



THE REPUBLIC OF UGANDA

Investing in Forests and Protected Areas for Climate-Smart Development (IFPA-CD)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

PROJECT: The Proposed Boundary Demarcation of Otzi East & Otzi West CFRS in
Moyo District, Uganda (Boundary survey and installing boundary pillars)

EXECUTING AGENCY: National Forestry Authority (NFA)

Financed by



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ACRONYMS

CFRs	Central Forest Reserves
CSOs	Civil Society Organisations
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental & Social Management Plan
ESS	Environmental and Social Standard
E&S	Environmental and Social
E&SS	Environmental & Social Screening
FLEG	Forest Law Enforcement and Governance
FMU	Forest Management Unit
GBV	Gender-Based Violence
ICRs	Implementation Completion Reports
IFPA-CD	Investing in Forests & Protected Areas for Climate-Smart Development
ISRs	Implementation Supervision Reports
LC	Local Council
MTWA	Ministry of Tourism, Wildlife & Antiquities
MWE	Ministry of Water & Environment
NCR	No Cost Required
NDP IV	Fourth National Development Plan
NFA	National Forestry Authority
NFP	National Forest Plan
NPs	National Parks
NTFPs	Non-Timber Forest Products
OHS	Occupational Health and Safety
OPM	Office of the Prime Minister
O&M	Operation & Maintenance
PAs	Protected Areas
PCU	Project Coordination Unit
PPE	Personal Protective Equipment
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
UWA	Uganda Wildlife Authority
VAC	Violence Against Children
WRs	Wildlife Reserves

1. INTRODUCTION

1.1. Project Background

The Ministry of Water & Environment (MWE), Uganda Wildlife Authority (UWA), and National Forestry Authority (NFA) are implementing the Investing in Forests and Protected Areas for Climate-Smart Development (IFPA-CD) Project with support from the World Bank. The project is implemented in close collaboration with the Ministry of Tourism, Wildlife & Antiquities (MTWA) and the Office of the Prime Minister (OPM).

The project is being implemented in selected sites in the Albertine Rift and the refugee hosting areas of West Nile region and Lamwo District with focus on targeted Protected Areas (PAs) which include 07 National Parks (NPs), 04 Wildlife Reserves (WRs), 27 Central Forest Reserves (CFRs) and 18 Refugee Host Districts.

1.2. Project Development Objective

The Project Development Objective is to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes. The project aims to support the government agenda of increasing forest cover through afforestation and reforestation and slowing down the loss and degradation of the nation's forests.

1.3. Project Components

The project is implemented under 4 components outlined below:

- *Component 1: Improved management of forest protected areas.* This focusses on improving management of government-managed forest and wildlife PAs to ensure they can continue to generate revenues and provide important environmental services.
- *Component 2: Increased revenues and jobs from forests and wildlife protected areas.* This focusses on increasing revenues and jobs from forest and wildlife PAs through targeted investments in tourism and productive forests.
- *Component 3: Improved landscape management in refugee hosting areas.* This encourages establishment of greater tree cover in refugee-hosting landscapes on host community land outside PAs, supporting sustainable forest management and landscape resilience on private and customary land.
- *Component 4: Project Management and Monitoring:* This will cover operational activities for effective implementation of the project; the MWE shall be the lead implementing agency that will be responsible for establishing a Project Coordination Unit (PCU) that will have a mix of professional who will as well offer technical support NFA and UWA during the implementation of the project.

2. THE PROPOSED SUB-PROJECT.

The sub-project planned to be undertaken is the boundary demarcation of Otzi East and Otzi West CFRs; this will involve boundary survey and installation of boundary pillars. The assignment is to be executed by a Contractor who shall be hired by the NFA.

2.1. Location, Coordinates and Map of the Sub-Project area

Otzi East and Otzi West CFRs are located in Moyo District in the West Nile region of Uganda.

Otzi East spans through Metu & Dufile Sub Counties covering an area of 18,757 Ha with a total boundary length of 130Km. The forest stretches up to the international border between Uganda and South Sudan. Otzi West on the other hand is located in Metu Sub County on Moyo-Adjumani Road covering an area of Area 425 Ha (NFA, 2016; NFA, 2008).

The coordinate points for the proposed sub-project sites are:

Otzi East: 370694.8; 403031.17; 371161.13; 402242.3; 370892.6; 404132.85

Otzi West: 365046.36; 400282.0; 364314.5; 401348.15; 364237.26; 402742.78

The maps for the forest reserves are shown below (Figure 1 and Figure 2).

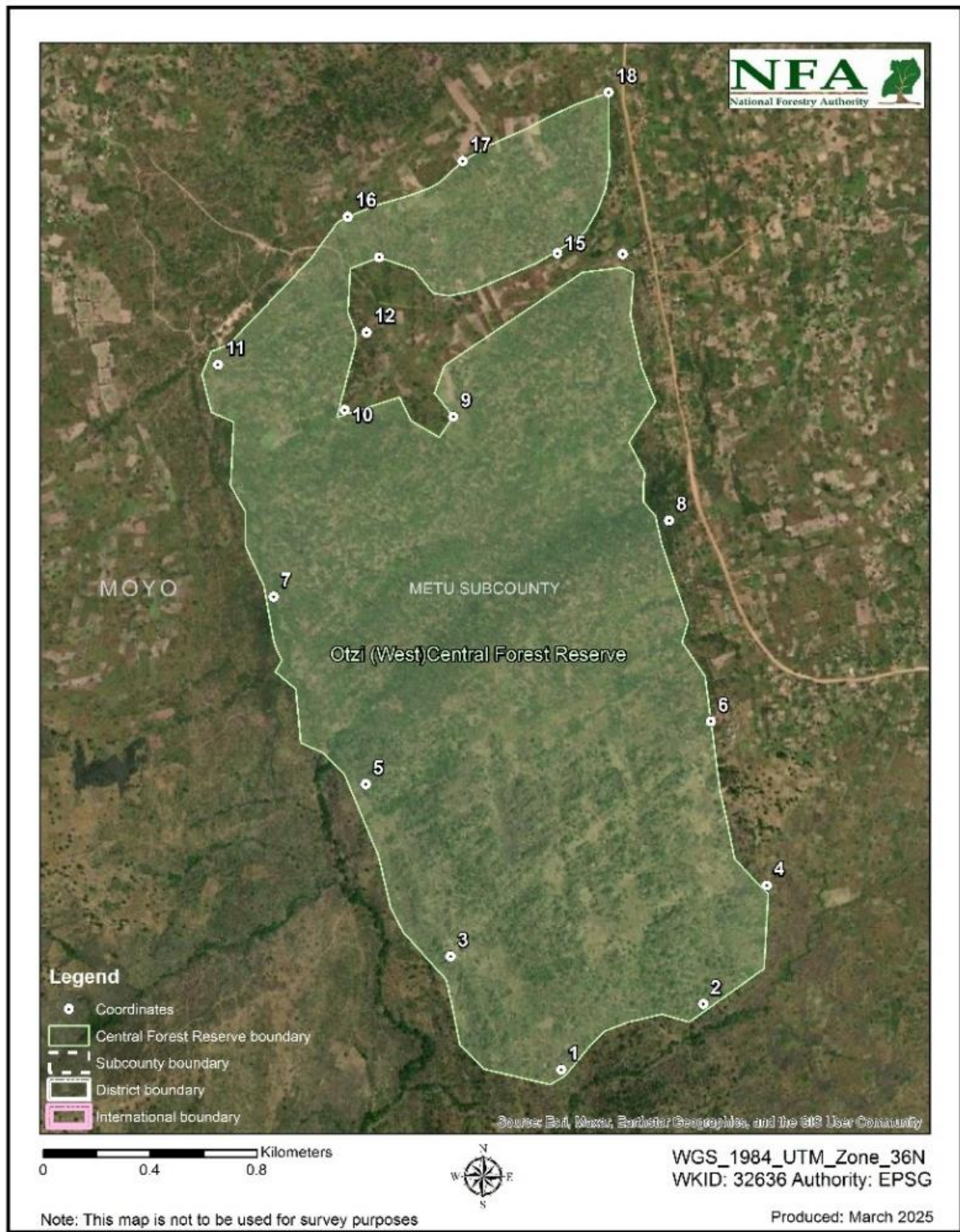


Figure 1: Map of Otzi West CFR

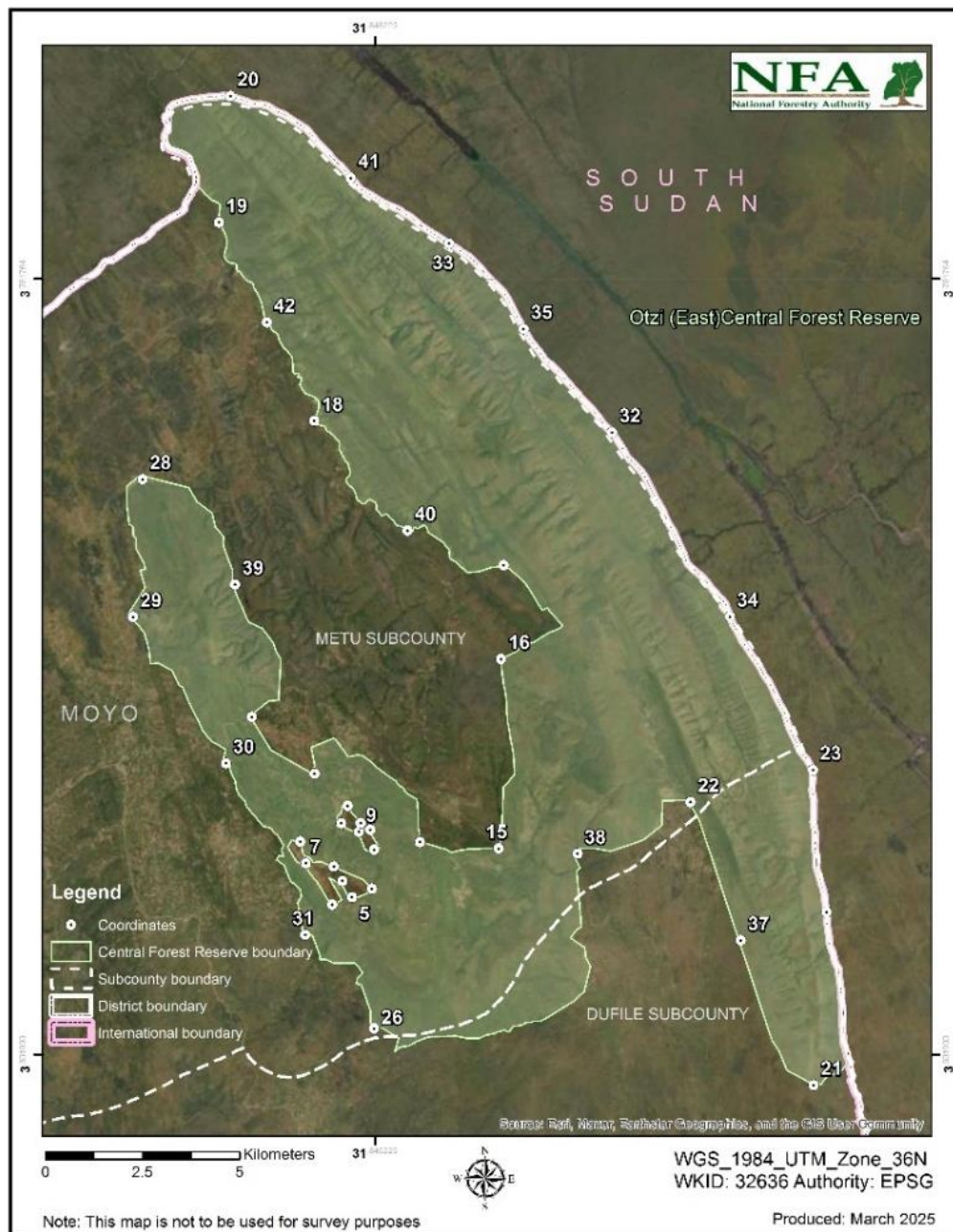


Figure 2: Map of Otzi East CFR

2.1.1. Management trends of Otzi CFRs

Otzi West and Otzi East CFRs were initially gazetted as protection reserves in 1946; the management and control was subsequently vested on the NFA in accordance with the National Forestry & Tree Planting Act, 2003 (NFA, 2016).

2.2. Ecological facts about Otzi CFRs

The Otzi West and Otzi East CFRs have diverse ecological characteristics which make it unique; these characteristics are outlined below.

2.2.1. Hydrological characteristics

Otzi East is a catchment for the source of water for Moyo Town Council & Metu Sub-County; the major streams include Chala, Amua, Apipi, Leya, Bibia, Lechu, Akaka, Ayiro, Lukuji, Ubi, Ayido, and Awodo. The CFRs in general are a water catchment for the River Nile and greatly influence the hydrological characteristics of the R. Nile (NFA, 2008; Uganda Forest Department, 2002).

