



The Republic of Uganda

**The National Uganda Social Action Fund Project
[P179904]**

[Draft]
**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

[May 09, 2023]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN FOR THE NATIONAL UGANDA SOCIAL ACTION FUND (NUSAF)

1. The Republic of Uganda (the **Recipient**) will implement the National Uganda Social Action Fund Project (NUSAF) (**P179904**) (the Project), with the involvement of the Office of the Prime Minister and District Local Governments, as set out in the Financing Agreement. The International Development Association (hereinafter the Association) has agreed to provide financing for the Project as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (**ESSs**), and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Office of the Prime Minister and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient Permanent Secretary of the Office of the Prime Minister. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING: Prepare and submit to the Association regular monitoring progress reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder activities, and functioning of the grievance mechanisms.</p>	Submit Quarterly and Annual reports to the Association throughout the Project Implementation Period, starting 6 months after the project effective date. Submit each report to the Association no later than 15 days after the end of each reporting period.	Office of the Prime Minister-NUSAF-TST
B	<p>INCIDENTS AND ACCIDENTS: Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers <i>including</i> cases of sexual exploitation and abuse (SEA), sexual harassment (SH), accidents that result in death, serious or multiple injuries, child abuse, gender-based violence, pesticide misuse etc. Provide adequate detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, as per the Association’s request, prepare an incident report and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association Task Team Leader (TTL) not later than 48 hours of learning of incident or accident</p> <p>Provide subsequent report to the Association within 7 (seven) working days following the incident/accident. It shall also be reflected in the quarterly reports.</p> <p>Notification/reporting system shall be in place throughout the Project life cycle.</p>	Office of the Prime Minister-NUSAF-TST
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE: Office of the Prime Minister which is the main implementing Agency shall establish and maintain a Technical Support Team (TST) in the form of a 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</p>	Recruit dedicated Environmental Specialist, Social Development Specialist, Gender Specialist, and other staff, at NUSAF-PIU preferably 6 months prior to disbursements and implementation of activities, and	Office of the Prime Minister-NUSAF-TST

	<p>These PIU Specialists will work closely with the decentralized structures at the District including the Environmental officers and community development officers as well as health persons. 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). Health and safety personnel at the district will support; training on health and safety requirement including; HIV/AIDS, first aid management, incident reporting as well as GBV and VAC referrals. They will work closely with other safeguards team at the district, sub county and Village Health Teams who are part of targeted communities.</p>	<p>maintain these positions throughout Project implementation.</p>	
<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/ MANAGEMENT PLANS AND MANAGEMENT OF CONTRACTORS</p> <p>1. Prepare, consult upon, adopt, disclose, and implement the Environmental and Social Management Framework (ESMF) for the Project consistent with the relevant ESSs.</p> <p>Prepare, consult upon, adopt, disclose, and implement the sub-project site-specific environmental and social instruments that include EAs, stand-alone ESMPs including CESMPs, and other instruments required.</p> <p>2. Environmental Assessments (EAs) and corresponding Environmental and Social Management Plans (ESMPs), including contractors ESMPs as set out in the ESMF (pgs 123) in a manner acceptable to the Association.</p> <p>3. The proposed subprojects/ activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> <p>EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project and in Annex 2 of ESMF:</p> <ul style="list-style-type: none"> a) Sub-projects involving significant conversion or degradation of critical natural habitats. b) 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 c) Sub-projects involving the use of unsustainably harvested timber or fuelwood d) Sub-projects supporting commercial logging in forested areas. e) Subprojects requiring use pesticides that are not on the approved list of agro-chemicals 	<p>Adopt the ESMF prior to appraisal, and thereafter implement the ESMF throughout Project implementation.</p> <p>Prepare, disclose, consult upon, and adopt the EAs and ESMP as needed prior to implementation of the specific activity for which it has been developed, and thereafter implement the EA and ESMP throughout Project implementation.</p> <p>Throughout project implementation as part of the assessment process conducted under action 1.2 above.</p>	<p>Office of the Prime Minister – NUSAF-TST</p>

