

**UGANDA: Investing in Forests and Protected
Areas for Climate Smart Development-
Project**

**Environmental and Social Management
Framework**

**(updated for Additional Financing and
Restructuring)**

May 2025

EXECUTIVE SUMMARY

Project Background: Uganda's natural forests are being lost and degraded at one of the highest rates in the world despite their importance for tourism and role they play in supporting other natural resource-based activities. The total net loss of Uganda's forests between years 2000-2015 was estimated at 1.8 million ha, making an average annual loss rate of 4%. The drivers of forest loss and degradation include agricultural expansion, wood extraction for energy, increased urbanization due to high population growth, free grazing animals and wildfires. Although Uganda has a legal and policy framework to protect forest and other wildlife areas, implementation has been weak and forest laws are unevenly enforced.

In order to conserve and sustain forest cover, Government of Uganda designed the *Investing in Forests and Protected Areas for Climate Smart Development (IFPA-CD) Project* that is being financed by World Bank (WB) and Government of Uganda (GoU). However, additional financing has been mobilized through the Uganda Multi-Donor Trust Fund from other development partners namely: KfW and SIDA, to supplement funding for IFPA-CD, as Additional Financing (AF) to the project. At the same time, some of the original activities are being restructured, in view of implementation to date and the requested two-year project extension.

Project implementation is led by the Ministry of Water and Environment (MWE), jointly with the Ministry of Tourism, Wildlife and Antiquities (MTWA), Uganda Wildlife Authority (UWA), and National Forestry Authority (NFA). The Office of the Prime Minister also has a role to play, especially with regard to project activities in refugee hosting areas. MWE is delegated the overall coordination and hosts a Project Coordination Unit (PCU). The AF will maintain the existing implementation arrangements for the original project.

Overall, the project is expected to have environmental and social impacts that are highly positive. Consistent with the intent and approach of IFPA-CD, IFPA-CD AF contributes to reduced deforestation and forest degradation within target landscapes of Uganda. It will continue to promote and improve the following: forest management and restoration; management and conservation of protected forest areas and adjacent landscapes; sustainable management of community forests and other wooded landscapes; and enhance livelihoods and economic opportunities for communities and businesses.

In addition to scaling up of the activities mentioned above, IFPA-CD – AF will among others expand biodiversity monitoring, support development of a strategic Sustainable Nature-Based Tourism Development Plan, provide support to Uganda Timber Grower's Association, and scale up support to development of timber value chains and plantations.

Project Development Objective remains unchanged and is “(i) improve sustainable management of forests and protected areas in target landscapes; and (ii) increase benefits to communities from forests in target landscapes”.¹

Methodology: An Environmental and Social Management Framework (ESMF) was developed for IFPA-CD during project preparation in 2019-2020 in a process that included stakeholder consultations and full disclosure. In view of the proposed AF, the ESMF has been updated. The update of this ESMF has been informed by the findings from relevant document reviews including

¹ Definition of the Project Development Objective was tightened through project restructuring which became effective in December 2024. Through the same restructuring, a named list of target protected areas was included in the legal agreement for the project and Ajai Wildlife Reserve was removed from project scope.

reports of World Bank's implementation support missions such as Aide Memoires, Implementation Status Reports (ISRs), progress reports from the Government of Uganda implementing agencies as well as additional engagements undertaken as part of preparation of this Additional Financing.

Other reviewed documents include those that comprise the policy and legislative framework for the Government of Uganda (GoU), the World Bank's Environmental and Social Standards (ESS)², the World Bank's Country Partnership Framework³ (CPF), the World Bank's assessment of country systems for environmental and social risk management⁴, the Gender Analysis report⁵, the Process Framework report⁶ and District Development Plans, Management Plans for Central Forest Reserves, Management Plans for National Parks and Wildlife Reserves, 30 Stakeholders Engagement Reports from different levels such as relevant Ministries, Government Agencies, District Local Government, CSOs, NGOs, and World Bank as elaborated in table 10 in chapter 4 of this ESMF report.

Where information in the ESMF for IFPA-CD remains relevant, it has remained unchanged.

Location of the Project Area: The Project's geographical focus is on selected priority areas in western and north-western Uganda, which includes the Albert Water Management Zone (AWMZ) and West Nile part of Upper Nile Water Management Zone. Component 1 support focuses on underlisted gazetted areas managed by UWA and NFA: national parks (NP) - Bwindi Impenetrable NP, Kibale NP, Murchison Falls NP, Mgahinga Gorilla NP, Queen Elizabeth NP, Rwenzori Mountains NP, and Semuliki NP; wildlife reserves (WR) - Toro-Semliki WR, Katonga WR, and Kabwoya WR; Central Forest Reserves (CFR)- Budongo CFR, Buhungiro CFR, Bugoma CFR, Echuya CFR, Era CFR, Ibambaro CFR, Ihimbo CFR, Itwara CFR, Kagombe CFR, Kakasi CFR, Kalinzu CFR, Kasokwa CFR, Kasyoha-Kitomi CFR, Kibego CFR, Kitechura CFR, Matiri CFR, Muhangi CFR, Mt Kei CFR, Nkera CFR, North Maramagambo CFR, Nyakarongo CFR, Otzi East CFR, Otzi West CFR Rwensambya CFR and South Maramagambo CFR, Wambabya CFR, and Wati CFR.

Component 2 will support specific plantation investments in the following CFRs: Kagorra CFR, Oruha CFR, Kikumiro CFR, Kyehara CFR, Mafuga CFR, Lendu CFR, Nyakunyu CFR, Okavureru, CFR, and Usi CFR and will have national scope under the plantation establishment and wood industry grant schemes. The following Natural Forest Reserves: Kanaga, Kijuna, Nyabiku, Ozubu and Ruzaire (in refugee-hosting areas) have been earmarked for boundary demarcation through tree planting under the AF.

Component 3 of the project, which focusses on issues linked to host communities and refugees, will continue to be implemented in 19 districts, in Albert Rift (Hoima, Kagadi, Kakumiro, Kamwenge, Kibaale, Kikuube, Kiryandongo, Kyegegwa) and West Nile (Adjumani, Arua, Terego (split from the Arua district), Koboko, Lamwo, Madi Okollo, Moyo, Obongi, and Yumbe, and in the Northern Region, Amuru district).

Project Components: The Project focuses on four main components, namely; i) Improved management of protected areas; ii) Increased revenues and jobs from forests and wildlife protected areas; iii) Improved landscape management in refugee hosting areas; and iv) Project management

² The World Bank (2017). ENVIRONMENT AND SOCIAL FRAMEWORK

³ World Bank (2016). Country Partnership Framework for the Republic of Uganda for the Period FY16-21, extended.

⁴ World Bank (2019). Assessment of Uganda's Country Systems for the Management of Environmental and Social Risks and Impacts throughout the Project Cycle. July 25, 2019

⁵ A Gender Assessment Note (14 December 2019). Uganda Investing in Forests and Protected Areas for Climate-Smart Development Project (P170466)

⁶ The Process Framework report.

and monitoring. As for IFPA-CD AF, the project components remain largely unchanged, with AF scaling up activities included in the original scope.

Baseline Environmental and Social Information: Baseline information for the Project area had earlier been discussed in three main categories namely physical (topography, soils, geology, hydrology and climate), biological (flora, fauna and protected areas) as well as the socio-economic environment (population, and economic activities) for all districts that had been earmarked for implementation of activities under component 3 under IFPA-CD. Since this baseline was produced not long ago, it is believed that it has not changed and is still valid.

For Component 1 and 2, specific areas for sub-projects have been and will continue to be studied and described in detail during preparation of site specific ESMPs and ESIA's.

Policy, Legal and Institutional Framework: Both the World Bank Environmental and Social Framework (ESF) and the relevant GoU legislation relevant to the Project have been considered in relation to the applicable policy, legal and administrative framework within which this ESMF has been prepared. The WB ESF is relevant as it applies to all projects supported by the World Bank through Investment Project Financing. The Government of Uganda in close collaboration with the World Bank and other development partners undertook a comprehensive country systems assessment for management of environmental and social risks and impacts throughout projects⁷. Although the assessment is not specific to forestry and climate change-related projects, it is noted that Uganda has adequate policies and laws regarding management of environmental and social risks/impacts. However, there are constraints on the implementation of the policies and laws due to a lack of legal provisions for ensuring effective implementation and enforcement, and by inadequate capacity for ensuring that environmental and social issues are properly addressed.

Stakeholders Engagement: Meaningful engagement with stakeholders is necessary for project implementation and sustainability. Engagements to date have been guided by the existing Stakeholder Engagement Plan (SEP) which was prepared, consulted upon and disclosed following the ESS 10 Stakeholder Engagement and Information disclosure requirements. Guidelines for inclusion and working with stakeholders including vulnerable groups have been discussed. The project has had extensive stakeholder engagement from early stages of the project identification, preparation and implementation, with project affected parties and other interested parties, including the Batwa marginalized and vulnerable groups⁸. Stakeholders included beneficiary populations and communities, district technical officers and politicians from lower-level local councils (LCs) to Constituency (LC1), religious leaders, officials at the Water Management Zone level, stakeholders from key sectoral ministries at the central level, and Members of Parliament (MPs). In January 2024, additional consultations were undertaken on the project to specifically discuss the vulnerability of some individuals or groups to discrimination.

The SEP is being updated on account of AF at the same time as the ESMF.