2.2.2. The topography and soils:

Otzi West and Otzi East are part of a short chain of rugged and rocky hills which occupy the escarpment whose altitudes ranges from 760m – 1667m running along the international border with South Sudan. The rock types of are typical quartzite boulders with massive proportions; but also, weathering has led to the splitting and sliding of boulders giving rise to deep clefts and cracks in which trees and plants find a foothold. The soils are thin skeletal and of little agricultural value (NFA, 2016).

2.2.3. Vegetation and floral & faunal biodiversity

Vegetation type in Otzi East/West is dry Combretum savannah woodland and grassland characterised by undifferentiated semi-deciduous thicket (58%) and *Butyrospermum - Hyparrhenia* savanna (42%).

The CFRs are part of the network of critical sites for biodiversity conservation in Uganda; they are known for primitive cycad species and butterflies. The Flora and Fauna of these reserves are of average diversity but characterized by a good number of rare and or restricted range species especially Otzi East; this makes them forest reserves of considerable conservation significance. The forests have 10 unique species not found elsewhere in Uganda, including 07 trees and 03 butterflies. The unique tree species include: *Adenodolichos paniculatus*, *Canthium zanzibaricum*, *Dalbergia nitidula*, *Euphorbia venenifica*, *Maerua subcordata*, *Ochna alba* and *Phyllanthus muellerianus* while the 03 unique butterfly species include: *Acraea baxteri*, *Acraea buettneri* and *Acraea insignis*. Otzi East also has one species of small mammal (*Crocidura selina*) which is endemic to Uganda and one tree (*Grewia pubescens*) that is endemic to the Albertine rift region (Uganda Forest Department, 2002).

According to the Uganda Forest Department, 2002 (in its Uganda Forestry Nature Conservation Master Plan), Otzi East CFR was identified as a forest of high biodiversity importance which is a potential for tourism. Otzi was ranked 08th in overall importance out of the 65 forests investigated with a biodiversity index of 14.1. Otzi was ranked 10th for species diversity and rarity value of species represented.

2.3. The importance of Otzi East & West CFRs

Otzi CFRs have provided immense benefits to the riparian communities; the benefits are both tangible and intangible which have influenced the local conditions of the area as well as the socio-economic status of the population. The major benefits from the CFRs are outlined in the subsequent sub-section.

2.3.1. Ecological function and support services.

The forests of Otzi are water catchment forests for the River Nile and most of the reserves are on escarpment where many rivers and streams originate from and empty into the Nile. These have influenced the local hydrological characteristics and the water supply needs of the area.

The forests and adjoining woodlands maintain the water table of the area; this makes water available for crop cultivation even during the dry season along the stream valley, At the same time, this water is available for domestic animals.

These forests are extensive and evergreen; this makes them have a great contribution in absorbing carbon dioxide from the atmosphere - thereby contributing to the mitigation of global warming. However, the quantity of carbon sequestered has not yet been quantified to give exact value to this contribution (Uganda Forest Department, 2002).

2.3.2. The Socio-Economic benefits from Otzi CFRs

The socio-economic benefits from Otzi CFRs to the riparian communities are majorly direct benefits as a result of material harvests from the forests. The major benefits include:

- a) Timber forest products from Otzi CFRs (though at a considerably low scale) have markets both within Moyo & Adjumani Districts. The increasing demand for forest produce has exerted pressure on the forests and the subsequent functions of the forest have been strained.
- b) Non-Timber Forest Products (NTFPs) whose demand is mainly from within the districts of Moyo and Adjumani. Otzi CFRs have several NTFPs that include bamboo, Christmas tree seeds, bio energy, wild honey, apiculture, grass, designing stones, poles, medicinal plants, fruits, firewood, wild meat, and cottage materials (NFA, 2016; Uganda Forest Department, 2002).

2.3.3. Cultural significance

It has been reported that there are big trees in Otzi, especially in the valleys that have over the years been known to be homes for the dead ancestors. It is locally believed that this is where the spirits of the dead come to rest/take shelter since they have no homes, and several rituals are done here, eg Leya - a stream known for cursing wrong doers (NFA, 2016).

2.4. Threats and conflicts

Several threats exist in the management of CFRs of Otzi and these include bush fires, illegal charcoal burning, hunting, and grazing (NFA, 2016). The other issue of concern is encroachment pressure from the refugees and some nationals.

2.5. Standards for Boundary Demarcation

According to the NFA Standards for Boundary Demarcation (NFA, 2005), the practice of boundary has been revised as outlined below:

- (i) Before embarking on a re-survey operation, the Commissioner, Department of Lands and Surveys is informed in writing through the relevant district surveys officer, who is involved throughout the activity
- (ii) Hold a meeting of the relevant staff at headquarters to consider stakeholders to be involved, including LG officials and communities, personnel to be involved, whether to outsource the

- work or not, access to labour, possible conflicts, security during the operation, and generate agreement on the budget, among others
- (iii) Frame a preliminary contract if the work is to be outsourced.
 - (iv) Conduct a reconnaissance around the Forest Management Unit (FMU), jointly with local communities & LG officials to appraise issues raised during the planning meeting
 - (v) Revise the budget (or contract if the work is outsourced) according to the findings of the reconnaissance
 - (vi) Stake out the boundary line and install the pillars using:
 - Modern tools to stake out accurate boundary lines (differential GPS, Total Station, etc)
 - Round concrete pillars instead of the traditional small beacons for boundary corner marking. The pillars should be 1.5 meters long (one meter above the ground) and long iron bars protruding to form a stable base and extending outwards 0.5 metres below ground level.
 - Cairns and white or red paint is put on Stones (in cement mortar if the section is sensitive) to show the direction of the boundary and position of corner cairns on rocky ground
 - The old numbering nomenclature (codes for district, FRs, beacon number serially for each FR) in recording the boundary particulars should be maintained
 - (vii) Record the boundary particulars on boundary plan map using the Lands & Surveys reference sheets
 - (viii) Submit survey data to Lands and Surveys Department for plotting on their Land Information system
 - (ix) Stock boundary maps for all FRs at strategic institutional units to hedge against loss that may arise if stored in one place.
 - (x) Keep hard copies of boundary maps at the FMU station, and a slide rule to facilitate mapping of activities being undertaken
 - (xi) Conduct regular field training in map reading and interpretation

2.6. Project Design, Scope and Execution Modalities

The planned boundary demarcation of Otzi East/West CFR shall adopt the aforementioned chronological tasks specified in the NFA Standards for Boundary Demarcation of 2005.

2.6.1. Design details

The proposed design of the sub-project involves:

- Boundary re-survey - establishment of control points and cutline which is to be jointly conducted by the NFA survey staff, field staff of South West Range and District Surveyor of Moyo in the presence of the different stakeholders.
- Installation of boundary pillars; the pillars planned are those made of concrete and iron bars. Erecting of Boundary pillars is planned at a spacing of 200m apart. This shall be done by the Contractor in the presence of various stakeholders and the NFA field staff. The process of erecting boundary pillars involves manual digging (hand excavation) of pits to a depth of about 1 meter using a hoe and a shovel. The pillars shall be transported to the site with a carrier vehicle,

offloaded and manually erected by workers who are recruited from the neighbouring communities. The tools used include shovels, spades, hoes and pangas; these are used for digging pits for pillar planting and site clearing.

2.6.2. The scope of the work:

The total distance that is planned for boundary demarcation is: Otzi East 73.5Km, Otzi West 12.12 Km. This area is to be re-surveyed and marked with concrete pillars.

2.6.3. Execution modalities:

The stepwise execution of the assignment's key activities and the persons responsible is as outlined below:

No	Activity	Responsible person
	Preliminary activities	
1.	Stakeholder engagements – This shall be done in corroboration with the area district leadership; especially the Lands Officer, District Surveyor, Physical Planner, District Forest Officer, District Environment Officer, Political Leaders (District Chairperson and Executive member responsible for Natural Resources), RDC, CAO, and DISO. The participation of sub-county leaders, opinion leaders, elders, religious leaders, Security Personnel, community members and Contractor among others shall also be considered.	NFA team
2.	Joint reconnaissance survey – This shall involve transect walk along the forest boundary line which is planned for demarcation. The participation of community members including and key district and sub-county leaders shall be emphasized. The reconnaissance survey shall help to: (i) map out community knowledge about the forest reserve; (ii) identify where key feature such as cultural sites are located; (iii) verify previous survey and natural boundary marks (if any); (iv) assess community attitude about the activity; and (v) assess the security status of the area.	NFA team & Contractor
3.	Setting out – This shall involve analysis of data from reconnaissance survey to guide the actual process of pillar installation. This too shall ascertain the actual scope of the works to be executed.	NFA Team & Contractor
4.	Mobilization of workforce: The Contractor shall engage in setting up workforce that shall help in the execution of the assignment. The main workforce shall be casual labourers who shall be involved in clearing, digging and installation of the demarcation pillars.	Contractor
	Boundary demarcation activities (Pillar installation process)	
1.	Production of demarcation pillars: The Contractor shall undertake holistic production of demarcation pillars at a centralized location of choice (but within the sub-project vicinity). This shall help in quality monitoring of the demarcation pillars by the NFA staff.	Contractor

2.	<i>Pillar transportation to the site:</i> Once all the pillars have been secured from the production point, these shall be transported to the sites where they are to be installed. The transportation shall be by use of Tipper Trucks. The loading and off-loading of the trucks shall be done by the Contractor's workforce	Contractor
3.	<i>Clearing/Pitting:</i> The Contractor shall undertake the clearing of the site and pitting of the installation points in preparation for pillar planting. The pitting shall be done at interval of 200m for areas without corners while areas with corners shall be adjusted to shorter distance as shall be ascertained in the field. These tasks shall be implemented manually by the casual labour force recruited from within the community.	Contractor
4.	<i>Pillar planting:</i> This is the actual installation of pillars in the ground which shall as well be executed by the casual labour force.	Contractor

2.7. Analysis of Project alternatives

Analysis of the project alternatives is meant to explore the different options that could be undertaken to execute the project. The pros and cons of the different options reviewed have to be presented. These are aimed at presenting the proponent and the funding agencies with fundamental information on what is very feasible and how to proceed with the project.

For the case of Otzi CFR, the alternatives considered were in connection to design, no project and the action alternative. The issues taken into consideration during this analysis of alternatives are benefits/demerits associated with: environment / ecology; practicability considerations; economic / financial benefits; socio-economic benefits; and sustainability considerations. The details of these analysis are presented in the ensuing sub-sections.

2.7.1. Design alternatives

With regards to design, the CFR boundary demarcation can be undertaken using the following approaches / designs: natural features, permanent infrastructure, and technological features. The brief explanations for these different design options are as outlined below:

Natural Features: This could involve use of features such as rivers, roads, footpaths, or mountain ridges where these are clear and easily recognizable. In some cases, natural trees could be used; or tree planting at the CFR boundary can be done.

Permanent Infrastructure: These could include planting boundary pillars; cairns / beacons; directional trenches; and signposts. The proposed project intends to use boundary pillars for boundary demarcation.

Technological Features: These could involve the use of Remote Sensing imagery using aerial surveys; or GPS technologies (taking transect walks along CFR boundary while taking GPS readings to establish exact locations).