	<ul style="list-style-type: none"> f) Drainage of traditional wetlands for agricultural use. g) Construction or rehabilitation of seasonal dams with adverse downstream affects. h) Sub projects requiring new or significant expansion of disposal facilities which may result in pollution contamination to nearby water sources. i) New or significant expansion of disposal sites requiring involuntary public participation. j) Closing of gaps, culverts etc. in existing roads which may affect water flow significantly. k) Projects that require Compensation for loss/replacement costs will not be funded under NUSAF l) Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict. m) Activities that may involve involuntary resettlement or land acquisition (other than voluntary land donation) or impacts on known cultural heritage. n) Dams as mentioned in the ESRS and such drainage works beyond a certain volume, etc.will be excluded. 		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES: Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of Labor Intensive Public Works beneficiaries /workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>Components activities will employ community workers and contracted workers, including vulnerable workers such as women, persons with disabilities, children (of working age (18 years), in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</p>	<p>Prepare, disclose, consult upon, and adopt the LMP prior to project effectiveness, and thereafter implement the LMP throughout the Project lifecycle.</p> <p>Revise LMP as necessary throughout Project implementation, including at least annually and as further information becomes available.</p>	Office of the Prime Minister- NUSAF-TST
2.2	<p>COMMUNITY WORKERS: The Project shall ensure that community workers under Components 1 and 2 including sustainable livelihood and Labor-Intensive Public Works activities are engaged in line with the targeting criteria in the PAD and Operations Manual and are provided with labor and working conditions that meet the requirements of the ESS2 including, inter alia, occupational health and safety, working conditions, non-discrimination as per the LMP to be prepared.</p>	Prior to disbursement of funds for Component 1 and 2 and throughout project implementation	Office of Prime Minister- NUSAF-TST
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:		

	<p>The Project shall prepare and implement a Health and safety Management Plan (HSMP) with adequate occupational health and safety measures for workers (including emergency preparedness and response measures) in line with the ESMF/IPMP and World Bank Group (WBG) Environment, Health and Safety (EHS) Guidelines proportional to the different activities under Component 1 and 2.</p> <p>Traffic and Road safety: The Project shall prepare a Traffic and Safety Management Plan as part of OHS measures.</p>	<p>Prepare and adopt the HSMP prior to disbursement of funds for components 1 and 2, and thereafter implement throughout Project implementation</p> <p>Revise HSMP as necessary throughout Project implementation, including at least annually and as further information becomes available.</p> <p>Traffic and Safety Management Plan prepared prior to disbursements and through-out project implementation</p>	<p>Office of Prime Minister – NUSAF-TST</p>
2.4	<p>GRIEVANCE MANAGEMENT:</p> <p>The Project shall establish a community grievance mechanism with clear process including in its Management information System (MIS) and assign focal points to address these grievances within OPM-NUSAF-TST</p>	<p>The GM processes are reflected in the ESMF, SEP and in future in the LMP. The GM shall be established and made operational prior to disbursement of funds.</p>	<p>Office of Prime Minister – NUSAF-TST</p>
<p>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p>			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare, adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	<p>Adopt the WMP as part of project ESMF, and thereafter implement the WMP throughout Project implementation.</p>	<p>Office of Prime Minister – NUSAF-TST</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action [1.2] above.</p> <p>The Project shall:</p> <ol style="list-style-type: none"> a) Prepare an Integrated Pest Management Plan (IPMP), including emergency response measures b) Incorporate resource (water, energy and raw materials) efficiency and pollution prevention and management measures as part of the project ESMF, ESIs/ESMPs to be prepared under action [1.2] above; and subsequently in subprojects. 	<p>Adopt an IPMP and WMP as part of project ESMF, and thereafter implement the WMP and IPMP throughout Project implementation.</p> <p>During activity design/preparation and prior to implementation of the specific activity for which ESIA/ESMP has been developed, and thereafter implement the ESIA and ESMP throughout Project implementation.</p>	<p>Office of Prime Minister – NUSAF-TST</p>