Application and screening of activities

The ESMF has outlined mechanisms for the screening of proposed project activities and identified potential environmental and social impacts and their subsequent management, and a Screening Form is included in this ESMF (see Annex 1.1.). The ESMF also describes the working arrangements between the project implementing institutions and other relevant institutions for the

⁷ World Bank (2019). Assessment of Uganda's Country Systems for the Management of Environmental and Social Risks and Impacts throughout the Project Cycle. July 25, 2019.

⁸ Vulnerable and Marginalized Groups (VMGs) is the term used in Uganda for groups meeting the requirements of ESS7

implementation of proposed risk measures and indicated requirements for institutional capacity building.

Grievance Redress Mechanism (GRM): ESS10 requires establishment of a functional GRM for each project, for an effective avenue for expressing concerns and achieving remedies for communities to ensure sustainability of the Project. In addition, the World Bank will support the strengthening of the GRM to ensure it includes an effective, safe, ethical, and confidential mechanism to receive, manage, refer, and monitor grievances related to exclusion and discrimination. Further details of this support can be found in Annex 10. Under IFPA-CD, for UWA, Grievance Redress Committees (GRCs) were formed at Conservation Area and Protected Area levels, and the roll out to lower levels is on-going. For NFA, GRCs have been formed at Range level, and roll out to lower levels is on-going. In refugee hosting districts, GRCs run from lower levels up to the national level. The project is streamlining its grievance redress mechanisms (GRMs) to incorporate the Inter-Agency Feedback, Referral, and Resolution Mechanism (FRRM) system majorly used in refugee settlements; this is in liaison with the lead agencies involved in refugee operations (especially UNHCR). The Project GRM is augmented by the World Bank's Grievance Redress Service, which provides an easy way for Project-affected communities and individuals to submit World Bank projects related complaints.

Potential impacts and mitigation measures: The positive impacts of this project outweigh the potential negative impacts. These include; ecosystem services benefits; improved law enforcement; direct project benefits to local communities; creation of employment; reduced costs/risks in restoration of the protected areas; and climate change effects managed/avoided. Negative impacts identified include possible impacts due to establishment of tree nurseries and afforestation through small plantations and localized impacts within protected areas where small infrastructure (such as park gates, buildings, patrol stations) are to be built. They also include those associated with the anticipated civil works (labor influx impacts on host and refugee communities, social exclusion, exacerbation of gender issues, etc.) exclusion and discrimination of vulnerable or marginalized individuals or groups from project benefits. Stakeholder consultations identified the need to engage and include the Batwa in the management of conservation areas to which they have cultural attachment, particularly through enhanced engagement in existing and expanded collaborative forest management and collaborative resource management groups. A Vulnerable and Marginalized Groups Framework was prepared to address issues related to the Batwa engagement in project activities (<https://mwe.go.ug/library/vulnerable-and-marginalized-groups-framework-vmgf-ifpa-cd-project>). Vulnerable and Marginalized Groups Plans have been prepared for specific sites where the Batwa are present as part of the planning of detailed implementation activities (<https://mwe.go.ug/library/project-specific-vulnerable-and-marginalized-groups-framework-vmgf-and-process-framework-pf>). A Process Framework was prepared to cover potential impacts and mitigation measures related to restrictions of access to target protected areas (<https://www.mwe.go.ug/library/process-framework-pf-ifpa-cd-project>) The assessment also identified potential gender discrimination and marginalization of some vulnerable groups in the region. Mitigation measures have been proposed following ESF mitigation hierarchy for each anticipated impact in order to avoid, minimize or reduce the risks and mitigate effects of the anticipated impact.

The Environmental and Social Commitment Plan (ESCP) has been updated to guide the client's commitment to implementing environmental and social actions and plans. Site specific impacts continue being assessed when sites for project activities are identified prior to implementation.

Project Institutional Implementation Arrangements: The implementation of the Project has been mainstreamed into existing government structures at national and local government levels. Under component 3, technical services providers (TSPs) working with local authorities are responsible for oversight and coordination of the project implementation at district and community levels. The community has a leading role in the identification, prioritization and implementation of prioritized Project activities in areas outside protected areas. The Project Implementation Manual (PIM) sets forth clear roles, responsibilities and required capacities for implementing partners and other stakeholders to manage environmental and social risks. This document sets out institutional measures that support the management of environmental and social risks, including associated capacity building and budgetary measures.

Monitoring and Evaluation: The ESMF sets out the framework for monitoring environmental and social risks and impacts to ensure proper appraisal on the effects of project activities. The process will promote learning, feedback and specific corrective measures be put in place to mitigate any negative effects. It also sets out compliance requirements and enforcement of terms and conditions for approval, including formulating compliance strategies and assessment and management of the environment and social risks and impacts. In addition, the World Bank will provide support for enhanced monitoring of the risk of exclusion or discrimination for individuals or groups who may be vulnerable or marginalized. Further details of this support are found at Annex 10.

The ESMF had been updated to integrate enhanced inclusion and non-discrimination measures. In March 2024, following the enactment of the Anti-Homosexuality Act, 2023, this document and its annexes were further updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank–financed projects and program in Uganda. These measures are described in various sections of this document including section 5 and annexes 11 and 12.

The ESMF is also updated on elements of incident reporting; this is explicitly provided in Annex 2

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ACRONYMS

AWMZ:	Albert Water Management Zone
CFM:	Collaborative Forest Management
CFR:	Central Forest Reserve
CPF:	The Country Partnership Framework
CRM:	Collaborative Resource Management
DLG:	District Local Government
DRC:	Democratic Republic of Congo
<u>EISM</u>	<u>Enhancement of Implementation Support and Monitoring</u>
EMA:	Environment Management Act
ESIA:	Environmental and Social Impact Assessment
ESMF:	Environmental and Social Management Framework
ESMP:	Environmental and Social Management Plans
ESS:	Environmental and Social Standards
FSSD:	Forestry Sector Support Department
GBV:	Gender-based Violence
GEF:	Global Environment Facility
GO:	Grievance Officer
GoU:	Government of Uganda
GRM:	Grievance Redress Mechanism
GRS:	Grievance Redress Service
Ha:	Hectare
IDA:	International Development Association
IGA:	Income Generating Activities
IP:	Indigenous Peoples
LC:	Local Council
LG:	Local Government
M&E:	Monitoring & Evaluation
MoGLSD:	Ministry of Gender, Labour and Social Development
MOLG:	Ministry of Local Government
MPs:	Members of Parliament
MTWA:	Ministry of Tourism, Wildlife and Antiquities
MWE:	Ministry of Water and Environment
NEMA:	National Environment Management Authority
NFA:	National Forest Authority
NFTPA:	National Forestry and Tree Planting Act
NGO:	Non-Governmental Organization
NP:	National Park
OPM:	Office of the Prime Minister
PA:	Protected Areas
PAPs:	Project Affected Persons
PDO:	Project Development Objective
PF:	Process Framework

PIM:	Project Implementation Manual
PRA:	Participatory Rural Appraisal
RAP:	Resettlement Action Plan
REDD+	Reduced Emissions from Deforestation and Degradation and fostering conservation, sustainable management of forests, and enhancement of forest carbon stocks
SEP:	Stakeholder Engagement Plan
SPGS:	Sawlog Production Grant Scheme
UNFCCC:	United Nations Framework Convention on Climate Change
UWA:	Uganda Wildlife Authority
VMGF:	Vulnerable and Marginalized Groups Framework
VMGP:	Vulnerable and Marginalized Groups Plan
WB:	World Bank
WMZ:	Water Management Zone
WR:	Wildlife Reserve

1.0 INTRODUCTION

1.1 Project Background

Uganda's natural forests are being lost and degraded at one of the highest rates in the world despite their importance for tourism and the role they play in supporting other natural resource-based activities. The total net loss of Uganda's forests during the period 2000-2015 was estimated at 1.8 million ha, equivalent to an average annual loss rate of 4 percent. In the year 2000 forest covered 19.4 percent of the land area but this had reduced to 12 percent by 2015⁹. Several factors have been identified as drivers of forest loss and degradation and these include: the need for more land for agricultural expansion; wood extraction for energy; increased urbanization as a result of high population growth; free grazing animals and wildfires that constituted 72% of the annual carbon emissions for 2015¹⁰. This has been exacerbated in specific localities by Uganda's open-door refugee policy of hosting refugees from Rwanda, DR Congo, Ethiopia, Kenya, Sudan and Burundi. Uganda is the third largest refugee-hosting country in Africa. A recent assessment¹¹ has shown that the influx of refugees in north-western Uganda has exacerbated a range of ongoing environmental impacts and associated challenges, including land degradation and woodland loss, leading to inadequate access to energy for cooking and competition with local people for water and other natural resources. Although host communities were found to consume more wood fuel and other forest resources than refugees, the added demands from refugees in specific areas close to settlements has widened the gap between sustainable wood yields and the level of demand in refugee-hosting districts.

Although Uganda has a legal and policy framework to protect forest and other wildlife areas, implementation has been weak and forest laws are weakly and unevenly enforced. This is largely because the lack of (i) adequate access to the areas, (ii) basic infrastructure and equipment, and clearly marked boundaries. Another growing threat to effective forest management is more frequent and intense forest fires, due in part to climatic variability, but also to forest fragmentation which leads to edge effects leaving forest more vulnerable to damage from forest fires set to clear agricultural land. The spread of invasive and alien species is also having a severe impact on the landscape's protected areas. Invasive species contribute to the decline in biodiversity and is also driving an increase in human wildlife conflict. Where colonization of invasive species is extensive, such as in Queen Elizabeth NP, wildlife is driven outside the park in search of food, causing more frequent and dangerous encounters with communities. Delays in addressing the spread of invasive species can cause permanent changes to the landscape, and eradication becomes increasingly more expensive the longer the problem is left unaddressed. There is, therefore, a need to secure existing natural resources by reinforcing the management of protected areas.

