



**The Republic of Uganda**

**Ministry of Water and Environment**

**Investing in Forests and Protected Areas for  
Climate Smart Development (P 170466)**

**Updated  
ENVIRONMENTAL and SOCIAL  
COMMITMENT PLAN (ESCP)**

**June 15, 2026**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Uganda (“the Recipient”) is implementing the Investing in Forests and Protected Areas for Climate Smart Development Project (“the Project”), with the involvement of the Ministry of Water and Environment (MWE) and the Uganda Wildlife Authority (UWA), and Uganda Timber Growers’ Association (UTGA) as set out in the Financing Agreement. This Environmental and Social Commitment Plan (ESCP) supersedes previous versions of the ESCP for the Project.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this ESCP, in a manner acceptable to the International Development Association (“the Association”). The ESCP is a part of the Financing Agreement (the “Agreement”). Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association. As provided for under the Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient’s Permanent Secretary of the Ministry of Finance, Planning and Economic Development. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below, irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>1. The Ministry of Water and Environment (MWE), which is the main coordinating entity of the Project, shall maintain a Project Coordination Unit (PCU) with adequate resources and staffing, including, without limitation, an Environment and Social (E&amp;S) Coordinator nominated from the MWE, an Environmental Risk Management Specialist, a Social Risk Management Specialist, all with the requisite qualifications and experience and under terms of reference approved by the Association, to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project.</p> <p>2. In addition, E&amp;S focal points have been designated and shall be maintained at Uganda Wildlife Authority (UWA). In addition, the MWE shall maintain the E&amp;S focal points originally nominated at the National Forestry Authority. These focal points at UWA and MWE shall be responsible for the day-to-day implementation of the E&amp;S activities at their respective agencies/ministries.</p> <p>3. For grievance management and continuous stakeholder engagement each entity (MWE and UWA) shall maintain officers to manage the toll-free lines. Currently UWA has assigned two officers, and MWE assigned three officers to manage the toll-free lines and process grievances as appropriate and respond to complaints. Each entity shall maintain these officers full-time throughout Project implementation.</p>	<p>1. Maintain an E&amp;S Coordinator, Environmental Risk management specialist and Social Risk management specialist in the PCU throughout Project implementation.</p> <p>2. Maintain the focal points throughout Project implementation</p> <p>3. Maintain these officers throughout Project implementation</p>	<p>MWE</p> <p>MWE, UWA</p> <p>MWE, UWA</p>
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>1. Building on the training conducted under the Project, carry out further training of E&amp;S staff at the MWE – PCU and UWA with focus on the following areas that relate to their duties.</p> <ul style="list-style-type: none"> <li>• Implementation of Process Framework and its associated recommendations</li> <li>• Implementation of Stakeholder Engagement Plan (SEP) including stakeholder mapping, inclusive and participatory consultation methodologies, grievance management and monitoring and evaluation</li> <li>• Implementation of Grievance Mechanisms (GM)</li> <li>• Occupational health and safety (OHS) protocols, including the information to be collected and the process to be followed for incident reporting under the Project, including the revised Incident Reporting Protocol for the Project referred to in Section E.1.</li> <li>• Integration of Environmental &amp; Social aspects in the Procurement cycle</li> <li>• Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) and Gender-Based Violence (GBV)</li> </ul>	<p>1 and 2. Support the EISM implementation</p>	<p>MWE, UWA</p>