	<p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures for: (i) storage and handling of pesticides; (ii) improvement of the capacity of health Village health teams as first line (VHTs) support to victims and health centers in chargers in the treatment of pesticides incidents; (iii) disposal of unwanted or surplus insecticides shall follow the applicable requirements under the relevant ESSs, the WBG EHS Guidelines, and other relevant Good International Industry Practice (GIIP) to the Association.</p>		Office of Prime Minister – NUSAF-TST
ESS 4: COMMUNITY HEALTH AND SAFETY.			
4.1	<p>TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the site-specific ESMPs to be prepared under action 1.2 above.</p> <p>The Recipient shall adopt and implement as part of the ESMF measures and actions to assess and manage traffic and road safety risks to workers and the community resulting from movement of project vehicles or activities which may present safety risks on public roads, etc. The measures shall be incorporated into activity ESMPs.</p>	<p>Adopt and implement traffic and road safety measures as spelt out in the site specific ESMPs and in accordance with the ESMF</p> <p>Prior to disbursement for Component 2 sub projects and throughout project implementation</p>	Office of Prime Minister – NUSAF-TST
4.1	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project, including but not limited to, behavior of Project workers, potential risks of labor influx, including the transmission of HIV/AIDS, COVID-19 and other communicable diseases, response to emergency situations, and include these measures in the ESMPs to be prepared in accordance with ESMF, in a manner acceptable to the Association.</p> <p>The Health and Safety Management Plan (HSMP) or LMP to be developed in section 2.3 above shall include measures to assess and manage health and safety risks and impacts to the community arising from Project activities and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.</p>	<p>Same timeframe as for the adoption and implementation of the ESMF</p> <p>Prior to disbursement for Component 1 and 2 respectively and throughout project implementation</p>	Office of Prime Minister – NUSAF-TST
4.2	<p>GENDER BASE VIOLENCE AND VIOLENCE AGAINST CHILDREN RISKS: The Recipient shall prepare and implement stand-alone Gender-Based Violence Action Plans (GBV Action Plans), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA). The GBV Action Plan shall specifically address potential risks deriving from SEA associated with inclusion in activities, that arise during project implementation.</p>	<p>Prior to disbursement for Components 1 and 2 respectively and implemented throughout project</p>	Office of Prime Minister – NUSAF-TST
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>The recipient shall prepare, disclose, consult, adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>	Prior to project effectiveness	Office of the Prime Minister- NUSAF-TST
5.2	<p>RESETTLEMENT PLANS:</p> <p>No RAPs shall be prepared in the case of NUSAF. Rather the project will ensure districts prepare, disclose, consult, adopt and implement a Voluntary Land Consent Forms (VLC) for Community Driven Development (CDD) projects outlined in the RF with such forms attached to the RF consistent with ESS5. The implementers will ensure all the consent forms are disclosed publically and copies stored by the district land office and copies archived in NUSAF project office.</p>	Social/land acquisition Audit shall be done one year into sub-project implementation and continued yearly to the end of the Project.	Office of the Prime Minister- NUSAF-TST
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES.			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>To ensure identification of all areas that are ecologically sensitive, including National parks; Forestry reserves; Wildlife reserves; internationally protected areas; important (inland) fisheries areas; and include in the ESMF measures and procedures for managing any adverse impacts of the project to biodiversity and living natural resources.</p> <p>Engage the National Forest Authority (NFA), Uganda Wildlife Authority (UWA) or relevant department/agency of government to seek appropriate collaborative implementation of measures for managing the impact of human-wildlife conflict to project activities or design of activities that are compatible with, or complementary with biodiversity conservation.</p>	Adopt ESMF Prior to appraisal, and thereafter implement throughout Project implementation	Office of the Prime Minister – NUSAF-TST
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES.			
7.1	<p>VULNERABLE AND MARGINALIZED GROUPS FRAMEWORK</p> <p>Prepare, adopt, and implement a Vulnerable and Marginalized Groups Framework (VMGF) consistent with the requirements of ESS7.</p>	The VMGF to be prepared and adopted prior to effectiveness and implemented throughout Project implementation	Office of Prime Minister – NUSAF-TST
7.2	<p>VULNERABLE AND MARGINALIZED GROUPS PLAN</p> <p>Prepare, adopt, and implement a Vulnerable and Marginalized Groups Management Plan (VMGP) consistent with the requirements of ESS7.</p> <p>The Recipient shall ensure that these communities are appropriately informed, share in the project benefits in an inclusive and culturally appropriate manner and appropriate grievance and complaints management mechanisms provided for and included in the SEP.</p>	The VMGP to be prepared and adopted prior to implementation of activities in areas that have Vulnerable and Marginalize Groups and implemented throughout Project implementation	Office of Prime Minister – NUSAF-TST
7.3	Ensure the VMG data included/captured in both single and social registry under Ministry of Gender Labor and Social Development (MOGLSD)	Migrate VMG data from NUSAF MIS to the single and social registry	Office of the Prime Minister NUSAF-TST