As part of efforts to conserve and sustain forest cover, Government of Uganda (GoU) developed the Uganda Investing in Forests and Protected Areas for Climate Smart Development Project that

⁹ Ministry of Water and Environment (2018). *Proposed forest reference level for Uganda*. Republic of Uganda. February 2018.

¹⁰ Ministry of Water and Environment (2017). Draft Final REDD+ National Strategy

¹¹ World Bank and FAO (2018). *Rapid Diagnostic Assessment of Land and other Natural Resource Degradation in Areas Impacted by the South Sudan Refugee Influx in Northern Uganda*. FAO Technical Report, October 2018.

is being financed by World Bank (WB) and Government of Uganda (GoU). The Project contributes to the World Bank Group's twin goals of ending extreme poverty and building shared prosperity in a sustainable manner. The Project is also closely aligned with the Uganda Country Partnership Framework (FY16-21) (CPF)¹² and Uganda Vision 2040. The Project area targets some of the poorest districts in Uganda, which are also some of those most affected by the refugee influx. Specifically, the Project concept is aligned to support the Strategic Focus Area B: Raising Incomes in Rural Areas and seeks to strengthen natural resources management and build resilience, with particular attention to growing incomes of women.

The Government of Uganda is in the process of securing Additional Funding (AF) from other development partners through the Uganda Multi-Donor Trust Fund. The AF is intended to scale up existing activities in the project area, undertake new activities, or scale up already existing activities to new project areas.

The implementation of the Project is currently being led by the Ministry of Water and Environment (MWE), Ministry of Tourism, Wildlife and Antiquities (MTWA), Uganda Wildlife Authority (UWA), and the National Forestry Authority (NFA). The Office of the Prime Minister has a coordinating role, especially with regard to activities in refugee hosting areas. The implementing agencies will coordinate with, assist and facilitate the role of the World Bank-financed Enhanced Implementation Support and Monitoring.

The AF will maintain the existing implementation arrangements for the original project.

1.2 Description of Additional Financing

AF is under Uganda Multi Donor Trust Fund (MDTF) in the amount of approximately US\$26 million.

1.3 Proposed Changes

The proposed changes with the AF entail scaling up of activities and expanding the coverage of interventions. Proposed activities under the AF are well aligned with the original Project Development Objective (PDO), therefore the PDO will remain unchanged.

The content of the components (Section 2.4) of the parent project are adjusted to reflect the expanded scope and new activities proposed under the AF. The proposed changes are to increase the overall cost of the Project to US\$203.9 million (consisting of US\$178.2 million (US\$148.2 million from the World Bank and US\$30 million from the Government of Uganda) in the parent project plus US\$26 million AF).

In addition to AF, the project has restructured and included new wildlife and forest protected areas as well as 9 plantation CFRs. These include Karuma, Toro Semuliki, 9 Plantation Central Forest Reserves under NFA have been added to the target for plantation establishment (Nyakunyu, Kagorra, Oruha, Kikumiro, Kyehara, Lendu, Mafuga, Okarevu and Usi forest reserves. Natural forests (5) added include: Ozubu 681 ha, Kijuna 1225 Ha, Kanaga 650 ha, Nyabiku 355 ha, Ruzaire 1,160 ha

¹² World Bank (2016). *Country Partnership Framework for the Republic of Uganda for the Period FY16-21*

1.4 The Environmental and Social Management Framework (ESMF)

During preparation of IFPA-CD, an Environmental and Social Management Framework (ESMF) was developed in tandem with a Process Framework (PF) as one of a set of due diligence instruments required to address and manage environmental and social impacts associated with the Project activities. In addition, an Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Framework (SEF) and Vulnerable and Marginalized Groups Framework (VGMF) was prepared and publicly disclosed in October 2020 (<https://mwe.go.ug/library/vulnerable-and-marginalized-groups-framework-vmgf-ifpa-cd-project>). The ESMF has also been updated to include mechanisms aimed at enhancing implementation support and monitoring of mitigation of risks and impacts associated with exclusion and discrimination of the vulnerable or marginalized persons.

This followed the World Bank Group's communication of its concerns with the potential of exclusion and discrimination of the vulnerable or marginalized individuals and groups, the Government of Uganda issued five Circulars (see Annex 9). Of particular importance is the Circular on Uganda's Social Safeguard Policies issued on September 21, 2023, by the Ministry of Finance Planning and Economic Development, to all Accounting Officers, Ministries, Departments and Agencies and Local Governments which states that:

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

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

Subsequently, as part of preparation of AF, the ESMF is now being updated.

The ESMF is being updated to meet the World Bank’s Environmental and Social Standard (ESS) requirements and will be disclosed as part of the Project appraisal process. The MWE, NFA and UWA are the agencies responsible for implementing the provisions and recommendations outlined in the ESMF, with the MWE playing a coordination role. To this end, these institutions will also ensure that all their partners implement measures outlined in the ESMF throughout the project cycle, so that the project achieves the objectives of the ESSs. In addition, this ESMF is also updated following the GoU and World Bank focus on enhancement of inclusion and non-discrimination measures in all projects in 2023. The preparation of this document and its annexes include specific measures to mitigate the social risks associated with discrimination against or exclusion of any affected individuals and groups from accessing project benefits and opportunities in World Bank—financed projects and program in Uganda. These measures are described in various sections of this document including Annexes 11, 12, and 13.

It should be noted that further stakeholders’ engagement will be carried out continuously throughout the project implementation.

1.5 Objectives of the Environmental and Social Management Framework (ESMF)

The purpose of this ESMF is to ensure that IFPA-CD AF activities are screened for any negative social and environmental impacts and mitigating measures are taken into account in sub-project design and implementation.

Specifically, the objectives of this ESMF are to:

- Provide a framework for integration of social and environmental aspects at all stages of project planning, design, execution and operation;
- Enhance positive social and environmental impacts of the project;
- Prevent and/or mitigate any environmental and social impact that may be resulting from the proposed activities;
- Enhance capacity building, knowledge and awareness for environmental and social risk management (including exclusion and discrimination of vulnerable or marginalized individuals and groups) for all project stakeholders;
- Make environment information available to stakeholders and the public to foster consensus and project ownership or collective responsibility for socio-environment actions;
- Establish clear procedures and methodologies for environmental and social planning, review, approval, and implementation of IFPA-CD AF Project subprojects; and
- Prescribe project arrangements for the preparation and implementation of sub-projects to adequately address World Bank ESF requirements.

1.6 Environmental and Social Management Framework Methodology

The update of this ESMF has been informed by 2 processes:

- Document reviews

In the process of updating the ESMF, several documents were reviewed, including the Environmental and Social Review Summary (ESRS), the Environmental and Social Commitment Plan (ESCP) and the project's other ESF instruments (SEF, SEP, VMGF, VMGPs etc.). Additionally, subsequent reports of World Bank's implementation support missions such as Aide Memoires and Implementation Status Reports (ISRs) and progress reports from PCU were also reviewed. The update also considered documents prepared to enhance social inclusion and non-discrimination under Annexes 11, 12 and 13. The update of the ESMF mainly gives special emphasis to potential impacts of any new sub-project activities to be supported by the proposed AF operations.

- Stakeholder consultations

It has to be noted that consultations had taken place during the processes that led to the development of IFPA-CD project. However, additional consultations were undertaken in view of the scale up of wood industry activities under Component 2. Additionally, consultations were also undertaken to assess risks associated with exclusion and discrimination of vulnerable or marginalized individuals and groups which may be adversely affected by the project.

The main objective of the consultations was to ensure that key interests of the stakeholders, at various levels are addressed and incorporated into the implementation of the sub-projects and these consultations were carried out as part of the update process of the ESMF. These additional AF consultations were very insightful in understanding the issues.

Table 1: Summary of additional stakeholder consultations

S/No	Key Consultations undertaken
1	Formation and capacity building of GRC members at range level (5 Range level GRCs)
2	Formation and capacity building of GRC members at conservation level (11 Conservation level GRCs)
3	Formation and capacity building of GRC at the sub county levels (189 sub county GRCs formed and trained from 33 districts)
4	Formation and capacity building of GRC at the Village levels is ongoing (done in 5 districts so far)
5	Engagements with UNHCR with a view to streamline IFPA-CD grievance redress mechanisms (GRMs) with the Inter-Agency Feedback, Referral, and Resolution Mechanism (FRRM) system was done though not yet concluded.
6	Stakeholder meetings were held for boundary re-opening in various CFRs and boundary elements aimed at preventing human wildlife conflict (electric fence and elephant trench)
8	Stakeholder consultations in the refugee hosting districts (19 consultations made)
9	Consultation of the Kwonga clan on the proposed support (One consultation meeting with the clan members, other stakeholders and district officials held)
10	Appointment of IFPA-CD district Focal persons (Focal persons have been appointed by the districts)
11	Follow-up meeting with Batwa NGOs (Meeting with the Batwa NGOs held and concerns raised are discussed)

12	Further engagement of the Batwa Community (Field Mission to Kisoro to further engage the Batwa was done)
13	Inclusion and Nondiscrimination training completed (472 stakeholders from 33 districts)
14	Conduct trainings/sensitizations on ESIRT, the Project Labour Management Procedures (including the ESHS Code of Conduct) and reporting templates etc. (Done in 4 Ranges and 11 Conservation Areas)
15	Consultations with the Uganda Timber Growers Association (UTGA) on timber processing interventions
16	Consultations with Nyabyeya Forestry College (NFC) on additional activities to be supported

The details of these engagements are captured in Chapter 7. It should be noted that further stakeholders' engagement will be carried out continuously throughout the project implementation.