	<ul style="list-style-type: none"> <li>Implementation of the Vulnerable and Marginalized Groups Plans (VMGP) throughout Project implementation, including conducting regular stakeholder engagement with Batwa communities present in the Project areas.</li> <li>Any other training included in the implementation plan for UWA under 4.4. Ensure that the Uganda People’s Defense Force (UPDF) staff engaged in Project activities are part of this training. There shall be no dedicated training for the UPDF outside of the scope of training provided to UWA and MWE staff under the Project.</li> </ul> <p>2. Additionally, the Recipient shall support the Enhanced Implementation Support and Monitoring (EISM) to ensure:</p> <ul style="list-style-type: none"> <li>Training of government staff and private sector consultants/clients, workers, and contractors on non-discrimination under the Project, including identifying individuals and venues, as well as providing other logistical support.</li> <li>Training Project level GM on non-discrimination under the Project, including developing training materials, identifying venues, and providing trainers.</li> <li>Preparation of training modules for call center operators, data management personnel, and community outreach personnel on appropriate handling of sensitive information.</li> </ul>		
	3. Train Contractors on E&S aspects indicated above in B that are relevant to their work.	3. As B above, and on a regular basis throughout the Project implementation period	MWE, UWA
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>1. Prepare and submit to the Association regular monitoring reports on the ESHS performance of the Project, including but not limited to:</p> <ul style="list-style-type: none"> <li>The implementation of the ESCP.</li> <li>Status of preparation and implementation of E&amp;S documents of the Project.</li> <li>Summary of stakeholder engagement activities carried out as per the SEP.</li> <li>Complaints submitted to the grievance mechanism(s), including evidence of the grievance log, and progress made in resolving them (with timeframe and proposed solutions).</li> <li>Complaints received through the EISM, and progress made in addressing them</li> <li>E&amp;S performance of contractors and subcontractors as reported through monthly contractors’ and supervision firms’ reports.</li> <li>Number and status of resolution of incidents and accidents reported under Section E below.</li> </ul>	1. Submit quarterly reports to the Association throughout Project implementation. Submit each report no later than 15 days after the end of each reporting period.	MWE
D	<b>CONTRACTORS’ MONTHLY REPORTS</b>		MWE

	<ol style="list-style-type: none"> <li>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association</li> </ol>	<ol style="list-style-type: none"> <li>Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under section C above.</li> </ol>	
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <ol style="list-style-type: none"> <li>In accordance with the Incident Reporting Protocol in Annex 2 of the ESMF, promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of SEA, SH, security risk accidents and incidents and accidents that result in death, serious or multiple injury; and any incidents, accidents or complaints related to the discrimination of vulnerable or marginalized individuals or groups. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Ensure the establishment and operation of a unified system of incident recording and reporting under the Project, including a standard template for such reports, a repository for all reports, and well-described procedures communicated to all relevant staff.</li> <li>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</li> <li>Provide available details of the incident or accident to the Association upon request.</li> <li>Arrange for an appropriate review of the incident or accident (or complaint) to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident, accident, or complaint and prevent its recurrence.</li> </ol>	<ol style="list-style-type: none"> <li>Throughout Project implementation, notify the Association no later than 24 hours after learning of the incident or accident.</li> <li>Provide a subsequent report to the Association within a timeframe acceptable to the Association.</li> <li>Provide details available within 5 working days upon request.</li> <li>Provide a review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association. Also reflect these incidents, accidents and complaints in the quarterly reports to the Association referred to in section C above.</li> </ol>	MWE, UWA
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <ol style="list-style-type: none"> <li>Adopt and implement the sub-project Environmental and Social Impact Assessment (ESIAs) and / or corresponding Environmental and Social Management Plan (ESMPs) consistent with ESS1 and other relevant ESSs.</li> </ol>	<ol style="list-style-type: none"> <li>Adopt the ESIA and/or ESMP before launching the bidding process for the respective subproject activity OR prior to the carrying out of subproject activity that requires the adoption of such ESIA and/or ESMP. Once</li> </ol>	MWE, UWA

