge finance” for micro and small women entrepreneurs and poise them to transition to available market options (for example: the INVITE supported credit line). Applicants for the funds will be required to demonstrate a high likelihood of being able to repay the loans, including through use of psychometric questionnaires to assess the credit-worthiness of applicants. Sub-component 1D responds to evidence that competitively awarded stipends have the potential for long-term income generation for small entrepreneurs as well as evidence that women pivoting to male dominated sectors have a higher chance at income generation.

4.4 Emergency Response Component (ERC)

The ERC is designed to provide swift response in the event of an Eligible Crisis or Emergence through a portion of the undisbursed project envelope to address immediate post- crisis and emergency financing needs. The ERC may be used following natural disasters or other crises and emergencies allowing funds to be reallocated from other components of the project. In the event of an emergency event, it is not anticipated that a re-allocation of project funds will cause serious disruption to project implementation.

Activities under the NUSAF IV Project shall be governed by the World Bank Directive Contingent Emergency Response Component (ERC) (October, 2017). The PIST shall be the implementing Agency for the ERC.

Disbursement of emergency financing under the ERC shall be contingent upon:

- a. the recipient establishing a nexus between the disaster event and the need to access funds to support recovery and reconstruction activities (an “eligible event”); and
- b. Submission to and no objection granted by the World Bank of an Emergency Action Plan (EAP).

The EAP shall include a list of activities, procurement methodology and safeguards procedures. The EAP shall require consideration of safeguard implications for any proposed emergency supplies procurement or reconstruction activities. The World Bank, through the no objection process, shall closely examine the nature of the proposed activities, particularly those Grid expansion and last mile connection, to ensure

- I. that they are not prohibited under the negative list and
- II. That the recipient is aware of the required safeguard compliance documentation before initiating the process by which the proposed works will be prepared and implemented.

Emergency activities financed under the ERC shall involve financing provision of critical goods or emergency recovery and rehabilitation works, and it is likely these shall fall into substantial or high risk according to the World Bank ESF risk classification.

Activities that fall under high risk could involve procurement of emergency supplies such as medicine and water and do not require the application of safeguard instruments, post- screening or assessment.

Other emergency supplies, such as fuel products, shall require safeguard instruments (such as ESMPs) to ensure procurement, storage and dispensing procedures are adequate.

Preparation of the Environmental and Social Management Plan (ESMP) will have regard to this ESMF and safeguard instruments will require World Bank approval prior to commencement of activities. Importantly, the ESMP shall need to include procedures for:

- i. Consultation and disclosure;
- ii. Integration of mitigation measures and performance standards into implementation;
and
- iii. Supervision/monitoring and reporting measures to ensure compliance.

4.4.1 Emergency Reporting

The respective district safeguards teams shall be responsible for reporting the environmental and social incidences whenever such incidences occur to the PIST. The PIST shall compile and report incidences to the World Bank within 48 hours for major incidents such as fatalities, HSE incidences, Sexual Exploitation and Abuse (rape and defilement, GBV/VAC), etc. followed by a root-cause analysis report within 7 days, whereas other minor incidences will be reported to the World Bank through quarterly reports. Requirements for incident reporting shall be included in relevant project contracts for sub projects under component 3.

4.4.2 Reporting procedure

4.4.2.1 Initial communication

Initial communication of the emergency/incident to the responsible personnel/ project worker at the

project site shall involve making a phone call, and SMS/WhatsApp, for incidents that require immediate attention to the respective district environment and social specialist.

GBV and SEA related cases, shall be rated using the World Bank's assessment tool. OPM-TST shall implement actions recommended for the appropriate level of risks prior to work effectiveness and workers' deployment. This would include signing of enforceable Codes of Conduct by workers, establishment of referral pathways with support from the OPM GBV Specialist, sensitization activities for workers/communities by relevant Service providers and consultant/Contractor staff, etc. three months after project effectiveness.

4.4.2.2 Classification

Classification of the incident will entail ascertaining the type of the incident, that is; whether the incident is indicative (e.g., near miss, minor injury), serious or severe (e.g. disablement, fatality). The type of the incident shall further inform the reporting timelines to the PIST and the World Bank respectively. Serious and severe incidents shall be reported to the Bank within 48 hours while indicative ones will be reported on a quarterly basis (included in the quarterly ESHS report). The sub-projects shall submit incident reports to the PIST monthly except for the major accidents which must be reported (to the PIST) within 12 hours of occurrence.

4.4.2.3 Notification

Notification shall involve getting details of the victim, the circumstances under which the incident occurred and the time at which the incidence occurred.

4.4.2.4 Investigation

After the respective TST receives notice of the incident, investigations shall commence focusing inter alia on the root cause(s) of the incident and identifying corrective and preventive action.

4.4.2.5 Response

Responding to incidences includes coming up with corrective and preventive measures that must be implemented within specified timelines to ensure that such incidences do not re-occur.

4.4.2.6 Follow up

This is aimed at finding out if the response was complete, its effectiveness and any lessons that can be learnt from the process.

4.4.3 Roles and Responsibilities

The PIST at OPM shall assume the overall implementation of the Project. The Project Manager, Environmental Specialist, Social Safeguards Specialist, and other technical officers at the Project Secretariate (OPM) the Project Implementation Support Team (TST). The TST shall be responsible for consolidation of E&S management reports, verification of incidences and quality control and quality assurance of the reports before they are submitted to the World Bank.

The PIST Environment Specialists and the Social Safeguards specialists shall be responsible for overseeing the monitoring of the ESMF for their Project safeguards aspects, including the implementation of the monitoring plan. They shall conduct field supervision visits to the different project sites.

Site-specific ESMPs shall be developed and implemented by the implementing district safeguards teams and beneficiary communities with support from the TST and hired Consultants where applicable. The TST shall ensure that the ESMPs are in conformity to the ESMF.

Overall, the World Bank shall undertake project implementation support and supervision missions twice a year to ensure effective environmental and social safeguards management and that the project development objectives are realized.

5 ESMF IMPLEMENTATION SCHEDULE AND BUDGET

This section presents the budget estimates for implementation of the ESMF. It does not include costs for specific sub-projects whose budgets shall be developed during the preparation of the ESMPs under the NUSAF IV Project. However, at the district level, the implementation of the ESMF activities shall be mainstreamed into component specific activities, whose sub-project specific ESMP cost shall not be less than 5% of the sub-project cost. At the National level, ESMF capacity building and compliance monitoring/evaluation activities shall be directly supported through programs operations funds of the Project.

5.1 ESMF Budget

The budget, implementation timing and responsibilities are presented in Table 16 below.

Table 16: ESMF Implementation Schedule and budget estimates.

ITEM	,000 USD				
	Year 1	Year 2	Year 3	Year 4	Year5
Training of CDOs, DEOs, and NDOs in safeguards management (environment, social, vulnerability issues, GRM issues, monitoring and reporting etc.)	350,000	350,000	250,000	250,000	250,000
Facilitation of CDOs, NDOs and DEOs to screen sub-projects	200,000	200,000	200,000	100,000	50,000
Facilitation for extension workers (DVOs, DFOs, Community Animal Health Workers, agricultural extension staff etc.) to train beneficiaries and monitor implementation of safeguards (IPM and pesticide use, soil conservation, animal husbandry, etc.)	300,000	100,000	50,000	50,000	50,000
Environmental and Social Audit		300,000			300,000
Technical Back stopping and Compliance assessment, Monitoring & documentation of innovation & good practices	100,000	100,000	100,000	100,000	50,000
GBV and VAC action Plan activities	50,000	50,000	50,000	50,000	50,000
Cross learning and exchange visits for international good practice		300,000			
RPF activities including development of VMGPs & activities	725,000				
Sub-totals	900,000	1,300,000	650,000	550,000	750,000
Total Budget Estimates (2.5% of the overall sub projects funds under component 1 and 2)					5,075,000

*NB: NDOs – NUSAF Desk Officers; DVOs – District Veterinary Officers; DEOs – District Environment Officers;
CDOs – Community Development Officers*

5.2 ESMF Disclosure

This ESMF will be disclosed in compliance with relevant Ugandan regulations and the World Bank Environment and Social Framework. It will be disclosed both in-country in one or two of the local dailies, in OPM's website, at the host regions districts and cities and at the World Bank's external website. OPM and implementing agencies will provide copies of the respective ESIA's and other required documents for disclosure on the World Bank external website for public access and OPM website as well.

6 CONCLUSION AND RECOMMENDATION

6.1 Summary and Conclusions

This ESMF describes the proposed NUSAF IV components by identifying the likely environmental and social impacts associated with the Project activities and proposes mitigation measures to control environmental and social impacts during project implementation.

This ESMF provides guidance on how environmental and social impacts of the project shall be assessed and managed. This notwithstanding, at a general level, potential impacts of project components have been discussed and possible mitigation proposed.

Specific measures shall be implemented by Service providers, and such measures shall form part of the Service providers' ESMP obligations. Socio-economic impacts such as those associated with involuntary resettlement and compensation can be easily dealt with through the RAP– Relevant guidance will be available within the RPF.

Preliminary institutional and capacity assessment undertaken during the preparation of this ESMF indicates that there are inadequate Environmental and social safeguards capacity at the Office of the Prime Minister (OPM). Training is therefore recommended for staff in the Project Technical Support Team (PIST). An Environmental Safeguards Specialist and a Social Safeguard Specialist should be hired by the Project on contract, to oversee its implementation. At the District/City levels and Municipal level, capacity enhancement of the safeguard's teams will be required for them to effectively guide the implementation of the ESMF.

It can also be concluded that there are adequate environmental and social policies in Uganda to guide the preparation of the relevant safeguards assessments during implementation, but with tendencies of weak follow-up during supervision and monitoring.

Once environmental and social impacts are properly managed, the NUSAF IV Project will have immense positive benefits to the project direct and indirect beneficiaries, their communities and the surrounding environment.

It is recommended that farmers be trained in the use of the IPMP to be able to develop their IPM approaches. This needs to be done from seed selection, land preparation, through planting and farm maintenance to harvesting and post harvesting issues. The IPMP should also be rendered more accessible perhaps through a simplified Operational Manual. The 4 pages of tables on Pest

Management and Monitoring Plan should be highlighted and rendered accessible to farmers.

The Waste Disposal Plan should be fully broken down into simplified languages and versions and beneficiary communities trained through it to enable them to develop their own simple Waste Management Plans throughout the sub-project life cycle. Proper waste disposal methods should be promoted across the project stages and components.

ANNEXES

Annex 1: References

2009A Guide to the Environment Impact Assessment process in Uganda Kampala
NEMA 2010 DDP for Serere District 2010 - 2015; Biological and socio-economic survey of Protected areas in Karamoja. Kampala

2010Gender and the Rural Non-Farm Economy in Uganda NRI Report No. 2657Kampala DFID IFCehs Guidelines

IFPRI2011Who Owns the Land? Perspectives from Rural Uganda's and Implications for Land Acquisition. Discussion paper No. 01136 Kampala

2013Karamoja Situational Analysis. Norther Uganda Women's Empowerment Programme (NYWEP)Kampala CARE Internation Uganda

2007Land Transaction in Land Under Customary Tenure in Teso: Customary Land Lase and Vulnerability of Land Rights in Eastern Uganda. Land and Equity Movement in Uganda Kampala

MAAIF 2013 SME for Regional Pastoral Livelihood Resilience Project – PRLRP Kampala MAAIF Makerere University2011Uganda Health System Assessment 2011Abt Associate Inc

MoES 2013 Environmental and Social Management Framework. Uganda Global Partnership for Education Project Kampala MoES

MoGLSD2009National Policy for Older and People, 2009KampalaMinistry of Gender, Labour and Social Development

MoNR 1994 The National Environment Management Policy 1994KampalaMinistry of Natural Resources

National Forest Authority September 2022 NFI 2019 Kampala

New vision Disclosure of NUSAF successor by the Prime Minister NUSAF successor to eradicate poverty in Northern Uganda — NUSAF 2 PWP Design Review 2013 Kampala

Open docs Cross border dynamics healthcare West Nile Uganda Kampala Uganda

OPM 2013 Second Northern Uganda Social Action Fund (NUSAF2), Safeguards Summary Implementation Status Report. Kampala

OPM 2019 National Risk and Vulnerability Atlas of Uganda Kampala Office of the Prime Minister

2011 Tenure in Mystery: Status of Land Under Wildlife, Forestry and Mining Concessions in Karamoja Region, Uganda Kampala

*The Cooperator News Insecurity, poor road-network affecting cross border trade
UBOS2011Summaries of Statistical Abstract Kampala Uganda Bureau of
Statistics UBOS 2013 National Projections Report 2013KampalaUganda Bureau
of Statistics UNAIDS 2011 UNAIDS Strategy for Uganda Kampala UNAIDS*

WFP & UBOS 2011 Comprehensive Food Security and Vulnerability Analysis (CFSVA).

World Bank 2007 Environmental, health and safety guidelines for electric power transmission and distribution. Internation on Finance Corporation of the World Bank Group

Annex 2: Chance Finds Procedure

Adopted & Modified Template Version 1, March 2023, Date of first Modification: 10th March 2023

1. Introduction

This document describes the Chance Find Procedure for National Uganda Social Action Fund IV (NUSAF IV) (hereafter referred to as “the Project”), outlining the procedures that Office of the Prime Minister (OPM) will follow should potential cultural heritage discoveries occur during the small-scale construction and/or renovation activities associated with the Project.

The Chance Find Procedure has been developed in alignment with international good practice, including the World Bank Environmental and Social Standards (notably ESS8), and complies with Government of Uganda requirements as well as internal policies and procedures. Details on the Project description, social context and legislative framework can be found in the first two sections of the Environmental and Social Management Plan (ESMP).

Government of Uganda require projects to have established a provisional Chance Find Procedure upon submission of a full proposal. The scope and scale of the Chance Find Procedure will be proportionate to the nature, scale and type of potential risks and impacts to cultural heritage that may arise from the Projects’ small-scale construction and/or renovation activities. In addition, the Chance Find Procedure will be commensurate with the type and scale of the planned construction/ renovation activities. As such, construction/ renovation activities deemed at screening to have a negligible potential negative impact on cultural heritage (e.g., renovations to ranger shelters, etc.) or with a small/ negligible footprint will not require a Chance Find Procedure. This will need to be justified in the ESMP. This Chance Find Procedure is provisional (full proposal stage) and it will be updated and established within the first three months of project implementation.

Cultural heritage is defined as resources with which people identify as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions. Cultural heritage encompasses tangible and intangible heritage, which may be recognized and valued at a local, regional, national or global level, as follows¹:

¹ World Bank Environmental and Social Framework, 2017.

Tangible cultural heritage, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be in urban or rural settings, and may be above or below land or under the water; and

Intangible cultural heritage, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts and cultural spaces associated therewith— that communities and groups recognise as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

Tangible cultural heritage is the focus of this Chance Find Procedure and in particular, chance finds which are when archaeological, historical, cultural and/or remain material is unexpectedly encountered during project construction or operation.

For this Project, the small-scale construction and/or renovation activities include Access roads construction and markets among others.

As such, risks and impacts to tangible cultural heritage, and in particular, archaeological material, that may arise from Project activities could include damage to burial site, cultural monuments and sites, unearthed remains etc., owing to earth works.

2. Purpose of the chance find procedure

A Chance Find Procedure is a project-specific procedure which is to be followed if previously unknown cultural heritage is encountered during project activities. The Chance Find Procedure sets out how chance finds associated with the project will be managed. The procedure includes a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of WB ESS8 and national law; and to train project personnel and project workers on chance find procedures².

The Chance Find Procedure aims to:

Protect physical cultural resources from the adverse impacts of physical investment activities and support their preservation.

² World Bank Environmental and Social Framework, 2017.

- Promote the equitable sharing of benefits from the use of Physical Cultural Resources; and
- Raise awareness of all construction workers and management on site regarding the potential for accidental discovery of cultural heritage resources.

This Chance Find Procedure therefore intends to provide NUSAF IV and their contractors with an appropriate response in accordance with the relevant national legislation and international good practice. As such, all contracts for civil works will include this Chance Find Procedure.

For the Chance Find Procedure to be effective, the site manager must ensure that all personnel on the proposed development site understand the Chance Find Procedure and the importance of adhering to it if cultural heritage resources are encountered. In addition, training or induction on cultural heritage resources that might potentially be found on site should be provided by NUSAF IV.

3. Procedure

Prior to project implementation, NUSAF IV shall be responsible for siting and designing project activities to avoid significant adverse impacts to cultural heritage. The environmental and social risks and impacts identification process at the screening stage should help determine whether the proposed location of a project is in areas where cultural heritage is expected to be found, either during construction or operations.

In such cases, in line with Government of Uganda Environmental and Social Management legal frameworks, NUSAF IV will develop provisions for managing chance finds through a chance find procedure which will be applied if cultural heritage is subsequently discovered. NUSAF IV and any contractors will make sure not to disturb any chance find further until an assessment by competent professionals is made. Where necessary, this will include qualified experts, including the relevant government authorities and civil society organizations, as well as traditional knowledge holders and other people from the area who should be consulted on whether disclosure of information is desirable, since there are situations in which disclosure may compromise the safety or integrity of the cultural heritage in question and/or endanger the sources of information.

Procedures for accidental discovery of cultural resources (chance finds)

This Chance Finds Procedure covers the actions to be taken from the discovering of a heritage site or item to its investigation and assessment by a professional archaeologist or other appropriately qualified person to its rescue or salvage.

If cultural resources (e.g., archaeological sites, historical sites, remains, objects, graveyards or individual graves) are discovered when undertaking small-scale construction activities, civil works and/or renovation activities, the following procedure will be executed:

- a) Halt the construction activities around the chance find to avoid any (or further) damage;
- b) Report the discovery to your supervisor or the Environmental Officer/Specialist (or project equivalent) immediately;
- c) Delineate and fence the discovered site or area and provide a 25-meter buffer zone around all sides of the find;
- d) Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard will be arranged until the responsible local authorities (Sub- County/District Community Development Officer), national authorities (e.g., officers from the Ministry of Gender Labour and Social Development specifically the Department of Family-and-Culture-Affairs) or the local Institute of Archaeology, if available, can take over;
- e) Forbid any removal of the objects by the workers or other parties;
- f) Note the type of archaeological materials you think you have encountered, their location (GPS) and if possible, the depth below the surface the find occurred;
- g) Photograph the exposed materials, preferably with a scale (e.g., a file binder, coin, rules etc.);
- h) Notify the responsible local authorities and the relevant Institute of Archaeology immediately (within 24 hours or less);
- i) Responsible local authorities would oversee protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the local Institute of Archaeology. The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; these include the aesthetic, historic, scientific or research, social, and economic values;
- j) Decisions on how to handle the finding shall be taken by the responsible authorities. This could include changes in the physical investment layout (such as when finding an

irremovable remain of cultural or archaeological importance) conservation, preservation, restoration, and/or salvage;

- k) Implementation for the authority decision concerning the management of the finding shall be communicated in writing by relevant local authorities;
- l) The mitigation measures could include the change of proposed Project design/layout, protection, conservation, restoration, and/or preservation of the sites and/or objects;
- m) Construction work at the site could resume only after permission is given from the responsible local authorities concerning safeguard of the heritage; and
- n) The physical investment proponent is responsible for cooperating with the relevant local authorities to monitor all construction activities and ensure that the adequate preservation actions are taken and hence the heritage sites protected.

In addition, NUSAF IV is obliged to declare the chance find discovery as soon as possible to the Government of Uganda.

Annex 3: Environmental and Social Screening Form (ESSF)



OFFICE OF THE PRIME MINISTER

**THE NATIONAL UGANDA SOCIAL ACTION FUND IV (NUSAF IV)
ENVIRONMENTAL & SOCIAL SAFEGUARDS SCREENING FORM**

A. Environmental & social review (ER) form

(This form filled with appropriate information is to be attached to each sub-project document)

District:	Sub-county:	Parish:
-----------	-------------	---------

Sub-project in-charge	Sub-project name:
Subproject objectives:	

B. Specification status

1. Will the sub-project encroach onto an important natural habitat. ☐ Yes ☐ No

- a. Wetlands ☐ Yes ☐ No
- b. Forests ☐ Yes ☐ No
- c. Water ☐ Yes ☐ No
- d. Rangelan ☐ Yes ☐ No

2. Will the sub-project affect sensitive ecosystems. ☐
 Yes ☐
 No If yes, describe how it will affect sensitive ecosystems.

-
3. Will vegetation be cleared. ☐ Yes ☐ No
If yes, are there proposed actions to restore cleared areas
-

4. Use firewood for fuel. ☐ Yes ☐ No
5. Use petroleum-based fuel. ☐ Yes ☐ No
6. Involves use of pesticides. ☐ Yes ☐ No
7. Diversion or use of surface waters. ☐ Yes ☐ No
8. New or rebuilt irrigation or drainage systems. ☐ Yes ☐ No
9. Require the construction of a seasonal dam. ☐ Yes ☐ No
10. ☐ Yes Involves latrines, septic or sewage systems. ☐ No
11. ☐ Yes generation (e.g., slaughterhouse, medical waste, market etc.). ☐ Yes ☐ No Waste
- Description of type of waste generated solid (bulk), solid (particulate), liquid, gaseous, etc.
-

proposed waste management/disposal methods

12. Residues that may be used as fertilizers: ☐ Yes ☐ No ☐ In part, Describe.
-

13. Do the sub-project activities Occur within vicinity of a protected area? ☐ Yes ☐ No
14. Affect any protected up or downstream? ☐ Yes ☐ No
15. Affect any ecological corridors for migratory species? ☐ Yes ☐ No
16. Are the sub-project activities likely to introduce new species/varieties into the area?
☐ Yes
☐ No What type seeds, invasive species?

-
17. Will slope or soil stability be affected? ☐ Yes ☐ No
18. Will local resources such as sand, gravel, bricks, ground water be used? ☐ Yes ☐ No
19. Will activities cause soil salinity? ☐ Yes ☐ No

C. Social safeguards and social risks screening

20. Will subproject activities affect aesthetics of the landscape? ☐ Yes ☐ No
- i. Describe existing land use patterns (community facilities, tourism, agriculture etc.).
- ii. Will sub-project activities cause any changes in land use. ☐ Yes ☐ No
- iii. Will the subproject activities restrict peoples' access to natural resources. ☐ Yes ☐ No
- iv. Are there any cultural/spiritual sites in the vicinity of the sub project site. ☐ Yes ☐ No
- v. If yes, what measures have been put in place to safeguard this site?

-
- vi. Will the sub-project alter any of these sites. ☐ Yes ☐ No
- vii. Will the sub-project causes losses in livelihood opportunities for households? ☐ Yes ☐ No
- viii. Will the sub-project activities affect any resources the people take from the natural environment? ☐ Yes ☐ No
- ix. Will the subproject require any resettlement or compensation of residents including squatters? ☐ Yes ☐ No
- x. Will there be additional demand to local resources (e.g., water supply, sanitation facilities, health centers, lodging, etc.)? ☐ Yes ☐ No
- xi. Is the program likely to create local employment opportunities including women and youth? ☐ Yes ☐ No
- xii. Did the sub project identification process socially include opinions of all key categories? ☐ Yes ☐ No
- xiii. Do the designs (In case of infrastructure) meet the requirements of

expected varied users including PWDs, women, children etc.? ☐ Yes
☐ No

xiv. Will the sub project require / trigger expropriation of land / involuntary land acquisition?
☐ Yes ☐ No

xv. Will the sub-project create exposure or create risk of gender-based violence (GBV) and sexual exploitation and abuse (SEA)? ☐ Yes ☐ No

xvi. Does the sub project pose risks of child labour and forced/labour exploitation? ☐ Yes
☐ No

xvii. Does sub-project implementation create conditions that may lead to spread of diseases such as HIV/AIDS, Hepatitis B, STIs/STDs? ☐ Yes ☐ No

xviii. Is sub-project implementation likely to lead to emergency of any people grievances/complaints/concerns? ☐ Yes ☐
 No

xix. What Measures and actions are in place to mitigate/manage the above risks?

D. Exclusion List

For further analysis, any project that will possess impacts as listed below shall not be financed. Will any of the sub projects posse high risks as listed below. ☐ Yes ☐ No

If “YES”, the project be dropped and if “NO” the project proceeds to the next step of the analysis.