In addition to the above, consultations were done in March 2023 to January 2024, with civil society organizations, donors, and other interested parties regarding the exclusions and discrimination risks and impacts, which apply to IFPA-CD and other World Bank funded project. The engagement was led by the World Bank, and included meetings with Government of Uganda representation, other Development partners and NGOs/CSOs. The identified risks and concerns included:

- i. Limited capacity of project teams in assessing and addressing vulnerable or marginalized individuals or groups -related risks
- ii. Vulnerable or marginalized individuals or groups may decline to take part in consultations for fear of being reported.
- iii. The possibility of exclusion from employment opportunities or involvement of in CFM and CRM groups agreements and/or Memorandum of Understandings (MoU)
- iv. Project teams may not be equipped to adequately address complaints related to discrimination, particularly as complaints may be challenging to address without causing harm to the parties involved.
- v. Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries
- vi. The need to provide safe spaces and other psychological support for vulnerable or marginalized individuals and groups as this may arise.

The preparation of the updated ESMF mainly included the collation of baseline data on the environmental and social conditions in the scale-up activities and additional consultations.

The ESMF outlines the environmental and social impact assessment procedures, reporting systems, and responsibilities of the implementing agencies during the implementation of IFPA-CD project.

The tools and mechanisms provided include among others:

- E&S Screening Checklist/Form;
- Steps to be taken for preparation of an ESIA
- Guidelines to develop and implement project briefs, ESMPs and any other relevant subproject level instrument

- Grievance Redress Mechanism
- Stakeholder consultation process
- Enhancement of Implementation Support and Monitoring (EISM)

2.0 PROJECT DESCRIPTION

2.1 Location of the Project Area

The Project's geographical focus is on selected priority areas in western and north-western Uganda. The Project area includes the Albert Water Management Zone (AWMZ) and West Nile part (plus Lamwo district) of Upper Nile Water Management Zone.

The Albert Nile WMZ is largely comprised of the Lake Albert catchment area which is shared between Uganda and the DRC, is located at the northern tip of the western rift valley. On the Ugandan side, it is stretching from the slopes of the Rwenzori Mountains in the Southwest, through the escarpment of Albertine Rift Valley down to the Victoria Nile delta in the North-eastern end of the lake. The spatial extent of this catchment is a total area of 18,037 km². Lake Albert covers an area of 5,270 km² of which 2,850 km² (54%) is on the Ugandan side. At an altitude of 615 m it lies between two parallel escarpments, that on the western side rising abruptly to nearly 2,000 m above the water surface. Like most large rift valley lakes, the lake is ribbon shaped lying in the northeast southwest direction and runs approximately 160km in length and is 35km at its widest point. The lake is relatively shallow with an average depth of 25m and maximum depth of 58m and has a total volume of about 280 km³. The implementation of the Project within this WMZ targets the Districts of Hoima, Kamwenge, Kibaale, Kiryandongo, Kikuube, Kakumiro, Kagadi Kyegegwa which form part of the Albert Water Management Zone (AWMZ) and also target Protected Areas and Central Forest Reserves.

The upper Nile region surrounding Lake Victoria is one of the most densely populated of Africa with up to 1200 persons' km. Population growth rates are among the highest in the world. In 1985, 32% of the Ugandan portion of the catchment was occupied by agriculture and, with population having doubled in the interim, deforestation and excessive cultivation with little input use have been the predominant land use trends. In West Nile, which is part of the Upper Nile WMZ, the Project will be implemented in the Districts of Adjumani, Madi Okollo, Terego, Obongi, Arua, Amuru, Koboko Moyo, Yumbe, and Lamwo. The Project also targets Wildlife Protected Areas, plantation Central Forests and Central Forest Reserves as listed in Table 2 and Table 3 below.

Refugee hosting districts supported through the project have been selected, because they are situated within project target landscapes of Albertine and West Nile regions, they host refugee communities or are within a 5 km radius of the refugee settlements. In order to ensure appropriate coverage and landscape contiguity, the project is working in clusters of districts based on the boundaries set as of July 1, 2010. This allows the project benefit from the technical capacity of local government staff in the original districts, while securing continuity in cases of creation of new districts.

TABLE 2: LIST OF NATIONAL PARKS AND WILDLIFE RESERVES TARGETED UNDER THE PROJECT

No.	Name of the Park/Wildlife Reserve	Size (Ha)
1.	Bwindi Impenetrable National Park	32,100
2.	Mgahinga Gorilla National Park	3,370
3.	Kibale National Park	79,500
4.	Semuliki National Park	22,000
5.	Queen Elizabeth National Park	197,800
6.	Murchison Falls National Park	384,000
7.	Rwenzori Mountains National Park	99,600
8.	Toro-Semliki Wildlife Reserve	54,300
9.	Kabwoya Wildlife Reserve	22,532
10.	Katonga Wildlife Reserve	21,000

TABLE 3: LIST OF CENTRAL FOREST RESERVES SUPPORTED IN THE PROJECT

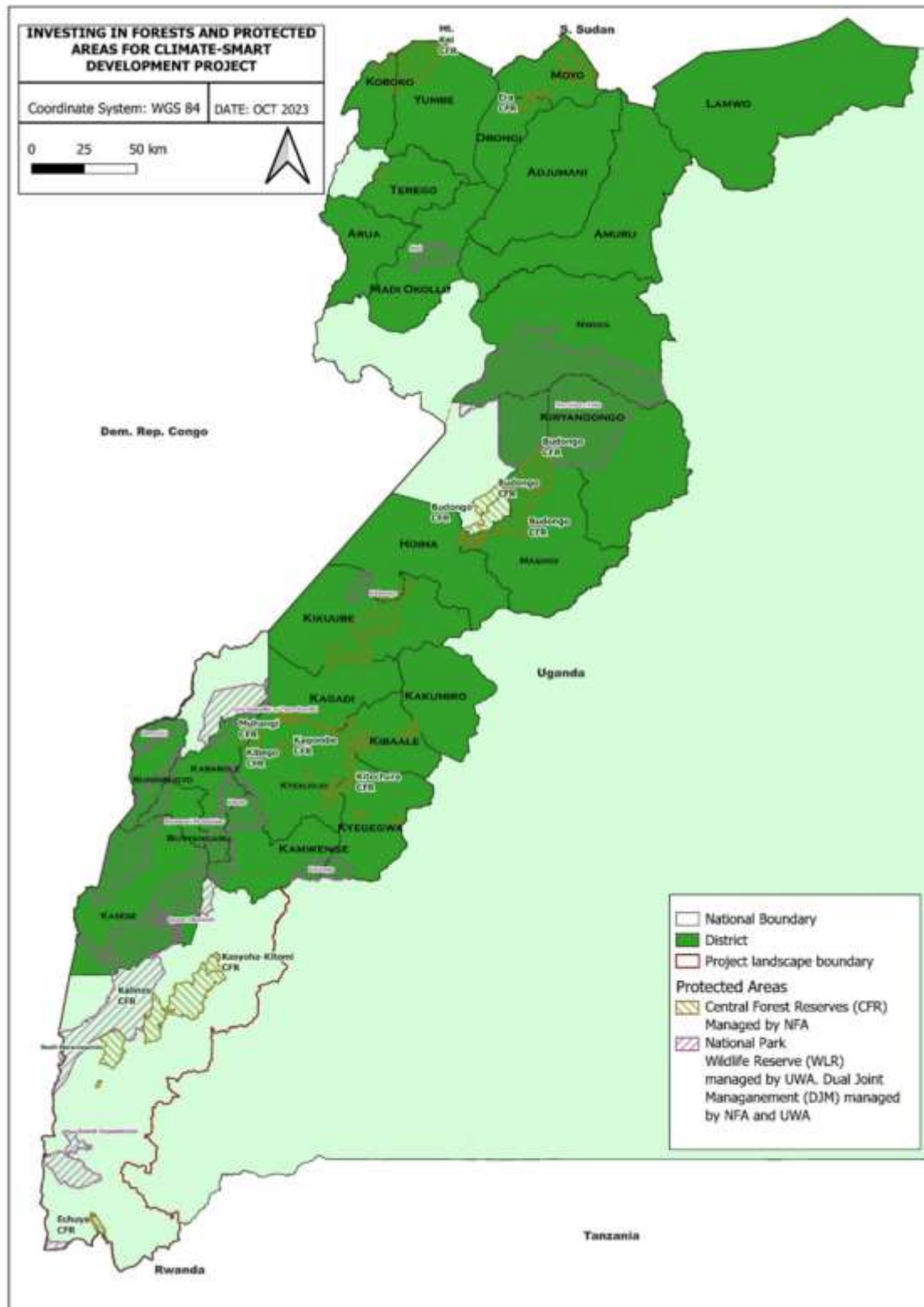
	Selected CFRs	Type of project investments
1.	Budongo	Ecotourism
2.	Kasokwa	Ecotourism
3.	Rwensama	Protection
4.	Bugoma	Ecotourism / refugee-hosting area
5.	Wambabya	Private plantation development
6.	Bujawe	Private plantation development
7.	Kasongoire	Private plantation development
8.	Kandanda-Ngobya	Private plantation development
9.	Mpanga	Private plantation development
10.	Ibamba	Private plantation development
11.	Kyamugongo	Private plantation development
12.	Kagombe	Refugee
13.	Ruzaire	Private plantation development
14.	Kanaga	Private plantation development
15.	Kijuna	Private plantation development
16.	Oruha	Private plantation development
17.	Lendu	Private plantation development
18.	Mafuga	Private plantation development
19.	Okarevu	Private plantation development
20.	Kikumiro	Private plantation development
21.	Kyehara	Private plantation development
22.	Usi forest reserves	Protection
23.	Ozubu 681 ha	Protection
24.	Nyabiku	Private plantation development
25.	Sirisiri	Private plantation development
26.	Nyakunyu	Private plantation development
27.	Kitonya Hill	Private plantation development
28.	Fumbya	Private plantation development
29.	Nsekuro Hill	Private plantation development
30.	Itwara	Private plantation development
31.	Kibego	Protection
32.	Muhangi	Protection