	<p>2. Implement the updated ESMF for the Project, consistent with the relevant ESSs.</p> <p>3. Ensure social inclusion and non-discrimination, and implementation of measures to mitigate the risks of discrimination against or exclusion of any vulnerable or marginalized individuals or groups and include measures for this purpose in the ESMF and SEP and subsequently, ensure they are reflected in ESIA, ESMPs, the Project implementation manual (PIM) and implemented throughout the life of the Project.</p> <p>4. <b>EXCLUSIONS:</b> Exclude the following types of activities as ineligible for financing under the Project. Reflect this exclusion list in the ESMF.</p> <ul style="list-style-type: none"> <li>i. Sub-Projects involving significant impacts on critical habitats.</li> <li>ii. Activities involving significant degradation or conversion of natural habitats</li> <li>iii. Any activity that involves the introduction of invasive species or poses significant risks to biodiversity, land conversion or legally protected natural resources</li> <li>iv. Sub-Projects involving the use of unsustainably harvested timber or fuelwood as determined in agreement with the Association.</li> <li>v. Sub-Projects supporting commercial logging in forested areas.</li> <li>vi. Sub-Projects requiring the use of pesticides that are not on the approved list of agro-chemicals, as is described in the updated ESMF.</li> <li>vii. Activities that require conducting of Risk Hazard Assessment (RHA).</li> <li>viii. Drainage of traditional wetlands.</li> <li>ix. Sub-Projects that will lead to surface and groundwater pollution, pest resistance, habitat degradation and soil disturbance leading to the introduction of alien and invasive plant species.</li> <li>x. Large-scale infrastructure sub-Projects and any sub-Projects that could have adverse impacts on ecologically sensitive areas and known cultural heritage sites.</li> <li>xi. Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.</li> <li>xii. Any activity that might physically relocate Vulnerable and Marginalized Groups (VMG) or adversely affect their lands, natural resources or cultural heritage or that would require Free Prior Informed Consent (FPIC) under ESS7.</li> <li>xiii. Activities that may involve involuntary resettlement or land acquisition (other than minor voluntary land donation, where informed consent and power of choice</li> </ul>	<p>adopted, implement the respective ESIA and/or ESMP throughout Project implementation</p> <p>2. Implement the updated ESMF throughout Project.</p> <p>3. Throughout Project implementation as part of the screening process under ESMF/ESIA</p> <p>4. Throughout Project implementation.</p>	
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	<p>is well documented) or lead to physical or economic displacement of individuals or communities or require compensation for loss/replacement costs; other than restriction of access related to Protected Areas management as covered under the Project Process Framework.</p> <p>xiv. Sub-Projects that may involve exclusion and discrimination of people, especially the vulnerable or marginalized groups, as well as the disadvantaged groups.</p>		
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <ol style="list-style-type: none"> <li>1. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the LMP, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</li> <li>2. Identify and engage suitably experienced firms to augment the capacity of contractor's team in managing E&amp;S risks and impacts, including risks associated with exclusion or discrimination of vulnerable or marginalized individuals and groups.</li> <li>3. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</li> <li>4. Provide copies of contracts with contractors/subcontractors and supervising firms to the Association.</li> <li>5. Ensure collaboration and incorporate requisite inputs of the Project Environment and Social teams in the Project procurement and contracting process</li> </ol>	<ol style="list-style-type: none"> <li>1. As part of the preparation of procurement documents and respective contracts.</li> <li>2. Prior to start of works and throughout Project implementation</li> <li>3. Supervise contractors throughout Project implementation.</li> <li>4. Copies of relevant contracts provided to the Association upon request.</li> <li>5. Throughout Project Implementation</li> </ol>	MWE, UWA
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <ol style="list-style-type: none"> <li>1. Carry out consultancies, studies, capacity building, training, and any other technical assistance activities under the Project under terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</li> </ol>	<ol style="list-style-type: none"> <li>1. Throughout Project implementation</li> </ol>	MWE, UTGA, and UWA
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <ol style="list-style-type: none"> <li>1. Implement the LMP for the Project. The LMP shall include, inter alia, provisions on working conditions, management of workers relationships, OHS (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. The LMP shall address risks associated with exclusion and discrimination of vulnerable or marginalized individuals and groups that may be excluded based on jobs and other employment opportunities.</li> <li>2. Review the policies of employed/contracted NGOs and private companies to ensure their consistency with Project LMP and national Labor laws prior to entering</li> </ol>	<ol style="list-style-type: none"> <li>1. Implement the LMP throughout Project implementation. Revise LMP as necessary throughout Project implementation.</li> <li>2. Prior to entering into implementation contracts or agreements and implemented throughout Project implementation</li> </ol>	MWE, UWA