The detailed analysis of these design options is explained in the subsequent table

Key Issue considered	Design Alternatives for the Boundary Demarcation		
	<u>Natural Features:</u>	<u>Permanent Infrastructure:</u>	<u>Technological Features:</u>
Environmental / ecological considerations	<ul style="list-style-type: none"> ▪ The natural features and natural trees are very appropriate since they do not involve any ecological damage. ▪ Planting of trees would contribute to ecological benefits in the CFR and the riparian areas. 	<ul style="list-style-type: none"> ▪ Boundary pillars could lead to some ecological disturbances (excavation of soils to plant pillars); these are however expected to be minimal and localised to the point of fixing the pillar ▪ Directional trenches could cause massive excavation of the CFR perimeter which would cause significant ecologic damage (since the trench has to remain open) 	Technological features would present no ecological impact (most feasible environmentally).
Economic / financial considerations	Natural features & natural trees are economically very feasible since they do not present significant financial expenditure. The minimal expenses incurred would cover costs for stakeholder engagements and allowances for boundary verification teams. Tree planting on the other hand would present considerable costs which would somewhat be moderate (depending on the scale of planting & species considered).	The costs of executing this technology (boundary pillars) would be somewhat moderate. However, it is an exercise that can be supervised to ensure that the quality of the pillars is made good (materials to be used & workmanship) – thus ensuring value for money.	The costs associated with technological features are substantial enormous. The costs of acquiring the equipment, deploying the equipment and the skilled teams for the exercise (especially the remote sensing imagery using aerial surveys) come at a high cost.
Socio-economic considerations	Use of natural features, natural trees or planted trees has nothing detrimental to the society. It would ensure that the public utilisation of these features continues unabated – the people would continue to harvest natural goods & services from the CFRs and these features.	The use of this technology creates employment to members of the public. This together with the community engagements held enhances on the ownership of the intervention by the members of the public.	There is no significant socio-economic implication from the use of this technology. Save for the minimal employment that could be extended to the community in terms of guides during the ground-truthing exercise, it is high-tech.
Sustainability considerations	These do not present any costs of maintenance and therefore present	The pillars have minimal Operation & Maintenance (O&M) requirements	In terms of sustainability, this technology is the most feasible. Once

		(clearing the sites, maintaining the visibility of the pillars) and therefore a very viable option.	the data is captured, it can be stored in computerised systems and can be easily accessed and validated.
Practicability considerations	<ul style="list-style-type: none"> ▪ The boundaries of the CFRs are not always perfectly delineated by these natural features. ▪ Some of the natural features (e.g. roads & footpaths) can shift with time following government developmental interventions and therefore fail to serve the purpose of being CFR boundary marker. ▪ Planted trees would be practicable; however, these are prone to damage/destruction (cut by humans, naturally dry or destroyed by storms). It would therefore involve continuous restoration. 	It is very practical to execute this technology; the technology is available in the country and has ever been used successfully in other CFRs within the country.	This technology is practical. However, it involves sophisticated equipment and highly skilled expertise which is not readily available
Verdict remark	The natural features are however unfeasible because they are not practicable (see practicability explanation above) – <i>Not a viable alternative</i>	The permanent structures are readily available; can be acquired at a moderate cost; once established, they stay permanent and require minimal O&M costs - <i>Most viable alternative</i>	The technological features are feasible but not readily available; they also come at a very high cost - <i>Not a viable alternative</i>

Table 1: Design Alternatives for the Boundary Demarcation

According to the above analysis, the most feasible option is the use of ***Permanent Infrastructure***. This analysis therefore substantiates the proposal of the proponent (NFA) to use boundary pillars for boundary demarcation. To enhance credibility and for long-time records, the location of the permanent structures should be enhanced with technological features (especially GPS georeferenced points of the boundary pillars).

2.7.2. No Project Alternative

The "no-project alternative" considers the implications of not proceeding with the proposed boundary demarcation. Choosing the no-project alternative would mean that the current status Otzi CFR boundary stays as it is. The Forest Management Plan for Otzi/Zoka Group of Central Forest Reserves for the Period 2016 – 2026 clearly states that the boundary for Otzi CFR has not been opened (NFA, 2016). Keeping this status quo as it is without undertaking boundary demarcation would mean the following:

Environmentally / ecologically, there would be no ecological impact (damage) inflicted on the Otzi CFR by the proposed intervention (boundary demarcation); this would be ecologically sensible. On the financial perspective, the proponent would not incur any costs; this too would be financially sensible. The no project alternative neither attracts any sustainability considerations for no action taken, nor does it have the need to consider the practicability of a null intervention.

On the socio-economic perspective, there would be no direct project benefits from the project to the community (in terms of employment and provision of goods) which would be a negative implication.

On the conservation point of view, the incidences of encroachment of the Otzi CFRs would continue and this would bring the local communities in direct confrontation with the NFA law enforcement personnel which would be a social misdemeanour. Similarly, the no project alternative would mean that there would be no engagements between the communities, local authorities and NFA which would help clarify on what activities are permissible in the CFR and the zones where these activities are permitted.

The no project alternative leaves a very precarious scenario which puts the Otzi CFR at risk of continued encroachment which equally affects the biodiversity in it and values derived from the biodiversity. Furthermore, the encroachment would gradually diminish the ecological functions of Otzi CFR. It would also gradually diminish the government responsibility and management oversight on the CFR since its boundaries would remain unknown. ***The no project alternative is therefore not a viable option.***

2.7.3. Action alternative

This alternative entails undertaking the proposed boundary demarcation. This would bring numerous benefits, including: the creation of direct employment opportunities to the locals, rectification of the Otzi CFR boundaries; improved relationship between the local communities and the NFA; and enhanced measures for the conservation of Otzi CFR – meaning that the government control and regulation of what takes place in the CFR shall be achieved.

There have been a number of demands to have the boundaries for several CFRs in the country demarcated / re-opened following several incidences of encroachment which have led to human-wildlife conflicts and also friction / altercations between the public and NFA. The interventions through the IFPA-CD project which have provided for resources for undertaking boundary demarcation is a long-awaited intervention at the right time. ***Proceeding with the boundary demarcation under this project is therefore a wise undertaking.***

2.8. The need for an Environmental & Social Management Plan (ESMP)

The Environmental & Social Management Plan (ESMP) is a comprehensive framework designed to identify, assess, and manage the potential environmental and social impacts of a project. ESMP for the boundary demarcation in Otzi CFR is a structured approach designed to identify, assess, and propose feasible measures for managing the potential environmental and social impacts of the activity. This plan is aimed at ensuring that the project activities address the unique issues associated with the activity while promoting sustainability and compliance with the environmental and social regulations. It is a guiding document to mitigate negative impacts, enhance community benefits, and protect the local environment throughout the scope of the activity.

2.8.1. Objectives of the ESMP

The main objectives of the ESMP are:

- 1 To provide adequate measures and controls that shall be used to minimise and mitigate the environmental and social risks and impacts resulting from the activities of the proposed intervention in the Otzi CFRs
- 2 To comply with the World Bank Environmental and Social Standards (ESSs) as well as applicable national legislation in the implementation of the sub project activities by the Contractor.
- 3 To guide the National Forestry Authority in the preparation of the bidding documents and works contracts.

3. POLICY, LEGAL, REGULATORY, DEVELOPMENTAL & INSTITUTIONAL FRAMEWORK.

In coming up with this ESMP for the proposed activity, (boundary demarcation of Otzi East and Otzi West CFRs), the applicable policies, laws, regulations and developmental frameworks ought to be reviewed. This review is aimed at evaluating the relevance of each of these instruments to the proposed intervention and therefore document the pertinent issues to be considered during the execution of the activity. The environmental and social policy & legal frameworks have been developed to advance the conservation and wise use of natural resources while ensuring the well-being of the people. This comprehensive review aligns to the principle of promoting sustainable development during project implementation.

Detailed descriptions of the relevant policies, laws, regulations and developmental frameworks are outlined in the subsequent sub-sections. Emphasis has also been put on the relevant Environmental and Social Standards (ESS) of World Bank Environmental and Social Frameworks that are applicable to the activity.

3.1. National Policies

3.1.1. Uganda Forestry Policy, 2001

Key provisions/requirements	Relevance and Applicability
<p>Policy Goal: An integrated forest sector that achieves sustainable increases in the economic, social and environmental benefits from forests and trees by all the people of Uganda, especially the poor and vulnerable</p> <p>Relevant policy statements: <u>Policy Statement 1:</u> The permanent forest estate under government trusteeship will be protected and managed sustainably <u>Policy Statement 5:</u> Collaborative partnerships with rural communities will be developed for the sustainable management of forests <u>Policy Statement 7:</u> Uganda's forest biodiversity will be conserved and managed in support of local and national socio-economic development and international obligations</p>	<p>The interventions in Otzi CFRs is in line with the policy goal of achieving sustainable increases in all the benefits from forests & trees</p> <p>✓ The intervention shall contribute to the protection and sustainable management of the forest in support of local & national aspirations.</p> <p>✓ NFA shall engage the rural communities in the planned activities – this shall foster ownership from the locals.</p>

3.1.2. National Environment Management Policy, 1994

Key provisions/requirements	Relevance and Applicability
<p>Policy Goal. “Sustainable social and economic development which maintains or enhances environmental quality and resource productivity on a long-term basis that meets the needs of the present generations</p>	<p>The planned intervention aligns with the policy goal; it will enhance environmental quality and productivity on a long-term basis.</p>

<p>without compromising the ability of future generations to meet their own needs”</p> <p>Relevant policy objectives:</p> <ul style="list-style-type: none"> ✓ Enhance the health and quality of life of all people and promote long-term, sustainable socio-economic development through sound environmental and natural resource management and use; ✓ Conserve, preserve and restore ecosystems and maintain ecological processes and life support systems, especially conservation of national biological diversity; ✓ Raise public awareness to understand and appreciate linkages between environment and development; and ✓ Ensure individual and community participation in environmental improvement activities. 	<ul style="list-style-type: none"> ✓ The intervention shall contribute to: <ul style="list-style-type: none"> (i) sound environmental management which shall promote sustainable socio-economic development; (ii) conservation & restoration of ecosystems and their ecological processes. ✓ In line with the policy, NFA shall undertake awareness creation and ensure full participation of the public.
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3.1.3. Wildlife Policy, 1999

Key provisions/requirements	Relevance and Applicability
<p>The Uganda Wildlife Policy seeks to “sustainably manage and develop wildlife resources and healthy ecosystems in a developed Uganda”. This is aimed at conserving wildlife resources in a manner that contributes to the sustainable development of the nation and the well-being of its people. The policy seeks to achieve this through a number of strategies key of which include: (i) Promoting sustainable management of wildlife Protected Areas; (ii) Effectively mitigating human-wildlife conflicts; (iii) Promote local, regional and global partnerships for conservation of wildlife.</p>	<p>The Otzi CFRs have some rare wildlife species which are of high scientific and tourism importance. The provisions of this policy align with the planned boundary demarcation which apart from conserving the forestry resources, shall also contribute to the conservation of wildlife in the CFRs.</p> <p>The team (Contractor & NFA) involved in the implementation of this activity shall have to be cognizant of these policy aspirations.</p>

3.1.4. National Employment Policy, 2011

Key provisions/requirements	Relevance and Applicability
<p>The National Employment Policy seeks to address the attainment of full productive and gainful employment coupled with decent work for better lives, livelihoods and equitable economic growth for all women and men in conditions of freedom, equity, security and human dignity.</p> <p>Some of the relevant objectives for realising this that have been fronted in this policy include: (i) To increase productivity, competitiveness and employability of the labour force, especially the youth and other most vulnerable members of the labour force; (ii) To ensure availability of reliable and timely labour market information, especially for those sectors of the labour market employing the poor and vulnerable</p>	<p>The demarcation of Otzi CFRs is going to generate some employment. The bulk of the workforce shall be non-professional workers who will be employed as casual labourers to execute the manual tasks involved in the boundary demarcation.</p> <p>The Contractor shall ensure that the intent of the employment policy is addressed; i.e. gainful and dignified</p>

women; and (iii) To promote and protect the rights and interests of workers in accordance with existing labour laws and fundamental labour standards.	decent employment for both men and women (including vulnerable persons) in conditions of freedom, equity, and security.
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3.1.5. National Child Labour Policy, 2006

Key provisions/requirements	Relevance and Applicability
<p>The National Child Labour Policy identifies the Construction sector as one of the areas where children are used as cheap labour. It also stipulates the damaging effects of child labour which include: (i) Denial of education; (ii) Damage and restricted physical, psychological and emotional growth and development; (iii) Vicious cycle of poverty and exploitation.</p> <p>The Policy therefore sets a Vision which is “a society free of exploitative child labour” and a Mission which is “To provide an enabling environment for prevention, protection and elimination of child labour.</p>	<p>There can be situations where children may require to obtain employment during the boundary demarcation; the Contractor shall be instructed to desist from this. The NFA supervision team shall monitor to ensure activity compliance to the requirements of this policy.</p>

3.1.6. The Uganda Gender Policy, 2007

Key provisions/requirements	Relevance and Applicability
<p>The Uganda Gender Policy aims to create an enabling environment for equitable access to resources and property rights, recognizing that gender equity is essential for sustainable development and economic growth. It outlines interventions that respond to the diverse livelihood needs of women and men, and enhance earning potential through incentive frameworks. It also addresses socio-cultural discrimination and gender-based violence, which are critical barriers to women's empowerment.</p> <p>The policy identifies the need for equitable salary treatment and improved labour conditions for women and emphasizes the importance of special measures for promoting affirmative action and non-discrimination irrespective of gender and age which is crucial for addressing historical imbalances and ensuring equal opportunities including employment.</p>	<p>The implementation of the proposed activity should take cognisance of the provisions of the gender policy. There should be no discrimination on the basis of gender when it comes to employment. The Contractor should go a step to demonstrate this during employment as one way of promoting affirmative action on gender.</p> <p>The NFA team shall monitor this and clearly document what measures and actions have been done with regards to the provisions of this police</p>

3.1.7. National Policy on HIV/AIDS and the World of Work, 2007

Key provisions/requirements	Relevance and Applicability
<p>The goal of the policy is to provide a framework for prevention of further spread of HIV and mitigation of the socio-economic impact of HIV/AIDS within the world of work in Uganda. The policy applies to</p>	<p>Although the country has taken significant steps to address the issue of HIV/AIDS, there is still a need to</p>