No.	Criteria	Yes [‡]
i.	Sub-projects involving significant conversion or degradation of critical natural habitats.	
ii.	Sub-projects involving the use of unsustainably harvested timber or fuelwood	
iii.	Sub-projects supporting commercial logging in forested areas.	
iv.	Subprojects requiring use pesticides that are not on the approved list of agro-chemicals	
v.	Drainage of traditional wetlands for agricultural use.	
vi.	Construction or rehabilitation of seasonal dams with adverse downstream affects.	
vii.	Sub projects requiring new or significant expansion of disposal facilities which may result in pollution contamination to nearby water sources.	
viii.	New or significant expansion of disposal sites requiring involuntary public participation.	

ix.	Closing of gaps, culverts etc. in existing roads which may affect water flow significantly.	
x.	Projects that require Compensation for loss/replacement costs will not be funded under NUSAF IV	
xi.	Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.	
xii.	Activities that may involve involuntary resettlement or land acquisition (other than voluntary land donation) or impacts on known cultural heritage.	

[‡] Tick if the response is yes.

E. Health, Safety and Hazard Risks Screening

- (i) Will the sub-project pose health and safety Risks to Beneficiaries at Work sites in LIS and LIPW? ☐ Yes ☐ No

If yes, Name the health, safety and Hazards envisaged in the Sub Project site?

- (i i) sub-project provide safeguard to workers' health and safety? ☐ Yes ☐ No

- (i i i) Name the Mitigation Measures the sub project will put in place to safeguard human health and safety.

F. Disaster and Climate Risks screening

- i) Are there any disaster and Climate concerns envisaged in the sub project Location? ☐ Yes ☐ No

If yes, Name the disasters and climate risks expected in the Sub Project site?

- ii) Name the mitigation and or adaptation measures that sub project shall put in place to address the disasters and climate risks on sub project site?

G. Evaluation

i) Produce significant amount of pollutants: ☐ Yes ☐ No

ii) Type of pollutants (if yes in 1): Air ☐ Water ☐ Soil ☐

iii) Quantity of pollutants (per month):

iv) Probable cumulative impacts Yes ☐ No ☐

v) Means of disposal available: Yes ☐ No ☐

vi) Fate of pollutants:

vii) Remedial measures and any other issues/comments:

H. Environmental Risk Rating

High ☐ Substantial ☐ Moderate ☐ Low ☒

Needs Further Evaluation. Yes ☐ No ☒

Needs LEA. Yes ☐ No ☒

Annex 4: Typical Environmental and Social Mitigations Checklists

a. Agriculture, Tree Nurseries and Afforestation

No.	Potential Impact	Recommended Mitigation
a.	Wet season soil disturbance	Schedule activities for the dry season
b.	Potential for debris flows or landslides	Prepare a watershed plan that identifies and address drainage/slope instability
c.	Sensitive downstream ecosystems	Identify and avoid effects of diversion or dams on downstream ecosystems
d.	Removal of native plant/tree species	Protect and encourage regeneration of endemic species
e.	Introduced plant/tree species invasion of native species	Ensure non-native species are compatible with native species
f.	Wildlife habitats or populations disturbed	Identify and avoid effects on habitats and migration routes of key species
g.	Environmentally sensitive areas disturbed	Identify and avoid activity in forest, riparian and wetland habitats with particular biodiversity
h.	Land Acquisition	Avoid occupied land. Prepare procedures to ensure equitable resolution.
i.	Private assets displaced	Avoid occupied land. Prepare procedures to ensure equitable resolution.
j.	Informal land uses displaced or access restricted	Avoid interference with informal land users, and take measures to provide access to alternative lands or resources
k.	Insufficient capacity to manage new plantations/pastures	Establish a local committee, where appropriate, and/or bylaws and provide appropriate controls
l.	Other (specify):	

b. Community buildings/ Facilities

1. Sitting/preparation stage..

- 1.1. Choose an appropriate site for your project approved by the community
- 1.2. Avoid dumpy or water-logged sites and wetland areas
- 1.3. Look at other alternatives and weigh the advantages against disadvantages of different sites
- 1.4. Avoid termite infested areas; where there are no alternatives take measures against termites in the designs and during construction.
- 1.5. Consider other existing structures on site in relation to your new project
- 1.6. Incorporate indigenous customs and building techniques in project designs if possible
- 1.7. Consider adapting layouts to fit natural patterns on project sites
- 1.8. Remember to clear only the project site and not to cut trees when not necessary
- 1.9. Ensure a holistic design approach, taking into account the operations of the

existing building, buildings to be added and support facilities like water supply, sanitation and the environment

- 1.10. Base design criteria and selection of materials according to local conditions and availability of resources

2. Construction

- 2.1. Always take measures to manage offsite impacts like quarries and how to restore them;
- 2.2. Ensure all your building waste is attended to – do not bury paint tins and plastics as they do not decompose;
- 2.3. Incorporate permanent erosion control plans on the site –provide a drainage system in the areas close to the school and always include dish drains around your buildings;
- 2.4. Make sure you clear all the debris or broken bricks from the kilning site and use them in the construction for back filling (when crushed), brick drains construction of paved walkways etc.;
- 2.5. Avoid excessive disruption of top soils during construction;
- 2.6. Cover haulage site trucks carrying cement or lime and avoid vegetation destruction to create temporary access roads to the construction site
- 2.7. Provide enclosed storage for cement, lime, and soils
- 2.8. Outline safety techniques and accident emergency measures during construction activities;
- 2.9. Collect only adequate wood for brick making (killing)-consider alternative brick making technologies if forest cover is deteriorating
- 2.10. Use water to suppress dust;
- 2.11. Remove excess materials of laterite, stone aggregate, concrete blocks, bricks, timber pieces

3. Operation stage

- 3.1. Dig a pit for ordinary waste; do not throw tins, glass and plastics in pits;
- 3.2. Plant trees and flowers around the school;
- 3.3. Maintain trees around the premises;
- 3.4. Do not allow animals to use the school premises for grazing;

c. Cattle watering points and water retention reservoirs

1. Sitting/preparation stage

- 1.1. Make sure the community agrees on the site and the usage;
- 1.2. Ensure that the lay out of the furrows or field is not too steep (gradient);
- 1.3. Ensure the sitting of the project avoids or minimizes encroachment on swamps and other ecologically sensitive areas;

1.4. Avoid dislocation of populations and communities.

2. Construction stage

2.1. Follow technical guidelines from Ministry of Water and Environment;

2.2. Avoid excessive topsoil disruption of population;

2.3. Mitigate topsoil disruption;

2.4. Plant trees and other ground cover.

3. Operational stage

3.1. Take measures to avoid siltation from the feeding streams;

3.2. Take measures to avoid erosion around the

water point/reservoir; Make sure community agrees on

usage of the water.

Prepared by: Environment officer

_____	_____	_____
Name	Signature	Date

Reviewed by: CDO

_____	_____	_____
Name	Signature	Date

Annex 5: NUSAF IV Environmental and Social Management Plan

The Environmental and Social Management Plan (ESMP) contain provisions on the management of inclusion and non-discrimination of vulnerable or marginalized individuals or groups following the enactment of the AHA. These provisions are consistent with recent actions taken by the GOU that are highlighted and included in Annex 12.

The purpose and objective of these provisions is to ensure: (i) that project impacts do not fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable; (ii) there is no prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged or vulnerable; (iii) Bank financed operations are implemented through their respective life cycles in a manner that is aligned with the inclusion and non-discrimination principles embedded in applicable Bank requirements including the Environmental and Social Standards in line with WB Policy paragraph 4 (b) ESF paragraph 28 (b) of ESS1 on Assessment and Management Environment and Social Risk and Impacts.

Guidelines on the implementation of the provisions will be developed and widely disseminated. These will address Third Party for inclusion and nondiscrimination that cover vulnerable or marginalized individuals or groups monitoring to ensure the implementation of the mitigations measures for their inclusion and non-discrimination. The Project Operational Manual (POM) will provide guidelines to facilitate the implementation of these provisions.

Project:
Watershed:
Village:
Parish:
Sub County:
District:

Project /Phase and Activity	Positive Environmental and Social impacts	Negative Environmental and Social impacts	Mitigation Measures	Indicator	Implementing Agency	Monitoring Agency	Frequency	Cost	Capacity Building
Planning Phase									
Total Cost									
Implementation Phase									
Total Costs									
Operations Phase									
Total Costs									
Prepared By: Parish Environmental Focal Person/ Community Facilitator Name..... Signature..... Date.....					Checked by: District Environment Officer Name..... Signature..... Date.....				

Exclusion list (Projects that will not be funded under NUSAF IV)

Exclusions.

Exclude the following types of activities as ineligible for financing under the Project:

- a) Sub-projects involving significant conversion or degradation of critical natural habitats.
- b) Sub-projects involving the use of unsustainably harvested timber or fuelwood
- c) Sub-projects supporting commercial logging in forested areas.
- d) Subprojects requiring use pesticides that are not on the approved list of agro-chemicals as described in Annex 6
- e) Drainage of traditional wetlands .
- f) Construction or rehabilitation of seasonal dams with adverse downstream affects.
- g) Sub projects requiring new or significant expansion of disposal facilities which may result in pollution contamination to nearby water sources.
- h) New or significant expansion of disposal sites requiring involuntary public participation.
- i) Closing of gaps, culverts etc. in existing roads which may affect water flow significantly.
- j) Sub-projects that require compensation for loss/replacement costs will not be funded under NUSAF IV
- k) Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.
- l) Activities that may involve involuntary resettlement or land acquisition (other than voluntary land donation) or impacts on known cultural heritage.
- m) All dams and such drainage works beyond a certain volume, etc.
- n) Activities that lead to physical displacement of individuals or communities including activities that would trigger FPIC.
- o) Activities that will lead to physical or economic displacement and loss of known cultural heritage sites
- p) Projects that will lead to surface and groundwater pollution, pest resistance, habitat degradation and soil disturbance leading to the introduction of alien and invasive plant species
- q) Activities that may affect the lands or rights of indigenous people or other vulnerable minorities and disadvantaged groups, without their consent.
- r) Sub-projects that may involve exclusion and discrimination of people especially the vulnerable and marginalized groups as well as the disadvantaged groups.
- s) Large-scale infrastructure sub-projects and any sub-projects that could have adverse impacts on ecologically sensitive areas and known cultural heritage sites.
- t)

Annex 6: Pest Management Plan

Food and cash crops in Uganda are constantly threatened by epidemic pests and diseases and weeds. Both foreign and indigenous pests, weeds and diseases are a threat to the country's agricultural sector. Climate change, modern means of travel, trade liberalization, and agricultural intensification could trigger the occurrence of new pest problems. Future outbreaks of existing or new pests, weeds and diseases are a certainty, and although all outbreaks will result in losses, the key risk is that badly and ineffectively managed responses to new outbreaks in the country will significantly raise the scale and impact of the losses. With the onset of climate change, which has extended warm temperatures to new regions, Uganda is bound to see pest-related problems spread to even wider areas since warmer temperatures due to climate change are expected to both encourage the spread of pests into new areas as well as render some plants more susceptible to their effects.

1.1. Key laws and policies National Laws

- a. The Constitution of the Republic of Uganda, 1995
- b. The Agricultural Chemicals (Control) Act, No. 1 of 2006
- c. The National Environment Act, Cap 153
- d. The National Agricultural Advisory Services Act, 2001
- e. The Public Health Act Cap. 281
- f. Occupational Safety and Health Act No. 9, 2006
- g. Uganda National Bureau of Standards Act, Cap 327
- h. Water Act, Cap 152

1.2. Policy Framework

- a. The National Environment Management Policy, 1994
- b. Plan for Modernization of Agriculture (PMA)
- c. The National Trade Policy, 2006

1.3. International Conventions

- a. Basel Convention
- b. Rotterdam Convention
- c. The International Maritime Dangerous Goods (IMDG) Code
- d. The International Code of Conduct for the use and distribution of pesticides
- e. The Safety and Health in Agriculture Convention

2. Scope

This Pest Management Plan is meant to enhance IPM within Uganda. The scope of this pest management plan includes:

- a. A history of pest problems, present pest problems and crop history;
- b. Analyzes the vulnerability of Uganda to pest attacks;
- c. Quantifies the losses attributed to these pests and diseases;
- d. Identifies the key pests and diseases of the major crops in Uganda;
- e. A review of the impact of the current pest control measures;
- f. Proposes appropriate integrated pest management strategies for the pests and diseases;
- g. Defines an appropriate implementation strategy for the proposed measures;
- h. Comprehensive strategies for handling, transportation and application of pesticides in compliance with national and international requirements relating to the different chemicals;
- i. Identifies capacity building and training needs.
- j.

3. Classification of pesticides

The WHO bases its toxicity ratings on the lowest published rat oral LD₅₀, the lethal dose (in milligrams of substance per kilogram of body weight) that kills 50% of the test animals in a standard assay (WHO, 2010). WHO gives a hazard ranking of IA (Extremely Hazardous) to the most hazardous pesticide active ingredients. While the WHO ratings generally reflect acute toxicity, they also take into account other toxic effects such as reproductive and developmental toxicity. WHO does not evaluate the fumigants, a class of gaseous pesticides that are generally extremely hazardous, nor does it evaluate pesticides believed obsolete or discontinued (WHO, 2010).

WHO Toxicity Classification		Rat LD ₅₀ (mg of chemical per kg of body weight)			
Class	Description	Solids (oral)	Liquids (oral)	Solids (dermal)	Liquids (dermal)
Ia	Extremely hazardous	< 5	< 20	< 10	< 40
Ib	Highly hazardous	5 - 50	20 - 200	10 - 100	40 - 400
II	Moderately hazardous	50 - 500	200 - 2,000	100 - 1,000	400 - 4,000
III	Slightly hazardous	> 500	>2,000	>1000	> 4,000
Table 5	Unlikely to present acute hazard in normal use	> 2,000	> 3,000	---	---
Table 6	Not classified: believed obsolete				
Table 7	Fumigants not classified by WHO				

4. Procurement of Pesticides

The following criteria will apply to the selection and use of pesticides in activities under NUSAF IV

- a. Pesticide financed under NUSAF IV must be manufactured, packaged, labeled, handled, stored, disposed of, and applied according to standards that, at a minimum, comply with the FAO's guidelines on pesticides.
- b. Consistent with World Bank standards, NUSAF IV financing will not be used for formulated products that fall in WHO classes IA and IB, or formulations of products in Class II, if (a) the country lacks restrictions on their distribution and use; or (b) they are likely to be used by, or be accessible to, lay personnel, farmers, or others without training, equipment, and facilities to handle, store, and apply these products properly.
- c. NUSAF IV financing will not be used for any pesticide products which contain active ingredients that are listed on Annex III of the Rotterdam Convention (on Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade), unless the Country has taken explicit legal or administrative measures to consent to import and use of that active ingredient.
- d. NUSAF IV financing will not be used on any pesticide products which contain active ingredients that are listed on Annex A & B of the Stockholm Convention on Persistent Organic Pollutants, unless for an acceptable purpose as defined by the Convention, or if an exemption has been obtained by the Country under this Convention.
- e. NUSAF IV financing will not be used for any pesticide products which contain active ingredients that are listed on Annex III of the Rotterdam Convention (on Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade), unless the Country has taken explicit legal or administrative measures to consent to import and use of that active ingredient.

5. IPM Plan

Key Elements - The elements of the IPM will include the following:

- (a) Preventing pest problems;
- (b) Monitoring for the presence of pests and pest damage;
- (c) Establishing the density of pest population, which may be set at zero, that can be tolerated or corrected with a damage level sufficient to warrant treatment of the problem based on health, public safety, economic or aesthetic threshold;
- (d) Treating pest problems to reduce population below those levels established by damage thresholds using strategies that may include biological, cultural, mechanical and pesticidal control methods and that shall consider human health, ecological

impact, feasibility and cost effectiveness; and
 (e) Evaluating the effects and efficacy of pest treatments.

Decision Making - Detecting a single pest under the Project will not always mean control is needed. A decision to use pesticides will be taken only as the very last resort and will also be based on conclusions reached from an agro-ecosystem analysis and trials. The decision will also depend on the number of pest and diseases found in the respective crop and the level of damage they are doing. If it is absolutely necessary to spray crops with pesticides, use of selective rather than broad-spectrum pesticides shall be strictly observed.

Pest Monitoring and Surveillance - A process for the reporting and identification of unusual plants, animals and pests will be established to track and document all pest cases, be it minor or major in a pest inventory register. Pest surveys will be conducted on a regular basis to detect new infestations and will include the types, abundance, location of pest plants, date when first spotted or seen, and date when reported. This information will be gathered from surveillance or monitoring system to be put in place, periodic surveys to be conducted and feedback from farmers/farm assistants. The data will be managed in a standardized way so that trends can be established. A rapid response process for the management of new infestations will be established to treat and manage new pest infestations as soon as they are identified. The potential to exploit mobile phones to enhance field surveillance of disease outbreaks and the efficacy of recommended control options is massive and will help to bridge the current gap between science and practice. Furthermore, enhanced field surveillance through interventions such as this will permit the project to recognize risks due to disease earlier and to deploy control measures to prevent catastrophic disease epidemics.

6. Key Crop Pests and Diseases

According to literature sources as well as consultations with DAOs and NAADS Coordinators as well as the smallholder farmers interviewed, the following is a summary of the key common pests and diseases of beans, rice, cassava, maize, and coffee:

Crop	Key Pests	Key Diseases
Coffee	Coffee Twig Borer, Coffee Meal Bug, and the Coffee Berry Borer Antestia bugs and lace bugs.	Coffee Wilt Disease and Coffee Leaf Rust Disease (Fungus).
Maize	Stalk Borer, Armyworm and Maize Weevil	Maize streak disease, Maize Leaf necrosis, grey leaf spot, and Maize smut. Maize Lethal Necrosis disease

Beans	Cutworms and Aphids	Bean Root Rot (fungal), Bean anthracnose, Bean wilt, and the Bean Rosette (viral), Bean Common Mosaic Disease
Rice	<i>Quelea quelea</i> birds, Termites, Aphids, Rice Stem Borers	Rice Yellow Mottle Virus (RYMV), Rice Bright and Rice Blast
Cassava	Mealy Bug, Cassava White Fly	Cassava Mosaic and the Cassava Brown Streak Disease

The four key steps to be followed under the IPM strategy will be as follows:

a. Set Action Thresholds

Before taking any pest control action, the IPM will first set an action threshold, a point at which pest populations or environmental conditions indicate that pest control action must be taken. Sighting a single pest will not always mean control is needed. The level at which pests will either become an economic threat be a critical criterion to guide future pest control decisions.

b. Monitor and Identify Pests

Not all insects, weeds, and other living organisms require control. Many organisms are innocuous, and some are even beneficial. The IPM program will work to monitor pests and identify them accurately, so that appropriate control decisions can be made in conjunction with action thresholds. This monitoring and identification will remove the possibility that pesticides will be used when they are not really needed or that the wrong kind of pesticide will be used.

c. Prevention

As a first line of pest control, the IPM program will work to manage the crop to prevent pests from becoming a threat. This will include using cultural methods, such as rotating between different crops, selecting pest-resistant varieties, and planting pest-free rootstock. These control methods are expected to be very effective and cost-efficient and will present little to no risk to people or the environment.

d. Control

Once monitoring, identification, and action thresholds indicate that pest control is required, and preventive methods are no longer effective or available, the IPM program will then evaluate the proper control method both for effectiveness and risk. Effective, less risky pest controls will be chosen first to disrupt pest mating, or mechanical control, such as trapping or weeding. If further monitoring, identifications and action thresholds indicate that less risky controls are not working, then additional pest control methods will be employed, such as targeted spraying of pesticides. Broadcast spraying of non-specific pesticides will only be conducted as a last resort.

7. IPM Pest Management Practices

The following measures will be adopted by all farmers where feasible:

Pest Preventive Measures: Diseased plants or affected portions of the plant will be removed and burned. Phytosanitary measures, such as physical removal of pests, affected plant parts, infected plants (virus- infected plants, severely disease-infected or pest-infested plants should be undertaken. It may also be possible for farmers to minimize pest attack through good timing.

Use of Host Resistance and Early Maturing Varieties: Choice of crop and variety can help to reduce pest problems. An important result consistent across countries and crops is that growing more varieties of the same crop within the farm, leads to a decreased variance of pest and disease damage. This means that even though certain pests and diseases might affect crops on a farm, overall, the risk of having a severe infection or pest outbreak is lower, e.g., they might just have a few spots, lesions or bites. In general, it is much better to farm ‘with nature’ than against it. This means choosing a crop that is naturally suited to the soil type and environmental conditions of the farm, rather than trying to adapt the farm to suit the chosen crop.

Crop genetic diversity has the potential to curb epidemics and outbreaks to save farmers from high yield losses and is overall a more resilient system, where crops are unlikely to suffer significant damage when and if a new pest or disease comes around. Traits needed by plants to adapt to pathogen threats following climate change generally come in the categories of resilience and durable resistance. In addition, ‘early maturing’ varieties of crop reach maturity and are ready for harvesting sooner than normal varieties. If pests only become a problem later in the growing season, choosing an early maturing variety may be a good idea.

Some varieties of crop have been developed that have resistance to certain pests and the Project will ensure that the smallholder farmers plant them if pests are a major cause of lost harvest. Every effort will be made by the Project to select and use crop varieties resistant or tolerant to disease and pests to check on regular usage of agro-chemicals. The Project will collaborate with NARO and other research institutions to get information and varieties resistant to disease and pests for their usage. This strategy is one of the measures the project hopes will render usage of agro-chemicals to be very minimal or unnecessary.

However, it is also important to note that the use of agricultural improved inputs remains low generally and particularly among women farmers. This is due to lack of access to or non-availability, of inputs lack of knowledge about inputs and the cost barriers. Increased

use of improved inputs is very important to enhancing yields and production at farm level and ultimately increasing individual and household incomes (FOWODE, 2012). This is to be addressed by the ACDP by distributing quality seeds and resistant varieties to the smallholder farmers.

- a. **Biological Control:** This tactic takes advantage of the fact that organisms depend or even feed on each other for survival. Thus, biological control method tries to ensure that pests are reduced by organisms which are their natural enemies. These natural enemies can be conserved by taking care with farming practices so that they are not killed but are encouraged. Under ACDP, biological control will be considered by the Project as the first line of control for pests and diseases, when incidence is noticed and where an appropriate biocontrol agent is available. In this case, the project will adopt measures such as ensuring existence of an environment conducive to the proliferation of pests' bio-control agents is to be maintained in the crop areas in the project and these include regular application of *Trichoderma* spp., *Pochonia chlamydosporia*, *Pseudomonas fluorescens* and other antagonistic microorganisms. For insect pests, the project will engage in planting of biocontrol agents such *Neem* trees which can be planted along the plots of crops. For successful introduction of biological control agents, the Project will consider the following: The environment must be suitable for the population to flourish.
- b. Be certain the control agent will virtually feed only on the weed or pest species itself, and not on crop plants.
- c. The control agents must not be native to the area.

Cultural Practices: Cultural control methods will include:

- a. Crop rotation - Crop rotation helps to prevent pest populations building over a number of years.
- b. Inter-cropping,
- c. Field sanitation and seed bed sanitation,
- d. Use of pest-resistant crop varieties,
- e. Managing sowing, planting or harvesting dates;
- f. Water/irrigation management,
- g. Practices to enhance the buildup of naturally existing predator populations;
- h. Hand-picking of pests or hand-weeding;
- i. Use of traps or trap crops.

Chemical Control: With the above measures for control pests and diseases, chemical control will therefore be an addition and its application will be undertaken with utmost care as per applicable standards governing safe applications of agrochemicals (e.g. [FAO](#)

[Guidelines](#)) to ensure safety of the environment and the farmers. Agro-chemicals to be used should be registered for use in Uganda as well as acceptable for procurement under World Bank Safeguard Policies. In all, the application of agro- chemicals shall follow recommended practices by FAO.

8. Management of Livestock Diseases in Uganda

Livestock disease has been identified as one of the most significant constraints to animal production in the NUSAF project areas. According to the Karamoja Annual District Veterinary Office reports, the most significant animal diseases in the region are; tick-borne diseases (Anaplasmosis, Babesiosis, Heart water, Theileriosis) and Contagious Diseases like Contagious Bovine Pleuropneumonia (CBPP), Foot and Mouth Disease (FMD), Peste des Petits ruminants, Sheep Pox and Goat Pox, Fowl Cholera, Fowl Typhoid, Newcastle Disease (NCD) and Camel Pox.