	implementation contracts or agreements. Project Consultants /contracted staff shall be managed in accordance with Contract terms and conditions.		
	<p><b>COMMUNITY WORKERS:</b></p> <p>1. Ensure that community workers engaged under Part 1 of the Project are provided with labor and working conditions that meet the requirements of the ESS2 including, inter alia, occupational health and safety, working conditions, non-discrimination as per the LMP.</p>	1. Contractors adopt and implement LMP prior to engaging community workers.	MWE, UWA
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY</b></p> <p>1. Require contractors and subcontractors to prepare and implement OHS Management Measures in accordance with the site-specific ESMPs under action 1.1 and the OHS Protocols above.</p>	1. Supervise implementation of the OHS management measures throughout Project implementation.	MWE, UWA
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>1. Establish, maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2; and assign focal points within UWA and MWE to address the grievances.</p> <p>2. Strengthen the Project GRM through the EISM to ensure that the grievance mechanism includes an effective, safe, ethical, and confidential mechanism to receive, manage, refer, and monitor grievances related to exclusion and discrimination.</p> <p><b>PROJECT WORKERS TRAINING:</b></p> <p>3. Implement training of Project workers designed to heighten awareness of E&amp;S risks and to mitigate impacts on local communities. This shall include worker training and sensitization on the obligations of Project participants to ensure non-discrimination of individuals or groups who are vulnerable or marginalized, including the following measures:</p> <ul style="list-style-type: none"> <li>• Enhance existing Project-level grievance redress mechanisms to safely, ethically, and confidentially receive cases related to discrimination under the Project and refer them to an appropriate grievance handling mechanism.</li> <li>• Design and operate a mechanism for receiving grievances related to discrimination under the Project (including from Project level grievance mechanisms noted above).</li> <li>• Establish a hotline or an alternative complaint mechanism, for individuals to lodge complaints of discrimination on Projects financed by the Association or voice their concerns without fear of reprisal.</li> </ul> <p>4. The Project shall use the EISM GRM, which is an alternative to lodging complaints through a Recipient-led Project-level GRM, for complaints related to discrimination of vulnerable or marginalized individuals or group.</p>	<p>1, 2 and 3. Establish grievance mechanism prior to engaging Project workers and the start of work; and thereafter maintain and operate throughout Project implementation.</p> <p>4. Prior to commencement of activities and implemented throughout the Project.</p>	MWE, UWA

<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> 1. Adopt and implement a Waste Management Plan (WMP) for works, as part of ESIA/ESMPs prepared for the sub-projects, to manage hazardous and non-hazardous wastes, consistent with ESS3.	1. Adopt the WMP where applicable prior to commencement of works and thereafter implement the WMP throughout Project implementation.	MWE, UWA
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> 1. Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.1 above.	1. Same timeframe as for the adoption and implementation of the ESIA/ESMPs.	MWE, UWA
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> 1. Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.1 above.  2. The Recipient shall cause the contractors to implement measures and actions to assess and manage traffic and road safety risks to workers and the community resulting from the movement of Project vehicles or activities which may present safety risks on public roads, etc. The measures shall be incorporated into the activity ESMP.	1. Adopt traffic and road safety measures as spelt out in the site specific ESMPs and in accordance with the ESMF. Thereafter, implement these plans throughout Project implementation.  2. During preparation of ESMPs for Component 1,2 and 3 subprojects and throughout Project implementation	MWE, UWA, and any contractors
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> 1. Adopt and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx such as the spread of HIV/AIDS, Ebola and other communicable diseases; response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.	1. Same timeframe as for the adoption and implementation of ESMPs.	MWE, UWA
4.3	<b>SEA AND SH RISKS</b> 1. implement the stand-alone GBV Action plan.  2. Additional SEA/SH measures and actions shall be incorporated in the ESMPs and as part of the GRM establishment a response mechanism to handle potential cases, i.e. referral to medical and psychosocial support.	1. implement the GBV Action Plan throughout the project implementation.  2. Same timeframe as for the adoption and implementation of ESMPs.	MWE, UWA
4.4	<b>SECURITY MANAGEMENT, INCLUDING INVOLVEMENT OF THE MILITARY</b>	1 and 2 Throughout Project implementation.	MWE, UWA