<p>all workers and employers in the public and private sectors, both formal and informal and associated workplaces and contracts of employment. The areas covered include: non-discrimination on the basis of known or perceived HIV status; confidentiality; HIV testing within the workplace; greater involvement of people living with HIV/AIDS; promotion of prevention, treatment, care and support; and gender concerns in the world of work. The policy sets out guiding principles and strategies for the implementation of the key areas of focus.</p>	<p>advance prevent further spread of HIV/AIDS and mitigate its impacts. The Contractor shall be required to demonstrate how issues of HIV/AIDS shall be addressed during the contract implementation. As a minimum, the contractor shall be required to demonstrate compliance to these policy provisions.</p>
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3.2. The National Legal Frameworks

3.2.1. Constitution of the Republic of Uganda, 1995

Key provisions/requirements	Relevance and Applicability
<p>The Constitution mandates the State to protect important natural resources, including land, water, wetlands, minerals, oil, fauna and flora on behalf of the people of Uganda. It further goes ahead to assert that the State shall: (i) create and develop parks, reserves and recreation areas and ensure the conservation of natural resources; and (ii) promote the rational use of natural resources so as to safeguard and protect the biodiversity of Uganda. The need for integration of people in the development process is emphasised in the Constitution.</p> <p>The protection and preservation of the environment is specifically planned to be achieved by: (i) Protecting and preserving the environment from abuse, pollution and degradation; (ii) Managing the environment for sustainable development; and (iii) Promoting environmental awareness.</p>	<p>The implementation of this activity (boundary demarcation) is in line with the provisions of the Constitution. While executing this activity, the Contractor and NFA shall ensure that there is meaningful integration of the people into the activity; and awareness creation is comprehensively conducted – prior to and during the execution of the activity.</p>

3.2.2. National Forestry and Tree planting Act (2003)

Key provisions/requirements	Relevance and Applicability
<p>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. Specifically, the Act stipulates that (i) Natural forests shall not be destroyed, damaged or disturbed except in the course of carrying out activities for the sustainable management of the forest reserve; (ii) Forests shall be developed and managed so as to – conserve biological diversity, ecosystems and habitats; sustain the potential yield of their economic, social, health and environmental benefits; conserve</p>	<p>The proposed activity is aligned to the requirements of this Act. Once implemented, it will minimise and/or eliminate destruction or disturbance of the forest while enhancing the ecological, social and cultural values derived from the Otzi CFRs.</p>

natural resources especially soil, air & water quality; and conserve natural heritage and promote aesthetic, cultural and spiritual values.	The implementing team (Contractor and NFA) shall adhere to the requirements of this Act.
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3.2.3. National Environment Act No.5 of 2019

Key provisions/requirements	Relevance and Applicability
<p>The Act mandates the lead agency (in this case, NFA) to issue guidelines and prescribe measures for the management of forests in Uganda in consultation with NEMA. The guidelines and measures issued or prescribed are expected to take into account (among the different forest categories) the forests in protected areas, including forest reserves and national parks. The Act stipulates that the forests shall be managed in accordance with the principle of sustainable development; and the traditional uses of forests which are indispensable to the local communities and are compatible with the principle of sustainable development shall be protected.</p> <p>The Act further sets out guidelines and measures for the conservation of Biological Diversity in situ. It also sets out the purpose of environmental and social assessments to be undertaken to evaluate environmental and social impacts, risks or other concerns of a given project or activity.</p>	<p>The planned boundary demarcation of Otzi CFRs (a measure that has been advanced by NFA in CFRs) is in line with the provisions of the Act. It seeks to advance the sustainable development of the forests and ensure continuity of its traditional uses.</p> <p>The reviews / screening conducted and the preparation of this ESMP responds to the requirements of environmental and social assessments for the activity. The Contractor and NFA shall therefore heed to the recommendations of the ESMP and the general requirements of the Act.</p>

3.2.4. Wildlife Act, Cap 200, 2000

Key provisions/requirements	Relevance and Applicability
<p>The Act provides for: (i) The conservation of wildlife in the country so that the abundance and diversity of species are maintained in order to support sustainable utilisation of wildlife for the benefit of the population; (ii) Sustainable management of wildlife conservation areas; (iii) The protection of rare, endangered and endemic species of wild plants and animals; (iv) The enhancement of economic and social benefits from wildlife and promotion of tourism; (v) public participation in wildlife management.</p> <p>The Act also outlines the role of the ministry and functions of the Authority (UWA); the need for environmental impact assessment; general offences in wildlife conservation areas; historical rights of communities around conservation areas; and regulations governing wildlife conservation areas.</p>	<p>The implementing teams (Contractor and NFA) shall execute the assignment with due consideration to the requirements of this Act. Otzi CFRs have rare and endemic biodiversity which shall be given due attention.</p> <p>The involvement of the community that is emphasised in the Act shall be handled during stakeholder engagements.</p>

3.2.5. Occupational Safety and Health Act, 2006

Key provisions/requirements	Relevance and Applicability
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<p>The Act provides for the prevention and protection of persons at all workplaces from injuries, diseases, death and damage to property. It spells out the key roles expected of the employers and employees during execution of work. The significant provision of this Act is the safety and welfare of workers which is consistent with a range of national and World Bank safeguards policies that are applicable to this project.</p>	<p>The Contractor shall be required to adhere to the provisions of this Act. The minimum basic safety gear that is appropriate for the workers should be provided during implementation of the activity. All the measures undertaken should be documented to help in assessing the level of compliance.</p>
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3.2.6. Employment Act, 2006

Key provisions/requirements	Relevance and Applicability
<p>i. This Act spells out general principles aimed at checking on work-related vices which include forced labour, discrimination in employment and sexual harassment.</p> <p>ii. The Act has provisions for: notification of existing vacancies, issuance of employment contracts, acceptable duration of works (days per week and hours per day), leave days, payment of wages, labour inspections, settling grievances and termination of employment. It further provides that a child under the age of twelve years shall not be employed in any business, undertaking or workplace.</p>	<p>The Contractor shall take responsibility to comply with the requirements of this Act; NFA shall supervise and offer technical support to ensure compliance with the requirements of the Act.</p> <p>The Project implementers shall be instructed not to engage any child workers at the Project site during the activity implementation and to also ensure that there is no forced labour under the Project.</p>

3.2.7. Workers Compensation Act, Cap 225

Key provisions/requirements	Relevance and Applicability
<p>The Act provides for the compensation of workers in case of injury (several categories of injury and level of compensation are specified) and death; and compensation in respect of occupational diseases. It also spells out the need to provide medical aid and treatment to the workers in the course of their employment. It sets out the employer's liabilities and mechanisms for determining claims</p>	<p>The Contractor shall be supervised to ensure that all cases that evoke the Act are conclusively handled. NFA shall offer technical support and supervise to ensure adherence with the Act.</p>

3.2.8. Historical Monuments Act, 1968

Key provisions/requirements	Relevance and Applicability
<p>The Act provides for the preservation and protection of historical monuments and objects of archaeological, paleontological, ethnographical and traditional interest. The Act requires that any person who discovers any such object takes such measures as may be reasonable for its protection. The Acts further prohibits activities</p>	<p>The Contractor shall adopt the Chance Finds Procedures in addressing possible encounters of any archaeological resources during Project implementation (Annex 3).</p>

such as: (i) cultivation or ploughing soil that detracts any preserved or protected object; (ii) making alteration, additions to, or repair, destroying, defacing or injuring any preserved or protected object.	The NFA team shall provide the requisite technical support in this area.
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3.2.9. Uganda Survey Act, 1964

Key provisions/requirements	Relevance and Applicability
<p>The Act gives the Commissioner of Lands & Surveys power to authorise any necessary survey. However, when a survey is to be carried out in any area, notice has to be published specifying the local limits before the survey is undertaken. Thereafter, a Government Surveyor shall determine and mark out the boundaries of the land and cause boundary marks to be erected. The owner of the surveyed land shall then maintain any survey or boundary mark lawfully erected on his or her land, or on the boundaries of the land, in good condition and repair, and shall keep such marks clear of high grass and brushwood.</p> <p>Every owner of land shall give immediate notice to the nearest administrative unit or nearest police station if any survey or boundary mark lawfully erected on his / her land is injured, destroyed or removed. It shall be the duty of every chief to prevent the destruction, injury or alteration of any survey or boundary mark within the local limits of his or her jurisdiction. Whenever the commissioner becomes aware that any survey or boundary mark lawfully erected has been injured, destroyed or removed, or requires repair or clearance, the commissioner may cause the mark to be re-erected, repaired or cleared.</p>	<p>In the execution of this activity, the Developer (NFA) shall give notice to the Commissioner for Lands & Surveys at the Ministry of Lands. NFA shall execute this assignment with participation of the district survey staff so that the records of boundary surveys are captured with responsible Commissioner. NFA shall ensure that the pillars used for the survey are strong, conspicuous and shall be maintained in good condition.</p> <p>To ensure safety of the survey marks, NFA shall strengthen collaboration with the local authorities (district, sub-county, police and community structures) to strengthen community awareness on the need to safeguard the pillars.</p>

3.3. The National Regulations Framework

3.3.1. National Environment (Environmental & Social Assessment) Regulations, 2020

Key provisions/requirements	Relevance and Applicability
<p>The Regulations provide general guidance on the Environmental & Social (E&S) assessments that should be undertaken when a development project is to be implemented. The Regulations outline the steps to be undertaken in case an ESIA study has to be undertaken; or when a Project Brief is to be undertaken.</p> <p>The Regulations have to be interpreted alongside the National Environment Act (2019). The Act specifies the sub-projects for ESIA and Project Briefs; and also, those where neither of the above is to be undertaken. According to Schedule 11 of the Act (projects or activities exempted from Environment Assessments), the proposed sub-project is an environmental enforcement action and thus falls under this category.</p>	<p>In view of the provisions of the Regulations, an E&S screening had to be prepared and the ESMP developed for managing any E&S impacts.</p> <p>The developer and the hired service provider therefore have to take responsibility for managing the identified E&S risks.</p>

3.3.2. National Environment (Wetlands, Riverbanks & Lakeshores Management) Regulations 2000.

Key provisions/requirements	Relevance and Applicability
<p>The Regulations focus on (i) The conservation and wise use of river banks, wetlands and their resources for ecological and tourist purposes; (ii) Ensuring water catchment conservation; (iii) Minimizing and controlling pollution; and (iv) Ensuring that wetlands and river banks are protected as habitats for species of fauna and flora.</p>	<p>The interventions planned for the Otzi CFRs are directly focused on these targets of this Regulations. It worthwhile acknowledging that Otzi CFRs have a number of streams that contribute to the hydrological status of R. Nile and as well influence the water supply demands in the riparian urban and rural communities. The planned activity is not likely to have an adverse impact on the wetlands in the CFRs; instead, this activity shall contribute to improved characteristics of the wetlands and hence enhancing the wetland values and functions. The Contractor shall pay attention to ensure that no waste generated from the activity are dumped in the wetlands and streams in the CFRs</p>

3.3.3. National Forestry Regulations, 2016

Key provisions/requirements	Relevance and Applicability
<p>The Regulations set out the principles for sustainable forest management. The key principles (among others) worthy mentioning with regards to the planned activity include: (i) Conservation of ecosystems, habitats and biological diversity and their health and vitality; (ii) Sustaining the potential yield of the ecological, social and economic benefits of forests; (iii) Promoting participation of stakeholders in the planning and management of forests; (iv) Conservation of watersheds and other natural resources, including soil and water; (v) Conservation of natural heritage of forest resources and their aesthetic, cultural and spiritual values; and (vi) Regular monitoring of management activities and their impact.</p>	<p>The proposed intervention in the Otzi CFRs is clearly contributing to the realisation of the principles of sustainable forest management set out in the Regulations.</p> <p>NFA and Contractor shall ensure that the participation of all the stakeholders is achieved and thereafter NFA should undertake the regular monitoring of the CFRs.</p>

3.3.4. The National Environment (Waste Management) Regulations, 2020

Key provisions/requirements	Relevance and Applicability
<p>The Regulations place ultimate responsibility for waste to a person who generates it. The Regulations require the generator of the waste to apply waste management measures that: (i) prevent harm to human health & ensure safety of humans; (ii) prevent pollution, harm to biological diversity and contamination of the environment; (iii) use best available technologies and best environmental practices to manage waste.</p>	<p>For the waste anticipated in the execution of the activity, the Contractor shall be required to adhere to the appropriate means of waste management. The Developer (NFA) shall be required to monitor the Contractor's operations to ensure compliance.</p>