The success of any disease surveillance programme in the NUBSP project will have to involve the deployment of personnel who will be moving in the field in a well-planned manner, using various methodologies to detect signs of livestock disease. Therefore, the active participation of the District veterinary services (management and field staff), other extension staff, Community Animal Health Workers, farmers and other organizations operating on the ground is very important.

9. Management of Tree Nurseries Pests and Diseases

Damping off: Damping-off is a collective name for a number of non-specific fungal diseases that cause a serious threat to seedlings after germination. The seedlings begin to rot from the stem tissue just above the root collar resulting in the seedlings toppling over. The disease begins in patches and finally spreads to the entire bed. The humid environment created for the maximum growth of the seedlings also favours the growth of the fungi. The disease occurs in very wet conditions, often induced by over watering and excessive shading. Because of the quick spread of the disease, you must respond to it promptly.

If the attack is at an early stage, chemicals, such as copper oxide and Benlate (Benomyl 50%) are available on the market. The dosage must be according to the instructions of manufacturer, but care needs to be taken not to routinely use the same product since resistance may build up. Spraying should generally be done in the afternoon, and no watering must be done after spraying. All infected stock must be removed and burnt as soon as possible. The growing medium should not be reused, and all sowing equipment and the germination environment must be disinfected.

Fusarium circinatum (pitch canker fungus) is a major pathogen in almost all commercial

tree nurseries in RSA, where the focus has been on nursery hygiene and monitoring (with early detection and removal of infected plants). Deaths occur not only in the nursery but in the field after planting out too. In the nursery tip-dieback of the small seedlings is the most common symptom of Fusarium. Little is currently known about the disease's transmission but worryingly, it can be spread from untreated seed.

Pesticides: Pesticides protect seedlings from insect pests, and fungal diseases while they are growing. They come in many forms but usually in liquids (for spraying) or powder. Several types of control procedures are available. Pest and disease control begins with the site selection and physical plant development. The most likely insects to attack a nursery stock are termites, crickets and grasshoppers. Insecticides for controlling these insects are available on the market.

Safety Issues: Chemical use has become common in many tree nurseries; unfortunately, the safe use of chemicals is not equally common. Some of them are highly toxic to humans. The degree of toxicity is usually stated on the label of the container as a LD₅₀ value, but it is better to treat all pesticides with the respect due to any poisonous material. The workers handling the chemical must follow the product instructions. Strictly, dispose of excess chemical and empty containers properly, wear the right PPE and wash thoroughly when the spraying is finished.

10. Training Needs and Strategy

Training Needs - The Agricultural extension staff working with the NUSAF IV project will assist and train farmers to be able to develop their IPM approaches to the management of pests and diseases. This will be done holistically from seed selection, land preparation, through planting and farm maintenance to harvesting and post harvesting issues. Farmers will be trained and encouraged to make detailed observations in their fields regularly so that they can detect early infestations and make the appropriate management decisions using agro-ecosystem analysis (AESA). In this way, it will be ensured that pest and disease problems do not escape notice and are not allowed to develop to the extent that they cause very severe damage and heavy crop losses. The decision to use chemical pesticides will be taken only as the very last resort as already indicated in the IPM principles above.

Tree Nursery Development: The aim of the training will be to equip participants with basic knowledge and skills necessary for the identification and management of tree pests and diseases. Specifically, the training should focus on:

- (i) Recognition, interpretation and diagnosis of pest and disease problems in tree nurseries and plantations based on symptoms and signs

- (ii) Procedures of pest and disease sample collection, packaging and submission for laboratory diagnosis
- (iii) Basic principles and practice of pest and disease management in tree nurseries and plantations

11. Livestock Management

Filling of human resource gap by training Community Animal Health Workers (CAHWs) in the program area will be important in livestock management and these sub-professional groups (veterinary assistants, auxiliaries and community animal health workers and the like) are often important elements in surveillance systems, if properly supervised and hence must be singled out for special training.

Pesticides Use Training - The key training needs that have been identified among others include post-harvest handling of crops, storage, disposal as well as safe use and handling of pesticides. Training for “safer pesticide use” is a common approach to mitigate the potential negative health and environmental impacts of pesticides. This conventional approach will promote reducing health risks of pesticides by safer use of the products through training, use of protective equipment and technology improvements, as well seeking to reduce pesticide hazards via regulations and enforcement in addition to the training. A well-illustrated booklet on safe pesticide use designed for self-learning will be developed and distributed to farmers, Extension staff, stockiest and their staff.

12. Pest Management and Monitoring Plan

Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility
Threat from other crop pests and diseases	Educate and train farmers to adopt good agricultural practices (GAP)	Adoption of IPM techniques/ approaches	Farmers trained in IPM techniques and GAP	1. Number of farmers trained, Training records 2. Incidence of crop pests 4. Production losses from crop pests	MAAIF, CPMC, STPC

Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility
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	Apply ACB approved or recommended pesticide if necessary	Inspection of pesticides at farm/storage gate prior to use (Project Policy)	Applied pesticides registered and approved by key stakeholders and in conformity with IPM principles	Records of pesticides applied at each farm	MAAIF, CPMC, STPC
Impact on post-harvest losses due to pests	1. Provide adequate and proper storage facilities	Post-harvest loss reduction plan based on IPM techniques in place	a.) Post harvest losses avoided or minimized b) Applied pesticides registered and approved by key stakeholders and in conformity with IPM principles	Number of farmers trained in IPM techniques for post-harvest storage; Number and condition of storage facilities in use	MAAIF, CPMC, STPC
	2. Monitor incidence of post-harvest pests			Number of cases of post-harvest pests	MAAIF, CPMC, STPC
	3. Confirm status and integrity of pesticides at storage gate prior to use	Inspection of pesticides at farm/storage gate prior to use (Project Policy)		Records of pesticides applied at storage sites/ rooms	MAAIF, CPMC, STPC

13. Pesticides Management and Monitoring Plan

Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility
Improper use of pesticides by farmers and extension staff	Educate farmers and extension staff on proper use of pesticides and pesticide use hazards including use of PPE.	Pesticide hazards and use guide manual or leaflet for the project (include simple pictorial presentations)	Proper use of pesticides by farmers and farm assistants	Number of cases of pesticide poisoning occurring under the project	DAO, CPMC, STPC
	Control and supervise	Adoption of IPM approaches/	Farmers trained in	Number of farmers trained,	DAO, CPMC, STPC
Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility

	pesticide use on farms	Techniques	IPM techniques	Training records	
	Monitor pesticide residue in crops	Random sampling procedure for crops and storage products	Pesticide residue in crops within acceptable limit/MRL	1. Levels and trend of pesticide residue in sampled crops 2. Number of times exported crops are rejected due to pesticide residues	DAO, CPMC, STPC
Pollution of water resources and aquatic life	Control and supervise pesticide use by farmers	Adoption of IPM approaches/ techniques	Farmers trained in IPM techniques	Number of farmers trained, Training records	DAO, CPMC, STPC
	Proper disposal of pesticide containers by resellers/farmers	Pesticide container collection and disposal plan	Pesticide container disposal plan developed and implemented	1. Number of farmers/ resellers aware of pesticide container disposal plan 2. Number of containers collected	DAO, CPMC, STPC
	Monitor pesticides in water resources	Environmental quality monitoring plan (linkage with Project ESMP)	Pesticide concentration in water resources (boreholes, streams etc.)	Levels of pesticides in water resources	DAO, CPMC, STPC
Abuses in pesticide supply and sales	Identify all pesticide distributors and resellers interested in providing services and products to farmers under the Project	Registration policy for all interested distributors and resellers under project	Only approved and licensed dealers and resellers supply pesticides under project	a) Company registration documents b) Evidence of license/permit to operate in pesticides c) Evidence of location and contacts of suppliers/resellers	DAO, CPMC, STPC

Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility
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	Confirm status and integrity of pesticides supplied under project Ban big pesticide containers to minimize decanting cases	a.) All pesticides are to be in the original well labeled pesticide containers prior to use b.) No decanting of pesticides under this project c) Inspection of pesticides at farm gate prior to use Decanting policy (No decanting of pesticides under project)	a) Only approved and registered pesticides used under project b) Banned pesticides avoided c) Fake and expired pesticides avoided d) Integrity of pesticide guaranteed at farm gate level All pesticides delivered for use are in the original containers	a) List of pesticides supplied and used in line with Agricultural Chemicals Board b) Cases of pesticides found in non-original containers c) Inspection records for pesticides at farm gate prior to use Cases of pesticides found in non-original containers	DAO, CPMC, STPC
Poisoning from improper disposal of pesticide containers	1. Educate farmers, extension staff and local communities on health hazards associated with use of pesticide containers	1. Pesticide hazards and use guide manual or leaflet for the project	Farmers, extension staff, local communities educated on pesticide health hazards	Number of cases of pesticide poisoning through use of pesticide containers; Number of farmers returning empty pesticide containers at collection points; Number of farmers, extension staff, and resellers trained in proper cleaning of pesticide containers	DAO, CPMC, STPC

Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility
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	2. Properly dispose pesticide containers	2. Pesticide container cleaning and disposal plan	Pesticide container cleaning and disposal		
General health and safety of farmers/crops and environmental hazards	Educate farmers to adopt Best Practices based upon IPM techniques; and do not use chemical pesticides unless advised by MAAIF	IPM techniques with emphasis on cultural and biological forms of pest control	Compliance with national laws and WB policy on Pest/pesticide management	Number of farmers trained in IPM techniques; Number of farmers implementing IPM on their farms Frequency of chemical pesticides usage	DAO, CPMC, STPC
	Provide PPEs to farmers/extension staff for pesticide use in the fields	Health and safety policy for farm work	Farmers and accompanying dependents (children) protected against pesticide exposure in the fields	Quantities and types of PPEs supplied or made available under the project	DAO, CPMC, STPC
	Educate farmers/farm assistants in the proper use of pesticides	Pesticide hazards and use guide manual or leaflet for the project (include simple pictorial presentations)	Farmers know and use pesticides properly; pesticide hazards and use guide leaflet or flyers produced.	Number of farmers trained in pesticide use; Number of farmers having copies of the pesticide hazard and use guide flyers;	DAO, CPMC, STPC
	Properly dispose obsolete and unused pesticides	Obsolete and unused pesticide disposal plan	obsolete and unused pesticide disposal plan prepared and implemented	Relationship between pesticide supply and usage	DAO, CPMC, STPC
Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility

	Educate farmers to obtain or purchase quantities of pesticides required at a given time and to avoid long term storage of pesticides	Pesticide use policy/plan	Only pesticides needed are purchased; long term storage of pesticides by farmers avoided	Relationship between pesticide supply and usage	DAO, CPMC, STPC
	Provide emergency response to pesticide accidents and poisoning	Emergency response plan	Pesticide accidents and emergencies managed under the project	Number of pesticide accidents and emergencies	DAO, CPMC, STPC

Annex 7: Waste Management Plan

1. Introduction

This Waste Management Plan (WMP) has been prepared to address waste management issues associated with the NUSAF IV project in line with legal and regulatory requirements. All stakeholders in the project shall have to adhere to this Plan. The NUSAF IV Environment Specialist together with the DEOs are responsible for ensuring that waste is managed in accordance with this Plan by providing the necessary resources and by issuing instructions and guidance during the course of project.

2. Definition of Waste

The National Environment (Waste Management) Regulations 1999 state that "waste" includes any matter prescribed to be waste, and any radioactive matter, whether liquid, solid, gaseous or radioactive which is discharged, emitted or deposited into the environment in such volume, composition or manner as to cause an alteration of the environment.

3. Key Laws and Regulations

Reference will be made to the provisions in the following legal framework:

- a. Constitution of the Republic of Uganda, 1995
- b. The National Environment Act (Cap 153)
- c. Water Act Cap 152
- d. National Environment (Waste Management) Regulations, 1999
- e. The National Environment (Standards for Discharge of Effluent into Water or on Land) Regulations, 1999
- f. The National Environment (Audit) Regulations, 2006
- g. The National Environment Management Policy, 1994
- h. General Specifications for Roads and Bridge Works 2005

4. Waste Management Principles

Waste will be managed in line with the hierarchy of waste management options ordered by preference as follows:

Waste Prevention – It is the responsibility of all project stakeholders to limit the amount of waste produced, insofar as is reasonably and economically practicable. This is to be achieved by careful consideration of the disposal implications of all developments and purchases.

Reuse – It is the responsibility of all stakeholders in so far as is reasonably and

economically practicable to reuse articles that have not yet reached the end of life.

Recycling – Where opportunities exist and where regulations apply, waste recycling shall be encouraged and implemented to minimize the amounts of waste destined for landfill.

Transport – Waste will be collected from site waste hold/storage areas at regular intervals to authorized transfer, treatment or disposal sites only. Transportation of waste shall be done by NEMA Licensed Waste Transporters. Any vehicle used for the transportation of waste must be fit for purpose.

Treatment - Where wastes are sent for treatment to render safe or reduce hazardous properties of waste prior to recycling or disposal, it must be ensured that the segregation, storage, handling, transport and treatment processes comply with legislation.

Disposal – Where the production of waste is unavoidable, it shall be ensured that the segregation, storage, handling, transport and disposal processes comply with legislation and contract requirements. Hazardous wastes where possible shall be treated using appropriate technologies to remove or minimize the hazardous properties prior to disposal. All treatment/sorting facilities shall be licensed by NEMA such that they are permitted to accept, transfer and treat wastes accordingly.

5. Waste Management Hierarchy

In deciding on the best method for managing any waste, there is a hierarchy for decision making which addresses issues such as sustainability, cleaner production, health, safety, and environmental protection. The same hierarchy will be applied to the NUSAF3 project at each level, starting at the top of the hierarchy. The hierarchy will be as follows:

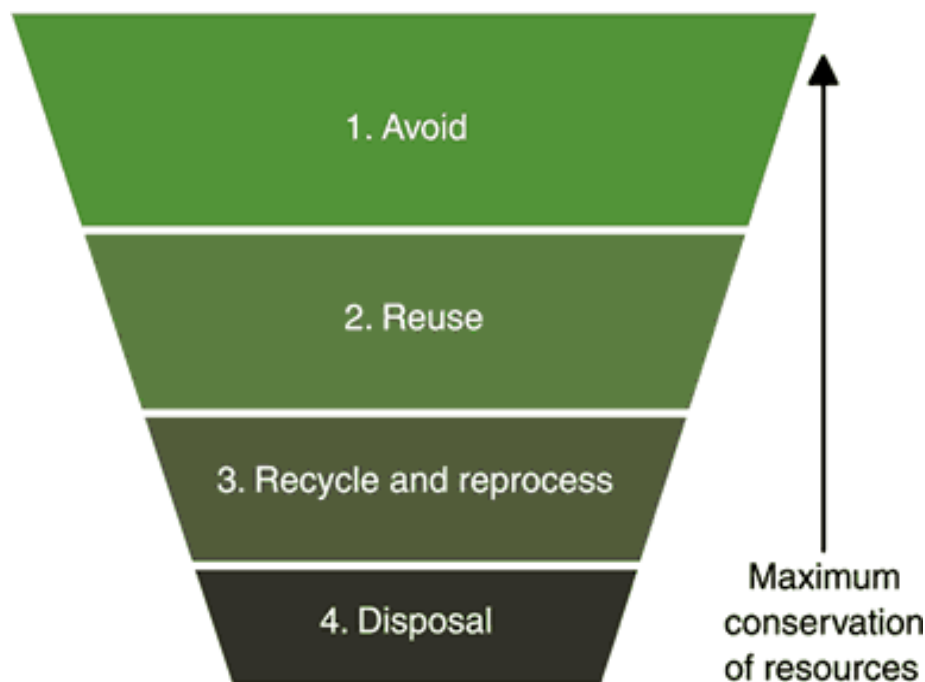


Figure: Waste Minimization Hierarchy

Avoid/Prevent: Waste avoidance by reducing the quantity of waste being generated. This is the simplest and most cost - effective way to minimize waste. It is the most preferred option in the Waste Management Hierarchy and is therefore ranked first. All waste generators shall endeavor to prevent waste by tight estimating to ensure that large surpluses of construction materials are not delivered to site; supplier co- ordination (requiring the supplier to take back/buy back surplus and sub-standard/rejected materials); operate a “just in time” delivery system (coordinating material delivery with its use).

Reuse: Reuse occurs when a product is used again for the same or similar use with no reprocessing. Reusing a product more than once in its original form reduces the waste generated and the energy consumed, which would have been required to recycle.

Recycle and Reprocess: Recycling involves the processing waste into a similar non - waste product consuming less energy than production from raw materials. Recycling spares the environment from further degradation, saves landfill space and saves resources.

Dispose: Removing waste from worksites, compounds and offices and dumping in a licensed landfill site, or other appropriately licensed facility.

General Storage, Collection and Transport of Waste

The following measures to minimize adverse impacts will be instigated:

- a. Handle and store waste in a manner which ensures that it is held securely without loss or leakage, thereby minimizing the potential for pollution;
- b. Use waste haulers authorized or licensed to collect specific categories of waste;
- c. Remove waste in a timely manner;
- d. Maintain and clean waste storage areas regularly;
- e. Minimize windblown litter during transportation by either covering trucks or transporting waste in enclosed containers;
- f. Obtain the necessary waste disposal permits from NEMA, if they are required, in accordance with the National Environment (Waste) Management Regulations 1999;
- g. Dispose of waste at licensed waste disposal facilities;
- h. Develop procedures such as a ticketing system to facilitate tracking of loads, particularly for chemical waste, and to ensure that illegal disposal of waste does not occur; and
- i. Maintain records of the quantities of waste generated, recycled and disposed where feasible.

Temporary Waste Storage and Segregation

Waste storage facilities will be provided as a secure, short-term store for all waste streams generated on site prior to them being collected by relevant waste carriers for final disposal. Wastes must be classified and segregated in accordance with the National Environment (Waste) Management Regulations 1999 to ensure that each category of waste transported by or on behalf of the project meets the waste acceptance criteria of the authorised waste receiving site/process. All Contractors' staff has a responsibility to ensure that the waste generated by their activities are segregated and identified as follows:

Waste Electrical and Electronic Equipment

Waste Electrical and Electronic Equipment (WEEE) is any item that is powered by mains or battery electricity. WEEE must be segregated from other waste.

Waste Batteries – There are certain battery types that are classified as Hazardous Waste and so must be segregated, stored and transported for recycling separately from non-hazardous batteries and or other waste.

Waste Destined for Recycling – Contractors will as opportunities arise implement waste recycling schemes to minimise the amount of biodegradable waste that goes to landfill and to reduce the impact to the environment from the final disposal of other wastes. Plastic bottles, glass, aluminium cans, and metals will be stored onsite and then given away for recycling.

Domestic Waste – Domestic Waste is the non-infectious and non-hazardous waste found in any household or office. It shall be segregated according to the labels.

Food (Catering) Wastes

- a. Catering waste is divided into food waste and non-food waste.
- b. Catering waste shall be collected and separated by personnel in the catering team and then transported by the waste collector.
- c. Food waste shall be removed daily from the kitchen.
- d. Food waste shall always be contained in plastic bags for disposal to prevent pest like flies and rats
e.g. from breeding.
- e. Non-food waste (beverage cans, packing materials, etc.) shall be collected in separate containers

Medical Waste

The key to minimization and effective management of health-care waste is segregation (separation) and identification of the waste. The most appropriate way of identifying the

categories of medical care waste is by sorting the waste into color-coded plastic bags or containers (WHO, 1995). In addition to the color coding of waste containers, the following practices are recommended (WHO, 1995).

- a. Bags and containers for infectious waste will be marked with the international infectious substance symbol;
- b. All sharps will be collected together, regardless of whether or not they are contaminated. Containers should be puncture-proof (usually made of metal or high-density plastic) and fitted with covers. They should be rigid and impermeable so that they safely retain not only the sharps but also any residual liquids from syringes. To discourage abuse, containers should be tamper-proof (difficult to open or break) and needles and syringes should be rendered unusable. Where plastic or metal containers are unavailable or too costly, containers made of dense cardboard are recommended (WHO, 1997); these fold for ease of transport and may be supplied with a plastic lining.

Table 15: WHO Color codes for medical waste segregation

Type of Waste	Color and Markings	Type of Container
Infectious	Yellow	Strong leak-proof plastic bag or bin with biohazard symbol.
Pathological	Red	Strong leak-proof plastic bag or bin with biohazard symbol.
Sharps	Yellow (marked sharps)	Puncture proof containers.
Chemical and pharmaceutical	Brown	Plastic bag or container.
Noninfectious/non-hazardous (non-clinical)	Black	Plastic bag or container.
Radioactive waste		Lead box, labeled with radioactive symbol.



Figure 7: Illustration of the coding system recommended by World Health Organization

Chemical Waste

Chemical waste that is produced should be handled in accordance with the National Environment (Waste) Management Regulations, 1999. Containers used for the storage of chemical waste should:

1. Be suitable for the substance they are holding, resistant to corrosion, maintained in good condition, and securely closed;
2. Display a label in English
3. Containers used for the storage of chemical wastes shall be suitable for the substance they are holding, resistant to corrosion, maintained in a good condition, and securely closed Display a label. Proper labelling is essential.
4. The storage area for chemical waste shall:
 - 4.1. Be clearly labelled and used solely for the storage of chemical waste;
 - 4.2. Have an impermeable floor and bundling, of capacity to accommodate 110% of the volume of the largest container or 20% by volume of the chemical waste stored in that area, whichever is the greatest;
 - 4.3. Have adequate ventilation;
 - 4.4. Be covered to prevent rainfall entering (water collected within the bound must be tested and disposed as chemical waste if necessary);
 - 4.5. Be arranged such as to separate incompatible materials.

a. Waste Management and Disposal Practices

Excavated Materials

- Excavated materials are not considered likely to cause adverse impacts, since they may be possible to be used as reclamation fill, which is considered a useful reuse of the material. Any uncontaminated inert material may be delivered to public fill site.
- Surplus excavated material, quarry overburden, rock rejected for aggregate, aggregate surplus to the requirements and the like shall not be discarded indiscriminately.
- Different types of surplus excavated materials shall be deposited separately in the spoil dumps or quarries requiring restoration.

b. Construction and Demolition Waste

- Careful planning and good site management can minimize over ordering and waste of materials such as concrete, mortars and cement groups;
- If feasible, the noise enclosure shall be designed so that the materials are reusable after it has been dismantled and removed;
- The design of formwork could maximize the use of standard wooden panels so that high reuse levels can be achieved;
- Alternatives such as steel formwork or plastic facing could be considered to increase the potential for reuse;
- Disposal of construction waste can either be at a specified landfill, or a private landfill to be acquired by the Contractor.

Medical Waste

Description – Medical care-based wastes including used and/or contaminated sharps will be generated at health care centers. This particular waste is hazardous by its nature and is basically classified in infectious and non-infectious wastes.

Disposal Options

In the project, medical waste will be handled as follows:

- General medical care-based wastes (packaging e.g., boxes etc.) will be disposed just like for domestic refuse;
- Highly infectious waste shall, whenever possible, be sterilized immediately by autoclaving. It therefore needs to be packaged in bags that are compatible with the proposed treatment process: red bags, suitable for autoclaving, are recommended.
- Small amounts of chemical or pharmaceutical waste may be collected together with infectious waste;
- Disposal by incinerating aims at complete combustion of medical waste is to totally burn it up to complete sterile ashes.

There are incinerators locally fabricated in Uganda. A good example is the MAK IV incinerator that has been specially invented for the burning of medical waste such as used cotton, syringes and safety boxes. The stainless-steel machine uses waste paper as fuel and burns at up to about 1200 degrees Celsius. The top of the incinerator is covered with sand, to stop air leakage but also work as refractory powder, to prevent heat loss. It can burn 5 kilos of waste in about 25 minutes.

Domestic Solid Waste and Management

This includes solid waste that is typically non-infectious and includes: Kitchen waste, paper and cardboard, plastics, glass, metals, etc. Aluminum cans, glass bottles, paper, other office waste and packaging materials such as plastic and cardboard will be recovered at the Municipal respective Municipal Composting Sites.