	<ol style="list-style-type: none"> <li>1. Ensure that conduct of UWA officers in the course of Project activities is consistent with the updated Standard Operating Procedures (SOPs) in line with good international practice regarding law enforcement, including with regard to community engagement, arrests and detention, and the use of force. To this end, ensure that the use and handling of weapons by the UWA rangers follows UWA’s internal protocol, which allows use of weapons only by trained personnel, prescribes adequate response levels, tracking of gun use, etc.</li> <li>2. Ensure that conduct of MWE officers during Project activities is consistent with good international practice regarding law enforcement, including with regard to community engagement, arrests and detention, hiring, and the use of force.</li> <li>3. Implement Operational Agreement between UWA and UPDF, dated July 15, 2025 that shall supplement an existing MOU and identify terms of engagement which shall apply between the parties to that Agreement and their personnel, including seconded or attached personnel, when engaging in joint law enforcement activities for the management and protection of Protected Areas under the Project within UWA mandate. These Agreements shall be consistent with ESS4 and good international practices and subject to the Association review and no-objection.</li> <li>4. UWA shall implement the implementation plan in the Institutional Assessment of the law enforcement functions of UWA.</li> <li>5. Report significant changes in the Project’s security situation within 48 hours to the Association, to be followed by any necessary changes to this ESCP.</li> </ol>	<ol style="list-style-type: none"> <li>3. UWA to implement the Operational Agreement between UWA and UPDF, dated 15 July, 2025, throughout Project implementation.</li> <li>4. Implement the implementation plan on the timeframe specified in the assessment.</li> <li>5. Throughout Project implementation</li> </ol>	
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>PROCESS FRAMEWORK (PF)</b></p> <ol style="list-style-type: none"> <li>1. Implement livelihood activities in communities that experience restrictions of access to Protected Areas as a result of the Project, consistent with the Process Framework. Livelihood restoration activities in response to access restriction shall be included in Collaborative Forest Management agreements and Collaborative Resource Use Memoranda of Understanding entered by MWE and UWA respectively with community groups in communities adjacent to Protected Areas.</li> <li>2. Implement the updated Process Framework in accordance with ESS5.</li> </ol>	<ol style="list-style-type: none"> <li>1. Throughout Project implementation</li> <li>2. Implement the updated Process Framework throughout Project implementation</li> </ol>	MWE, UWA
5.2	<p><b>MONITORING AND REPORTING</b></p> <ol style="list-style-type: none"> <li>1. Ensure that monitoring and reporting on the implementation of the Process Framework is conducted as part of regular reporting</li> </ol>	<ol style="list-style-type: none"> <li>1. Throughout Project implementation.</li> </ol>	MWE, UWA