3.4. The National Development Frameworks

3.4.1. National Forest Plan, 2011/12 – 2021/22

Key provisions/requirements	Relevance and Applicability
<p>The National Forest Plan (NFP) advances the following strategic objectives: (i) Enhance the capacity of forestry institutions to enable them effectively perform their mandates; (ii) Increase the forest resource base by increasing forest cover to the 1990 levels; (iii) Increase economic productivity of forests and employment in the forestry sector; and (iv) Restore and improve ecosystem services derived from sustainably managed forests.</p> <p>In a bid to realise the products and services from the forests, the NFP focuses on investments in: (a) Forest law enforcement and governance (FLEG); (b) Strengthening of institutions responsible for forest management; and (c) Restoration of degraded natural forests. The NFP acknowledges that inadequate implementation of FLEG has contributed to deforestation and forest degradation. It puts emphasis on empowering local communities to take active participation in FLEG.</p> <p>The NFP puts emphasis on effective protection of the forests as an important activity if high value forests are to be conserved. It seeks to give special attention to the woodland reserves of high biodiversity conservation values (<i>Otzi CFRs are in this category</i>). Activities such as enrichment planting, encroachment planting, protection, liberation tending, etc. are planned to receive high priority in order to halt deforestation and forest degradation.</p>	<p>The proposed interventions of the boundary demarcation of Otzi CFRs are in line with the provisions of the NFP.</p> <p>Once this is undertaken, it will surely contribute to the improvement of the Otzi CFRs – which are of high ecological and social value.</p> <p>NFA shall be required to rally for community participation in the conservation activities – during the boundary demarcation and the subsequent efforts even after the demarcation (this has been clearly pointed out in the ESMP’s mitigation and enhancement measures)</p>

3.4.2. Vision 2040

Key provisions/requirements	Relevance and Applicability
<p>One of the several attributes of Vision 2040 which aligns with the need for conservation is the one which states that “<i>able to exploit and use its resources gainfully and sustainably</i>”. Furthermore, one of the vision’s aspirations is: “<i>a desire for a green economy and clean environment where the ecosystem is sustainably managed</i>”. The Vision sets a target of increasing forest cover from 15% (2010 baseline) to 24% by 2040.</p> <p>The Vision acknowledges that the state of natural resources has been facing increasing challenges including rapid deterioration due to: increased pressure from high population growth & economic activities; and poor disposal of wastes from industries & human settlements among others. On this backdrop, efforts are aimed at attaining a green and clean environment by 2040; this should ensure no water and air pollution while conserving the flora and fauna and restoring and adding value to the ecosystems. Efforts are to be made to restore and add value to the ecosystems (wetlands, forests, range lands) by undertaking re-forestation and afforestation and other strategic activities. Restoration of degraded ecosystems is also to be achieved through monitoring and inspecting the</p>	<p>The aspirations and strategic measures put across in Vision 2040 are in conformity with the planned intervention in the Otzi CFRs.</p> <p>Once the intervention is successfully accomplished, it shall surely contribute to the long-term drive towards the conservation of vital ecosystems which have far reaching outcomes that benefit the population and other ecological services as well.</p>

restoration of ecosystems (wetlands, forests, catchments); equitable transfer of environmentally sound technologies; and assist the population to internalize the full environmental and social cost of goods and services.

3.4.3. The fourth National Development Plan (NDP IV) 2024

Key provisions/requirements	Relevance and Applicability
<ul style="list-style-type: none"> ✓ Among the several emerging issues identified in the NDP IV are the need to (i) Add value to the existing tourism products, diversify & develop more products, and undertake evidence-based marketing in key tourism source markets; and (ii) Promote the sustainable use of natural resources and mitigate against risks that come with climate change vulnerability, biodiversity loss, and pollution. ✓ In pursuit of the NDP IV goal, the government plans to aggressively invest in tourism development among other identified growth areas to contribute to poverty reduction through employment and diversification of livelihood opportunities which in turn shall provide additional income and contribute to a reduction in the vulnerability. ✓ The NDP IV in its development strategies seeks to promote sustainable use and management of natural resources and the focus is on restoring, conserving as well as strengthening sustainable management of natural resources such as land, forests, water, and wetlands. These efforts are expected to contribute to the mitigation of the effects of climate change and prioritize investments which are expected to foster innovation and create job opportunities in sectors such as renewable energy, conservation, and environmentally friendly practices. 	<p>The NDP IV emerging issues are catered for in the planned activity. Similarly, the activity shall contribute to the NDP IV goal when employment opportunities are generated to the local community and in future tourist potentials in Otzi CFRs. The activity once concluded shall strengthen the sustainable management of the forest resources.</p>

3.5. The World Bank Environmental and Social Framework 2017

No.	The Standard	Key provisions	Relevance and Applicability
1.	ESS-1: Assessment and Management of Environmental and Social Risks and Impacts	<p>ESS-1 places a responsibility on the Borrower to assess, manage and monitor E&S risks and impacts during project life cycle in a manner that is proportionate to the nature and scale of the project and the potential risks and impacts.</p> <p>To achieve this, the Borrower has to undertake an environmental & social assessment of the proposed project which is proportionate to the risks and impacts of the project. This will help identify mitigation measures and actions and to improve decision making and ensure that projects are environmentally and socially sound and sustainable.</p>	<p>An E&S Screening for the proposed activity was undertaken which culminated into screening report; the report highlighted a number of E&S issues and recommended for preparation of an ESMP.</p> <p>The ESMP (this document) has gone into a detailed step to review the potential risks and mitigation measures that shall be implemented to avert any negative consequences from the activity. It has also stipulated the enhancement measures for some</p>

		<p>The ESS-1 also stipulates an ESMP as one of the instruments that the Developer can prepare so as to detail: (i) Measures to be taken during the implementation & operation of a project to reduce, eliminate or offset adverse E&S impacts; and (ii) Actions needed to implement the proposed measures</p>	<p>of the positive impacts expected from the activity.</p> <p>The Contractor and Developer (NFA) shall heed to the proposals fronted in this ESMP so as to comply with the requirements of the ESS-1.</p>
2.	ESS-2: Labor and Working Conditions	<p>ESS-2 recognizes the relevance of employment and income generation geared to poverty reduction and economic growth. This employment has to meet the basic minimum requirements that uphold the principle of equity, fairness and justice. ESS-2 places emphasis on (i) Promoting safety and health at work; (ii) Promoting fair treatment, non-discrimination and equal opportunity of project workers; (iii) Protecting project workers, including vulnerable workers such as women, persons with disabilities, children, migrant workers etc. (iv) Preventing the use of all forms of forced labour and child labour; (v) Providing project workers with accessible means to raise workplace concerns</p>	<p>The areas of emphasis stipulated in ESS-2 shall be taken care of during community engagements, recruitment and execution of the work. The Contractor and NFA shall put emphasis on the provisions of ESS-2 during the planning and execution of the activity.</p> <p>The Contractor & NFA shall also pay attention to the specific guidance provided in the IFPA-CD Labour Management Procedures and Occupational Health and Safety Measures during the execution of the activity.</p>
3.	ESS-3: Resource Efficiency and Pollution Prevention and Management	<p>ESS-3 stipulates requirements aimed at addressing resource efficiency and pollution prevention and management during project implementation.</p> <p>Out of the ESS-3 objectives, the ones that are directly related to the proposed activity are: (i) Avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities; and (ii) Avoid or minimize generation of hazardous and non-hazardous waste.</p>	<p>The scale of pollution expected from this activity shall be very minimal and shall be localised. The use of cement and waste generated from cement bags may cause some pollution if not well managed. However, the Contractor and NFA shall be required to manage all waste to ensure that there shall be no pollution.</p>
4.	ESS-4: Community Health and Safety	<p>ESS-4 focuses on the health, safety, and security risks and impacts on project-affected communities and the need for Borrowers to avoid or minimize such risks and impacts especially for people who may be vulnerable. The need to forecast and avoid adverse impacts on the health and safety on communities; and the need to avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials are the</p>	<p>The Contractor is expected to use vehicles for the transportation of boundary demarcation pillars. This raises the need for measures to ensure that these do not cause any risks to the workforce and members of the public. The Contractor and NFA shall work to ensure that all vehicles used are in good mechanical condition and speed limits are observed</p>

		main provisions of ESS-4 which are of importance in the planned activity.	during the execution of the assignment.
5.	ESS-6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	<p>ESS-6 recognizes that protecting & conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development; and the maintenance of core ecological functions. It also places consideration for the livelihood of project-affected parties who access and use of biodiversity or living natural resources.</p> <p>The objectives of ESS-6 are: (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; and (iv) To support livelihoods of local communities, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.</p> <p>The requirements of ESS-6 apply to projects that potentially affect biodiversity or habitats, either positively or negatively, directly or indirectly, or that depend upon biodiversity for their success. It stipulates the need for the Borrower to identify potential project-related risks and impacts on habitats and the biodiversity; and subsequently avoid the adverse impacts or manage these in accordance with the mitigation hierarchy to achieve no net loss and or where feasible achieve a net gain of biodiversity over the long term.</p>	<p>For the proposed intervention, the core objective is to achieve protection & conservation and sustainable management of biodiversity and living natural resources in Otzi CFRs. The successful implementation of the boundary demarcation shall minimise/eliminate cases of encroachment of the CFR which in a long run shall contribute positive impacts on the biodiversity and habitats in Otzi CFRs.</p> <p>The ESMP has also identified some risks anticipated during the execution of the activity; the Contractor shall be expected to implement the proposed mitigation measures and NFA shall monitor to ensure compliance.</p> <p>The execution of the activity does not in any way curtail the local population from accessing and using “permitted goods” from the CFR; they will also continue to enjoy the intrinsic values and services from the CFRs uninterrupted.</p>
6.	ESS-8: Cultural Heritage	ESS-8 recognizes the fact that people identify with cultural heritage as a reflection and expression of their values, beliefs, knowledge and traditions; and that cultural heritage is part of people’s cultural identity and practice. Some of the objectives of ESS-8 are: (i) To protect cultural heritage from the adverse impacts of project activities and support its preservation; and (ii) To promote	According to the literature review, Otzi CFRs have some cultural sites (See Section 2.3.3) though this wasn’t revealed by the communities during engagements held. The NFA team shall make further inquiries on this forestatd cultural

		<p>meaningful consultation with stakeholders regarding cultural heritage. The requirements of ESS-8 apply to projects that are likely to have risks or impacts on cultural heritage (located in, or in the vicinity of, a recognized cultural heritage site) regardless of whether or not it has been legally protected or previously identified or disturbed.</p> <p>ESS-8 requires a Borrower to avoid impacts on cultural heritage and when avoidance is not possible, the Borrower identifies and implements measures to address impacts in accordance with the mitigation hierarchy. A project-specific chance finds procedure has to be followed if previously unknown cultural heritage is encountered during project activities. Where the Borrower's project site contains cultural heritage or prevents access to cultural heritage sites, the Borrower will allow continued access to the site, or will provide an alternative access route.</p>	<p>heritage and if any further engagements are required with the locals who directly interact with it, this shall be planned and executed. In case of other cultural heritages, the project's chance finds procedure (in Appendix 3) shall be followed by the Contractor and dully supervised by NFA.</p> <p>In the context of the planned activity, there is not going to be any hindered access to the CFR by the community; the pillars shall be installed at some distances while all other areas have no enclosure material. The locals who interact with the forestated cultural heritage shall continue to have unimpeded access.</p>
7.	ESS-10: Stakeholder Engagement and Information Disclosure	<p>The emphasis of ESS-10 is on open, transparent and effective engagement between the Borrower and project stakeholders that can improve the E&S sustainability of projects and enhance project acceptance.</p> <p>The engagements should be conducted throughout the project life cycle to build strong, constructive and responsive relationships vital for the successful management of E&S risks. Stakeholder engagement is most effective when initiated at an early stage of the project and developed throughout to inform decision making and assessment, management & monitoring of E&S risks and impacts.</p> <p>The stakeholder interest and support for the project; timely disclosure of E&S risks and impacts to the stakeholders; and accessible and inclusive means of raising issues and grievances are paramount in the implementation of the project. The nature, scope and frequency of stakeholder engagement will be proportionate to the</p>	<p>Stakeholder engagements have been undertaken during the screening exercise; these engagements raised pertinent issues that informed the planning and implementation of the activity.</p> <p>Considering the nature and scope of the planned activity, there are no significant E&S risks anticipated. However, NFA and the Contractor shall continue to engage the stakeholders during the implementation of the activity in line with the requirements of ESS-10.</p>

	nature and scale of the project and its potential risks and impacts	
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3.6. Institutional Framework:

The implementation of the proposed sub-project needs to be handled collectively with a number of stakeholders / institutions taking part. The institutions that have a role to deliver in the proposed sub-project are outlined below.