Hazardous (Chemical) Waste

1. For the process which generates chemical waste, it may be possible to find alternatives which generate reduced quantities or even no chemical waste, or less dangerous types of chemical waste.
2. The wide range of materials and chemicals involved such as oil, lubricants, cutting oils, sludge, paints etc. Hazardous waste shall be identified, classified, handled and disposed of safely.
3. The machinery used during construction will require maintenance that will include change of engine oil, hydraulic oil and coolants.
4. The maintenance schedule varies from machine category and the type of fluid changed. Typically, maintenance is determined by the number of hours of operation of a machine as shown below for bulldozers:
 - 4.1. Every 250 hours or monthly - Engine oil & filters plus transmission filters.
 - 4.2. Every 500 hours or 3 months - Fuel filters and hydraulic system filters.
 - 4.3. Every 1000 hours or 6 months - Transmission oil and final drive oil.
 - 4.4. Every 2000 hours or one year - Hydraulic system oil and Coolant
 - 4.5. For small vehicles, maintenance is typically carried out after accumulation of 2500 miles usually after 3 months i.e., 4 oil changes per year. The number of machines and the frequency of service are related to construction activity.

A NEMA-Licensed Contractor will be engaged to transport and dispose of chemical waste.

Advice should be sought from the DEO or NUSAF IV Environment Specialist about safe handling, storage, transport, treatment and disposal for any other waste substance or material that is not covered in this WMP.

Detailed Hazardous Waste Inventory and Management Plan

Waste Type	Description	Source	Hazardous Characteristics	Management Or Treatment Option
Acidic Wastes	Spent pickling and cleaning acids	During construction and maintenance of equipment/machinery.	Corrosive (sulphuric acid, hydrochloric acid), will contain heavy metals.	Neutralize with lime and dispose residues to landfill
E-Waste	VDU's Computer Waste Cell Phones Printer Cartridges	Various	Heavy metals including Cadmium, Nickel and Lithium from batteries	Recycle or treat, contain and dispose to Landfill
Oily (Hydrocarbon) Waste	Oily water	Oily Water Drains from vehicle maintenance areas	Petroleum Hydrocarbons, PAHs	Oil separators for recovery of oil and send offsite for incineration
	Lubricating Oil	Mechanical Workshops	Petroleum hydrocarbons, heavy metal compounds present as additives, e.g., Zn, Mo, etc.	Incineration
	Grease	Mechanical Workshops	Can contain Heavy Metals and Antimony as additives	Incineration
	Contaminated Rags	Mechanical Workshops	Petroleum hydrocarbons, Degreasers	Incinerate
	Oil Contaminated Soil / Adsorbents	Mechanical Workshops	Petroleum hydrocarbons, Degreasers	Incinerate
	Oil Filters	Mechanical Workshops	Petroleum, hydrocarbons, Degreasers	Recover oil and send for recycling of metal components.
Clinical waste	Sharps	Health Centres	Infectious – needle stick, injuries, etc.	Incineration at in high temperature incinerator
	General Infectious Waste	Health Centres	Infectious	Incineration at in high temperature incinerator
	Pharmaceutical/ Chemical Waste	Health Centres	Toxic; can include solvents	Incineration at in high temperature incinerator
Waste Chemicals	Detergents and Cleaning Chemicals	Offices	May be corrosive and can contain chlorine chemicals. Are toxic to aquatic organisms.	Treat, contain and dispose as hazardous waste.

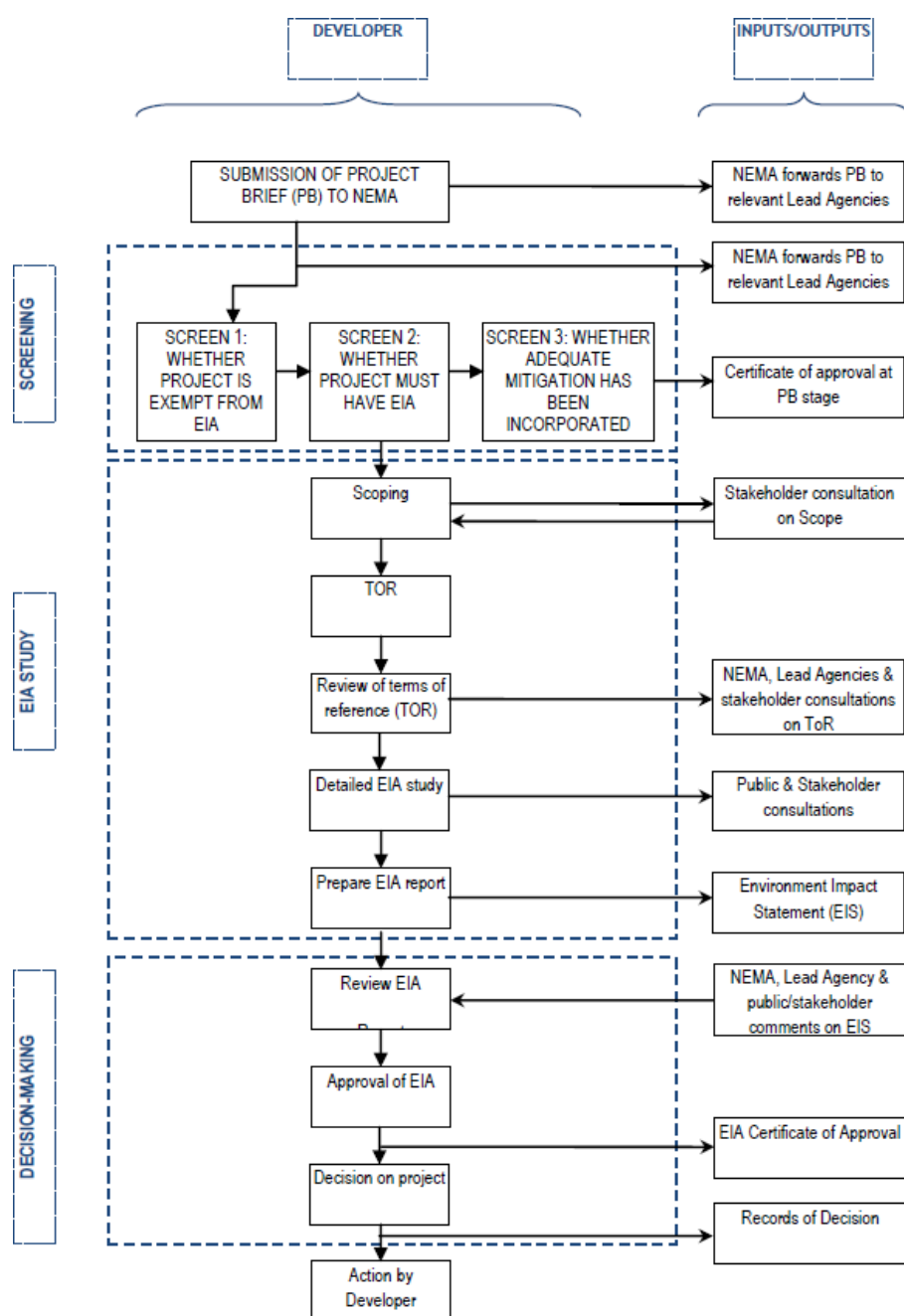
Detailed Non-hazardous Waste Inventory and Management Plan

Waste Type	Description	Source	Management Or Treatment Option
Scrap Metal	Various	During construction especially from fabrication works	Waste metals can be sold as scrap for recycling
Domestic (General) Waste including wood waste, office waste, and Canteen waste	Packaging, paper, Food	Administration office block, kitchen, etc.	- To be stored onsite to be collected by NEMA licensed Waste Collector to nearest Municipal Composting Site; - Further sorting and recovery of material to be conducted by the facility staff at nearest Composting Site; - Composting
Sand/Soil/Overburden /Rubble from construction	Mainly during road construction	Various	Utilize as fill material for stone quarries and borrow pits and take excess material to landfill.
“Clean” Run-off Water		“Clean” areas of site including Batching Plant	- Discharge to drainage system; - Collect and utilize as water for dust suppression (sprinkling) if acceptable contamination levels.

Annex 8: Detailed ESIA Process in Uganda

Overview

The ESIA guidelines (NEMA 1997) and the ESIA regulations (NEMA 1998) recognize the following stages in an ESIA process: Project Brief formulation; Screening; Environmental impacts study; and Decision making. In addition, public consultation is required throughout the ESIA process.



(Source: ESMF MoES, 2013)

The ESIA process in Uganda as described is initiated by the submission of a project brief – a document that contains the same sorts of information that are in the ESSF and a format for which is contained in the ESIA guidelines. Once the information is judged to be complete, NEMA requests comments from the lead agency and then screens the project. The Executive Director has three options: (a) approve the proposed project, if the ESIA is not mandatory and the project brief includes adequate mitigation measures, or (b) request the developer to prepare an Environmental and Social Impact Study (ESIS) if a decision cannot be made on the basis of the project brief. If OPM's Environmental Specialist has ascertained that the project is on the mandatory ESIA list, NEMA state that the project brief stage is normally omitted, moving straight into the ESIA process. If the decision is for an ESIS, the proponent obtains NEMA approval of the proposed ESIA consultant, conducts a scoping exercise, and agrees with NEMA on the study terms of reference. The study is conducted and culminates in submission of an Environmental Impact Statement (ESIS) to NEMA for review and decision. Stakeholder consultation is mandatory at scoping, Terms of Reference preparation, during the environmental study, and preparation of the draft Environmental and Social Impact Statement (ESIS). The content of an ESIS, as specified in the ESIA regulations, covers the recognized elements of environmental and social assessment good practice, including consideration of technical and site alternatives and induced and cumulative impacts.

The ESIA Regulations (First Schedule) list the issues to be considered in an ESIA, including:

- a. Biodiversity
- b. Ecosystem maintenance
- c. Fragile ecosystems
- d. Social considerations including employment generation, social cohesion or disruption, immigration or emigration, local economy
- e. Effects on culture and objects of cultural value
- f. Visual impacts

Preparation of Project Brief

According to the National Environment Act, "project brief" means a summary statement of the likely environmental effects of a proposed development referred to in section 19 of the Act. Unlike the ESIA, a project brief does not require a scoping report and neither submission of terms of reference for approval by NEMA.

According to Regulation 5 of the ESIA Regulations, 2006, a Project Brief is supposed to contain the following:

- a. the nature of the project in accordance with the categories identified in the

Third Schedule of the Act;

- b. the projected area of land, air and water that may be affected;
- c. the activities that shall be undertaken during and after the development of the project;
- d. the design of the project;
- e. the materials that the project shall use, including both construction materials and inputs;
- f. the possible products and by-products, including waste generation of the project;
- g. the number of people that the project will employ and the economic and social benefits to the local community and the nation in general;
- h. the environmental effects of the materials, methods, products and by-products of the project, and how they will be eliminated or mitigated;
- i. Any other matter which may be required by the Authority.

If the Executive Director is satisfied that the project will have no significant impact on the environment, or that the Project Brief discloses sufficient mitigation measures to cope with the anticipated impacts he may approve project. The Executive Director of NEMA or his delegated official shall then issue a Certificate of Approval for the project. However, if the Executive Director finds that the project will have significant impacts on the environment and that, the Project Brief does not disclose sufficient mitigation measures to cope with the anticipated negative impacts, he shall require that, the developer undertakes an ESIA for the planned project.

Environmental Screening

The purpose of screening is to assist categorize the type of ESIA required for the project i.e. does it require a full ESIA, a Project Brief or no ESIA at all is required. This is important to enable the application of the appropriate ESIA level based on the project's anticipated levels of significant impacts as elaborated in the National Environment (ESIA) Guidelines 1997.

Scoping and Preparation of ToRs

Scoping is the initial step in the ESIA process. Its purpose is to determine the scope of work to be undertaken in assessing the environmental impacts of the proposed project. It identifies the critical environmental impacts of the project for which in-depth studies are required, and elimination of the insignificant ones. The scoping exercise should involve all the project stakeholders so that consensus is reached on what to include or exclude from the scope of work. It is also at this stage that project alternatives are identified and taken into consideration. The contents of the scoping report are the same as the project brief; however, more detail is likely to be needed. This may involve some preliminary data collection and fieldwork. The Developer takes the responsibility for scoping and

prepares the scoping report after consultation with NEMA, Lead Agencies and other stakeholders. The developer with assistance from technical consultants will draw up the ToRs for the ESIS and submit a copy to NEMA that shall in turn be forwarded to Lead Agencies for comments, in this case including the District Environment Officer.

Preparation of the ESIS

In preparing an ESIS, relevant information is collected on issues of real significance and sensitivity. These are then analyzed, mitigation measures developed for the adverse impacts and compensatory measures recommended for unmitigated environmental impacts. Measures aimed at enhancing beneficial or positive impacts are also given. An ESIS documents the findings and is submitted to NEMA by the developer.

Review of ESIS and Decision on Project

The Developer is required to submit ten (10) copies of the ESIS to NEMA for review and approval. NEMA then forwards a copy to the Lead Agencies for comments. NEMA in consultation with the Lead Agencies shall review the contents of the ESIS, paying particular attention to the identified environmental impacts and their mitigation measures, as well as the level of consultation and involvement of the affected stakeholders in the ESIS process. In this review, the level to which the ToRs set out for the study is addressed shall be considered. In making a decision about the adequacy of the ESIS, NEMA shall take into account the comments and observations made by the Lead Agencies, other stakeholders and the general public. NEMA may grant permission for the project with or without conditions, or refuse permission. If the project is approved, the Developer will be issued a Certificate of Approval.

Environmental and Social Management Plan

The Environmental and Social Management Plan (ESMP) is intended to ensure efficient management of environmental and social issues in subprojects. The ESMP consists of:

- a. The relevant project activities,
- b. The potential negative environmental and social impacts,
- c. The proposed mitigating measures,
- d. The institutions responsible for implementing the mitigation measures,
- e. The institutions responsible for monitoring the implementation of the mitigation measures and the frequency of the afore-mentioned measures;
- f. Capacity building needs and
- g. The cost estimates for these activities.

In many cases, NUSAF3 will likely have sub-projects, most of which are small in nature

without significant environmental impacts. This calls for ESMP specific actions to mitigate these impacts and conforming to the obligations stipulated in the screening exercises, the environmental checklists and all legal instruments in force. At the time of the implementation of the sub-projects, the potential environmental and social impacts must be clearly identified and a management plan formulated, implemented and the plan's performance monitored during and after execution of sub-project activities. The impacts must be avoided or neutralized where possible or mitigated in conformity with Uganda's and the World Bank's prescriptions for sound environmental management.

Environmental Management and Monitoring Plan

Monitoring is the continuous and systematic collection of data to assess whether the environmental objectives of the project have been achieved. Good practice demands that procedures for monitoring the environmental performance of proposed projects are incorporated in the ESIS. Monitoring provides information on the occurrence of impacts. It helps identify how well mitigation measures are working, and where better mitigation may be needed. The monitoring program should identify what information will be collected, how, where and how often. It should also indicate at what level of effect there will be a need for further mitigation. How environmental impacts are monitored is discussed below.

1. Responsibilities in terms of the people, groups, or organizations that will carry out the monitoring activities be defined, as well as to whom they report amongst others. In some instances, there may be a need to train people to carry out these responsibilities, and to provide them with equipment and supplies;
2. Implementation Schedule, covers the timing, frequency and duration of monitoring are specified in an implementation schedule, and linked to the overall sub project schedule;
3. Cost Estimates and Source of resources for monitoring need to be specified in the monitoring plan;
4. Monitoring methods need to be as simple as possible, consistent with collecting useful information, so that the sub project implementer can apply them.
5. The data collected during monitoring is analyzed with the aim of:
 - 5.1. Assessing any changes in baseline conditions;
 - 5.2. Assessing whether recommended mitigation measures have been successfully implemented;
 - 5.3. Determining reasons for unsuccessful mitigation;
 - 5.4. Developing and recommending alternative mitigation measures or plans to replace unsatisfactory ones; and

5.5. Identifying and explaining trends in environment improvement or degradation.

Public Consultation

The environmental impacts or effects of a project will often differ depending on the area in which it is located. Such impacts may directly or indirectly affect different categories of social groups, agencies, communities and individuals. These are collectively referred to as project stakeholders or the public. It is crucial that during the ESIA process, appropriate mechanisms for ensuring the fullest participation and involvement of the public are taken by the developer to minimize social and environmental impacts and enhance stakeholder acceptance. An effective consultation process should generally ensure that:

- a. The public has a clear understanding of the proposed project; and
- b. Feedback mechanisms are clearly laid out and known by parties involved.

Different stages of the ESIA process require different levels of public consultation and involvement. The key stages are:

- a. Public consultation before the commissioning of the ESIS;
- b. Public consultation during the ESIS; and
- c. Public consultation during ESIS review.

Consultation can be before, during the ESIA study or during its review as outlined below:

Consultation before the ESIA

On submission of the project brief to NEMA, it might be decided that views of the public on the project are sought. NEMA is obliged to publish the developer's notification and other relevant documents in a public notice within 4 weeks from the date of submission of the project brief and/or notice of intent to develop. It is important therefore, that a plan for stakeholder involvement is prepared before the ESIS begins. Such a plan should consider:

- a. The stakeholders to be involved;
- b. Matching of stakeholders with approaches and techniques of involvement;
- c. Traditional authority structures and political decision-making processes;
- d. Approaches and techniques for stakeholder involvement;
- e. Mechanisms to collect, synthesize, analyze and, most importantly, present the results;
- f. The ESIS team and key decision-makers;
- g. Measures to ensure timely and adequate feedback to the stakeholders;
- h. Budgetary/time opportunities and constraints

Public consultation during the ESIS

During the ESIS, the study team should endeavor to consult the public on environmental

concerns and any other issues pertaining to the project. Though consultations are very critical at the scoping stage, ideally, it should be an on-going activity throughout the study. During the ESIS review, the public is given additional opportunity for ensuring that their views and concerns have been adequately addressed in the ESIS. Any earlier omissions or oversight about the project effects can be raised at this stage. To achieve this objective, the ESIS and related documents become public after submission to NEMA. An official review appointment will be announced, where the reviewing authority must answer questions and remarks from the public. These questions have to be handed in writing prior to the meeting.

Annex 9: Generic ToRs for ESIA for NUSAF Projects

Background

Assessment (ESIA) indicates the purpose of the Environmental and Social Impact Assessment (ESIA), presents an overview of the proposed project to be assessed, as well as the project's purpose and needs. It shall also briefly give the background information on the subproject as well as the need for the ESIA in line with national environmental policies and legislations.

1. Objectives of ESIA study

The main objective of the ESIA should be stated. The environmental and social impacts study should take into consideration all environmental and social impacts of the proposed subproject activities and identify the main environmental and social aspects that are likely to be raised by key stakeholders in order to optimize the project from the environmental and social point of view, by avoiding, minimizing, reducing or off-setting negative and enhancing positive impacts.

2. ESIA Study Methodology

2.1. Desk Research and Literature Review

The consultant shall perform a comprehensive literature review of key documents related to environmental, security, occupational health and safety legislation, policies, guidelines, manuals, procedures, practices, international best practices related to the project. The appropriate Field tools including questionnaires, data collection forms etc. shall then be developed.

2.2. Site Investigation

The consultant shall visit the project area with the aim of identifying the following:

- Physical-cultural and historical sites
- Noise sensitive areas
- Wildlife habitats, feeding, and crossing areas
- Proximity to residential places, road network, recreational activities etc.
- Sensitive social receptors
- Hydrological setting

2.3. Public and Institutional Consultations

The consultant shall carry out extensive consultations with all key stakeholders including but not limited to the following:

- a. NEMA
- b. MoES
- c. MoH
- d. OPM
- e. District Local Government Officials
- f. Affected communities
- g. Interested Communities

2.4. Analysis of Project Alternatives

The Consultant shall identify and systematically, undertake comparison of the potential Project Alternatives taking into account environmental and social factors such as:

- Sites – Assess suitability of the site and potential alternative sites;
- No-Project Scenario: This will include the alternative of not having the project to demonstrate environmental, social, and economic conditions without it.

2.5. Impact Analysis

The consultant shall evaluate potential project impacts considering planning, construction, and operation stages which shall cover social, ecological, and environmental issues. Identification of impacts shall include positive and negative impacts, direct and indirect impacts, and immediate and long-term impacts, unavoidable or irreversible impacts. The assessment of the potential impacts will also include; landscape impacts of excavations and construction, loss of nature features habitats and species by construction and operation, soil contamination impacts, noise pollution, soil waste, and socio-economic and cultural impacts.

It is important to follow a precautionary approach to ensure that the potential for cumulative impacts is considered and avoided where possible. Cumulative impacts shall be assessed by combining the potential environmental and social impacts of the proposed NUSAF IV with the impacts of substantial projects that have occurred in the past, are currently occurring, or are proposed or planned in the future within the proposed Project cumulative impact corridor.

2.6. Preparation of the ESMP

Depending on the relevance of each impact identified, specific corrective measures must be identified in order to mitigate the potential negative impacts and eventually to strengthen the positive ones. Mitigation measures could consist of the integration of proposed actions into the designs of the respective components. Besides, appropriate measures can be taken to compensate negative impacts that can occur and cannot be avoided, design appropriate measures to reduce/eliminate the negative identified impacts, to tackle needs and problems pointed out by consultation with stakeholders, to improve local living conditions and to promote local development. The District and sub county safeguards teams will identify the appropriate measures that can be taken to maximize and/or enhance the positive impacts and avoid, reduce or minimize the negative impacts. The ESMP will include measures to avoid, prevent, reduce, mitigate, remedy or compensate any adverse effects on the environment and social in relation to the respective construction and operation activities.

2.7. Capacity and Training Needs

The Consultant shall identify the institutional needs to implement the environmental and social assessment recommendations by reviewing the institutional mandates and capability of implementing institutions at local/district and national levels and recommend steps to strengthen or expand them so that the management and monitoring plans in the ESIA can be effectively implemented. The recommendations may extend to management procedures and training, staffing, and financial support.

2.8. Preparation of Environmental and Social Monitoring Plan

The Consultant with support from the safeguards from NUSAF IV will prepare a specific description, and details, of monitoring measures for the Environmental and Social Monitoring Plan including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, and definition of thresholds that will signal the need for corrective actions as well as deliver a monitoring and reporting procedure. The monitoring program would enable verification of the adequacy of the management plans and other mitigation measures identified in the ESMP, and would provide a basis for determination of any remedial measures or adjustments to management aspects if required. The Consultant and safeguards team should provide a time frame and implementation mechanism, staffing requirements, training and cost outlays.

3. Team Composition

The ESIA Experts for NUSAF Subprojects shall comprise of experts proposed herewith. It is important that, the ESIA teams are constituted taking into account the prevailing conditions on the proposed subproject sites.

3.1. Environmental Management Specialist (Team Leader)

Key Qualifications:

He/she should possess the following qualifications:

- At least an MSc. Environmental Management, Natural Resource Management or Environmental Engineering and four years of experience or a good BSc degree with experience of at least 6 years in conducting ESIA for infrastructure projects
- Should be registered with NEMA as an Environmental Practitioner and also certified as a Team Leader.

Tasks:

He/she will perform the following roles:

- Provide overall coordination and leadership to an ESIA team;
- Take a leadership role in steering stakeholder consultations during ESIA for slaughterhouse projects;
- Play an inter-phase role between client, NEMA and other stakeholders during ESIA process;
- Conduct site visits of planned subprojects;
- Identify impacts of the project activities on the social and associated environment items;
- Participate in the elaboration of technical, legal and regulatory norms to comply with environmental requirements in all the chain of project activities;
- Identify, assess and propose environmental mitigation measures for the NUSAF IV subproject under study; and
- Prepare an ESMP for the project.

3.2. Occupational Health

and Safety Specialist Key

qualifications:

- In addition to relevant formal training, should have undertaken training in OHS;
- Should have undertaken trainings in ESIA and or Environmental Audits;

Tasks:

- Participate in stakeholder consultations to discuss energy issues and safety aspects;

- provide OSH input throughout the assignment;
- provide public health aspects in the assignment;
- Participate in development ESIA for projects and participate in stakeholders' workshop.

3.3. Ecologist

Key qualifications:

- Must have a postgraduate training in natural sciences (forestry, botany or zoology);
- Must have undertaken an ESIA training;
- Conducted at least 5 ESIA studies in development projects.

Tasks:

- Take a lead in the ecological investigations of the project;
- Consult with stakeholder institutions on ecological aspects of the project;
- Review various literature sources on ecological matters of the projects; and
- Participate in write up of Environmental Impact Report.

3.4. Socio-economist Key qualifications:

- He/she should have undertaken postgraduate training in the fields of sociology, anthropology or social work or related social sciences;
- He/she should have conducted ESIA studies with experience of at least 5 years; and
- Must be registered with NEMA.

Tasks:

- Take a lead in stakeholder consultations especially with the key stakeholders, local residents etc.;
- Provide socio-economic input/expertise throughout the assignment;
- Lead in the formulation of social survey instruments;
- Provide social input in the Environmental Impact Report.