		under MOGLSD annually	
ESS 8: CULTURAL HERITAGE.			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Adopt and implement measures for safeguarding Cultural Heritage in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS8.</p> <p>In the case where a sub-project to be financed is located in the area of cultural heritage, the district safeguards team shall not go ahead with activities in that location but shall Identify alternative sites. Measures to address risks and impacts on cultural heritage and include in the sub-project ESMPs.</p>	Adopt measures as indicated in the ESMF prior to the start of activities and thereafter implement throughout Project implementation period	Office of Prime Minister - NUSAF-TST
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures provided for in the Environmental and Social Management Framework (ESMF) and Environmental and Social Screening Forms/checklists and Environmental and Social Management Plans (ESMP)</p>	Adopt chance finds procedures in the ESMF prior to the start of activities and thereafter implement throughout Project implementation period	Office of Prime Minister - NUSAF-TST
ESS 9: FINANCIAL INTERMEDIARIES.			
9.1	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</p> <p>Prepare, adopt, and implement Stakeholder Engagement Plan (SEP) consistent with ESS10. The Project shall develop a Stakeholder Engagement Plan (SEP) prior to the appraisal and define operational details to guide the development of the Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association.</p> <p>Implement the SEP(s) consistent with ESS10, including the use of different, culturally appropriate communication approaches to ensure communication also with the most vulnerable, including illiterate and people with disabilities.</p> <p>Disclose all key relevant information throughout project</p>	Prior to the Project Appraisal and thereafter implemented throughout the project cycle	Office of the Prime Minister-NUSAF-TST
10.5	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>Establish, publicize, maintain, and operate a grievance mechanism, which is accessible to all stakeholders to enable resolve project grievances in a timely manner that promotes the success of the project.</p> <p>The project will leverage on experience from NUSAF 3 and currently DRDIP that is ongoing with a well-established GRM including an online system for receiving grievances.</p>	The GM shall be established and made operational prior to disbursement of funds.	Office of Prime Minister-NUSAF-TST
CAPACITY SUPPORT			
CS1	To enhance E&S capacity of the implementing agencies and entities (including PIU staff and	Submit capacity assessment and	Office of Prime Minister -

	<p>Local governments (District, Sub County, Parish and community level)) training will be required in</p> <ul style="list-style-type: none"> • National laws and regulations on environmental and social risks and impacts management. • World Bank’s ESF and the 10 ESSs • Stakeholder mapping and engagement and implementation of the stakeholder engagement plan • Specific aspects of environmental and social assessment • Emergency preparedness and response including reporting of incidents and accidents, maintaining an incident log; • Community health and safety • Gender based Violence, SEA/SH prevention and response measures, Violence against Children and other social risks • Grievance Management. • Labour Management Procedures • Training should also include E&S screening, Biodiversity assessment and OHS measures. 	<p>capacity building plan within three months after project effective date and thereafter implement it throughout Project implementation.</p>	<p>NUSAF-TST</p>
<p>CS2</p>	<p>Training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations will also be done in-line with ESMF and ESMPs of each approved sub-project. And these training is to benefit largely Village Health Teams (VHTs), Community Project Management Committees (CPMCs) DEOs, CDOs and Community Facilitators</p>	<p>One month prior to commencement of project activities and thereafter on a regular basis.</p>	<p>Office of Prime Minister NUSAF-TST</p>