No	Stakeholder / Institution	Roles / Mandates	Remark
1.	NFA (Headquarters & Regional Office)	<ul style="list-style-type: none"> ▪ Lead Agency in all activities in the CFRs and is the proponent of the sub-project. ▪ Take lead in pre-implementation stakeholder engagements and ensure that these are sustained even after the activity. ▪ Take lead in the CFR boundary surveys. ▪ Overall management of the contract and the proposed activity. ▪ Supervisory oversight (monitoring) to the hired Contractor to ensure that all the E&S requirements are met ▪ Provide technical advice to all stakeholders on the sustainable. ▪ Continuous monitoring of the boundary demarcation and human activity to ensure that there is no demolition or the pillars and no encroachment of the Otzi CFRs. ▪ Establish and sustain collaboration with the local authorities and stakeholders to ensure wise use of the Otzi CFRs. 	The developer shall undertake these roles and mandates with full cognisance of the project specific requirements and national requirements too.
2.	MWE (PCU)	<ul style="list-style-type: none"> ▪ Guide the developer to ensure that the contract signed is cognizant of E&S requirements. ▪ Offer technical support to the NFA Team and the Contractor on the E&S requirements during activity implementation. ▪ Take part in the supervision of the assignment. ▪ Promotion, public information, and advocacy for the forestry sector initiatives 	These have to be done prior to the implementation of the activity and during execution.
3.	Moyo District & associate local authorities	<ul style="list-style-type: none"> ▪ Rally the general public to support efforts geared to the conservation of the forest reserves. ▪ Take part in the awareness creation of the communities. ▪ Participate in the boundary demarcation activities – especially technical staff (Surveyor, Forest Officer etc) and local politicians hailing from the locality. ▪ Take part in the monitoring of the implementation of the activity and contribute to the decisions that shall lead to the success of the activity and its sustainability. ▪ Implement national policies relating to forestry. ▪ Promote tree planting in the communities ▪ Support law enforcement interventions especially those that seek to curtail illegal activities in the CFRs. 	The district & its associate local authorities shall be expected to undertake this on a continuous basis in collaboration with the NFA regional office.

4.	Neighbouring Local Community	<ul style="list-style-type: none"> ▪ Participate in forest management activities ▪ Advance wise use (sustainable harvesting of forest products). ▪ Monitor and report on any illegal activities in the CFRs ▪ Participate in fire control interventions ▪ Participate in the boundary demarcation activities – provide labour, sell building materials to the contractor and other locally available resources, ▪ Participate in the planned meetings and take part in decision making ▪ Access and use specified forest products free of charge and in close collaboration with the NFA. 	The communities shall be expected to collaborate with NFA in the strategic interventions aimed at advancing sustainable use of the CFRs
5.	Contractor	<ul style="list-style-type: none"> ▪ Execute the activity in line with the contractual obligations and other instructions given to by the NFA. ▪ Establish mechanisms for the E&S compliance in line with the proposals presented in the ESMP and other measures that shall be issued 	MWE and NFA teams shall undertake comprehensive induction of the Contractor and his workers.
6.	Civil Society Organisations (CSOs)	<ul style="list-style-type: none"> ▪ Collaborate with NFA staff especially on stakeholders' engagements (advocacy) ▪ Offer technical skills (trainings) in the fields of nursery management, tree planting and management. ▪ Advance livelihood interventions in the communities that can minimise over reliance on the CFRs and hence reduce human pressure on the CFRs 	NFA to seek out for potential CSOs operating in the area so that they can configure their operations to the Otzi CFRs conservation interventions.
7.	Private Sector	<ul style="list-style-type: none"> ▪ Involve them in stakeholder engagements ▪ Rally their agents (those who harvest forest resources for sell to private sector dealers) to engage in sustainable harvesting and doing this in collaboration with NFA 	Attention should be paid to the private sector dealers – lest they become perpetrators of illicit activities in the CFRs

4. METHODOLOGY

This sub-section presents the details of the methods that were used in the preparation of this ESMP.

4.1. Environmental & Social Screening

The Environmental & Social Screening (E&SS) was conducted by the staff of the developer (NFA). The screening exercise involved field / site assessments, observations, and engagements with stakeholders. The E&SS process was guided by the project's E&SS Screening Form. The ESS process culminated into a screening report which outlined the major facts regarding the sub-project. The screening process established that the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant; these are expected to be low in magnitude, temporary and/or reversible, site-specific, without likelihood of impacts beyond the actual footprint of the project.

The screening exercise therefore ascertained that an ESMP shall suffice for addressing and mitigating the probable environmental and social impacts and risks.

4.2. Site visit

The proposed sub-project area was visited to assess the on-site environmental and social conditions. During the site visits, observation and assessment of the physical characteristics of the proposed sub-project site, the immediate surrounding areas and other environmental and social attributes likely to affect or be affected by the implementation of the sub-project was undertaken.

The site visits assisted in identifying and assessing the likely impacts as a result of the sub-project implementation. The site visits also assisted in establishing benchmarks that will be used in monitoring compliance of the sub-project to mitigation measures.

4.3. Document Review

A review of the relevant documents was done; this was in preparation for the ESS exercise and during the preparation of the ESMP. The major project documents that were reviewed include:

- i. The project Environmental and Social Management Framework
- ii. Labour Management Procedures
- iii. Occupational Health and Safety Measures

- iv. IFPA-CD Stakeholder Engagement Plan
- v. Stakeholder engagement plan

Other sources of literature that were consulted to get the basic facts regarding the sub-project have been acknowledged in the ESMP (details have been listed in the References sub-section). These facts have provided more insights on the planned sub-project.

The additional documents that have been reviewed include the applicable national policies, laws, regulations and developmental frameworks; and the World Bank’s Environmental & Social Standards (details have been presented in Section 3 of the ESMP).

4.4. Stakeholder Consultations

The ESS team held consultations with the relevant stakeholders in the sub-project area. The consultations were aimed at obtaining their comments on the proposed sub-project especially with respect to the potential environmental and socio-economic issues and impacts. These consultations were a precursor for community awareness about the sub-project and were also meant to inform the process of developing the ESMP with the associated relevant mitigation measures. The details of the consultations undertaken are listed below.

Date	04/11/2024
Entity / Community	Otzi Sub County
Stakeholders Consulted	<ul style="list-style-type: none"> ▪ LC II Chairpersons ▪ LC 1 Chairpersons ▪ PWDs ▪ Community Members ▪ NFA field staff
No Consulted	25
Key issues Raised	Feedback given to issues raised
It’s a good practice for NFA to open and demarcate CFR boundaries to avoid land related conflicts	This is done regularly to differentiate CFR land from community/individual land to avoid issues of encroachment
NFA should involve the elderly in boundary identification	Forest boundary reopening and demarcation is an open activity that involves stakeholders at every level right from consultations.
Upon boundary demarcation, will the communities be allowed to pick firewood?	Yes, as it has been communities will be allowed to access the forest to pick only acceptable products on a regulated basis.
Community land is not enough, thus requesting to allow crop cultivation in the forest.	By law, crop cultivation in a CFR is not allowed. Communities are advised to embrace smart agriculture through Government support initiatives and utilised their own available land for agricultural purposes.
As communities, there is need to protect the environment. We cannot exist without trees but trees can exist without us.	Grateful for the drive and advocacy to protect the environment
Where can the communities get seedling to plant trees on their own land	Communities to liaise with NFA field staff and get free indigenous seedlings for reforestation/afforestation on private land

Prioritise available jobs to local communities	This is the mode of the project, to work with local communities.
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5. IMPACT IDENTIFICATION AND MITIGATION

The implementation of the sub-project is expected to generate both positive and negative impacts. The positive impacts need to be enhanced while the negative impacts shall need to be mitigated. The subsequent sections present an outline of the positive and negative impacts from the sub-project. The impact analysis has been structured along the major activities involved in the sub-project.

5.1. Expected Positive E&S Impacts / Benefits

No	Activity	Potential E&S Impact	Impact Description	Enhancement measures
Preliminary activities				
1.	Stakeholder engagements	Acceptability of the project by the locals	The local population and authorities shall welcome the sub-project intervention	Stakeholder engagements: (i) Ensure correct information about the planned activity is provide to the stakeholders (ii) Contractor and NFA Teams to continue with stakeholder engagements during the activity implementation.
		Enhanced cooperation from local population & local authorities during activity implementation	Once adequate awareness creation is done, the local population and authorities shall join in the planned activities.	Stakeholder engagements: Disseminate messages regarding the need for the participation of the local population and authorities (employment, decision making)
2.	Mobilization of workforce (recruitment & deployment)	Employment of the locals in the sub-project activities	The locals are expected to turn up for job opportunities that shall be available in the sub-project. The Contractor is expected to source for local labour from within the locality.	(i) Comprehensive community awareness creation meeting (ii) Provide clear and accessible information about recruitment. (iii) Avoid recruitment of children (iv) Briefing the Contractor on the E&S protocols of the project.
Boundary demarcation activities				
3.	Production of demarcation pillars	Financial benefits to the locals by way of:	Once the boundary demarcation activities commence, there shall be an	(i) Disseminate information to the locals regarding the requirements for food items,

No	Activity	Potential E&S Impact	Impact Description	Enhancement measures
4.	Pillar transportation to the site	(i) Sale of food items to the workforce (either directly to workers or to the Contractor).	increased number of workers engaged by the Contractor. These shall need food which shall be sourced from within the area. Furthermore, some of the Contractor's workers may not be from the area – these shall need places of abode. The activity also requires construction materials – most of this shall be sources from within the locality.	local construction materials and accommodation facilities. (ii) Contractor should ensure that the items & services sourced from the locality are fully paid for (iii) Keep record of the items sources or services acquired (iv) Avail employment contracts to the workers
5.	Clearing / Pitting	(ii) Sale of local construction materials (sand, aggregate, cement etc)		
6.	Pillar planting	(iii) Accommodation – especially for migrant workers. (iv) Salary payment for the workforce recruited.		
Post-Implementation positive impacts				
7.	Post-Project inspections and assessment of the CFRs.	Improved conservation & health of the CFR ecosystem. This is expected to yield the following concomitant values (i) Improvement of the social benefits from the CFRs to the locals (ii) Enhanced ecological functions from the CFRs (iii) Scientific importance of the CFR (iv) Boost in the tourism potential in the CFRs; these will also come with additional benefits to the locals and the whole nation.	Once the boundary demarcation is completed and the locals retreat from any portions encroached (or halt any planned encroachment), there shall be an improvement in the ecological conditions (health) of the CFRs. These arise because there shall be no detrimental activities taking place in the CFRs portions that shall be cordoned off with the boundary line.	(i) Continuous monitoring and assay of the CFRs conditions - NFA (ii) Continued stakeholder engagements even after boundary demarcation exercise - NFA
		Enhanced cooperation from the local population & local authorities after the activity implementation	Once the local population & local authorities realise the benefits from the activity, there will be more cooperation towards the conservation and sustainable use of the CFR.	NFA Field Teams to continue with stakeholder engagements even after boundary demarcation exercise
		The NFA's statutory duty of protecting the CFRs shall be eased.	Since the CFRs boundaries shall be clearly defined; and with the participation of the locals, incidences of encroachment shall be eliminated / minimised – thus managing such a resource becomes easy.	(i) NFA to continuously monitor incidences of encroachment & demolition of boundary pillars (ii) NFA to continue with stakeholder engagements even after boundary demarcation exercise

5.2. Key Adverse E&S Impacts/Risks

No	Activity	Potential E&S Risks	Impact Description	Mitigation measures
Preliminary activities				
1.	Stakeholder engagements	Misinformation of the public that may cause resistance to the planned activity	In some cases, saboteurs can infiltrate the public with wrong information meant to jeopardise the project	Stakeholder engagements: (i) Prepare & provide the correct information regarding the planned activity to the stakeholders (ii) Timely engagement of the stakeholders
2.	Joint reconnaissance survey	Minor injuries during transect walks	The activity shall involve transect walks through the planned demarcation areas; most of these areas could be bushy and with rough terrain that can cause minor injuries to the survey teams	Provide appropriate Personal Protective Equipment (PPE) for the survey teams
		Misinformation of the public	<i>As above</i>	<i>As above</i> <ul style="list-style-type: none"> ▪ Involve the local population & local authorities in the transect walks so that they can appreciate what is actually being done.
3.	Setting out	Nil	----	----
4.	Mobilization of the workforce (recruitment & deployment):	(i) Complaints of marginalisation and discrimination during recruitment (ii) Recruitment of children (Child Labour)	(i) Incidences where some persons in the community may complain of being denied employment may arise. This is due to the high level of unemployment in the country (ii) Either the Contractor may opt to recruit children as a cheap labour; or Children (especially those out of school) may pursue employment with the Contractor	(i) Provide clear and accessible information regarding recruitment – qualifications, numbers required (ii) Avoid recruitment of children – screening should consider getting age confirmation or confirmation from the Local Council (LC) leaders. (iii) Briefing the Contractor on the E&S protocols of the project. (iv) Comprehensive community awareness creation meeting
Boundary demarcation activities				
5.	Production of demarcation pillars	(i) Health risks (respiratory diseases such as flu and other	<ul style="list-style-type: none"> ▪ Scenarios where cement dust may be inhaled by the workers are a possibility 	(viii) Provide the appropriate PPEs for the workforce for the different tasks (basic