3.5. Aquatic Ecologist Key qualifications:

- Must have a postgraduate degree or training in natural sciences (fisheries, aquatic ecology or zoology);
- Must have undertaken an ESIA training;
- Conducted at least 5 ESIA studies in water resources development projects.

Tasks:

- Take a lead in all aquatic ecological assessments of the project;
- Assess impacts on aquatic ecology including fish;
- Consult with stakeholder institutions on ecological aspects of the project;

- Participate in write up of Environmental and Social Impact Report.

3.6. Hydrologist

Key qualifications:

The Hydrologist shall possess proven experience in river management in developing countries. He/she shall have a minimum of BSc Degree qualification in a relevant field as well as post graduate qualifications in river management with a minimum of fifteen (15) years overall experience. Knowledge of sediment transport modeling in rivers will be an advantage.

Tasks:

- Review the hydropower designs and their potential impact on the river's hydrology;
- Assess the potential impacts of any river diversions or other activities;
- Overall evaluate the different dam safety designs

4. Expected Deliverables

The Consultant shall produce an ESIA report acceptable to OPM, NEMA and the funding institution and the report shall include the following as per the requirements of Regulation 14 of the National (Environmental Impact Assessment) Regulations of Uganda:

- a. the project description and the activities it is likely to generate;
- b. the proposed site and reasons for rejecting alternative sites;
- c. a description of the potentially affected environment including specific information necessary for identifying and assessing the environmental effects of the project;
- d. the material in-puts into the project and their potential environmental effects;
- e. an economic analysis of the project;
- f. the technology and processes that shall be used, and a description of alternative technologies and processes, and the reasons for not selecting them;
- g. the products and by-products of the project;
- h. the environmental effects of the project including the direct, indirect, cumulative, short-term and long-term effects and possible alternatives;
- i. the measures proposed for eliminating, minimizing, or mitigating adverse impacts;
- j. an identification of gaps in knowledge and uncertainties which were encountered in compiling the required information;
- k. an indication of whether the environment of any other State is likely to be affected and the available alternatives and mitigating measures;
- l. such other matters as the Executive Director may consider necessary.

Annex 10: Sample Contract Clauses for Civil Works and facilities

The following information is intended solely as broad guidance to be used in conjunction with the national laws. Based on this information, environmental rules for contractors should be developed for each project, considering the subproject size, site characteristics, and location (rural vs. urban). Each contract should have its own specific clauses that reflect the mitigation and other remedial measures in the ESIA/ESMP that cascade into the Contractor – ESMP. After choosing an appropriate site and design, construction activities can proceed. As these construction activities could cause significant impacts on and nuisances to surrounding areas, careful planning of construction activities is critical. Therefore, the following rules (including specific prohibitions and construction management measures) should be incorporated into all relevant bidding documents, contracts, and work orders.

Prohibitions

The following activities are prohibited on or near the project site:

- Cutting of trees for any reason outside the approved construction area;
- Hunting, fishing, wildlife capture, or plant collection;
- Use of unapproved toxic materials, including lead-based paints, asbestos, etc.
- Disturbance to anything with architectural or historical value;
- Use of firearms (except authorized security guards); and
- Use of alcohol by workers.

Protection of Archaeological and Historical sites

A clause for “Protection of Archaeological and Historical Sites’ should be added to all bidding documents for the works contract which explains the steps to follow whenever new archaeological remains, antiquity or any other object of cultural or archaeological importance are encountered during construction.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the Department of Museums and Monuments in order to undertake pre- construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

- a. Stop construction activities.

- b. Delineate the discovered site area.
- c. Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a night guard should be present until the responsible authority takes over.
- d. Notify the responsible foreman/archaeologist. Who in turn should notify the responsible authorities, Department of Museums and Monuments and local authorities (within less than 24 hours)
- e. Responsible authorities would oversee protecting and preserving the site before deciding on the proper procedures to be carried out.
- f. An evaluation of the finding will be performed by the Department of Museums and Monuments. The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values.
- g. Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage.
- h. Implementation of the authority decision concerning the management of the finding.
- i. Construction work could resume only when permission is given from the Department of Museums and Monuments after the decision concerning the safeguard of the heritage is fully executed.

In case of delay incurred in direct relation to Archeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archeological findings works and protections.

Construction

Management Measures

Waste Management and

Erosion:

Solid, sanitation, and, hazardous wastes must be properly controlled, through the implementation of the following measures:

Waste Management:

- Minimize the production of waste that must be treated or eliminated.

- Identify and classify the type of waste generated. If hazardous wastes (including health care wastes) are generated, proper procedures must be taken regarding their storage, collection, transportation and disposal.
- Identify and demarcate disposal areas clearly indicating the specific materials that can be deposited in each.
- Control placement of all construction waste (including earth cuts) to approved disposal sites (>300 m from rivers, streams, lakes, or wetlands).
- Dispose in authorized areas all of garbage, metals, used oils, and excess material generated during construction, incorporating recycling systems and the separation of materials.

Maintenance:

- Identify and demarcate equipment maintenance areas (>30m from rivers, streams, lakes or wetlands).
- Ensure that all equipment maintenance activities, including oil changes, are conducted within demarcated maintenance areas; never dispose spent oils on the ground, in water courses, drainage canals or in sewer systems.
- Identify, demarcate and enforce the use of within-site access routes to limit impact to site vegetation.
- Install and maintain an adequate drainage system to prevent erosion on the site during and after construction.

Erosion Control

- Erect erosion control barriers around perimeter of cuts, disposal pits, and roadways.
- Spray water on dirt roads, cuts, fill material and stockpiled soil to reduce wind-induced erosion, as needed.
- Always maintain vehicle speeds at or below 10mph within work area.

Stockpiles and Borrow Pits

- Identify and demarcate locations for stockpiles and borrow pits, ensuring that they are 30 meters away from critical areas such as steep slopes, erosion-prone soils, and areas that drain directly into sensitive water bodies.
- Limit extraction of material to approved and demarcated borrow pits.

Site Cleanup

- Establish and enforce daily site clean-up procedures, including maintenance of adequate disposal facilities for construction debris.

Safety during Construction

The Contractor's responsibilities include the protection of every person and nearby property from construction accidents. The Contractor shall be responsible for complying with all national and local safety requirements and any other measures necessary to avoid accidents, including the following:

- Carefully and clearly mark pedestrian-safe access routes.
- If school children are in the vicinity, include traffic safety personnel to direct traffic.
- Maintain supply of supplies for traffic signs (including paint, easel, sign material, etc.), road marking, and guard rails to maintain pedestrian safety during construction.
- Conduct safety training for construction workers prior to beginning work.
- Provide personal protective equipment and clothing (goggles, gloves, respirators, dust masks, hard hats, steel-toed and-shanked boots, etc.,) for construction workers and enforce their use.
- Post Material Safety Data Sheets for each chemical present on the worksite.
- Require that all workers read, or are read, all Material Safety Data Sheets. Clearly explain the risks to them and their partners, especially when pregnant or planning to start a family. Encourage workers to share the information with their physicians, when relevant.
- Ensure that the removal of asbestos-containing materials or other toxic substances be performed and disposed of by specially trained workers.
- During heavy rains or emergencies of any kind, suspend all work.
- Brace electrical and mechanical equipment to withstand seismic events during the construction.

Nuisance and dust control

To control nuisance and dust the Contractor should:

- Maintain all construction-related traffic at or below 15 mph on roads within 200 m of the site.
- Maintain all on-site vehicle speeds at or below 10 mph.
- To the extent possible, maintain noise levels associated with all machinery and equipment at or below 90 db.
- In sensitive areas (including residential neighborhoods, hospitals, rest homes, etc.) more strict measures may need to be implemented to prevent undesirable noise levels.
- Always minimize production of dust and particulate materials, to avoid impacts on surrounding families and businesses, and especially to vulnerable people (children, elders).
- Phase removal of vegetation to prevent large areas from becoming exposed to wind.

- Place dust screens around construction areas, paying particular attention to areas close to housing, commercial areas, and recreational areas.
- Spray water as needed on dirt roads, cut areas and soil stockpiles or fill material.
- Apply proper measures to minimize disruptions from vibration or noise coming from construction activities.

Community Relations

To enhance adequate community relations the Contractor should:

- Follow the Ugandan and EA requirements i.e., inform the population about construction and work schedules, interruption of services, traffic detour routes and provisional bus routes, as appropriate.
- Limit construction activities at night. When necessary, ensure that night work is carefully scheduled, and the community is properly informed so they can take necessary measures.
- At least five days in advance of any service interruption (including water, electricity, telephone, and traffic routes) advise the community through postings at the project site, and affected homes/businesses, or through any other means as deemed adequate.

Environmental Supervision during Construction

The bidding documents should indicate how compliance with environmental provisions and design specifications will be supervised, along with the penalties for non-compliance by contractors or workers. Construction supervision requires oversight of compliance with the manual and environmental specifications by the contractor or his designated environmental supervisor. Contractors are also required to comply with national laws governing the environment, public health and safety.

Annex 11: Details of Consultations

Nakapiripirit District Consultations on NUSAF successor Operation		
Name	Issue raised	Proposed Measure/recommendation
District Representatives FGD		
1. District Chairperson Representative (Hon. John Lonye Secretary Works and Technical Services) 2. Hon. Kodet Paul (Councillor representing Workers) 3. Hon Kadu Lakayi John (Councillor Incharge Kadamas)	- Nakapiripirit District is unique in its own sense in terms environment, biodiversity, climate and the people. - The kadama should have been enlisted as part of the minority / indigenous groups just like the IK. However, they do not qualify to be in that category rather vulnerable (belong to pian and pokot) and must be given special attention due to their location - There are physical cultural resources unique to the kadam and other areas of nakapiripirit which needs not to be destroyed by any program (akireket, hills, caves, etc.)	- There is need for proper targeting based on vulnerability and poverty status of the Households so kadas are not left out - The climate change and disasters faced in the district need to be given due attention with appropriate mitigation strategies such as irrigation, pest management measures, social protection etc. - NFA and UWA needs to dialogue with district Local Government on collaborative resource use and management within the project context (ESS6) - Human Animal Conflict due to pian up needs attention from UWA - Chance find procedures (ESS8) needs to be established under the project to support assessments of this during location and siting of facilities or investments under the project
4. Hon Sagal William (Councilor representing Persons with Disability)	Issues of disability should be taken care off in targeting investments and beneficiaries' selections under NUSFA. Putting a cap of only 10% as was in NUSAF3 gave exclusion of many persons with disability in LIPW/DRF. And livelihood activities	- Adequate stakeholder engagements to ensure social inclusion (Highlighted in SEP) ESS10 - Special allocation and as well criteria should be developed to guide beneficiaries targeting of persons with disability - And targets must be set for this specific component which shall be monitored and evaluated on
5. Mr. Jobs Lomenen (Deputy CAO) 6. Mr. Kocho Mark (Chief Finance Officer) 7. Mr. Lesse Atibu (District Production Coordinator)	NUSAF successor implementation structure needs to be expanded and include CFOs and auditors in critical such as digital payments stem etc.	Chief finance officers and internal audits need to be brought on board on digital payments mechanisms, so they guide districts

	• Also, critical technical officers relevant to project components need to be brought on board to support sub project implementation in communities. Unlike in NUSAF3 where the NDO was overall in-charge whether technical or not and led to lots of implementation challenges • Clarity on the new fund flow of NUSAF successor • In adequate operations funds making it difficult for technical supervision and backstopping for technical officers which possess risk to the project • SBDI model under NUSAF 3 was critical and worked in the district • Youth and Women lack entrepreneurship knowledge, skills and capital to enhance business and livelihoods • Mindset change challenges makes it difficult for many programs to succeed including NUSAF3 • Challenges of early warning systems to strengthen shock responses • Economic infrastructure such as Markets, accessibility, water for production, value addition facilities and energy needs are enormous	• NDO to remain coordinator and experts from critical departments assigned as component focal point persons • NUSAF programs team to allocate funding based on scope of activities and area of coverage other than flat rate across the board • PDM concepts need to be linked with NUSAF • There is need for the expansion of the SBDI model to cover at least each sub county (1 per sub county) • Youth and women entrepreneurship programs, skilling and mentorship must be implemented under NUSAF successors and those in the age between youth and elderly (35-54 years) need this component • NUSAF successor should design a robust mindset change program hinged on the PDM mind set pillars to support its components implementation. Also, this should come with clear stakeholder engagement plan and communication strategy • The project to include economic infrastructure as core to support market linkage and agro industrialization • Need for the project to invest in strong early warning systems to support prompt shock responses and provide farmer information
Sub County Representatives FGD		
8. Hon Loyelel Gregory (LC111 Chairperson Lemusui) 9. Hon. Paul Yarameri (Loregae Sub county) 10. Mr. Benson (SAS Moruita) 11. Ms. Losiske Teddy (SAS CAO office) 12. Aguma Agnes (SAS kakomongole SC)	• Insecurity and covid hit hard the wider community including the NUSAF3 beneficiaries. LIPW and DRF supported beneficiaries including the elderly, sick, pregnant mothers etc. through cash for Work	• The LIPW and DRF component must be included in all the sub counties in the district and saving aspects strengthened • There is need to consider tree planting component in NUSAF support restoration agenda and climate change through encouraging landlords to offer land

13. Lorika Ronnie (SAS Loregae Sub County)	• Tree planting or restoration activities didn't do well because most were done in public or communal lands • Sub County involvement was minimal in NUSAF3	for trees, the vulnerable work get paid through LIPW and benefit sharing clearly defined between land lords and beneficiaries this will help address issues of O&M and sustainability • Need to strongly bring on board the sub county technical teams in implementation (SAS, CDO, Extension staff production and Health)
Nakapiripirit Town Council		
14. Mr. Philip Lodoumoe (Town Clerk) 15. Hon. Lobwal Raphael (Town Mayor Nakapiripirit Town Council)	• Town/ urban areas are unique, and investments must be properly defined to suit the context	• Proposed investments are in areas of value additions, market infrastructure, non-traditional livelihoods, accessibility etc.
Safeguards (EHSS) Experts FGD		
16. Ms. Bako Florence (District Environment Officer) 17. Mr. Lomongin Johan 18. Lotukon Lazorus (Health Incharge) 19. Aboka Florence (CDO Kakomongole) 20. Abura Simon Peter (CDO, Kawach) 21. Alupo Susan (CDO Namalu)	• Inadequate environmental safeguards structures at lower levels • In adequate funding for safeguards activities at all levels. Safeguards teams dependent on ESMP funds • Capacity gap on the new ESF requirements such as labor and working conditions, incident management, chance finding measures and as well as OSH. • Cordon and search issues are becoming of concern in the region due to disarmament, this might affect the project role out in communities for fear to be arrested • The is in adequate documentation of safeguards good practices • Targeting errors (exclusion) in previous NUSAF3 due to in adequate involvement of CDOs officers at sub county • Indicators and targets to support safeguards reporting is challenging	• Re-instate Local Environment Committees at all levels to support environment management • Need to allocate adequate resources for ESMPs activities management • Need to train all safeguards team prior to project implementation on new ESF and provide necessary tools • OPM to find measures on security issues to ensure communities are not hindered from participating in the project • OPM to ensure communication teamwork plan support safeguards teams in districts to document lessons, successes and good practices on the project for wide sharing • CDO should be brought on board to manage beneficiary targeting process with CFs in-line with ministry of gender single registry requirements

	Grievance redress management was challenging in NUSAF3	- Define targets and indicators to facilitate adequate safeguards reporting and contribution to overall project outcome - A robust GRM must be developed and assigned to CDOs to manage the whole process especially complaints and grievances on GBV/VAC, conflicts /tensions, site accidents etc. and grievance registered must be distributed to all sub counties. Monthly meetings must be done by all CDOs to review progress on complains management
Nabilatuk District Consultations on NUSAF successor Operation		
District Representatives & Town Council FGD		
CAO Nabilatuk, Deputy CAO Anyakun Paul Jovic, William Nabur (DCDO), Raymond Korobe (DEO), Longolio John (Town Clerk), Lokiru Cahrles (Water Officer),	- All sectors lag behind - Community infrastructure component needs to be considered in the projects (Water, health, roads, bridges, markets, value addition facilities and storage) - Insufficient funds allocation. No equity and fairness in allocation of budgets from OPM - Environmental degradation and unsustainable energy /charcoal burning /firewood need to be addressed - Drought challenges and food insecurity needs great attention and well thought strategies need to be devised to support address the challenges - Group approach needs to be revisited as these affected results of NUSAF3 especially livelihood support - Malnutrition very big challenge in the whole district IPC reports indicates Nabilatuk second highest in Karamoja	- Need for NUSAF programmers to use the human development indicator report and other UBOs reports to support justification for district specific needs - Allocation formular should be needs based and do not use population measure rather poverty and vulnerability measurement as there are irregularities in population data. - Promote Natural and assisted regeneration measures (area closure) as local trees are resistant and has good potential to regenerate by themselves once properly protected - Promote indigenous species and some drought resistant species like neem with economic value - The tree growing programming must be thought about introducing the landlords and clear benefit sharing to foster O&M and sustainability. - Tree planting must be made core responsibility for all benefiting households before accessing funding (each household given up to 5 varieties of trees including fruits) to plant and nurture alongside the main project.

	and overall national malnutrition levels stand at 23% • Low attendance, retention and performance in most schools is due to insufficient food. The allocations from ministry and as well as partners isn't sufficient to supports schools. High level of dropouts etc. • Youth and women economic empowerment activities are critical and need to be harmonized with other government support for sustainability • Mindset change challenges needs to be addressed in NUSAF successor. • Urban activities shouldn't be the same as rural activities due to uniqueness and challenges of land • and which needs to be strengthened • Capacity building needs	
District Council Representatives District Chairperson Lokol Paul, Hon Lorukale, Hon. Zacharia Koryang.	• The STAAC component under IG contributions in NUSAF3 was very minimal and nothing much was done in that component • Implementation structures were in adequate. Not all technical teams were involved in the implementation and thus affected the project • Mentorship required to be strengthened by able bodied households to unable bodied so they can learn and grow • Issues of insecurity will impede NUSAF activities	• The STAAC component needs to be strengthened, and community department should support complaint and grievance handling • DIST, SIST, Parish, the council, RDC, DISO offices must be part of the teams. NDO needs to coordinate and leave technical work to technical officers to manage in projects • Operations funds need to be rethought through and sufficient to support all structures managing the project • Mentorship done by able bodied selected households to unable bodied so they learn and grow • OPM and Ministry of defense need to handle this issue carefully, so households get involved in the projects

	Large scale agriculture production models must be promoted to address food security issues	SBDI promoted in all Sub County (1 per sub county)
Sub County FGD		
Aleper Moses (Agric Officer-Town Council), Miriam Awas (Assistant Animal Husbandry Officer-Nabilatuk), Martha Angella (CDO-Lolachat), Hon. Namuk William	- Livestock diseases is change and requires attention from NUSAF - Rain fed agriculture and small hold farming systems not sustainable - CF recruited in NUSAF3 where not of technical expertise thus affected quality of implementation - Un timeliness of release of funds affected planning seasons - In adequate remuneration for the CFs - Cash payments mechanisms especially cash for work needs to be revised so the rightful beneficiaries get their cash if the project has to realize results - Saving component under NUSAF3 wasn't well guided	- There is need for establishment of animal kiosks/Clinics to address animal diseases and this can be part of the menu and communities will pay for these services at subsidized prices - Irrigation facilities must be established to promote large scale agriculture for high value crops and cash crops - Timely release of funds by OPM. All funds must be released by the end of second quarter of every financial year to facilitate proper planning for seasonal crops - Promote effective digitalized payments like SAGE program - Commercial officers to be provided with clear guided saving module - Technical CFs to be recruited who have skills in agronomy, forestry, business entrepreneurship etc and recruitments assigned to the sub county
Safeguards Team FGD		
William Naburi DCDO, Teko Ruth (Senior Probation Officer),	- Most of the productive land are in the fragile ecosystems near or adjacent to the game/wildlife reserves, wetlands, riverbanks, hilly etc. which needs protection from pollution and degradation - Pest and diseases including locusts affect production fields - Some of the project investments are unsustainable because of land issues not managed well during the project generation. Some of the assets (tree	- Critical soil and water conservation strategies need to be implemented - Integrated pest management strategies need to be looked into, and this should be managed by the production department (agriculture, veterinary) and Forestry department. - Land consent forms used in NUSAF 3 must be revisited and must be mandatory and where there is benefit sharing. This must be clearly spelt out in the agreement

	plantations) have been sold out by landlords • Health and safety requirements need great attention and incident reporting. NUSAF3 team trained only districts and sub counties, and the training wasn't done for CFs • GBV and VAC issues arise during the targeting and during cash transfers	• Critical/specialized training of health and safety as well as incident management is required for all CFs, CDOs, Environment Officers and Health personals attached to the project like what was done in NUSAF3 • GBV and VAC issues must be assigned to CDOs to manage at Sub County levels. And a well thought strategy and modules of GBV and VAC need to be developed and used to sensitize communities.
Moroto District Consultations on NUSAF successor Operation		
District representatives and Municipality FGD		
District Chairperson Hon. Koryang, Paul Jiko Lomuria DISO, District CAO Mr. Alex Chelimo, District Internal Auditor Ezatiru Rebecca, District Physical Planner Stella Apolot, District Engineer Orup Ceasor, District Water Officer Lokiru Musa, District Agricultural Officer Loli Mark	• Environmental, climate and disaster shocks have been triggered by population negative actions (massive tree cutting, charcoal burning etc.) has resulted to food insecurity due to prolonged drought and lack of water reservoirs from rains as all fragile ecosystems are destroyed. • Because of that, there is no livelihoods to depend on. Cattle rustling has set in as a source of livelihood to communities. Many young able-bodied youth have resorted to this including school children and many have lost lives • Covid crisis made it worse that households utilized their saving, assets created sold etc. • Malnutrition is high in the district just like else were in karamoja. • The Vulnerable groups including severely disabled, elderly, pregnant, lactating, children under two and sick numbers are over whelming.	• Shock response social protection strategies must be promoted (cash for work) • Promote restoration activities well thought with use of indigenous species which are drought resistant • Establish sustainable nursery beds with indigenous species • Support water for production (irrigation and valley tanks for livestock) • Promote Apiary for nutrition and other nutri livelihoods (soya, beans, simsim, g-nuts, vegetables) to support vulnerable groups • Also, cash for vulnerable groups is needed • Contingency budgets need to be considered for any crisis response like covid, locusts etc. • Initiate discussions with UWA and NFA on management of resource use but also human animal conflicts • Promote efficient energy technologies such as briquettes making, efficient cook stoves, biogas and solar for the rural and urban households

	• Human animal conflicts in sub counties bordering the mountain and the wildlife reserves threaten household livelihoods • Coupled with literacy levels. • Poor accessibility and rural economic infrastructures (markets, storage/bulking stores, Value addition and processing facilities) • Waste management challenges in urban areas with no proper waste management value chain (collection, sorting, transportation and safe disposal) • Many youths are redundant and this has led to high crime rates in the urban areas. Most of the programs targeting the youth are unsustainable as the aspect of mindset change and skilling isn't part of the package provided • Energy challenges (high dependency of charcoal and fuel wood) This has affected the district in terms of economic development	• Youth programs must have skilling component before giving out grants. And profitability analysis must be done to guide profitable enterprises • Waste management technologies must be implemented in all urban and growth centers to address solid waste and hygiene issues which continue to affect the towns. • Urban menus should not be the same as the rural menus due to uniqueness of location, land and as well as populations
Sub Counties and Town councils FGD		
Town Clerk Katiekile, Hon Ngole, LC3 Hon Marks Lakabenyan, Sub County SAS Katiekile Joseph Onyang, Sub County SAS Logiel Anthony, Sub County SAS Tapach,	• Improper zoning and planning for profitable agriculture has led to food insecurity in the rural areas • Exclusion of urban populations from many of the government programs yet vulnerability is high in the urban and growth centers • Pest and diseases continue to affect farmers' fields and as well livestock	• Zone the areas to provide guidance on which value chains to be implemented in which zone • The concept of SBDI IN Lokeriaut must be scaled out to all sub counties • Water for production/irrigation must be number one on the menu for Karamoja if the region must produce and improve food security • Pest management measures and provision of support on pesticides and acaricides must be part of the project menu