33.	Kitechura	Protection
34.	Ibambaro	Protection
35.	Matiri	Protection
36.	Buhungiro	Protection
37.	Rwensambya	Refugee
38.	Kalinzu	Ecotourism
39.	North Maramagambo	Protection
40.	South Maramagambo	Protection
41.	Ihimbo	Ecotourism
42.	Kakasi	Protection
43.	Kasyoha-Kitomi	Ecotourism
44.	Echuya	Ecotourism
45.	Mt Kei	Private plantation development
46.	Kagorra	Private plantation development
47.	Otzi (East)	Protection
48.	Otzi (West)	Protection
49.	Era	Refugee
50.	Abiba	Private plantation development
51.	Kafu	Private plantation development
52.	Iyi	Private plantation development
53.	Omier	Private plantation development

**TABLE 4: PROJECT DISTRICTS WITH ACTIVITIES OUTSIDE PROTECTED AREAS
(under Component 3)**

Districts as of July 1, 2010	Districts as of September 1, 2023
<i>Albert Water Management Zone</i>	
1. Hoima	1. Hoima
	2. Kikuube
2. Kamwenge	3. Kamwenge
3. Kibaale	4. Kakumiro
	5. Kagadi
	6. Kibaale
4. Kiryandongo	7. Kiryandongo
5. Kyegegwa	8. Kyegegwa
<i>West Nile / Upper Nile Water Management Zone</i>	
6. Adjumani	9. Adjumani
7. Amuru	10. Amuru
8. Arua	11. Madi Okollo
	12. Terego
9. Koboko	13. Koboko
10. Lamwo	14. Lamwo
11. Moyo	15. Moyo
	16. Obongi
12. Yumbe	17. Yumbe

FIGURE 1: LOCATION OF THE PROJECT AREA



2.2 Project Beneficiaries

The Project benefits mainly people/communities living around and within the landscapes of the protected areas. Project implementation combines investments in forest management in both state-managed and community managed lands and focuses on improving the management of forests and increasing revenues for sustaining forests and supporting resilient livelihoods.

2.3 Project Development Objectives

The PDO remains unchanged and is “(i) improve sustainable management of forests and protected areas in target landscapes; and (ii) increase benefits to communities from forests in target landscapes”.

2.4 Project Components

The Project has four components with subcomponents as summarised in Table 4 below.

TABLE 5: PROJECT COMPONENTS AND ACTIVITIES

Components/sub-components	Activities
Component 1: Investments to improve the management of forest and protected areas. Focus on improving the management of government-owned forest and wildlife protected areas to ensure they can continue to generate revenues and provide important environmental services. Provide support to seven National Parks, four Wildlife Reserves, and up to 28 CFRs. Implementation led by the NFA and UWA. Summary of activities: Improve management of high biodiversity values of forests and for generating jobs and revenues that can help sustain their conservation and increase benefits to local communities.	
Sub-component 1.1: <i>Improvement of infrastructure and equipment for the management of forest protected areas.</i>	Implemented by UWA and NFA Activities include: (i) Provide investments in: (a) grading and maintenance of tracks and trails within protected areas to improve access for park management; (b) boundary planning (including community consultations) and demarcation(using boundary markers);(c) infrastructure (such as gates and fences); (d) equipment and community-oriented activities to manage human-wildlife (e.g. trenches, fences); (e) investments in staff ranger housing; (f) communications; (g) vehicles and equipment and; (h) management plan revisions and updates. Activities with AF include: • Full biodiversity inventory in QE landscape (including assessment of opportunities and threats to BD in PAs) - Queen Elizabeth NP, Kyambura WR, Kasyoha-Kitoma CFR, Kalinzu CFR, Kigezi WR, South Maramagambo CFR and North Maramagambo CFR) • Biodiversity inventory update in target PAs • Monitoring equipment (supporting rolling out of Earth Ranger to TSWR) • Forest monitoring tools and equipment • Integration of biodiversity monitoring into NFMS • New construction of offices and staff housing at CFR level • New construction of junior staff housing in MGNP & TSWR
Sub-component 1.2: <i>Increasing the involvement of local communities in the management of forest and wildlife areas by increasing their</i>	Implemented by UWA and NFA Activities include: technical assistance packages and training aimed at developing the skills at community level to actively participate and benefit from the management of forest and wildlife resources. The technical assistance packages include targeted support for

access and benefits from these areas.	women to empower them to participate and take leadership roles in natural resources management. At field level, support will be provided for community engagement in the management of forest resources within protected areas. This includes establishment of collaborative resource management groups, collaborative forest management groups and support of livelihood activities with existing groups. No activities added under AF.
Sub-component 1.3: <i>Restoration of degraded natural forests and habitats in forest reserves.</i>	Implemented by UWA and NFA Activities include: Restoration through natural regeneration (based on enclosure of areas) and, where needed, enrichment planting, including through engaging and employing local communities. Activities with AF include: • Production and handling of additional seedlings • Restoration through enrichment planting on additional 3,900 ha • Restoration through removal of invasive species on additional 4,200 ha • Eradication of invasive species (QENP, TSWR, MFPA) • Removal of invasive plant species (dichrostachys) (labour under local contracts and tools) - Toro Semliki Wildlife Reserve • Inventory of infestation by invasive species and development of management plans (Budongo, Matiri, Kalinzu, N. Maramagambo, S. Maramagambo) • Invasive species removal (Budongo, Matiri, Kalinzu, N. Maramagambo, S. Maramagambo) • Invasive species removal (bamboo forest) (Echuya) • Monitoring of invasive species program • Removal of invasive plant species (labour under local contracts) (Budongo, Matiri, Kalinzu, N. Maramagambo, S. Maramagambo) • Removal of invasive plant species (tools and protective gear (boots)) The above activities will specifically be in Toro Semliki Wildlife Reserve, Budongo, Kagombe, Itwara, Kalinzu, Kasyoha Kitomi, Maramagambo and Echuya CFRs.
Sub-component 1.4: <i>Increased forest protection in CFRs and WRs in close proximity to refugee settlements</i>	Implemented by UWA and NFA At a small number of locations (Katonga WR, Kabwoya WR, Bugoma CFR, Wambabya CFR, Kagombe CFR, Rwensambya CFR, Mt Kei CFR, Otzi East CFR, Otzi West CFR, Era CFR, Wati CFR, and Nyakarongo CFR), deployment of additional resources to improve protected area management where there are site-specific threats to high value forest assets, either as a direct result of refugee incursion or indirectly by the added commercial demand for forest products arising from their presence. UWA and NFA to engage local communities in resource management efforts, including forest restoration, and strengthen enforcement efforts to better-protect remaining natural forests in these protected areas. Project supported activities include: (a) community livelihood activities (such as beekeeping and wild mushroom growing); (b) removal of invasive species; (c) forest restoration; (d) improvements for basic protected area management (communication and other equipment, vehicles, ranger posts, essential infrastructure); (e) improvements for wildfire management (fire observation towers and equipment); and (f) boundary demarcation for Ozubu 681 ha, Kijuna 1225 Ha, Kanaga 650 ha, Nyabiku 355 ha, Ruzaire 1,160 ha.
Component 2: Investments to increase revenues and jobs from forests and wildlife protected areas Increase revenues and jobs from these forest and wildlife protected areas through targeted investments in tourism and productive forestry Summary of activities: Increase the economic contribution of forests through boosting revenue generation and job creation and strengthen incentives for improved forest management. Investment in tourism infrastructure to achieve continued	

development of nature-based tourism, and in addition, investments to increase forest industry-based jobs and incomes. Targeted information campaign to narrow the gender gap in the forestry sector, support to women entrepreneurs and women-led producer organizations.	
Subcomponent 2.1: Investments in tourism	Implemented by UWA and NFA Activities include: tourist reception, information and interpretive facilities in identified protected areas infrastructure for new (or improving existing) tourist products and activities. Activities with AF include: • Construction of VIC in Echuya CFR • Installation of solar system • Installation of internet connectivity and LAN establishment • Installation of CCTV surveillance system • Equipment for Visitor Information Center (exhibition materials, promotion materials, etc.) • Training for staff (HQ and field) on tourism development and promotion • Community ecotourism site improvements (picnic site, craft shop, improvements to the office) • Strategic nature-based tourism master plan and UWA capacity assessment • Training for staff (HQ and field) on tourism development and promotion • Equipment (information boards, chairs, desks, screens) and information materials for visitor information centers (5 centers) • Safari vehicle – 8-seater covered (for use by UWA for drive up customers) – cost of procurement and vehicle insurance • Grader for road opening and maintenance
Subcomponent 2.2: Investments in productive forestry	Implemented by the MWE. Activities include: Investments to further increase plantation area to reach a critical mass that can meet the demands of the local and regional market Investments to support processing and utilization of forest products to produce higher value wood products. Activities with AF/ restructuring include • NFA plantation establishment (Kagorra, Oruha, Kikumiro, Kyehara, Mafuga, Lendu, Nyakunyu, Okavureru, Usi CFRs) • NFA plantation maintenance (CFRs as above minus Nyakunyu) • Support to UTGA • Providing support to Uganda Timber Grower's Association • Increased financing for Nyabyeya Forestry College • Equipment and machinery based on the investment plan • Benchmarking and market opportunities study • Support to market development • Building electronic marketplace for roundwood and improving market data and hardware to host the system • Purchase of office equipment • Support to certification (sustainable forest management and chain-of-custody)
Component 3: Improved Landscape Management Encourage establishment of greater tree cover in refugee-hosting landscapes outside protected areas, supporting sustainable forest management and landscape resilience on private and customary land.	