No	Activity	Potential E&S Risks	Impact Description	Mitigation measures
6.	Pillar transportation to the site	long-term respiratory ailments)	especially if there are no appropriate PPEs; these can result into short-term and even long-term respiratory ailments.	PPE should include the following: Hand Gloves; Face Masks, Gum Boots and Coverall Jackets, Helmets and Reflector Jackets)
7.	Clearing/Pitting	(ii) Safety risks – there is possibility of injuries during the execution of the following tasks:	<ul style="list-style-type: none"> ▪ The tasks associated with boundary demarcation involve working with tools and equipment that may cause injuries to the workers. ▪ Working environment is a bushy area; the possibility of encountering hostile animals and poisonous plants / animals is high. ▪ The Contractor may take advantage of the ruralness of the area and thereby abuse the workers by not availing the basic requirements. ▪ The employment shall draw some persons from outside of the locality into the area; cases of GBV may arise. Similarly, some locals get excited with earned incomes and this excitement can even go to the extent of triggering GBV cases. ▪ The operations are expected to make use of cement and other materials; these may generate waste (waste bags, residual steel and aggregate materials) at work sites where concrete pillars are moulded ▪ There is a likelihood of some misunderstanding amongst the workers or with their employer (Contractor) or by from 	(ix) Provide First Aid kits to manage any minor injuries that occur during works (x) Ensure that welfare & employment requirements are provided to the workers (xi) Ensure that employed persons sign Codes of Conduct (xii) Conduct community engagement especially on their relations with the workforce (xiii) Provide the basic welfare requirements for the workforce (xiv) Avail security guard to move alongside the workforce especially in sections where hostile wild life dwell in. (xv) Collect all the wastes and dispose in designated areas (xvi) The Contractor (and NFA) to conduct inductions and toolbox engagements with the Contractor's workers. (xvii) Put in place a grievance redress mechanism to respond to and manage any emerging grievances.
8.	Pillar planting	<ul style="list-style-type: none"> ✓ Masonry works (involving steel, aggregate, sand & cement) to make concrete pillars ✓ Loading & offloading of the pillars during transportation. ✓ Manual excavation of pits ✓ Manual installation of the pillars and anchoring in the pits with concrete mix. (iii) Biological hazards (snake bites, poisonous plants, attacks from aggressive wild life) (iv) Abuse of the workers' labour rights: <ul style="list-style-type: none"> ✓ Failure to provide employment contracts ✓ Failure to pay salaries & wages ✓ Failure to provide basic welfare requirements (safe drinking water, meals, First Aid ...) ✓ Failure to provide appropriate PPEs (v) Gender-Based Violence (GBV) and related grievances as the workers mix with the community (vi) Generation of waste (cement bags &		

No	Activity	Potential E&S Risks	Impact Description	Mitigation measures
		surplus construction materials) (vii) Grievances and misunderstandings	community members over a number of issues – payment, working conditions, welfare etc.	

NB-1: There shall be very minimal biodiversity destruction – especially species of the *Gramineae* family during clearing and pitting; these shall self-regenerate since there is adequate propagule within the excavated area; there is therefore no need for specific restoration efforts.

NB-2: In addition to these mitigation measures, the Contractor shall be expected to pay keen attention to the several potential safeguards risks, lapses and incidents as stipulated in the different policies, regulations, legislations and standards (outlined in Chapter 3) that may occur during the implementation of the sub-project. The Contractor shall address these based on the recommendations pointed therein in the review or in accordance with the internationally & nationally agreed performance standards

6. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

The Environmental and Social Management Plan (ESMP) outlay below provides a detailed breakdown of the period of implementation, responsibility centre and costs for the proposed mitigation measures and enhancement measures pointed out in the preceding sub-section of impact analysis.

6.1. Enhancement Costs for the ESMP Positive Impacts

Potential E&S Positive Impact	Proposed Enhancement Measures	Implementation Period	Responsibility	Cost Estimate (UGX)	Comment
Preliminary activities					
Acceptability of the project by the locals	Stakeholder engagements: Ensure correct information about the planned activity is provide to the stakeholders	Before commencing with the works	NFA	93,764,850	Contractor and NFA Teams to continue with stakeholder engagements during the activity implementation.
Enhanced cooperation from local population & authorities during activity implementation	Stakeholder engagements: Disseminate messages regarding the need for the participation of the local population and authorities (employment, decision making)	Before commencing with the works	NFA	Covered in above costing	Good to keep thr terms of engagement clear and conducive
Employment of the locals in the sub-project activities	Comprehensive community awareness creation meeting	Before commencing with the works	NFA	Covered in above costing	----
	Provide clear and accessible information about recruitment	Before commencing with the works	Contractor	No Cost Required (NCR)	Contractor should exhaust all possible channels of information dissemination
	Vigilant monitoring to ensure no recruitment of children	Before commencing with the works	NFA	NCR	This shall call for involvement of local leaders to ensure compliance
	Briefing the Contractor on the E&S protocols of the project.	Before commencing with the works	NFA	NCR	The pertinent E&S issues should be configured in the Contract.
Construction Phase (Boundary demarcation activities)					
Financial benefits to the locals by way of: (i) Sale of food items to the workforce (either directly to workers or to the Contractor). (ii) Sale of local construction materials (aggregate, sand, cement etc) (iii) Accommodation for workers. (iv) Salary payment.	Disseminate information to the locals regarding the requirements for food items, local construction materials and accommodation facilities.	Before or at the commencement of the works	Contractor	NCR	Ensure wider reach of information
	Contractor should ensure that the items & services sourced from the locality are fully paid for	At implementation of the works	Contractor	NCR	NFA to check for any cases of complaints during monitoring visits
	Keep record of the items sourced or services acquired	At implementation of the works	Contractor	NCR	
	Avail employment contracts to the workers	Before or at the commencement of the works	Contractor	NCR	NFA to review the contents of the Contracts to ensure that they meet the minimum requirements

Potential E&S Positive Impact	Proposed Enhancement Measures	Implementation Period	Responsibility	Cost Estimate (UGX)	Comment
Post-Implementation positive impacts					
Improved conservation & health of the CFR ecosystem. This is expected to yield other concomitant values (listed in Section 5.1 above).	Continuous monitoring and evaluation of the status of the CFRs	After the execution of the activity	NFA	37,000,000 (Non-project funds)	
	Continued stakeholder engagements even after boundary demarcation exercise - NFA	After the execution of the activity	NFA	42,000,000 (Non-project funds)	This shall keep the different stakeholders to keep into their mandates and obligations
Enhanced cooperation from the local population & local authorities after activity implementation	NFA Field Teams to continue with stakeholder engagements even after boundary demarcation exercise	After the execution of the activity	NFA	Covered in above SE cost	Sense of ownership from the locals
The NFA's statutory duty of protecting the CFRs shall be eased.	NFA to continuously monitor incidences of encroachment & demolition of boundary pillars	After the execution of the activity	NFA	Covered in above M&E cost	
	NFA to continue with stakeholder engagements even after boundary demarcation exercise	After the execution of the activity	NFA	Covered in above SE cost	As above

6.2. Mitigation Costs for the ESMP Negative Impacts

Potential Negative Impact	Proposed Mitigation Measures	Implementation Period	Responsibility	Cost Estimate (UGX)	Comments
Preliminary activities					
Misinformation of the public that may cause resistance to the planned activity	Stakeholder engagements: (i) Prepare & provide the correct information regarding the planned activity to the stakeholders (ii) Timely engagement of the stakeholders	Before commencing with the works	NFA	Embedded in the above cost of stakeholder engagements	Teams should keep track of any cases of discrete and subversive activities in the community
Minor injuries during transect walks at the	Provide appropriate PPE for the survey teams	Before commencing with the works	NFA	20,000,000	This serves to demonstrate to the forthcoming Contractor, the importance of safety

Potential Negative Impact	Proposed Mitigation Measures	Implementation Period	Responsibility	Cost Estimate (UGX)	Comments
time of reconnaissance survey					
Misinformation of the public	Stakeholder participation: Involve the local population & local authorities in the transect walks so that they can appreciate what is actually being done.	Before commencing with the works	NFA	8,000,000	Collective participation of locals and their leaders leaves no room for illicit and sabotage activities.
(i) Complaints of marginalisation and discrimination during recruitment	Provide clear and accessible information regarding recruitment – qualifications, numbers required etc.	Before commencing with the works	Contractor	NCR	Information should be in a medium that can be understood by the locals
(ii) Recruitment of children (Child Labour)	Avoid recruitment of children – screening should consider getting age confirmation or confirmation from the LC leaders.	Before commencing with the works	Contractor	NCR	This should cover a wider range of stakeholders so as to achieve utmost compliance
	Briefing the Contractor on the E&S protocols of the project.	Before commencing with the works	NFA	NCR	Involving key stakeholders (in NFA and PCU) to deliver pertinent information
	Comprehensive community awareness creation meeting	Before commencing with the works	NFA	Covered in the costing of 6.1 above	
Boundary demarcation activities					
(i) Health risks (respiratory diseases such as flu and other long-term respiratory ailments)	Provide the appropriate PPEs for the workforce for the different tasks (<i>basic PPE should include: Hand Gloves; Coverall Jackets, Gum Boots, Face Masks, Helmets, & Reflector Jackets</i>)	During the implementation of works	Contractor	Included in the figure above for the provision of PPE	The PPEs should be planned and availed ahead of commencement of works.
(ii) Safety risks – there is possibility of injuries during: ✓ Masonry works	Provide First Aid kits to manage any minor injuries that occur during works	During the implementation of works	Contractor	Included in the PPE figure above	The kits provided should have the full contents of essential items required.
	Ensure that the welfare and employment requirements are provided to the workers	During the implementation of works	Contractor	NCR	This has to be included in the E&S briefing to the Contractor and in the contracts signed

Potential Negative Impact	Proposed Mitigation Measures	Implementation Period	Responsibility	Cost Estimate (UGX)	Comments
<ul style="list-style-type: none"> ✓ Loading & offloading of the pillars. ✓ Manual excavation of pits ✓ Manual installation of the pillars and anchoring in the pits. 	Ensure the employed persons sign the Codes of Conduct	Before or during the commencement of works	Contractor	NCR	Support on the contents of the codes (see Annexes) has to be provided to the Contractor
	Conduct community engagement especially on their relations with the workforce	During the implementation of works	Contractor NFA	5,000,000	This should bring out all the risks associated with external labour influx to the area
	Avail security guard to move alongside the workforce especially in sections where hostile wild life dwell in.	During the implementation of works	Contractor	3,000,000	Consideration should be made to engage Forest Guards for the government agencies (as applicable)
	Collect all the wastes and dispose in designated areas	During the implementation of works	Contractor	5,000,000	Consideration should be made for re-use of waste materials
	Conduct inductions and toolbox engagements with the Contractor's workers.	During the implementation of works	(i) Contractor (ii) NFA	5,000,000	The NFA team should take part in the inaugural inductions of the Contractor's workers
	Establish grievance redress mechanisms	During the implementation of works	(i) Contractor (ii) NFA	NCR (done alongside SE)	The NFA team should take lead in the establishment and induction of the Contractor's grievance redress committee
<ul style="list-style-type: none"> (iii) Biological hazards (snake bites, poisonous plants, attacks from aggressive wild life) (iv) Abuse of workers' labour rights: <ul style="list-style-type: none"> ✓ Failure to provide employment contracts ✓ Failure to pay salaries & wages ✓ Failure to provide basic welfare requirements ✓ Failure to provide appropriate PPEs (v) GBV, SEA/SH, & related grievances as the workers mix with the community (vi) Generation of waste (cement bags & 					

Potential Negative Impact	Proposed Mitigation Measures	Implementation Period	Responsibility	Cost Estimate (UGX)	Comments
surplus construction materials (vii) Grievances and misunderstandings					

7. SAFEGUARDS MONITORING PLAN

The monitoring of the enhancement measures and the mitigation measures outlined in the ESMP is a fundamental requirement which needs to be done. The E&S performance monitoring is designed to ensure that the proposed enhancement and mitigation measures are implemented. The monitoring therefore assesses the compliance with national standards and World Bank Group requirements or guidelines.

The monitoring program below clearly indicates the linkages between impacts identified in the ESMP, indicators to be measured, methods to be used, monitoring locations, frequency of measurements, and the cost estimates for the monitoring exercise.