	• Insufficient water for production and where valley tanks are a majority have silted • Accessibility remains a challenge in all sub counties • Issues of mindset making it hard for uptake and sustaining many government programs • Vulnerable groups still need cash for work under LIPW and DRF	• Bridges need to be constructed to link farmers to the market • Mindset change programs as part of the mobilization strategy • Promote LIPW and DRF in sustainable manner
Safeguards Team FGD		
DCDO Lolem Margy, Lochodo William Senior Probation Officer, FIDA region Office, Senior Environment Officer Zachary, Nangiro Tubo	• ESS standards triggered according to project components will be all except ESS 9 • Issues of Safeguards budget must be looked into. Safeguards team depend on only ESMP funds which in most cases cause conflicts due to misunderstand by the community •	• ESS standards requirements is amendment of CDO, Environment Officers and Health personels as each of them have a stake in the management of safeguards issues. • The ESS management structures must include district, sub county, parish, community (VHTs, GRCs, Local Environment Committees) and inclusion of other external stakeholders such as justice, police, CSOs (FIDA) • ESS 8 must be strengthened to support Karamoja protect and preserve cultural heritage e.g. Moroto have areas such as mogos, nakabat, tapach etc.) that can be protected improved and can be cultural sites for eco-tourism) • Health and safety requirements must be handled carefully by involving the health department and VHTs • While GBV and VAC responsibility should be for Gender and Probation Officers • Clear safeguards targets to be set at the beginning in-line with projects funded • Certification of all projects as was in NUSAF3 must be promoted for compliance

		• Clear fund flow for ESMP funds and management mechanisms should be established under NUSAF successor
Napak District Consultations on NUSAF successor Operation		
District, Town Council and Sub county representatives FGD		
Deputy CAO Koryang Timothy, District Education Officer Nakoya, District Engineer Alinga Sisto, District Commercial Officer Siloi Joyce, District Water Officer	• Drought and floods are the core disasters that affect the district and bush fires which are manmade • Insecurity still a challenge in Bokora and this is escalated by raiders from pian, Matheniko and Jie • Water resources very big challenge and livestock have to travel long distances for water • Safe water for household domestic is also challenging. Ministry of water budgets do not support all critical areas. The ministry has also made many designs and promised to finance boreholes and valley tanks but to date nothing is being done. • Accessibility to productive areas potential for agriculture is a challenge • Pest and disease continue to affect farmers' fields and livestock • Environmental degradation is continuous as this is now source of livelihoods as a majority of the rural have no alternative source of income and livelihoods • Malnutrition is high just like any other district in Karamoja • Youth population keep increasing and a majority are dropouts and others are not in school. Many young girls are married of	• Invest in strong early warning systems to support prompt shock responses and provide farmer information • Zone the areas to wet and dry and provide guided value chains applicable for massive production. Livelihood designs promoted accorded to context and not generalized • Establish strong implementation structure including the extension staff • Sustainable security solutions be thought through by the project and security sector • Promote water for irrigation • Promote economic infrastructures such as markets, storage and access roads to facilitate trade/business • Scale out the SBDI model which seems to promote large scale agriculture besides block farming • Promote afforestation and desilting of water reservoirs through LIPW • Promote a mix of universal and targeted programs to address poverty and vulnerability • School livelihood programs, fencing and water infrastructure to be promoted to support address education sector challenges in the district. • Enhance participation of all stakeholders and communication strategy for better results for the project • NUSAF to timely disburse sub project and operations funds

	at tender and most recently hit hard by covid (lots of school dropouts) • Insecurity is scaring children in schools and retention remain a challenge especially for a girl child • Untimely disbursements affect project results • A coordinator needs to be from CAOs office and coordinate technical teams	• CAO to appoint a coordinator from his office who will work with technical focal points for components • Massive tree planting as core responsibility to be promoted and budgeted for at national levels and implemented by districts • Enhance the role of sub counties in NUSAF successor as all sectors have now recruited personnel that can support the project implementation
Safeguards Team FGD		
Ngiro James Senior Environment Officer, Agan Mary DCDO	• ESS standards triggered according to project components will be all except ESS 9 • Health and safety requirements need to be given attention including occupation health and safety • GBV and VAC issues need due attention • Targeting as critical issue to guarantee social inclusion	• ESS1, ESS10, ESS2, ESS3, ESS5 and ESS8 to be given great attention. • Grievance redress mechanisms as well as committee establishment done for safeguards and need to work closely with CMGs under IG • Responsibility for ESMP implementation must be categorized (District responsibility, sub county and community responsibility for results) • All safeguards team must be trained on MIS and reporting mechanisms • NEMA and MGLSD to work closely with the national level safeguards team • Funds release to sub projects must be tagged with compliance level • GBV/VAC action plans to be developed costed and managed by Gender and Probation office • CDOs given a responsibility of mobilization and targeting

Annex 12: Actions taken by GOU to Ensure Inclusion and Non-Discrimination

Annex 12 highlights recent actions taken by the GOU to ensure inclusion and non-discrimination of vulnerable or marginalized individuals or groups. It also includes transcripts of relevant Guidelines and Circulars issued by the GOU.

The Anti-Homosexuality Act was passed on May 26, 2023. The Government has continued to ensure inclusion and non-discrimination in all its projects and consistent with this, the Government has taken the following measures:

- **Letter of Assurance** (Sept 21, 2023) to all Ministries, Agencies, and local governments to implement mitigation measures on non-discrimination in WB-financed operations.
- **Budget execution circular** (July 10, 2023) to all public servants to ensure that projects are in line with Ugandan Constitution which emphasizes equality of all persons without prejudice or discrimination.
- **Circular on provision of health services** (June 5, 2023) that includes measures not to discriminate or stigmatize any individuals who seek health care for any reason.
- **Circular on provision of education** (August 18, 2023) services to all people without discrimination and exclusion in the delivery of education services, programs, and projects.
- **Circular issued by the Director of Public Prosecutions** (August 29, 2023) stating that prosecutors should seek guidance from ODPP before decision to charge is made under the AHA.

Of particular importance is the Letter of Assurance of September 21, 2023, from the Permanent Secretary/Secretary to the Treasury on Uganda's Social Safeguard Policies following excerpts:

“Following the World Bank Group’s concern with Uganda’s enactment of the Anti-Homosexuality Act, 2023 and as communicated in the budget Execution Circular 2023 of FY 2023/2024 on 18th July 2023, we guide:

- *All World Bank-financed projects must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements*
- *Under these projects, no person will be discriminated against or stigmatized, and the principles of non-discrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.*
- *All implementing entities of World Bank [supported] projects should agree and implement specific mitigation measures to address non-discrimination.*
- *These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring where applicable.*
- *Each project implementing entity shall develop comprehensive guidelines to address non-discrimination.”*

The following transcripts of relevant Guidelines and Circulars issued by the GOU are included in this annex: Letter of Assurance; Circular on provision of health services; Circular on provision of education services; Circular issued by the Director of Public Prosecutions, and relevant excerpts from the Circular on Budget Execution.

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In any correspondence on
This subject please quote No. ALD 141/259/01 TC



Ministry of Finance, Planning &
Economic Development,
P.O. Box 8147
Kampala, Uganda

21st September 2023

The World Bank Country Manager
Uganda Country Office
Kampala, Uganda.



UGANDA'S SOCIAL SAFEGUARD POLICIES

I am writing in reference to the above subject. Further reference is made to our letter dated 28th July, 2023 on the same.

Government of Uganda wishes to reiterate that World Bank-financed projects will be implemented in a manner consistent with the principles of non-discrimination within the provisions of Article 21 of our Constitution.

The Government confirms that it will ensure that under these projects, no person will be discriminated against or stigmatized and that the principles of non-discrimination and inclusion will be adhered to. The Public Finance Management Act, 2015 also emphasizes equality of all persons to access opportunities and benefits from projects and programs without prejudice and discrimination.

Further to the above, we have issued the attached instructions to all implementing entities of Government projects and programs which communicate about specific mitigation measures to take and the legal requirement for non-discrimination.

Please accept Country Manager, the assurances of my highest consideration and esteem.

Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

Rt.Hon. Prime Minister, Office of the Prime Minister

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance Planning and Economic Development

Mission

"To formulate sound economic policies, maximize revenue mobilization, ensure efficient allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development"

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

Solicitor General, Ministry of Justice and Constitutional Affairs

The Director of Public Prosecutions

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This subject please quote No.



Ministry of Finance, Planning &
Economic Development,
P.O. Box 8147
Kampala, Uganda

ALD 141/259/01 TC

21st September 2023

All Accounting Officers
All Ministries, Departments and Agencies
All Local Governments



UGANDA'S SOCIAL SAFEGUARD POLICIES

I am writing in reference to the above subject. Further reference is made to the Anti-Homosexuality Act, 2023 (AHA) that came into force on 30th May 2023.

Following the World Bank Group's concern with Uganda's enactment of the Anti-Homosexuality Act, 2023 and as communicated in the Budget Execution Circular of FY 2023/2024 on 18th July 2023, we guide that;

- All World Bank-financed projects must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements.
- Under these projects, no person will be discriminated against or stigmatized and the principles of non-discrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring where applicable.
- Each project implementing entity shall develop comprehensive guidelines to address non-discrimination.

Mission

"To formulate sound economic policies, maximize revenue mobilization, ensure efficient allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development"

Specific Measures for High Risk Sectors

Health

- The Ministry of Health issued a circular on August 8, 2023 that guarantees access to health care services for all and prohibits the discrimination or stigmatization of any individual who seeks health care services on any grounds.
- The Ministry of Health will widely disseminate and socialize health sector guidelines for the effective implementation of the circular.
- Implementing entities should strengthen grievance redress mechanisms, and third-party monitoring systems in collaboration with national and international partners.

Education

- The Permanent Secretary in the Ministry of Education and Sports on 18th August 2023 issued a circular stating that the Ministry of Education and Sports does not permit any form of discrimination against any persons in the delivery of education services, programs and projects.
- In light of that circular, the Ministry should ensure that there is no discrimination (including any form of bullying) against teachers and students on any grounds.
- The Ministry of Education and Sports will prepare project specific guidelines to address non-discrimination.
- Implementing entities should strengthen grievance redress mechanisms, including an independent hotline and third-party monitoring systems where necessary.



Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

Rt. Hon. Prime Minister, Office of the Prime Minister

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender, Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

The Solicitor General, Ministry of Justice and Constitutional Affairs

The Permanent Secretary, Ministry of Health

The Permanent Secretary, Ministry of Education and Sports

The Permanent Secretary, Ministry of Gender, Labour and Social Development

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This subject please quote No.

BPD 86/179/01



Ministry of Finance, Planning &
Economic Development,
P.O. Box 8147
Kampala, Uganda

10th July, 2023

All Accounting Officers (Central Government, Missions Abroad, and Local Governments)

All Chief Executive Officers of State-Owned Enterprises and Public Corporations

THE BUDGET EXECUTION CIRCULAR (BEC) FOR FINANCIAL YEAR 2023/2024

A. INTRODUCTION

1. This Circular is issued in fulfilment of Article 155 (1) of the Constitution, and Sections 13 (5) and 14 (1) of the Public Finance Management Act, 2015 (Amended).
2. The theme for the FY 2023/2024 Budget has been retained as: **"Full Monetization of the Ugandan Economy through Commercial Agriculture, Industrialization, Expanding and Broadening Services, Digital Transformation and Market Access"**. The Budget for FY 2023/2024 was approved to address the strategic mission of facilitating more Ugandans to join the money economy.
3. The purpose of this Circular is to communicate the following:
 - i. The FY 2023/2024 Annual Cash Flow Plan (**Annex 1**);
 - ii. The Policy, Operational and Administrative Guidelines for execution of the Budget in FY 2023/2024.
4. As you execute the Budget for FY 2023/2024, I urge all Accounting Officers to ensure that all program activities contribute towards addressing the following objectives:
 - i. Completion of public investments with higher multiplier effects on attainment of NDPIII and the NRM 2021-2026 Manifesto;
 - ii. Full-scale implementation of the Parish Development Model (PDM);
 - iii. Enhanced revenue mobilization and collection; and

Minister

"To formulate sound economic policies, maximize revenue mobilization, ensure efficient allocation and accountability for public resources in order to achieve the most rapid and sustainable economic growth and development"

- iv. Ensuring efficiency and effectiveness of Government through rationalization of public expenditure.
5. The key priorities to achieve the above objectives are detailed in the approved Budget for FY 2023/2024. For ease of reference, please follow the link <https://www.budget.finance.go.ug> to access the following key documents, among others:
- i. The Budget Speech for FY 2023/2024;
 - ii. Approved Estimates of Revenue and Expenditure Volume I (Central Government Votes and Missions Abroad);
 - iii. Approved Estimates of Revenue and Expenditure Volume II (Local Governments); and
 - iv. Approved Estimates of Revenue and Expenditure Volume III for the State-Owned Enterprises and Public Corporations.

B. THE ANNUAL CASH FLOW PLAN FOR FY 2023/2024

- 6. In accordance with Section 36 (b) of the PFM Act 2015 (Amended), the Annual Cash Flow Plan for FY 2023/2024 has been generated off the Program Budgeting System (PBS) based on the quarterly projections in your respective Vote work plans for FY 2023/2024.
- 7. The purpose of the Cash Flow Plan is to guide and ensure that Government maintains sufficient liquidity to be able to sustain and make timely payments to meet service delivery requirements by aligning Vote cash inflows and outflows to your respective Program Implementation Action Plans (PIAPs).
- 8. In view of the above, and in line with Sections 15 and 21 (i) of the PFM Act, 2015 (Amended), all Accounting Officers are urged NOT to overcommit the vote budgets beyond the Annual Cash Flow Plan issued in this Circular. Furthermore, you should submit expenditure commitments, in line with the PIAPs, indicating the actual forecast commitments and the cash position of your respective Votes as per Section 16 (i) of the PFMA, 2015 (Amended) to inform decision-making on the subsequent quarterly expenditure releases.



C. POLICY DIRECTIVES, ADMINISTRATIVE AND OPERATIONAL GUIDELINES FOR IMPLEMENTATION OF THE BUDGET FOR FY 2023/2024

Policy Directives

- 9.** The FY 2023/2024 Budget allocations directed resources to program areas meant for enhanced socio-economic transformation for all Ugandans through job and wealth creation, and increasing household incomes, by targeting the 39% of Ugandans still in the non-money economy. All Accounting Officers are urged to adhere to the following policy directives that guided the preparation of the Budget for FY 2023/24:
- i. Fund key Government priorities to increase the momentum in socio-economic transformation, for example: the standard-gauge railway, the meter-gauge railway, solar-powered irrigation, PDM, *Emyooga*, road maintenance, coffee value addition, vaccines and pharmaceutical manufacturing etc.;
 - ii. Support development initiatives that drive private sector growth;
 - iii. Implement only ongoing projects and other multi-year commitments as approved in the Budget;
 - iv. Halt new non-concessional projects, except those already provided for in the fiscal framework, or those with no direct or indirect claim on the Consolidated Fund;
 - v. Hold back any recruitment plans in FY 2023/2024 except on a replacement basis where the resources are already available;
 - vi. No travel abroad, except for critical positions of the Executive, Legislature, Judiciary, security, diplomatic relations and resource mobilization; and
 - vii. **NO** purchase of new vehicles except hospital ambulances, tailored vehicles for medical supplies/distribution, and for agricultural extension services, security and revenue mobilization.

Non-Discrimination

- 10.** Accounting Officers should ensure that all projects (whether Government of Uganda or externally funded) are implemented within the provisions of Article 21 (1) and (2) of the Constitution and Section 13 (11) (e) (i-ii) of the Public Finance Management Act, 2015 (Amended). This emphasizes equality of all persons in access to all opportunities and benefits presented by the above projects, without prejudice and discrimination on the ground of sex, race,

color, ethnic origin, tribe, birth, creed or religion, social or economic standing, political opinion or disability.

Advertising by Ministries, Agencies and Local Governments

11. In his letter of Ref. No. PO/3 dated 6th March 2023, H.E. The President directed that in FY 2023/2024, **"all Government advertising must be through the Uganda Broadcasting Corporation. Any Accounting Officer who deviates from this will be sanctioned including dismissal"**. Print media advertising should be done through the New Vision. I therefore urge all Accounting Officers to strictly adhere to this directive.

Contracting in Ugandan Shillings versus Foreign Currencies

12. I have received numerous requests from a number of Ministries, Departments and Agencies (MDAs) to undertake contracts in foreign currency, especially in United States Dollars and Euros. In line with the fiscal and monetary policies agreed with Bank of Uganda, I wish to reiterate this Ministry's position that no procurements should be undertaken in foreign currency as previously communicated in FY 2016/17, FY 2017/18 and FY 2018/19. Contracting in the local currency, is meant to preserve the sanctity and value of the Shilling since the budget is appropriated in the local currency which is easily convertible.
13. Therefore, this is to guide all Accounting Officers as follows:
 - i. That all contracts for works, goods and services shall be awarded in Ugandan Shillings to hedge against cost overruns due to global forex rates fluctuations that impact on the stability of the Shilling; and
 - ii. All contracts, including those that follow international competitive bidding procedures, shall be quoted in Ugandan Shillings. The only exemption will be where it is clearly expressed in the financing agreements with Development Partners to use other currencies in the bidding process, if necessary. This should be strictly the exception and not the norm. I request the Honorable Attorney General's chambers to take note and enforce this guideline while approving agreements.



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IN ANY CORRESPONDENCE ON



Ministry of Health
P. O. Box 7272
Plot 6, Lourdel Road
KAMPALA
UGANDA

THIS SUBJECT PLEASE QUOTE NO. **ADM:180/01**

THE REPUBLIC OF UGANDA

5th June 2023

Circular

All Hospital Directors, National and Regional Referral Hospitals
All District Health Officers
All Medical Superintendents
All Health Facility In-charges
Executive Directors of Implementing Partners
Executive Directors of Faith Based Medical Bureaus
The Executive Director Uganda Healthcare Federation

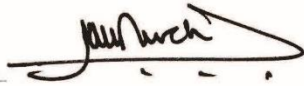
PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DESCRIMINATION

The constitution of the republic of Uganda recognises that health is a fundamental right and guarantees access to health care services for all. The Ministry of Health is mandated to provide Preventive, Promotive, Curative and Rehabilitative Health Services to all people in Uganda in their diversity **without any form of discrimination**. Furthermore, all services should be provided in a manner that ensures **Safety, Privacy and Confidentiality to all clients that seek health services in all facilities, both Public and Private.**

The Ministry of Health therefore reminds all health care workers and stakeholders about the above National commitments, and reiterates the following;

- **Not to deny services to ANY client who present themselves for services.**
- **Not to discriminate or stigmatize any individual who seeks health care services, for any reason – gender, religion, tribe, economic status, social status or sexual orientation.**
- **Patient rights and ethical values – Confidentiality, Privacy, Patient Safety as stipulated in the Patient's Charter should be upheld each time a patient seeks health care services at your facility**

Your cooperation in this matter is of great importance to improving access to service delivery for all our people.



Dr. Henry G. Mwebesa

DIRECTOR GENERAL HEALTH SERVICES

- cc. Hon. Minister of Health
Hon. Minister of State for Health (GD)
Hon. Minister of State for Health (PHC)
Permanent Secretary, Ministry of Health
All UN Agencies
PEPFAR Coordinator
Head Country Team Global Fund, Geneva
Country Manager, World Bank
Country Director – CDC, USAID, DOD
Director General, Uganda AIDS Commission
Directors, Ministry of Health
All Chief Administrative Officers
Registrars, Health Professional Councils

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In any correspondence on
this subject please quote: EPD 191/336/03



Ministry of Education and Sports
Embassy House
P.O. Box 7063
E-Mail: permasec@education.go.ug
Website: www.education.go.ug
Kampala, Uganda

18th August 2023

All Heads of Education Institutions

PROVISION OF EDUCATION SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

The Government of Uganda recognizes the Constitutional social objective to ensure all Ugandans enjoy rights, opportunities and access to education. Under our education objectives, the State is obligated to promote free and compulsory basic education, afford every citizen equal opportunity to attain the highest educational standard possible, and facilitate individuals, religious bodies and other non-governmental organizations to found and operate educational institutions if they comply with the general educational policy of the country and maintain national standards.

The Ministry is implementing the Gender in Education Policy which provides for equitable access to education for all without discrimination. To operationalize the Policy a number of policy strategies and guidelines exist including the National Strategy of Elimination of Violence Against Children, the Life Skills Toolkit, manuals on growth and sexual maturation. In addition, the Ministry has incorporated Sexuality Education into the curriculum to ensure age-appropriate information to enable young people to maneuver through the different challenges of life.

The purpose of this Circular, therefore, is to reiterate Article 21 (1) of our constitution with states that "All persons are equal before and under the law in all spheres of political, economic, social and cultural life and in every other respect and shall enjoy equal protection of the law". The Ministry does not condone any forms of discrimination and exclusion of any persons, in delivery of education services, programs and projects.

You are, therefore, called upon to observe and ensure the above standards in the delivery of education services, programmes and projects.

Ketty Lamaro
PERMANENT SECRETARY

Cc: First Lady and Hon Minister of Education and Sports
Ministers of State, Education and Sports

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Our Ref: ADM 12/01
Your Ref:

Date: 25th August, 2023

CIRCULAR NO.18/2023

All Prosecutors,
Office of the Director of Public Prosecutions.

**RE: MANAGEMENT OF CASES WITH CHARGES PREFERRED UNDER THE
ANTI-HOMOSEXUALITY ACT 2023.**

The Anti-Homosexuality Act (AHA) came into force on 30th May 2023. It has come to the attention of management that a number of charges of Homosexuality and Aggravated Homosexuality are now being preferred by some officers without internalizing some crucial aspects of the act.

It is important to note that the AHA only criminalises offences where a sexual act has been performed. The term "*sexual act*" is defined under Section 1 of the Act.

It is also important to note that Sections 2 (5) and 3 (5) of the AHA provide that "*for the avoidance of doubt, a person who is alleged or suspected of being a homosexual, who has not committed a sexual act with another person of the same sex, does not commit the offence of homosexuality under this section*".

Officers are therefore advised to peruse files with offences under the AHA cautiously while taking into account the abovementioned provisions.

You are hereby directed to ensure that all files with charges preferred under the AHA should first be submitted to Headquarters with a written legal opinion for further guidance before a decision to charge is made.

Management will soon organize sensitization meetings for all officers on the key aspects of the AHA.

A handwritten signature in black ink, appearing to read 'JFABodo'.

Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS

Annex 13: Enhanced Implementation Support and Monitoring on Non-Discrimination

The World Bank and IFC have hired an international and credible entity (firm, agency) with a strong knowledge of the Ugandan context and a track record of enhanced third-party implementation support and performance monitoring to undertake the tasks described in this section for all projects presently being implemented in the Uganda portfolio. The entity is expected to work with NGO/CSOs and country-based development partners.

The Enhanced Implementation Support and Monitoring (EISM) will primarily focus on supporting project teams to implement mitigation measures to address grievances and concerns from beneficiaries, communities, and workers relating to discrimination from project benefits.

The objectives of the Enhanced Implementation Support and Monitoring include:

- Assisting project teams to enhance existing project-level grievance mechanisms and develop and operate an independent mechanism that would identify, manage, and monitor cases of discrimination.
- Assisting the WB in strengthening the capacity of PIUs, workers, and contractors, subcontractors, and service providers.
- Ensuring contracts, codes of conduct, hiring procedures, whistle-blower protection protocols, and other measures, as needed, are in place to allow remediation of cases of discrimination.
- Develop a strong data management system and process that secures personal data and information in a manner that is safe, ethical, and confidential.
- Where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the Bank, propose appropriate remediation, and follow up on agreed actions to resolve the cases.
- Support the WB/IFC to monitor the efficacy of the agreed measures to mitigate the impacts on WB/IFC financed operations.

Table 17 illustrates the enhanced implementation support and monitoring steps. Figure 8 contains the Enhanced Implementation Support and Monitoring process. Figure 9 contains the Complaint Management for vulnerable or marginalized individuals or groups.

1. SCOPE OF WORK AND ACTIVITIES

To provide enhanced implementation and monitoring support to the World Bank/IFC operations in Uganda the EISM will:

1.1 Establish an effective and confidential mechanism to receive, manage, refer, and monitor grievances related to discrimination across the WB/IFC portfolio.