Summary of activities: Activities to be led by the MWE. This is to enhance the productivity of the landscape through improved tree cover, forest management and landscape resilience on private and customary land, including in refugee hosting areas. Support channeled through specialist service providers to work closely with DLGs to build capacity and facilitate implementation of agroforestry, small-holder plantation investments, and community forestry. The project will also support an on-farm wood fuels production scheme that will supply wood fuel to target refugee settlements. Activities to be carried out in host communities in refugee hosting districts. Districts selected are: in Albert Rift (Hoima, Kagadi, Kakumiro, Kamwenge, Kibaale, Kikuube, Kiryandongo, Kyegegwa) and West Nile (Adjumani, Amuru, Arua, Koboko, Lamwo, Madi Okollo, Moyo, Obongi, and Yumbe).	
Subcomponent 3.1: <i>Increased tree cover on community lands</i>	Activities include: Development of intensive, mixed-use agroforestry systems on household plots, with a strong orientation towards multi-purpose woody species that can provide fruit, fodder, fencing, fuel, shade, and also fix nitrogen, in intensive, multi-layered systems suitable for small areas. Support for woodlots on private land. These will enhance the supply of timber, poles, fuel, and other plantation products with seedlings supply from the private nursery network to provide context-appropriate planting material and an extension support mechanism. Enhanced management and protection of natural forests on customary, leasehold and freehold land, through support to establishment of community forests and implementation of activities within them (with focus on Kiryandongo and Hoima districts (within the boundaries as of July 1, 2010). Development and promulgation of Community Forest Regulations, through a consultative process that builds on existing guidelines and experiences, working with legal experts and GoU to secure assent and ensure dissemination and awareness-raising Support for district local governments through capacity building, provision of basic support packages of office equipment, for mobility and operational costs. No activities added under AF.
Subcomponent 3.2: <i>Supporting farm forestry for refugee fuel supply</i>	The project will, therefore, set up a program to purchase fuelwood from communities and supply it to refugees. This will simultaneously stimulate farm forestry, provide an energy lifeline to the refugees, and reduce pressure on natural woodlands. No activities are added under AF.
Component 4: Project management support Support to overall project management and forest monitoring. Summary of activities: Support project management support activities to ensure cost-efficient, timely, and quality delivery of project activities and results. Support for fiduciary management aspects, including procurement and financial management safeguards, social inclusion and gender competency development including a project gender strategy/action, and monitoring, evaluation and reporting. AF will cover additional costs related to project management, monitoring, fiduciary and environmental and social due diligence including incremental costs during the extension period.	

2.5 Project Alternative analysis

This project emerged as a priority investment from extensive analysis and consultations supported by the Pilot Program for Climate Resilience and the Forest Investment Program during which a wide range of investment options were considered and prioritized. During the project design, preparation, and defining/identifying the probable project location, the GoU in close collaboration with World Bank and other stakeholders identified and prioritized suitable project locations. The prioritization was informed by the alternative analyses, studies and stakeholder consultation for concurrence.

3.0 BASELINE ENVIRONMENTAL AND SOCIAL INFORMATION

3.1 Physical Environment

3.1.1 Topography

The topography of the Albertine Graben is mainly characterized by mountains and escarpments and is associated with valleys and flanks. The higher elevations support afro-montane and sub-montane forests, grasslands, and – on the highest peaks – afro-alpine moorlands. Whereas the West Nile exerts a first-order influence on the climatic gradients lying between the drier East African Plateau and the wetter Congo Basin with a unimodal rainfall regime. The topography of the West Nile especially the proposed project areas generally varies largely from highlands dropping into broad flat-bottomed valleys to broad flat-bottomed valleys and low slope gradient with high peaks in some areas like Mt. Otze at 1500m above sea level in Moyo, hills like Midigo and Kei in the Northern District.

3.1.2 Soils & Geology

The geological and geophysical data suggest that the Albertine Graben region has undergone substantial tectonic movements, and thick sediments have been deposited especially in the Albertine graben in fluvial deltaic and lacustrine environments. The soils are predominantly sandstones, siltstones, clay stones and shales. The sandstones and siltstones are mostly of high porosity and permeability. Whereas most of West Nile is underlain by rocks of the basement complex of Precambrian age which are composed largely of granite fascia grade rocks, which generally form enclaves in the gneiss complex. On hilltops, grey granite and gneiss are left exposed in many places. These granites and gneiss are intensively metamorphosed and deformed. The underlain Precambrian crystalline basement rocks are modified and altered by subsequent geological events including the rifting and volcanic activity, as well as the deposition of associated sediments. The rocks are overlain by predominantly ferrallitic sand loams with fine texture and to a lesser extent ferruginous soil. The commonest soil types in the region include dark cotton soils, clay loams latosols varying from dark grey to dark brownish which are slightly acidic and mainly derived from granite, gneissic and sedimentary rocks. They occur on the gently undulating - hilly topography of the region. Some sections are Brown - yellow clay loams with laterite horizon and Light - grey - white mottled loamy soils with laterite horizon ground, structure-less loamy sands.

3.1.3 Hydrology

The Albertine Graben has numerous hydrological features including rivers, streams and lakes. The three main lakes are L. Albert, L. Edward, and L. George with L. Albert as the major drainage feature in the region. The principal affluent streams for Lake Albert are Semliki, originating from L. Edward through the western edge of the great Ituri rain forest in DR Congo and the Victoria Nile. The region has other numerous small streams entering L. Albert from both Uganda and DR Congo, some of which are highly seasonal and of only minor importance to the hydrology. Whereas the west Nile region generally lacks adequate surface and ground water resources. The sources of water include ground water, rivers, springs, wells, gravity flow scheme. The coverage of water resources in the region is over various counties is fairly equal. Major problems attributed to water are largely experienced in several areas of the region including Koboko, Yumbe district, Madi-Okollo County in Arua where there are fewer water bodies and water quality is rather low.

3.1.4 Climate

Due to variations in the landscape, the Albertine region has a sharp variation in rainfall amounts. The landscape ranges from the low-lying Rift Valley floor to the rift escarpment, and the raised hill ranges. The Rift Valley floor lies in a rain shadow and has the least amount of rainfall. The region is characterized by a bimodal rainfall pattern with totals ranging from about 800 mm in the Lake Albert flat rising rapidly further away East above the Escarpment. The Albertine Graben region lies astride the equator and hence experiences small annual variation in air temperatures; and the climate may be described generally as hot and humid, with average monthly temperatures varying between 27°C and 31°C, and maximums consistently above 30°C.

The West Nile region receives a bi-modal rainfall pattern with an average total rainfall of 1250-1267mm. The region experiences two seasonal rainfall periods, light rains between April and October. The wettest months are usually July-November with >120mm/month. The period December-March is dry with less than 60mm/month. The rain is associated with the northern and southern movements of the inter-tropical front. The prevailing wind is from the east to the west with frequent windstorms during the dry season. Mean monthly evaporation ranges from 130mm-180mm. Areas along the Nile receive less rain (860mm) than the rest of the region (Arua, Yumbe, Moyo, Koboko Local Governments).

Temperature analysis based on different meteorological stations in the region, indicate that the highest temperatures are experienced between January and March (31 – 33 °C) and the lowest between July and November (27– 29 °C). This region experiences high rates of evapotranspiration, which has a resultant effect on runoff, groundwater recharge and dry season flows, increasing drought risks.

3.2 Biological Environment

3.2.1 Fauna

According to Andrew J. Plumtree (2007) the Albertine region is one of the most important regions for biodiversity conservation in Africa. It has a variety of vertebrate and invertebrate species than any other region on the continent and therefore contains many high global conservation priority sites harboring a variety of mammals, birds, reptiles, amphibians, and butterfly species. Some of the globally threatened mammals in the region include eastern gorilla (*Gorilla beringei*), golden monkey and Rwenzori otter shrew. Based on Bird- Life International (Stattersfield et al., 1998), Conservation International (CI) and WWF, this region is defined as a ‘Global-200’ priority ecoregion and part of the Eastern Afromontane Hotspot in the second global analysis. However, there is a spread of invasive and alien species in the landscape’s protected areas in the region like Queen Elizabeth NP. This contributes to the decline in biodiversity rising due to wildlife movement in search of food causing more frequent and dangerous encounters with communities and hence increasing human wildlife conflict.

The West Nile region has Mt Kei forest conservation area which used to be known as Mt.Kei White Rhino sanctuary but has been redesigned (the Mt. Kei wildlife sanctuary). The White Rhinos have become extinct from this sanctuary. The West Nile once supported a significant population of white rhinos, elephants and buffalo with few numbers of Derby eland. Today, the region still supports a small population of Klipspringer (on Mt. Kei), reed bucks, bush pigs, baboons. A survey of Mt. Kei indicated the importance of protected areas for the wildlife species found in wetlands, forests, along riverbanks like Sitatunga, water buck hippos and birds. Besides landscape degradation, wildlife in West Nile is threatened by the fact that the community utilizes game

products like meat, skins, horns or feathers; while other animals produce resources that are gathered e.g. honey from bees, eggs and feathers from birds. Besides, the above, fauna in the region is also highly affected by Refugee settlement and war leading to major decreases of fauna species. Based on Plumptre et al., 2007, there are possibilities of recovery to former levels with land scape management and good protection. On this note therefore, managing the landscape scale is a necessary long-term conservation strategy as landscape species may stand a better chance of survival over the longer term.