<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	<b>BIODIVERSITY RISKS AND IMPACTS</b> 1. Screen Project activities (including civil works) to avoid any significant impacts, loss or degradation of natural habitats and critical habitats such as Protected Areas, in accordance with the Project ESMF and consistent with ESS6.	1. Throughout Project implementation.	MWE, UWA
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<b>VULNERABLE AND MARGINALIZED GROUPS<sup>1</sup> FRAMEWORK (VMGF)</b> 1. A VMGF has been prepared, adopted, and disclosed on March 18, 2020. Based on this VMGF, four site-specific plans have been developed and disclosed on April 27, 2023 (see below). These were updated and re-disclosed on January 5, 2026.	1. Implement throughout Project implementation.	MWE, UWA
7.2	<b>VULNERABLE AND MARGINALIZED GROUPS PLANS (VMGPs)</b> 1. Implement the updated VMGPs for the following four Protected Areas: i) Bwindi Impenetrable National Park, ii) Mgahinga Gorilla National Park, iii) Semuliki National Park and iv) Echuya Central Forest Reserve.	1. Implement the updated VMGPs throughout Project implementation.	MWE, UWA
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b> 1. Ensure that ESS8 requirements are included in ESMPs if and as required in accordance with ESMF. Identify cultural heritage sites for exclusion from implementation of Project activities to the extent possible, including natural areas imbued with spiritual, religious, or cultural significance. Where exclusions cannot be made, include measures to address risks and impacts on cultural heritage and include them in the sub-project ESMP.	1. Prior to signing contractor contracts and thereafter implementing them throughout the Project implementation period.	MWE, UWA
8.2	<b>CHANCE FINDS</b> 1. Describe and implement the chance finds procedures in the ESMF and subsequent ESMPs of the Project. Implement a Chance Finds Procedure consistent with ESS8 as part of the ESMF and in each Contractor's ESMP. The Recipient shall implement and monitor the chance finds procedure described in the ESMF developed for the Project. Include chance finds procedures in all contractor contracts	1. Implement the chance finds procedures included in the ESMF throughout Project implementation.	MWE, UWA
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not relevant		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> 1. Implement the updated SEP for the Project, consistent with ESS10, which includes measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner,	1. Implement the updated SEP throughout Project implementation	MWE, UWA

<sup>1</sup> In the context of the Project, these are defined (also in the VMGF) as the groups that meet the four criteria under ESS7, specifically to the Batwa communities which have cultural attachment to the target Protected Areas (Echuya Central Forest Reserve (CFR), Bwindi Impenetrable National Park, NP, Mgahinga Gorilla NP, and Semuliki NP).

	which is free of manipulation, interference, coercion, discrimination, and intimidation.		
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <ol style="list-style-type: none"> <li>Maintain and operate an accessible grievance mechanism (GRM) to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism will be proportionate to the potential risks and impacts of the Project, including SEA/SH, exclusion and discrimination risks.</li> <li>The GRM shall receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</li> <li>The project grievance mechanism shall be equipped to receive, register, and facilitate the resolution of various stakeholder complaints. This shall include cases where the law enforcement personnel is involved as well as SEA/SH complaints, with referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</li> <li>All grievances (except those received through EISM) received from the multiple levels and channels available shall be consolidated in a single digitized GRM log to ensure that all of them are duly followed up and documented.</li> <li>Address claims received through the EISM.</li> </ol>	<ol style="list-style-type: none"> <li>The grievance mechanism shall be implemented throughout Project implementation.</li> <li>Throughout Project implementation.</li> <li>Throughout Project implementation.</li> <li>Throughout Project Implementation</li> <li>Throughout Project Implementation</li> </ol>	MWE, UWA

**INDICATORS FOR IMPLEMENTATION READINESS**

The following actions are indicators for implementation readiness:

A.1 - Maintain full time Environmental and Social Coordinator, Environmental Risk Management specialist and Social Risk Management specialist at the PCU throughout Project implementation.

A.2 - Maintain designated E&S Focal points at MWE (including those retained from the mainstreaming exercise) and UWA throughout Project implementation.

A.3 - Maintain designated officers at MWE (including those retained from the mainstreaming exercise) and UWA to manage the toll-free lines and process grievances throughout Project implementation.

10.2 - Maintain and operate the grievance mechanism throughout Project implementation.