To do so the EISM will:

- **Enhance existing project-level grievance redress mechanisms** to safely, ethically, and coincidentally receive cases related to discrimination on World Bank/IFC financed operations and refer them to an appropriate grievance handling mechanism.
- **Design and operate a mechanism for receiving grievances** related to discrimination on WB/IFC financed operations (including from project level grievance mechanisms noted above).

- **Establish a hotline or an alternative complaint mechanism**, for individuals to lodge complaints of discrimination on WB/IFC financed projects or voice their concerns without fear of reprisal. The EISM is an alternative to lodging complaints through a GOU-led project-level GRMs

NOTE: The EISM firm has established a nationwide GRM hotline – 0800 333125, designed specifically to receive grievances or concerns from vulnerable or marginalised individuals or groups that may be discriminated against or excluded from benefiting from all World Bank and IFC financed projects due to enactment of the AHA. The hotline is hosted and operated by a local NGO. The NUSAF IV Project will also benefit from the same hotline.

Table 17: Enhanced Implementation Support and Monitoring Steps	
Act as a key first step in the referral process from project-level GRMs Designed specifically to handle complaints restricted to WB/IFC projects	
Step 1	Receives and document complaints of discrimination in accessing WB/IFC projects' benefits, services, and opportunities.
Step 2	Develops specific security protocols to ensure that communications are safe, ethical, and confidential.
Step 3	Establishes a data management system on an international server guaranteed by the provider as safe and secure encryption and privacy.
Step 4	Implements a data privacy and protection policy to include confidentiality clauses to be signed by all personnel entrusted with managing referrals or referral-related information.
Step 5	Handles complaints in a confidential, anonymous, and non-judgmental manner which is sensitive to local context and in local languages.
Step 6	Provides detailed monthly reports of complaints received to the WB/IFC
Step 7	Provides ad hoc incident reports of all allegations to WB/IFC within 48 hours of receipt.
Step 8	Reports grievances to the WB/IFC, proposes appropriate remediation, and follows up on agreed actions to resolve the case.
Step 9	Maps available services for vulnerable or marginalized individuals or groups including counselling, legal services, protection, and other services.
Step 10	Refers individuals to the appropriate local services or organizations as needed.
Step 11	Regularly evaluates the effectiveness of mitigation measures to determine whether and how well the mitigation measures are functioning.

Step 12	Recommends and supports the implementation of adjustments to mitigation measures based on regular evaluations and their impact.
---------	---

1.2 Outreach and sensitization to project beneficiaries and communities involved with the World Bank/IFC Bank/IFC Portfolios.

Activities related to Outreach and sensitization to project beneficiaries and communities include:

- **Assist the WB/IFC to prepare and implement a plan to disseminate information** about the support provided by the entity including support to existent GRMs.
- **Prepare community/beneficiary information materials** on their rights within the Constitution of Uganda and World Bank/IFC policies informed by various official circulars issued by the GOU on non-discrimination and World Bank/IFC policies.
- **Develop and implement a methodology to conduct periodic outreach to beneficiaries/communities** to hold consultations on non-discrimination to identify issues and risks in a safe, ethical, and confidential manner.

1.3 Capacity strengthening and technical support

Activities related to capacity strengthening and technical support include:

- **Support to the WB/IFC on training** of government staff and private sector consultants/clients, workers, and contractors on non-discrimination by developing training materials, identifying venues, providing trainers, etc.
- **Support to the WB/IFC with training project level GRMs** on non-discrimination in World Bank and IFC financed Projects by developing training materials, identifying venues, providing trainers, etc.
- **Preparing training modules for call center operators, data management personnel, and community outreach personnel** on appropriate handling of sensitive information.
- **Providing technical support to the GOU for the development of Guidelines** on Nondiscrimination of Workers.

1.4 Monitoring and Evaluation

Activities related to monitoring and evaluation include:

- **Developing a system to regularly monitor WB/IFC projects** for 1) implementation of agreed GOU actions to mitigate the risk of discrimination on WB/ IFC projects, 2) incidents of discrimination on World WB/IFC financed projects.
- **Regularly evaluating the effectiveness of mitigation measures** to determine whether and how well the mitigation measures are functioning to improve WB/IFC awareness of incidents of discrimination on WB/IFC financed operations.
- **Recommending and supporting the implementation of adjustments to mitigation measures** based on regular evaluations and their impact.

3. Roles and responsibilities

The GOU and its PIUs remain responsible for the implementation of all project activities including mitigation measures supported by the EISM. The enhanced implementation and monitoring support mandate is specifically focused on:

- 1) supporting the WB/IFC to ensure the agreed measures on non-discrimination in the portfolio are implemented fully, ethically, safely, and to an appropriate standard of quality; and
- 2) to support the WB/IFC to enhance our awareness of cases of discrimination across the WB/IFC portfolio.

The GOU will facilitate the work of the Entity and collaborate as needed on all activities requiring their direct involvement, such as outreach and sensitization activities, capacity strengthening and technical support as well as the monitoring and evaluation of mitigation measures. The GOU will also ensure that the work under the EISM can be undertaken safely in accordance with existing circulars and their dissemination.

Figure 9: Description of Enhanced Implementation Support and Monitoring (EISM) Process

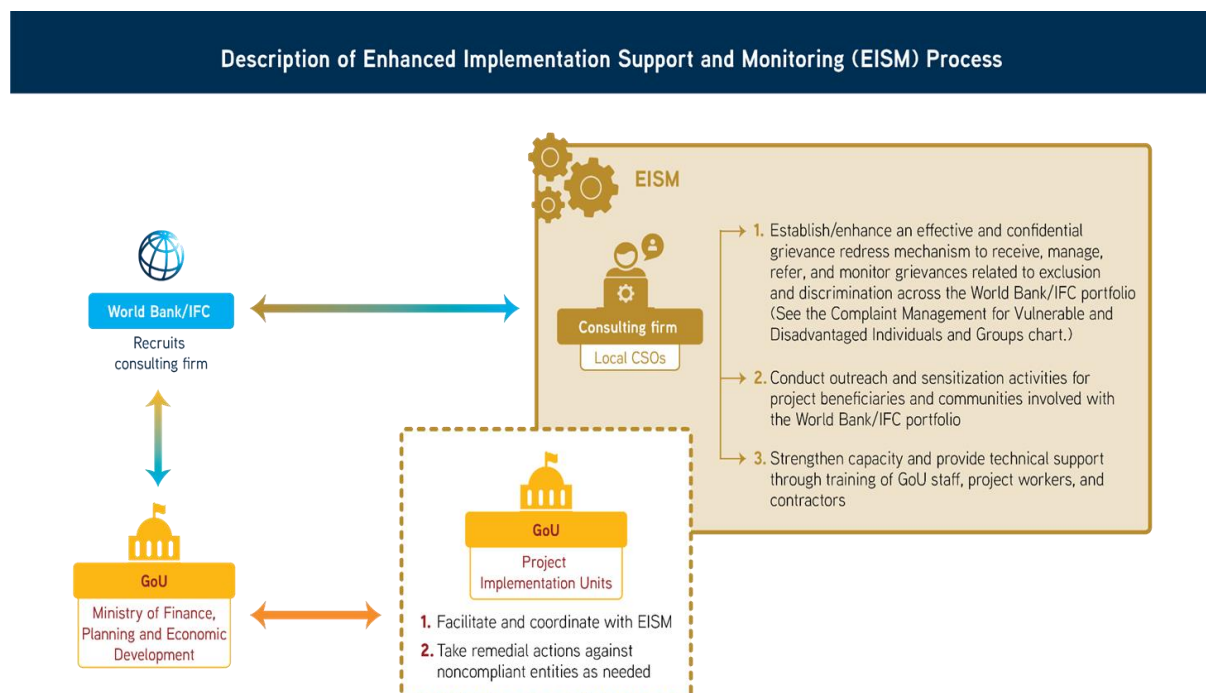
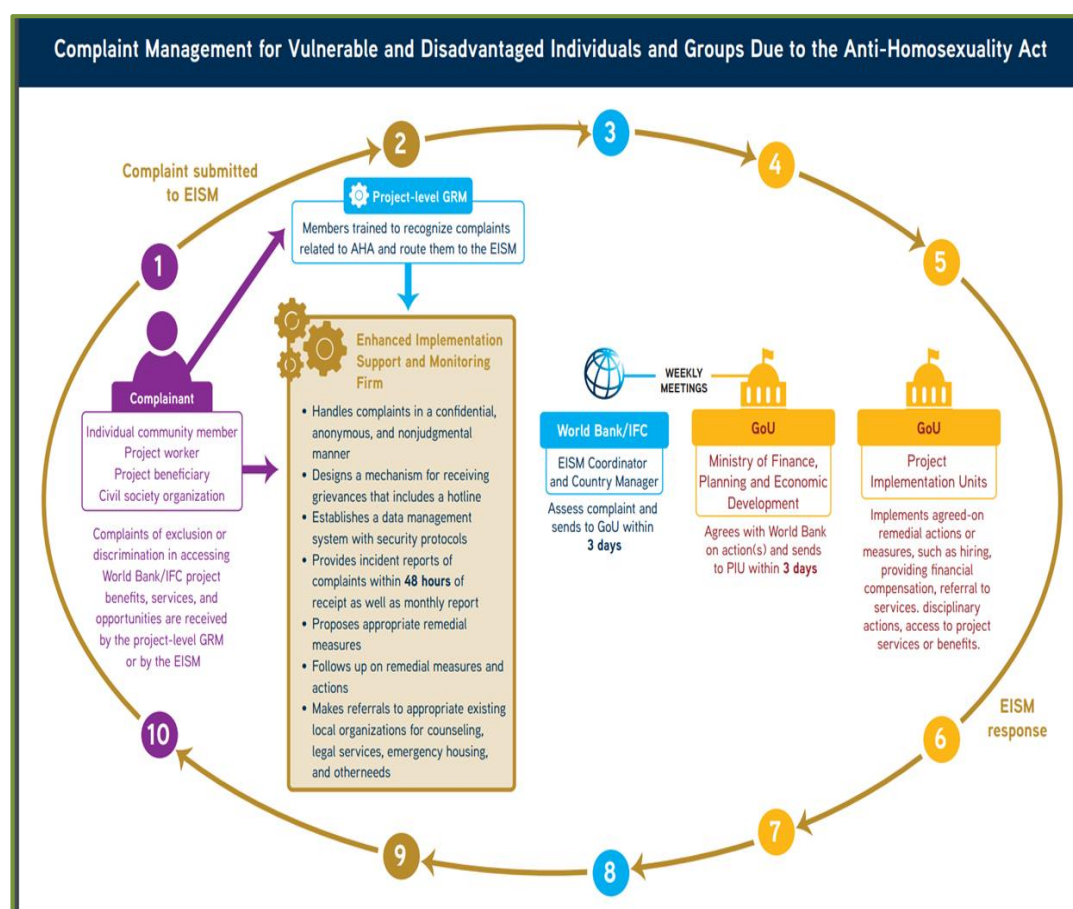


Figure 10: Complaint Management for Vulnerable and Disadvantaged Individuals or Groups due to AHA



Annex 14: Guidelines for Implementing Mitigation Measures to Address AHA-Related Risk

In July 2024, following the enactment of the Anti-Homosexuality Act (AHA) of 2023, the Environmental and Social documentation and its annexes including ESMF, RPF, SEPs, POMS etc. for all ongoing projects in the Ugandan portfolio were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank-financed projects and programs in Uganda. This ESMF for NUSAF IV includes such mitigation measures in various sections as appropriate.

The measures involve ensuring access to a project-level Grievance Redress Mechanism (GRM), establishing a dedicated hotline for receiving AHA-related complaints, requiring contract clauses and codes of conduct on nondiscrimination, and training project workers and contractors and community outreach activities on Inclusion and Nondiscrimination (IND).

Through a competitive process, the World Bank and International Finance Corporation (IFC) have contracted an international firm SREO Consulting Ltd. (SREO) to support the implementation of the mitigation measures. SREO will partner with local Civil Society Organizations (CSOs) and/or individuals with expertise and experience in inclusion and nondiscrimination in Uganda.

The World Bank will support the Ugandan government in the rollout of the mitigation measures through Enhanced Implementation Support and Monitoring (EISM), targeting PIUs including the PIST for NUSAF IV, contractors, subcontractors, frontline service providers, and local stakeholders, as required and set out in the environmental and social documentation.

This annex presents guidelines on how to implement the mitigation measures, including main steps and the roles and responsibilities of task teams, the Ugandan government, PIUs/PISTs, the World Bank, CSOs, SREO, and other stakeholders.

Steps for Implementing Mitigation Measures

Depending on the status of a particular project, the following steps may or may not be followed sequentially. One or more of the steps might not be relevant to a project, or it might be possible to accomplish two or more steps at the same time.

SREO and the relevant World Bank task team leader, social development specialist, and PIU/PIST should discuss and agree on the relevance and sequence of steps prior to their implementation.

1. Assess the Status of the Project

The approach, type, and level of effort will vary depending on a project's implementation status:

- **Ongoing projects.** Ongoing projects require retrofitting to include mitigation measures. Such projects should be considered high priority for monitoring because of the existing risk of discrimination.
- **Early-stage projects.** Projects at an early stage of implementation require retrofitting to include mitigation measures, but the need for monitoring is not as urgent as for ongoing projects. The priority level for early-stage projects will depend on the status of activities on the ground and whether or not a PIU and service providers are in place.
- **Closing and closed projects.** Projects that have closed since the enactment of the AHA or that will be closing in the next six months require a due diligence review to assess if there are any outstanding complaints or issues related to the discrimination of vulnerable or marginalized individuals or groups and if any remedial measures are needed.

The results of the due diligence should be incorporated into the standard environmental and social closure review unless it has been completed already. No further action is needed.

- **Pipeline projects.** A project that has not yet begun implementation provides the opportunity to integrate AHA risk mitigation measures and monitoring into its design.

NUSAF IV as a pipeline project has presented such an opportunity to integrate these mitigation measures and monitoring into its design.

2. Enhance Existing Project-Level Grievance Redress Mechanisms and Establish a Hotline

SREO will distribute a questionnaire to World Bank and PIU/PIST social development specialists to assess existing project-level GRMs. Based on a review of responses, it will recommend actions that the PIU/PIST or service providers can take to improve the GRMs.

With the support of SREO, the PIU/PIST and the social development specialist will revise the project GRMs to include effective, safe, ethical, and confidential referral pathways, ensuring that individuals or groups feel secure reporting incidents and that grievances are addressed quickly, efficiently, and appropriately.

SREO will provide training to GRM staff so they can recognize AHA-related complaints and route them to the EISM. The enhanced process will enable the PIU/PIST to identify complaints of exclusion or discrimination sent to the GRM and forward them to SREO within 48 hours of receipt.

Hotline on Discrimination and Exclusion

SREO has designed and operates a hotline (0800 333125) as an alternative way to receive complaints about the exclusion or discrimination of vulnerable or marginalized individuals or groups related to accessing benefits, services, or opportunities in World Bank/IFC operations. The design of the hotline will allow it to:

- Receive complaints in a confidential, anonymous, and nonjudgmental manner that is sensitive to local context and available in local languages.
- Compile detailed monthly reports of complaints.
- Advise complainants on remedial actions.
- Map available services for vulnerable or marginalized individuals or groups, including counseling, legal services, and protection.
- Refer individuals to appropriate local services or organizations.
- Implement a data privacy and protection policy that includes confidentiality clauses which must be signed by all personnel handling referrals
- Establish a data management system that guarantees safety through secure encryption and privacy protocols.
- Develop specific security protocols to ensure communications are safe, ethical, and confidential.
- Ensure all grievance mechanisms have appropriate whistle-blower protection protocols in place that enable safe reporting.

World Bank's Grievance Redress Service. In addition to the enhanced project-level GRM and the dedicated hotline, the World Bank has developed a specific window under its existing Grievance Redress Service (GRS) to manage complaints related to any World Bank project globally. A protocol has been developed to process all complaints related to exclusion or discrimination in the Uganda portfolio.

3. Conduct Outreach and Sensitization Activities

The World Bank team, PIUs/PISTs, and service providers should contact SREO to assist with:

- The preparation and implementation of a plan to disseminate information about existing GRMs and the dedicated hotline.

- The development and implementation of outreach activities on nondiscrimination delivered to beneficiaries and communities in a safe, ethical, and confidential manner.

4. Strengthen Capacity and Deliver Technical Support

The World Bank team, PIUs/PISTs, and service providers should contact SREO to assist with:

- Training workers, contractors, and project-level GRM staff on nondiscrimination and inclusion, including developing training materials, identifying venues, and hiring trainers.
- Delivering any other needed technical support related to the implementation of the mitigation measures.

SREO will prepare training modules for call center operators, data management personnel, and community outreach personnel on the appropriate handling of sensitive information given the AHA context.

5. Conduct Monitoring and Evaluation

Task team leaders, social development specialists, PIUs/PISTs, and service providers should contact SREO to:

- Support the monthly and quarterly monitoring and evaluation of the implementation of agreed measures and actions to mitigate the risk of exclusion and discrimination and to reduce incidents of discrimination or exclusion due to the AHA.
- Provide comments on regular evaluations of the effectiveness of mitigation measures.
- Offer feedback on recommendations and support the implementation of adjustments to mitigation measures based on their effectiveness.

6. Take Remedial Action

When a discrimination or exclusion complaint is reported to the dedicated hotline, the following process should be followed:

- SREO will report the grievance to the World Bank, propose appropriate remedial actions, and follow up on agreed actions to resolve the case.
- The World Bank's EISM coordinator and country manager will assess the complaint and then forward it to the Ministry of Finance, Planning and Economic Development. If the Ministry does not object to the World Bank's recommendations, they will be forwarded to the PIU/PIST.
- The PIU/PIST is responsible for implementing the agreed measures, which might include training and retraining, hiring, offering financial compensation, providing service referrals, taking disciplinary actions, and providing access to project services and benefits.

Roles and responsibilities for the Implementation of Mitigation Measures

The different steps presented are guidance on the how to do and the sequencing for the implementation of the mitigation measures bearing in mind that the sequencing can vary from one project to another, and activities done in parallel in some instances. Each Step identifies the roles and responsibilities of the

GOU, PIU/PIST, WBG, CSOs and SREO. The roles and responsibilities are summarized in this section in table 18.

This section also provides more specific information on roles and responsibilities to implement the mitigation measures of the EISM firm RSEO and the PIUs/PIST. The mitigations measures identified in the Projects' environment and social instruments will be implemented by the GOU through the PIU/PIST with the support of the EISM firm RSEO hired by the World Bank with NGO/CSOs and country-based development partners in implementing these mitigation measures. SREO's specific responsibilities include:

- Helping project teams improve existing project-level grievance redress mechanisms, and developing and operating an independent mechanism to identify, manage, and monitor cases of discrimination.
- Developing a robust data management system and process that secures personal data and information safely, ethically, and confidentially.
- Working with the World Bank to strengthen the capacity of PIUs/PISTs, workers, contractors, subcontractors, and service providers.
- Ensuring that contracts, codes of conduct, hiring procedures, whistle-blower protections, and all other needed protocols are in place to remediate cases of discrimination.
- Supporting the World Bank in monitoring the efficacy of the agreed mitigation measures.
- Reporting complaints of discrimination to the World Bank, proposing appropriate remedial actions, and following up on agreed actions to resolve cases.

With the support of SREO, PIUs/PISTs are responsible for implementing mitigation measures as described in the environmental and social instruments, including:

- Developing training, sensitization, information, educational, and communication materials on the principle of nondiscrimination of individuals or groups who are vulnerable or marginalized.
- Conducting consultations on nondiscrimination with targeted external stakeholders, including NGOs, CSOs, local governments, and other stakeholders, as appropriate.
- Integrating clauses on nondiscrimination and codes of conduct on nondiscrimination into all project contracts, which must be signed by all contractors, subcontractors, and service provider staff.
- Reviewing all relevant policy and protocol documents, including those for human resources and whistle-blower protections.
- Facilitating the monitoring of all measures to ensure their implementation, that all reported incidents are shared with the World Bank, and that they are addressed promptly.

Table 18: Roles and Responsibilities for the Implementation of Mitigation Measures

Government of Uganda

- Facilitating the implementation of mitigation measures under the leadership of the Ministry of Finance, Planning and Economic Development and through PIUs.
- Following up on reported cases of discrimination in coordination with the World Bank EISM coordinator and country manager.
- Achieving agreement with the World Bank on remedial actions and forwarding recommendations to PIUs.

Project Implementation Units/Project Implementation Support Teams

- Reviewing and enhancing project-level GRMs.
- Ensuring the implementation of mitigation measures.
- Facilitating capacity strengthening and community outreach efforts.
- Implementing agreed-on remedial actions and measures.

World Bank (task team leaders, social development specialists, and the EISM coordinator)

- Supporting capacity strengthening and training sessions.
- Facilitating communication between SREO and the Ugandan government, SREO and task team leaders, and SREO and PIUs/PISTs.
- Overseeing the remediation of reported cases, makes recommendations, and follows up to ensure their resolution.

Civil Society Organizations

- Hired by the EISM firm (SREO) to coordinate the monitoring of activities in Uganda.
- Participate in capacity-building and outreach activities to disseminate information about the hotline and the GRS to relevant populations.
- Receive and manage referrals for issues outside the EISM's scope.

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- Establishes a dedicated hotline and assists PIUs/PISTs in improving existing GRMs.
- Conducts outreach and sensitization activities.
- Provides capacity-strengthening and technical support to PIUs/PISTs.
- Monitors and evaluates discrimination complaints.

Annex 15: Voluntary Land Donation Protocol and procedure

1. Introduction: Voluntary Land Donation (VLD) is a process whereby individuals or communities willingly and without any form of coercion or duress offer their land for development projects. This is done with informed consent, meaning the land donors fully understand the implications of their donation, the benefits of the project, and the alternatives available to them. The land donors must have the power of choice, ensuring that they can freely decide whether to donate their land or not.

The NUSAF IV subcomponents will support the construction, rehabilitation, and upgrading of priority infrastructure identified by communities through the Community-Driven Development (CDD) approach to address ongoing infrastructure and service delivery needs. As a result, land will be required thus impacting the land holdings of individual farmers, community members, and other property owners. As a precautionary measure, the VLD Protocol or procedures will be implemented to encourage and manage the donation of land by community members for the development of the proposed investments. These procedures will ensure that land donations are voluntary, transparent, and beneficial to the community, while minimizing any negative impacts on beneficiary communities.

2. Principles of Implementation: Implementation of the NUSAF IV project will be grounded on several principles, including the principle of intensive community participation and contribution to the development effort. This will help foster a sense of ownership, transparency, and sustainability. Considering that NUSAF IV project implementation will follow the CDD Model, identification and location of investment projects can either be on public, communal, institutional, or private land.

Land for varied project investments will strictly be acquired through VLD procedures- land voluntarily donated for project investments without monetary conditions attached across the different land tenure regimes in the project areas. To avoid and minimize land acquisition risks, preference will be given to the establishment of investments in already established public institutions as well as on public land. However, in instances where public land cannot be secured, or private land is the best/only option, the latter will be secured through voluntary donation. The voluntary offers must be regularized and properly documented using “Standard Land Offer Forms” (see Annex 1 and 2, Donation Consent Form) with sufficiently binding clauses (guided by a lawyer). The “Standard Land Offer Form” will be fully signed by all key parties, including the land donor/spouse/children above 18 years, respective project beneficiaries represented by the respective Chairperson/s, and witnessed as well as authenticated by the area land committee plus local leaders i.e. LC1 and LC3 Chairpersons (See Table 1).

3. Procedures for Voluntary Land Donation: Following collection of information regarding land and assets that will be impacted by the Project, a land survey map will be prepared by responsible officials. The procedure below shall be followed:

- Extensive Sensitization: - shall be undertaken to mobilise community contribution and raise awareness that the project does not compensate for land and assets.
- Participatory Land Identification: - shall be with the active involvement of the affected community/individual and other relevant stakeholders guided by the principle “Free, Prior, Informed Consent (FPIC)”.
- Public Consultations and disclosure: - public meetings shall be conducted to explain the VLD process, its benefits, get feedback and address any community concerns. Donating land must be based on a full understanding of the sub-projects for which the land is donated and its consequences. The affected parties (the owners and users of the land) must be provided with accurate and accessible information about the purpose of the land, for how long it will be needed, and the impact of the donation to the affected

parties. Prior written notification indicating the location and size of land that is needed and the intended use for the sub-project shall be provided and disclosed.