3.2.2 Flora

Forests, savannah grassland, woodland and swamps are the main kind of vegetation within the Project targeted areas. Natural habitats are highly threatened by human activities influencing the natural vegetation with the biggest impact experienced in the Upper Nile due to high population caused by the refugee settlements. This in turn brings about the spread of invasive and alien species which also have a severe impact on the landscape's protected areas. Within the forest reserves and natural parks, a combination of human activities and wildlife grazing like elephants, hippopotamuses, buffalos, and antelope species have a major influence on the vegetation of the parks.

3.2.3 Protected Areas

There are various categories of protected areas in Uganda, including National Parks, Wildlife Reserve, Game Management Areas, Central Forest Reserves, and protected wetlands. A list of protected areas within the Project area is provided in section 2.1.

3.2.4 Forests

Natural forest types include those found at higher and lower altitudes and those with various plant compositions ranging from primarily evergreen to deciduous to bamboo forests. Various forest specialist species of conservation concern are associated with the various forest types.

Central Forest Reserves (CFRs) in Uganda fall in two main categories namely those for production and those for protection. Production forests which include savanna bushland and grassland areas were gazette for supply of forest products and future development of industrial plantations. The protection forests include all the tropical high forests, savanna woodlands and/or grasslands that protect watersheds and water catchments, biodiversity, ecosystems and landscapes that are prone to degradation under uncontrolled human use. The National Forestry Authority has characterized CFRs according to the following criteria: i) CFRs of ecological value (watershed protection, protection of water bodies and river courses); ii) CFRs of biodiversity importance; iii) CFRs with tropical high forest; iv) CFRs of importance for industrial plantations (especially timber and plywood). All these categories are found in the Project targeted areas and the Project is aiming at improving sustainable management of these forested and protected areas which ultimately increase their benefits to the community on a landscape scale.

3.2.5 Ecosystems and Land Cover

The Project target area is not only important for biodiversity but also for the ecological processes and ecosystem services. The savanna parks contained some of the highest biomasses of large mammals recorded on earth in the 1960s. The Albert Nile serves as the main river within the area and has many tributaries starting at the outflow of Lake Albert and follows the western arm of the East African Rift Valley into South Sudan, where it joins the Aswa River and becomes the Bahr

el Jebel or White Nile River and hence supports the land cover of the area as well as a resource that enhances social economic activities.

3.2.6 National Parks

The tourism sector has demonstrated high potential for generating revenue and employment from the country's protected areas. Uganda's tourism is nature based and 80% of tourists are interested at the wildlife and scenery. Ten out of the total twenty-two national parks and wildlife reserves in Uganda lie within the Albertine Graben. This region is currently ongoing oil exploitation which could contribute to causing disruption if not well planned. The prominent National Parks and Forest Reserves, along with other protected areas are inside and outside the Graben linked by wildlife corridors providing exchange of genes, allow animal interactions, act as dispersal routes and increase species diversity.

3.3 Socio-economic Environment

The Uganda Bureau of Statistics 2020 estimates West Nile region population to be approx. 3,200,000 people living in 500,000 households. This population is predominantly (80%) rural with subsistence farming as the main livelihood activity. Other activities include retailing, formal employment, hunting etc. The large population coupled with unsustainable livelihood activities have largely contributed to gradual depletion of forest cover/resources in the region. Some of the factors contributing to forest degradation are; increasing need for materials used for building shelter, search for fuel wood, bush burning for wildlife hunting. The Ecological Christian Organization and Malteser International 2018 study report reported that the lack of a proper tree tenure coupled with weak enforcement, and lack of alternatives for shelter construction materials largely contributes to the forest cover decline. The consequence of this effect is being felt by women, elderly and children particularly as they heavily depend on the environment for their livelihood. Based on this situation, the likelihood of sexual harassment, gender-based violence, malnutrition, school dropouts, community-refugee conflicts, decline of ground water, and degradation of soil will escalate if no viable solution is found for the situation.

The population structure in the Albertine graben reflects similar trends as those in the rest of the country with a pyramid structure reflecting a large dependent age. However, the population density in the region varies from very high around the southwest (near Bwindi, Echuya and Mgahinga) with levels between 3-500/ km² dropping slightly around the Ruwenzori Mountains, Kasyoha-Kitomi and Kibale to lower levels still(1-200/km²) around Bugoma, Kagombe, Kitechura and Budongo. In the southwest of the Albertine region, land is scarce with reducing pressures towards the north. The areas with land mostly experience pressures leading to forest degradation threats. Unlike the search for building materials in the West Nile, the Albertine region forests are affected by livelihood activities like; mining, Illegal harvesting of timber and other plant products, encroachment for farmland, hunting of bush meat, brick baking, charcoal making. Despite the quantification of the impacts by the Wildlife Conservation Society, there is still need for mitigation of impacts arising from the above-mentioned forests cover in the region.

The **Batwas** live around and have cultural attachment to four protected areas included as part of project support, namely: Echuya CFR, Bwindi Impenetrable NP, Mgahinga Gorilla NP, and Semuliki NP. As noted above a site-specific Vulnerable and Marginalized Group Plan (VMGP) has been prepared and disclosed for each of these four locations.

Echuya CFR is located in the most densely populated area of Rubanda and Kisoro districts. Other than Batwa, the forest is surrounded by Bakiga and Bafumira who comprise a bigger percentage

of the population. Their households are scattered in various settlements in villages located adjacent to the forest including Murubindi, Kashasha; Gitebe-Kanaba, Biizi-Rugeshi–Murora, Mukasaayi that comprises two settlements, Karengyere-Rwamahano and Kinyarushengye. The main settlements are located in Birara and Rwamahano Batwa Communities.

Bwindi Impenetrable NP is home to a fantastic diversity of flora and fauna and lies in the southwestern part of Uganda in the districts of Rubanda, Kanungu and Kisoro and is recognized a World Heritage Site for preservation of endangered mountain gorillas in 1992. Batwa are settled in all surrounding districts in particular; Ntenko Batwa Community located north of Nkuringo and Rubuguri Batwa Community.

Mgahinga Gorilla NP is located in the district of Kisoro. The park stretches beyond Uganda's borders into Rwanda, Democratic Republic of Congo, and Burundi. The major community groups are located in Rukyeri Batwa Community, Rukongi, and Rurembwe (Rwerere) Batwa Communities.

Semliki NP is found in the districts of Bundibugyo and Kasese, sprawls across the floor of the Semliki Valley on the remote, western side of the Rwenzori, and covers a distinct ecosystem within the larger Albertine Rift ecosystem. The Batwa are settled in one settlement of Bundimasyori (Ntandi) Batwa Community in Bundibugyo District.

Project landscape also hosts large populations of refugees. There are over 1.8 million refugees and asylum-seekers in Uganda as of March 2025; of which more than 1.45 million refugees in the Albertine Rift and West Nile, see table below. Most are accommodated in large, concentrated settlements.

Table 6. Refugee and asylum seekers population in project area

Location name	Source	Data date	Population
Madi Okollo & Terego	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	13.4% 248,736
Adjumani	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	12.4% 230,185
Yumbe	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	11.1% 206,626
Kiryandongo	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	8.0% 148,422
Kikuube	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	7.9% 147,369
Obongi	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	7.5% 139,334
Kyegegwa	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	7.2% 134,021
Kamwenge	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	5.5% 101,797
Lamwo	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	4.9% 90,047
Koboko	Government, Office of the Prime Minister, UNHCR	31 Mar 2025	0.3% 6,332

UNHCR (2025) Uganda - Refugee Statistics March 2025

<https://data.unhcr.org/en/country/uga>

4.0 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

This section summarizes applicable policy, legal and administrative framework within which, this ESMF has been prepared. Both the World Bank ESS and the relevant GoU legislation are summarized although there still exist some gaps between the two. According to Uganda's Country Environment and Social Systems Analysis Report, several major legal, policy, and institutional reforms are currently underway to address these gaps. When these reforms are complete, the legal, policy, and regulatory frameworks governing environment and social risk management in Uganda will have been comprehensively transformed.

4.1 The Policy Framework

4.1.1 The National Environment Management Policy-NEMP, 1994

The key objective of the policy (NEMP) is enhancement of health, quality of life and promotion of long-term, sustainable socio-economic development through sound environmental and natural resource management and optimizing resource use.

4.1.2 The National Land Use Policy, 2013

The overall policy goal is to achieve sustainable and equitable socio-economic development through optimal land management and utilization in Uganda. The policy recognizes amongst others, the need for the protection and sustainable use of land resources through conducting environmental assessments and implementation of measures outlined in such assessment studies. It also emphasizes the critical need to protect the environment and restore the integrity of degraded environments through optimal usage and management of land resources.

4.1.3 National Policy for the Conservation and Management of Wetland Resources, 1995

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

4.1.4 The National HIV/AIDS Policy, 2004

The policy provides the principles and a framework for a multi-sectoral response to HIV/AIDS in Ugandan's workplace. The policy applies to all current and prospective employees and workers, including applicants for work, within the public and private sectors. It also applies to all aspects of work, both formal and informal. The Project implementation will comply with the policy requirements.