7.1. Detailed monitoring schedule, indicators and costs

Proposed Enhancement / Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility to monitor	Cost Estimate
<p>Stakeholder engagements (<i>ensure timely engagement of the stakeholders</i>)</p> <p>(i) Ensure correct information about the activity is provide to the stakeholders</p> <p>(ii) Disseminate messages regarding the need for the participation of the local population and authorities</p> <p>(iii) Disseminate messages regarding community relations with the workforce</p>	Sub-Project area (neighbouring communities)	<p>(i) Records of meetings held – Content disseminated; Issues raised;</p> <p>(ii) Details of persons in attendance</p>	Count (for the number of meetings held and details of attendance)	Monthly – until the end of preliminary phase	NFA	NCR ¹
Briefing the Contractor on the project E&S protocols.	NFA Headquarters	<ul style="list-style-type: none"> ▪ Inception meeting records ▪ Monitoring reports 		Once (at inception) & Routinely (during monitoring visits)	NFA	NCR
Provide clear and accessible information about employment - numbers required, qualifications etc.	Sub-Project area	Copies of job adverts / notices disseminated in the area	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews (with the locals) 	Once (during the mobilisation)	NFA	2,000,000
Vigilant monitoring to ensure no recruitment of children	Sub-Project area	Contractor's employment policies & list of workers recruited	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews (for the workers) 	Once (mobilisation time) and Routinely (during execution)	NFA	5,000,000
Disseminate information to the locals regarding the requirements for food items, local construction materials & accommodation facilities.	Sub-Project area	<ul style="list-style-type: none"> ▪ Sale agreements ▪ Receipts ▪ Rental agreements 	Interviews (with the locals)	Routinely (during monitoring visits)	NFA	3,000,000

¹ Monitoring of these preliminary activities which are self-implemented by the Developer (NFA) do not attract any costs

Proposed Enhancement / Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility to monitor	Cost Estimate
Contractor should ensure that the items & services sourced from the locality are fully paid for	Sub-Project area	<ul style="list-style-type: none"> ▪ Payment records ▪ Community views ▪ Agreements, 	<ul style="list-style-type: none"> ▪ Interviews (with the locals) ▪ Observations 	Routinely (during monitoring visits)	NFA	NCR
Keep record of the items sourced or services acquired	Sub-Project area	Contractor's records (receipts, deliveries etc)	Observations	Routinely (during monitoring visits)	NFA	NCR
Avail employment contracts to the workers	Sub-Project area	Copies of employment contracts	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews with the workers 	Routinely (during monitoring visits)	NFA	5,000,000
Continuous monitoring and evaluation of the status of the CFRs, incidences of encroachment & demolition of boundary pillars	Sub-Project area	Monitoring Reports	<ul style="list-style-type: none"> ▪ Observations ▪ Biodiversity surveys ▪ Video and/or pictorials 	Annually	NFA	15,000,000
Continued stakeholder engagements after boundary demarcation	Sub-Project area	Minutes of meetings (with attendance details)	Counts	Annually	NFA	NCR
Provide appropriate PPE for the survey teams	Sub-Project area	<ul style="list-style-type: none"> ▪ PPE distribution list ▪ PPE delivery notes ▪ Evidence of actual use of PPEs by the survey team 	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews with the workers 	Once (during the initial survey)	NFA	NCR
Stakeholder participation: Involve the local population & local authorities in the transect walks so that they can appreciate what is actually being done.	Sub-Project area	Attendance records	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews with the locals 	Once (at inception of the activity)	NFA	5,000,000
Provide the appropriate PPEs for the workforce for the different tasks (<i>basic PPE should include the following: Hand Gloves; Face Masks, Gum Boots and Coverall Jackets, Helmets and Reflector Jackets</i>)	Sub-Project area	<ul style="list-style-type: none"> ▪ PPE distribution list ▪ PPE delivery notes ▪ Actual use of PPEs by the workers 	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews with the workers 	Routinely (during monitoring visits)	NFA	Embedded in the above costing
Provide First Aid kits to manage any minor injuries that occur during works	Sub-Project area	<ul style="list-style-type: none"> ▪ No. of Kits availed ▪ Kits delivery notes ▪ Actual use of Kits 	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews with the workers 	Routinely (during monitoring visits)	NFA	3,000,000

Proposed Enhancement / Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility to monitor	Cost Estimate
Ensure that the welfare and employment requirements are provided to the workers	Sub-Project area	<ul style="list-style-type: none"> ▪ Record of welfare items provided to the workers ▪ Copies of employment contracts issued 	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews with the workers 	Routinely (during monitoring visits)	NFA	NCR
Ensure the employed persons sign the Codes of Conduct	Sub-Project area	Copies of codes of conduct signed by the workers	<ul style="list-style-type: none"> ▪ Observations ▪ Interviews with the workers 	Once (at the start of the activity) and Routinely (during monitoring visits)	NFA	NCR
Avail security guard to move alongside the workforce especially in sections where hostile wild life dwell in.	Sub-Project area	<ul style="list-style-type: none"> ▪ Memos of Security Guards' engagement ▪ No of Security Guards engaged 	<ul style="list-style-type: none"> ▪ Observations ▪ Document review ▪ Interviews 	Once (at the start of the activity) and Routinely (during monitoring visits)	NFA	5,000,000
Collect and dispose all the wastes in designated areas	Sub-Project area	<ul style="list-style-type: none"> ▪ Schedules of disposal ▪ Quantities disposed ▪ Sites of disposal 	<ul style="list-style-type: none"> ▪ Observations ▪ Document review ▪ Interviews 	Routinely (during monitoring visits)	NFA	8,000,000
Conduct inductions and toolbox engagements with the Contractor's workers.	Sub-Project area	<ul style="list-style-type: none"> ▪ Reports of inductions ▪ Minutes of toolbox ▪ No. of workers engaged 	<ul style="list-style-type: none"> ▪ Observations ▪ Document review ▪ Interviews 	Once (at the start of the activity) and Routinely (during monitoring visits)	(i) NFA	NCR

REFERENCES:

National Forestry Authority (2016). Forest Management Plan for Otzi/Zoka Group of Central Forest Reserves for the Period 01 July 2016 – 30 June 2026.

National Forestry Authority (2005). Standards for Boundary Demarcation.

National Forestry Authority (2008). Managing Central Forest Reserves for the People of Uganda. Volume 2: Functions of Central Forest Reserves in Uganda

Uganda Forest Department (2002). Uganda Forestry Nature Conservation Master Plan.

ANNEXES

Annex 1: CONTRACTOR'S CODE OF CONDUCT

IMPLEMENTING ESHS AND OHS STANDARDS, PREVENTING GENDER BASED VIOLENCE AND VIOLENCE AGAINST CHILDREN

The Contractor is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the Environmental, Social, Health and Safety (ESHS) standards, and ensuring appropriate Occupational Health and Safety (OHS) standards are met. The Contractor is also committed to creating and maintaining an environment where children under the age of 18 will be protected, and where Sexual Exploitation and Abuse (SEA) and sexual harassment have no place. Improper actions towards children, SEA and sexual harassment are acts of Gender Based Violence (GBV) and Violence Against Children (VAC) and as such will not be tolerated by any employee, supplier, associate, or representative of the Contractor.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the Contractor commits to the following core principles and minimum standards of behaviour that will apply to all Contractor employees, associates, and representatives, including Managers and suppliers, without exception:

General

1. The Contractor – and therefore all employees, associates, representatives, Managers and suppliers – commits to complying with all relevant national laws, rules and regulations.
2. The Contractor commits to fully implementing the Environmental and Social Management Plan ESMP as approved by the Project.
3. The Contractor commits to treating women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV and VAC are in violation of this commitment.
4. The Contractor shall ensure that interactions with local community members are done with respect and non-discrimination.
5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behaviour are prohibited among all Contractor employees, associates, and its representatives, including sub-Managers and suppliers.
6. The Contractor will follow all reasonable work instructions (including regarding environmental and social norms).
7. The Contractor will protect and ensure proper use of property (for example, to prohibit theft, carelessness or waste).

Health and Safety

8. The Contractor will ensure that the project's OHS Measures are effectively implemented by Contractor's staff, as well as Managers and suppliers.
9. The Contractor will ensure that all persons on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents, and reporting conditions or practices that pose a safety hazard or threaten the environment.
10. The Contractor will:
 - i. Prohibit the use of alcohol during work activities.
 - ii. Prohibit the use of narcotics or other substances which can impair faculties at all times.
11. The Contractor will ensure that adequate sanitation facilities are available on site.
12. The Contractor will not hire children under the age of 18 for construction work, or allow them on the work site, due to the hazardous nature of construction sites.

Gender Based Violence and Violence Against Children

13. Acts of GBV and VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment and, if appropriate, referral to the Police for further action.
14. All forms of GBV and VAC, are unacceptable, regardless of whether they take place on the work site, the work site surroundings, or within the local community.
15. Sexual harassment of work personnel and staff (e.g., making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature) are acts of GBV and are prohibited.
16. Sexual favours (e.g., making promises of favourable treatment such as promotions, threats of unfavourable treatment such as losing a job, payments in kind or in cash dependent on sexual acts) and any form of humiliating, degrading or exploitative behaviour are prohibited.
17. The use of prostitution in any form at any time is strictly prohibited.
18. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.
19. Unless there is full consent by all parties involved in the sexual act, sexual interactions between the Contractor's employees (at any level) and members of the communities surrounding the work place are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.

20. In addition to Contractor sanctions, legal prosecution of those who commit acts of GBV and VAC will be pursued if appropriate.
21. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and VAC by a fellow worker.
22. Managers are required to report and act to address suspected or actual acts of GBV as they have a responsibility to uphold Contractor commitments and hold their direct reports responsible.

Implementation

To ensure that the above principles are implemented effectively, the Contractor commits to:

23. Ensuring that all employees sign the 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in GBV and VAC, child endangerment or abuse, or sexual harassment.
24. Displaying the Contractor and Individual Codes of Conduct prominently and in clear view, in offices, and in in public areas of the work space.
25. Ensuring that all employees attend an induction training course prior to commencing work on site to ensure they are familiar with the Contractor's commitments to ESHS and OHS standards, and the project's GBV and VAC Codes of Conduct.
26. Ensuring that all employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the GBV and VAC Codes of Conduct.

I do hereby acknowledge that I have read the foregoing Contractor Code of Conduct, and on behalf of the Contractor agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and ESHS standards, and to prevent and respond to GBV and VAC.

I understand that any action inconsistent with this Contractor Code of Conduct or failure to act mandated by this Contractor Code of Conduct may result in disciplinary action.

Contractor Name: _____

Signature: _____

Name: _____

Title: _____

Date: _____

Annex 2: INDIVIDUAL CODE OF CONDUCT

IMPLEMENTING ESHS AND OHS STANDARDS, PREVENTING GENDER BASED VIOLENCE AND VIOLENCE AGAINST CHILDREN

I, _____, acknowledge that adhering to Environmental, Social, Health and Safety (ESHS) standards, following the project's Occupational Health and Safety (OHS) requirements, and preventing Gender Based Violence (GBV) and Violence Against Children (VAC) is important.

The Contractor considers that failure to follow ESHS and OHS standards, or to partake in activities constituting GBV and VAC—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV may be pursued if appropriate.

I agree that while working on the project I will:

- Attend and actively partake in training courses related to ESHS, OHS, GBV and VAC as requested by my employer.
- Will wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.
- Take all practical steps to implement the Environmental and Social Management Plan (ESMP).
- Implement the OHS Measures.
- Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not sexually exploit or abuse project beneficiaries and members of the surrounding communities.
- Not engage in sexual harassment of work personnel and staff—for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature is prohibited, e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.
- Not engage in sexual favours—for instance, making promises of favourable treatment (e.g., promotion), threats of unfavourable treatment (e.g., loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
- Not use prostitution in any form at any time.
- Not participate in sexual contact or activity with children under the age of 18—including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.

- Unless there is the full consent by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered “non-consensual” within the scope of this Code.
- Consider reporting through the GRM or to my manager any suspected or actual GBV/VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

- Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
- Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labour below the minimum age of 18.
- Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank’s ESSs on child labour and minimum age.
- Take appropriate caution when photographing or filming children.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week’s salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety measures. That I will avoid actions or behaviours that could be construed as GBV/VAC. Any such actions will be a breach this Individual Code of

Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Name: _____

Title: _____

Date: _____

Annex 3: CHANCE FIND PROCEDURE

Chance find procedures will be used as follows:

- a) Stop the project activities in the area of the chance find;
- b) Delineate the discovered site or area;
- c) Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be deployed until the responsible local authorities and the DoMM take over;
- d) Notify the project supervisor who in turn will notify the responsible local authorities and the National Museum immediately (within 24 hours or less);
- e) The local authorities and the National Museum will take charge of protecting and preserving the site in case the finds are of interest to the Department
 - i. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the National Museum (within 72 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values;
 - ii. Decisions on how to handle the finding shall be taken by the responsible authorities and the National Museum. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage;
 - iii. The local authority/ National Museum decision concerning the management of the finding shall be communicated in writing by the National Museum; and
 - iv. Findings will be recorded in World Bank Implementation Supervision Reports (ISRs), and Implementation Completion Reports (ICRs) will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.
 - v. Project works could resume after permission is given from the responsible local authorities and the National Museum concerning safeguard of the heritage;
- f) The above procedure when applicable must be referred to as standard provisions during the project activities and therefore site supervisors shall monitor the procedure for any chance find encountered during project activities
- g) If the finds are not of interest to the Department of Museums and Monuments, they should be reburied on a site set aside for such purpose and project works continue

In case of Chance finds, the Implementing partners for the project will ensure that the chance finds procedure is adequately utilised and monitored.