- Informed Consent: - shall be based on full understanding of the impacts of proposed activities on the donated land to the donor, the size of land required, and a copy of the “Standard Land Offer Form” shall be shared.
- Confirmation: - that the affected parties agree to donate land/asset should be obtained in-person meeting and stakeholder’s consultation.
- Right of Refusal: - shall be made known to the potential donor as an option and that the right of refusal is specified in the donation document the donor will sign. The act of donation is undertaken without coercion, manipulation, or any form of pressure from public or traditional authorities.
- Livelihood Considerations: - The proportion of donated land may not exceed the area required to maintain the donor’s livelihood or household. Land donation shall not occur if it requires any household relocation or poses adverse impacts on resources and assets.
- Community and Collective Land: - donation can only occur with the consent of all individuals using or occupying the land.
- Verification: - from each person donating land (either through proper documentation or through confirmation by at least two witnesses) shall be obtained. The area land committee and local leaders (LC1 and LC3) must confirm land ownership and authenticate the land offer form.
- Free of Encumbrance: - the land to be donated shall be free from any encumbrances or encroachment and the donated land shall be registered in an official land registry upon acquisition.
- Due Diligence: - shall be undertaken carefully to: (i) identify the right that is being transferred (an ownership right, a user right, a right of way, etc.); and (ii) confirm whether the transferee actually has that right; to avoid conflict in the future. The transferee will have documentary evidence of such right in absence of which due diligence can establish these rights by consulting local community officials and leaders as well as neighbours.
- Legal Agreements: - shall organize a meeting to discuss and agree to the land donation and properly minute the resolution with suitable witnesses or ex-officials in attendance. Draft legal agreements, such as Memorandums of Understanding (MOUs), to formalize the land donation and should include the specific land being donated, and the terms and conditions of the donation.
- Land Offer Form: - The minutes will be used as a trigger to officially fill the “Project Standard Land Offer Form”, a copy of which will remain at the subproject level, a copy kept at the district level, and an electronic copy uploaded into the Project MIS at the Implementing Agency.
- Return of Unused Land: - any unused land for its agreed purpose shall be returned to the donor.
- Grievance Redress Mechanism (GRM): - a clear and accessible GRM shall be established and operationalized to address any concerns that may arise during the donation process and ensure its visibility and how affected parties can use it.
- Documentation: - NUSAF IV/OPM/PIU should ensure that: the consultation has taken place; the terms of the transfer are set out; the decision to transfer was freely made; an accurate map of the land being transferred (boundaries, coordinates) is attached; the period the land user rights will last is set out; all necessary parties sign the documents, including obtaining consent from spouses and ‘children’ over 18yrs; the transfer and title is registered or recorded; the land remaining following the donation is properly

titled, registered or recorded; and there is no disputed ownership and any claims by renters, users, squatters, or encroachers.

- Monitoring and Evaluation: Ensure that OPM/PIU implements the NUSAF IV Project in accordance with the agreed-upon plans and timelines, monitors the progress of the project and the impact of the land donations, and engages with the community regularly to provide updates and gather feedback. OPM shall conduct an evaluation of the subprojects to assess their outcomes and the effectiveness of the VLD process, including preparing reports to document the process, lessons learned, and recommendations for future projects.

The Table below illustrates confirmation of land donation and verification of ownership for the different land ownership categories under the proposed NUSAF IV.

Table 1: confirmation of land donation and verification of ownership

No	Category of ownership	Endorsement/confirmation of donation	Ownership verification
1.	Private Owner/HH	Original legitimate owner, Spouse and Children above 18 years	Area land committee and local leaders (LC1 and LC3)
2.	Public Institution	Institution's management committee	Area land committee and local leaders (LC1 and LC3)
3.	Public land	Communal users and local leaders	Area land committee and local leaders (LC1 and LC3)
4.	Communal land	Communal users/managers in trustee/ custodians and local leaders	Area land committee and local leaders (LC1 and LC3)

NB: For sub projects of tree planting (Component 2), as part of measures to combat climate change, there will be a "Special Land Offer form" that provides room for sharing of benefits between project beneficiaries and landlords from trees planted. This will act as an incentive/motivation to landlords to offer land for tree planting.

Annex 1: Standard Land Offer form

NATIONAL SOCIAL ACTION FUND (NUSAF IV) PROJECT

Consent Form: Voluntary Land Contribution

Name(s) of Landowner(s)	1.	2.
Village:		
Sub-County:		
District:		
Location of Land:		
Village:		
Sub-County:		
District:		
Land Tenure System (Please	Leasehold	Public Customary Freehold Mailo land

tick):	
Land Holding Size (ha):	
Confirmation of Land Ownership	I certify that this land legally or traditionally belongs to the following: of Village , Parish.....Sub- County.....in District LCI Signature Sub-county LC III Signature
Contribution Type (Please tick):	Voluntary without compensation
Period of Use:	Indefinite
Declaration of Landowner(s)	I/We declare that this land belongs to me/us and I/we hereby contribute it voluntarily for a community project Name(s) of Landowner(s) Signature
Name and Type of Development Project:	Name:..... Type:.....
Affidavit of Declaration	I/We declare and transfer Land User/Land Ownership rights of my/our land to the Community Based Organization or Group without any conditions for the development and implementation of the community development project

of Offer by Landowner (s)	described above:	
	Name of Landowner	Signature
	Name of Landowner	Signature

ANNEX 2: COMMUNITY LAND RESOLUTION FORM AND AGREEMENT ON LAND ALLOCATION / USE FOR NUSAF IV PROJECT

TERMS OF LAND USE AGREEMENT

1. This land use agreement is between As beneficiary (ies) of a development project funded under NUSAF IV (Recipient) andAs the landlord (Offeror)
2. We/I the beneficiaries(ry) of discussed and agreed that, shall be site of the proposed
3. That we/I the beneficiaries are aware that the land belongs to..... (The said landlord) and there are no alternative claims on the land.
4. That the 2 (Two) parties have agreed to the investment as described below;
5. That landlord has agreed to transfer land user rights to the beneficiary(ies) for the period of project implementation (.....)
6. That we the beneficiaries have agreed to use the land only for the agreed purpose as described above.
7. That we the beneficiaries have agreed to form a committee/association to manage the investment.
8. That we the beneficiaries will allow key NUSAF IV project stakeholders including Community Structures, District Officials and OPM/NUSAF IV teams to access the site for official purposes such as monitoring, supervision etc.
9. That we beneficiaries shall strive to peacefully resolve any conflicts with other communities concerning the investment and that we would strive to peacefully co-exist and resolve any conflict arising out of the investment facility following due process provided by the laws of Uganda.
10. That we the beneficiaries (in case of a group) would share the benefits of the project investments amongst ourselves equally, fairly and peacefully.
11. Any misunderstanding or complaint that may arise during execution of the agreement will be resolved amicably between the two parties or where necessary mediation by a suitable jointly agreed external party (preferably within the context of NUSAF IV structure).
12. This agreement is subject to renewal upon mutual understanding and agreement between the two parties.

Additional understanding and agreement between the two parties will include as follows;

1.

-
2.
-
3.
-
4.
-
5.
-

Signed:

Landlord /owner(s) –Offeror.

S/No.	Name	Location/Address	Signature
1.			
2.			
3.			
4.			
5.			

Signed by:

Beneficiary(ies)-Land users or authorised agents/representatives.

S/No.	Name	Location/Address	Signature
6.			
7.			
8.			
9.			
10.			

Witnessed on this Day of in the Year.....: by:

1. LC1 Chairperson

Name	Signature & R/Stamp

2. LC3 Chairperson

Name	Signature & R/Stamp

--	--

Any other witnesses deemed appropriate.

Names / Designations.

Signatures

Annex 16: VULNERABLE AND MARGINALIZED GROUPS FRAMEWORK (VMGF)

1.1 Purpose and objectives of the VMGF:

This VMGF has been prepared as part of the ESMF and sets out principles for management of risks that may be occasioned to Vulnerable and Marginalised Groups (VMGs) during implementation of the NUSAF IV project and has undertaken a social assessment to identify potential risks and propose mitigation measures; establish the requirements of ESS7, organizational arrangements, and design criteria to be applied to subprojects or project components required during project implementation when VMGs may be present in, or have collective attachment to, the project area. The VMGF sets out:

- a. The types of subprojects likely to be proposed for financing under the project.
- b. The potential positive and adverse impacts of such subprojects on VMGs.
- c. A plan for carrying out the social assessment for such subprojects.
- d. A framework for ensuring the meaningful consultation tailored to VMGs and in the specified circumstances, a framework for ensuring their Free, Prior and Informed Consultation, when relevant, during project implementation.
- e. Institutional arrangements, including capacity building where necessary, for screening project-supported activities, evaluating their effects on VMGs, preparing VMG Plans (VMGPs) and addressing any grievances.
- f. Monitoring and reporting arrangements, including mechanisms and benchmarks appropriate to the project.
- g. Disclosure arrangements for VMGPs to be prepared.

2. Rationale of the VMGF

The VMGF has been prepared in line with ESS7 of the World Bank's ESF and relevant Ugandan social policies and laws. This VMGF will be used in conjunction with the ESMF and VLD to:

- Address any adverse impacts on the livelihoods of VMGs and/or their assets or resources,
- Propose measures for access to culturally appropriate Project benefits and achieve the mandate of the Equal Opportunities
- Target the VMGs that are internationally considered as Indigenous Peoples (IPs) i.e. the Benet, Tepeth and Ik for NUSAF IV Project.

3. Approach and Methodology in VMGF Preparation

Literature Review. A desk review of key Project documents was undertaken including NUSAF Project Aide Memoire, PAD, ESRS, and ESCP. Others reviewed were Uganda's Vision 2040, National Development Plan (NDPIII), Parish Development Model (PDM), State of Environment Report 2021, Uganda National Social Protection Policy (2015), the Constitution of the Republic of Uganda and other relevant policies and laws among others.

Stakeholder Consultations. ESS 10 recognizes the importance of inclusive and meaningful engagement between the Borrower and project stakeholders as an essential element of good international practice. The stakeholder consultations were planned and carried out betweenXXXXXXXX andXXXXXXXX...

2. UNDERSTANDING THE VMGS UNDER THE PROJECT

2.1 Vulnerable and Marginalized Groups or Indigenous Peoples (ESF). ESS7 refers to a distinct social and cultural group possessing the following characteristics in varying degrees: (i) self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others; and (ii) collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural

resources in these areas; and (iii) customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and (iv) a distinct language or dialect, often different from the official language or languages of the country or region in which they reside. ESS7 contributes to poverty reduction and sustainable development by ensuring that WB supported projects enhance opportunities for VMGs to participate in, and benefit from, the development process in ways that do not threaten their unique cultural identities and well-being.

2.2 Objectives of ESS7. *According to the ESF, the objectives of ESS7 are to:* a) to ensure that the development process fosters full respect for the VMGs; b) avoid adverse impacts of projects on VMGs; c) promote sustainable development benefits and opportunities for VMGs; d) improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with VMGs; e) obtain the Free, Prior, and Informed Consultations (FPIC) of VMGs; e) recognize, respect, and preserve the culture, knowledge, and practices of VMGs, and f) provide them with an opportunity to adapt to changing conditions in a manner and in a time frame acceptable to them.

2.3 Recognizing VMGs in Uganda. *Uganda does not have an official definition of VMGs neither does it have a criterion for their identification.* According to Uganda's 1995 Constitution, there are 65 ethnic groups referred to as its indigenous communities as from the date of 1st February 1926. Ethnic diversity plays a major role in shaping the behaviours and ways of life of people as their cultural and social life differ from one ethnic group to another. The term 'indigenous' as referred to in the Constitution is used to describe the different ethnic groups that have historically resided within Uganda's borders. This understanding differs markedly from the way the term is used by international and regional organizations and by experts on VMGs' issues. Uganda uses ethnic minorities, to the exclusion of other factors, as the only method of identifying VMGs. These groups are not recognized as Indigenous Peoples (IPs) by the GoU which prefers to call them Vulnerable and Marginalized Groups or Ethnic Minorities. Although the Ugandan Constitution does not expressly recognize VMGs, it makes provisions for addressing some of the negative effects arising from ethnic imbalances.

2.4 The Vulnerable and Marginalized Groups of Uganda: *Several ethnic minority groups in Uganda fit the WB's ESS7 definition of IPs or VMGs as they are known in Uganda.* They include the Batwa in South-Western Uganda; the Ik in Kaabong district who live on the edge of the Karamoja - Turkana sub-regions (at the Uganda - Kenya border), Northern Uganda; the Benet on the slopes of Mt Elgon in Kween district (Eastern Uganda), and the Tepeth, who live on Mt. Moroto neighboring the Turkana and Pokot of Kenya in Karamoja.

The VMGs of Uganda are commonly characterised by: (i) historical and continued suffering, disempowerment and discrimination on economic, social, cultural and political grounds; (ii) reliance on their land and environment to sustain themselves both physically and culturally; (iii) threatened livelihoods mainly due to dwindling access to land and natural resources on which they depend as hunters and gatherers; (iv) comparatively lower health and education indicators than those of the dominant community; (v) social exclusion, deprivation and lack of participation in development processes; and (vi) separate economic systems from those of the mainstream or dominant community and tend to have minimal interaction (if any) with the socioeconomic and legal systems of national governments.

The key factors that continue to affect and maintain the marginalization of VMGs in Uganda include: (a) dispossession of ancestral lands including lack of access and/or no control or legal recognition of such land and other natural resources; (b) a focus on modern agriculture versus preservation of livelihoods of hunter and gatherers and pastoralist groups; (c) limited access to education leading to unfair competition for employment opportunities; (d) ignorance and limited access to information on government programs and basic entitlements; (e) limited access to agricultural and other social services such as health; (f) unequal development of

health care and other social infrastructure; (g) limited access to justice and increased conflict and a deteriorating security situation and recurrent inter-ethnic conflicts; and (h) limited access to livelihoods, financial, banking and credit facilities.

Socio-Demographic Information of VMGs. A desk review of the VMGs that meet the ESS7 classification shows that there are varying socio-demographic characteristics that any development intervention should consider. Most of the features demonstrate limited opportunities to access basic development opportunities. Below are descriptions of basic characteristics various categories of vulnerable groups in Uganda.

Gender and other socio-cultural aspects of VMGs in Uganda. Generally, differences in power and gender relations between men and women favour men, and women continue to suffer very high time burdens in pursuing their livelihood strategies (Uganda Gender Policy, 2007). Consultations with men and women revealed the prevalence of this form of negative masculinity. The relationship between the VMGs and their dominant neighbours is characterised by ‘discrimination, marginalisation and stereotyping’. VMG communities have significant cultural sites. Although some of these sites have been gazetted as National Parks or Tourist sites, most members of VMGs still rely on them for subsistence and livelihoods.

Key concerns and issues common to Vulnerable and Marginalized Groups in Uganda. Major challenges and concerns faced by these groups in Uganda include a) exclusion of human activities in protected forests by Ugandan laws, thus nullifying the customary land rights of VMGs; b) limited political participation and their socio-economic rights are ignored by the State and society; and eviction from their homelands which has limited Uganda's VMGs' access to natural forest food, herbal medicine, and shelter leaving some of them plagued by starvation and sickness

3. LEGAL, POLICY AND INSTITUTIONAL FRAMEWORK FOR VMGS

3.1 Revant Legal Framework. Under its National Objectives and Directive Principles of State Policy, the 1995 Constitution of the Republic of Uganda provides that every effort shall be made to integrate all its peoples including ethnic minorities while at the same time recognize the existence of, amongst others, their ethnic, religious and cultural diversity. Therefore, the Constitution requires that everything necessary be done to promote a culture of cooperation, understanding, appreciation, tolerance and respect for each other's customs, traditions and beliefs. However, while the Constitution offers no express protection for VMGs/Ips, Article 32 places a mandatory duty on the State to take affirmative action in favour of groups who have been historically disadvantaged and discriminated against. An equally important relevant constitutional provision with respect to the VMGs communities is contained in the same Article. This article enjoins the state “to take affirmative action in favour of groups marginalized on the basis of gender, age, disability or any other reason created by history, tradition or custom for purposes of redressing imbalances that exist against them.” Consequently, the Constitution mandates Parliament to enact appropriate laws, including laws for the establishment of an Equal Opportunities Commission (EOC), for the purpose of giving full effect to Article 32(1). Thus, while the promulgation of the 1995 Constitution was a positive step in the recognition of the rights of VMGs in Uganda, the provisions fall short of international standards regarding recognition of VMGs/IPs.

3.2 Institutional Framework. The nationwide coverage of the NUSAF IV Project indicates the participation of various government and private institutions in the implementation of this VMGF including their roles and responsibilities.

Office of the Prime Minister: - The Project will be led by the OPM in coordination with participating district local governments for technical support through the multisectoral technical planning committees. The project will select and finance technical partners (NGOs or consulting firms) that have proven experience in working with farmers and private sector off-takers to create links (for agricultural activities) and with micro entrepreneurs. These

partners will support in the identification of beneficiaries, deliver the capacity building (including soft skills and entrepreneurial skills), engage with private sector off-takers, and act as broker agents (for agricultural activities). In addition, the project will recruit mentors (called CBA) and support links to markets and financial institutions, learning from the effectiveness of this mechanism under NUSAF 3 as well as incorporating lessons from other economic inclusion and entrepreneurship programs worldwide. The OPM will ensure that the required instruments for managing E&S risks with emphasis on VMGs are prepared and implemented including: VMGPs, ESCP, ESMF, SEP, ESIA, and ESMPs.

Ministry of Gender, Labour and Social Development: - The MGLSD mandate is to empower communities to harness their potential through cultural, growth, skills development and labour productivity for sustainable and gender responsive development. The vision of the Ministry is “a better standard of living, equity and social cohesion, especially for poor and vulnerable groups in Uganda.” The mission of the ministry is “promotion of gender equality, labour administration, social protection and transformation of communities”.

The Uganda Human Rights Commission (UHRC): - The UHRC is Uganda’s national human rights institution created by the Constitution, with the mandate, amongst others, “to investigate violations of human rights and to monitor government compliance with its human rights obligations detailed in the Constitution.” This is in addition to making recommendations to Parliament on measures to promote human rights. The Commission has since its establishment played a very important role in highlighting human rights violations in the country and making recommendations for rectification. The Commission has on several occasions investigated and published its findings regarding the human rights problems of marginalized groups and made recommendations on how these could be rectified.

The Equal Opportunities Commission (EOC): - The mandate of the Commission is “to eliminate discrimination and inequalities against any individual or group of persons on the ground of sex, age, race, colour, ethnic origin, tribe, birth, creed or religion, health status, social or economic standing, political opinion or disability, and take affirmative action in favour of groups marginalized on the basis of gender, age, disability or any other reason created by history, tradition or custom for the purpose of redressing imbalances which exist against them, and to provide for other related matters.” *The EOC also has powers to hear and determine complaints by any person against any action, practice, usage, plan, policy programme, tradition, culture or custom which amounts to discrimination, marginalization or undermines equal opportunity.*

International Work Group on Indigenous Affairs (IWGIA): - IWGIA is an international human rights organization staffed by specialists and advisers on Indigenous Peoples affairs. IWGIA supports IPs' struggle for human rights, self-determination, right to territory, control of land and resources, cultural integrity, and the right to development. The aim was to establish a network of concerned researchers and human rights activists to document the situation of IPs and advocate for an improvement of their rights. IWGIA works at local, regional and international levels to further the understanding and knowledge of, and the involvement in, the cause of IPs. IWGIA publishes a wide range of books, reports, handbooks, and audio-visual material about IPs' rights and the human right situation of IPs around the world. *For the proposed NUSAF IV Project, the IWGIA will work to secure and mainstream IP's rights. They will also ensure that VMGs are not discriminated against in particular ways because of their culture, mode of production and subordinate positions.*

Minority Rights Group International: - Minority Rights Group International (MRG) is a NGO working to secure the rights of ethnic, religious and linguistic minorities and IPs worldwide, and to promote cooperation and understanding between communities. Their activities are focused on international advocacy, training, publishing and outreach. It is guided by the needs expressed by our worldwide partner network of organizations, which represent

minority and IPs. The MRG would be helpful during engagements and sensitisation exercise during project implementation of the NUSAF IV Project's VMGF.

3.3 International Treaties and Commitments on Vulnerable and Marginalized Groups.

This section highlights international and regional commitments and treaties which Uganda is a signatory and are relevant for the framework.

International Labour Organization (ILO): - The first international standard on populations was ILO 107 (1957), was revised and reformulated in 1989 and amended in ILO 169. In this Convention, IPs are defined in Article 1(1) as: i) Tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations; ii) Peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all their own social, economic, cultural and political institutions.

According to a new ILO report, released to mark the 30th anniversary of the Indigenous and Tribal People's Convention 1989 (No. 169), IPs are nearly three times as likely to be living in extreme poverty as their non-indigenous counterparts. The ILO has been engaged with indigenous and tribal peoples' issues since the 1920s. It is responsible for the Indigenous and Tribal Peoples Convention, 1989 (No. 169), the only international treaty opens for ratification that deals exclusively with the rights of these peoples. The ILO's Decent Work Agenda, with gender equality and non-discrimination as a cross-cutting concern, serves as a framework for indigenous and tribal peoples' empowerment. Access to decent work enables indigenous women and men to harness their potential as change agents in poverty reduction, sustainable development and climate change action.

The Vienna Declaration and Program of Action (VDPA), 1993: - The VDPA is a human rights declaration adopted by consensus at the World Conference on Human Rights on 25 June 1993 in Vienna, Austria. The convention emphasizes the need to give great importance to the promotion and protection of human rights of all persons rendered vulnerable including migrant workers.

East African Community Gender Policy, 2018: - The EA Protocol under the Section on Gender, Community Development and Civil Society emphasizes the need to adopt common approaches towards the disadvantaged and marginalized groups, including women, children, the youth, the elderly and persons with disabilities aimed at employment creation, poverty alleviation and improving working conditions.

3.4 The World Bank Environmental and Social Standard (ESS) 7.

ESS 7: Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities/VMGs as preferred to be called in Uganda contributes to the Bank's mission of poverty reduction and sustainable development by ensuring that the development process fully respects the dignity, human rights, economies, and cultures of IPs. For all proposed projects for WB financing that affect IPs, the Bank requires the borrower to engage in a process of meaningful engagement, to promote effective project design, to build local project support or ownership, and to reduce the risk of project-related delays or controversies, the Borrower will undertake an engagement process with affected VMGs, as required in ESS10. This engagement process will include stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation in a culturally appropriate and gender and intergenerationally inclusive manner. For VMGs, the process of meaningful consultation will also: a) involve VMGs' representative bodies and organizations (e.g., councils of elders or village councils, or chieftains) and, where appropriate, other community members; b) provide sufficient time for VMGs' decision-making processes; and c) allow for VMGs' effective

participation in the design of project activities or mitigation measures that could potentially affect them either positively or negatively.

Furthermore, the borrower will obtain the Free Prior and Informed Consultations (FPIC) of the affected VMGs in accordance with paragraphs 25 and 26 of ESS7 in circumstances in which the project will:

- Have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; or
- Have significant impacts on VMGs' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected VMG lives.

The Bank provides project financing only where free, prior, and informed consultation results in broad community support to the project by the affected VMGs. The policy establishes processing requirements: screening, social assessment, consultation with communities involved, preparation of framework and/or plan, and disclosure.

Annex 17: **ESMF Development team members.**

NO	NAME	DESIGNATION	MDA
1.	Caro Brenda Lorica	Project manager-DRDIP	OPM
2.	Nsamba Michael	Social Safeguards Officer -DRDIP	OPM
3.	Sekagya Moses	Environment Officer - DRDIP	OPM
4.	Emmanuel Robert Odeng'	GIS Officer - DRDIP	OPM
5.	Paul Mboya Jabuya	Resource Person - DRDIP	OPM
6.	Namukuve Fauza	Principal environment officer	MWE
7.	Mwodi Martin Kegere	Manager, National Tree Seed Centre - NFA	NFA/MWE
8.	Tonny Kiwanuka	Senior Environmental Inspector	NEMA
9.	Nambozo Constance Hannah	Research Assistant UNMA	MWE
10.	Harriet Asibazuyo	Senior Social Development Officer	MGLSD
11.	Ssentongo Ambrose	Principal General Safety Inspector	MGLSD
12.	Epaitai William	Resource Person – Social Development	MGLSD
13.	Sarah Bisikwa	Natural Resources Officer	Manafwa DLG

14.	Lomongin Joan	Community Development Officer	Napak DLG
15.	Lokongo Paulina	Environment Officer	