4.1.5 Renewable Energy Policy for Uganda

The overall objective of the Renewable Energy Policy is to diversify the energy supply sources and technologies in the country. In particular, the policy goal is to increase the use of modern

renewable energy from the current 4% to 61% of the total energy consumption by the year 2017. The Government's Policy Vision for Renewable Energy is: To make modern renewable energy a substantial part of the national energy consumption. Component 3 interventions are proposing to put management of forests and woodland resources, which supply almost all energy to the refugees, onto a more productive and sustainable basis.

4.1.6 The National Cultural Policy, 2006

The National Culture Policy, 2006 complements, promotes, and strengthens the overall development goals of the country. Its specific objectives include amongst others, the need to promote and strengthen Uganda's diverse cultural identities and to conserve, protect, and promote Uganda's tangible and intangible cultural heritage. This ESMF outlines Chance Finds Procedures (attached in Annex 4) to ensure protection and conservation of any PCRs that will be encountered during Project implementation.

4.1.7 The Occupational Health and Safety Policy, 2006

This policy will be especially relevant for Occupational Health and Safety (OHS) of the workers and the public in the implementation of the Project components. Its focus is on safety and wellbeing of workers in work environment these are all important considerations in the Project implementation and operations in particular during development of small-scale infrastructure and grading of tracks and trails in protected areas.

4.1.8 The Uganda Gender Policy, 2007

The Uganda Gender Policy is an integral part of the national development policies. It is a framework for redressing gender imbalances as well as a guide to all development practitioners. The aim of this policy is to guide all levels of planning, resource allocation and implementation of development programs with a gender perspective. The emphasis on gender is based on the recognition that "gender" is a development concept useful in identifying and understanding the social roles and relations of women and men of all ages, and how these impact on development.

4.1.9 The National Action Plan on Gender Based Violence (GBV)

Findings on the National Situation Gender Based Violence Analysis (2010) revealed that, Uganda has much Gender Based Violence which afflicts both females and males. The findings further indicated that, GBV issues in Uganda originate from institutionalized male dominance as opposed to female subordination, leading to unequal power distribution in the home and the society plus resultant GBV violations based on male dominance and male superiority tendencies. Therefore, the Action Plan on Gender Based Violence has specific actions that operationalize the Uganda National GBV Policy (2011-2015) through:

- Reducing rates of GBV incidences reported by GBV Intervening stakeholders;
- Reducing rates of GBV in the Uganda households, institutions and communities due to increased female Empowerment and decreased subordination tendencies;
- Decreasing the influence of harmful and negative traditional values and beliefs at all levels;
- Decreasing root causes of GBV incidences, more specifically patriarchy/male dominance tendencies in the Uganda society;

- Increasing male involvement and participation in curbing GBV incidences at the household, institutional and community levels;
- Increasing coordination and collaboration networks on GBV interventions; and
- Increasing capacities for effective intervention provision by the GBV stakeholders.

Both males and females need to be given opportunities during planning and implementation, to ensure that no or minimum impacts arises due to Project implementation.

4.2 National Legal Framework

4.2.1 The Constitution of the Republic of Uganda, 1995

The right to a clean and healthy environment is enshrined in Article 39 of the Constitution of Uganda, 1995 as well as integration of people in the development process. In particular, the Constitution guarantees a range of basic human rights to the people of Uganda which include: gender balance and fair representation of marginalized groups in development process; protection of the aged; the right to development; access to clean and healthy Environment to mention a few. These are some of the fundamental socio-economic aspects which are key for sustainability of humankind and the sustainability of the planned Project to focus its interventions on protection of forests and other protected areas without compromising with the constitutional obligations in the laws of Uganda.

4.2.2 The National Environment Act, 2019

Part V of the Act talks about the Management of the Green Environment such as special conservation areas, wetlands, conservation of Biological Diversity areas such as Conservation of biological resources *in situ*, Conservation of biological resources *ex situ*, management of genetically modified organisms, management of forests, management of rangelands, protection of cultural and natural heritage, management of climate change impacts on ecosystems, etc. This ESMF therefore has been prepared taking into consideration of this Act.

4.2.3 National Forestry and Tree Planting Act, 2003

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

4.2.4 The Land Act, Cap 227

The Acts provides for the tenure, ownership and management of land. It recognizes four tenure systems, i.e. Customary, Mailo, Freehold and Leasehold tenure systems. Section 34 provides that a person who owns land should utilize it in accordance with governing environment and forestry sectors. Section 44 (1) of the act provides the need to control environmentally sensitive areas including natural lakes, rivers, ground water, natural ponds, natural streams, wetlands, forest reserves, national parks and any other land reserved for ecological and touristic purposes. Section 44 (2) further stipulates that the local government may, upon request to the Government, be allowed to hold any of the resources referred to in subsection (1). The Act and the Constitution of

the Republic of Uganda all vest land ownership in Uganda to the hands of Ugandans and guide matters of land acquisition for development Project through compensation which must be fair, timely and adequate. There will be no land acquisition financed under the project.

4.2.5 Land Acquisition Act, 1965

This Act makes provision for the procedures and methods of compulsory acquisition of land for public purposes whether for temporary or permanent use. The Act requires that adequate, fair and prompt compensation is paid before taking possession of land and property. These provisions are meant to ensure that the process of land acquisition follows existing laws and that the affected persons receive fair, timely, adequate compensation. There will be no land acquisition under the project, including the AF.

4.2.6 The Occupational Safety and Health Act, 2006

The Act provides for the prevention and protection of persons at all workplaces from injuries, diseases, death and damage to property. The key provision of this Act is safety and welfare of workers which is consistent with a range of safeguards policies such as ILO Core Labour Standards. The ESMF provides for provision of safety gear for workers during implementation of Project activities especially for public works among other activities.

4.2.7 The Employment Act, 2006

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

4.2.8 Local Government (Amendments) Act 2010

An Act to amend, consolidate and streamline the existing law on local governments in line with the Constitution to give effect to the decentralization and devolution of functions, powers and services; to provide for decentralization at all levels of local governments to ensure good governance and democratic participation in, and control of, decision making by the people; to provide for revenue and the political and administrative setup of local governments; and to provide for election of local councils and for any other matters connected to the above. At district, sub-county and parish level the Project will be fully mainstreamed into existing structures.

4.2.9 The Refugee Act 2006

The legislation clearly enumerates the rights of refugees, as well as their obligations whilst in Uganda. Under section 35 (a) of the Act, it requires the refugees to be bound by and conform to all laws and regulations currently in force in Uganda. Since the Project area covers some of the refugee settlements, this Act needs to be considered when implementing Projects in refugees' settlement areas. Under this law, a range of refugees' inherent rights are to be guaranteed during the implementation of this Project in terms of conservation and management of forests and other protected areas, access to work, social services and means of production.

4.2.10 The Plant Protection Act (Cap 31)

The Act provides for the prevention of the introduction and spread of disease destructive to plants. Section 4(i) states “Every occupier or, in the absence of the occupier, every owner of land shall take all measures as he or she may be required to take by virtue of any rules made under section 3 and, in addition, such other measures as are reasonably necessary for the eradication, reduction or prevention of the spread of any pest or disease which an inspector may by notice in writing order him or her to take, including the destruction of plants. The services governed under this Act are implemented by MAAIF through the respective DAOs at the district level. As part of this project, NFA will give guidance on managing forests, UWA shall be responsible for national parks and other protected areas shall be managed (overseen) by the respective institution/authority.

4.2.11 Historical Monument Act, 1967

The Act provides for the preservation and protection of historical monuments and objects of archaeological, paleontological, ethnographical and traditional interest. Section 10(2) requires that any person who discovers any such object takes such measures as may be reasonable for its protection. The Project will adopt the Chance Finds Procedures in addressing possible encounters of any archaeological resources during Project implementation (Annex 4).

4.3 National Environment Regulations

4.3.1 The Refugees Regulations, 2010

In February 2010, the Government of Uganda issued new regulations to give effect to the 2006 Refugees Act. The legislation conforms to international refugee law and recognizes persecution based on gender as grounds for asylum. The Project will be implemented while being cautious of the rights and obligations of the refugees as interpreted by these Regulations. The Project also contributes to Uganda’s Comprehensive Refugee Response Framework (CRRF) and the related Water and Environment Sector Response Plan for Refugees and Host Communities in Uganda.

4.3.2 Environmental Impact Assessment Regulations, 2020

The procedures for conducting EIAs are stipulated in the s. The Regulations require environmental assessments to be conducted to determine possible environmental impacts, and measures to mitigate such impacts. At the end of the study, the environmental assessment report is submitted to NEMA to take a decision as to whether to approve or reject the Project. The Guidelines also stipulate that the ESIA process will be participatory, that is the public will be consulted widely to inform them and get their views about the proposed Project which in this case, has been undertaken to capture views of stakeholders for inclusion in the ESMF. The environmental screening guidelines for project activities’ will be developed and their use monitored by implementing agencies, with support and guidance from a dedicated environmental and social specialist who will be contracted into the Project Coordination Unit.

4.3.3 The National Environment (Audit) Regulations, 2006 (12/2006)

The Audit Regulations apply to environmental audits under the Environment Act, environmental audits under the ESIA regulations, voluntary environmental audits by the owner and any other audits as may be required or prescribed [Regulation 3]. Financial management requirements for this project provide for the compliance annual audits of the Project during implementation.

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

This law, consisting of 4 Parts, describes management policy and directions for important wetlands, riverbank and lakeshore areas that exist in Uganda. Any development Projects, within those registered areas need ESIA studies and permission to be granted by NEMA in accordance with Regulation 34 of this law depending on nature of the Project to be implemented. The Project will ensure that any project activities to be established along riverbanks or in wetlands comply with the above regulations.

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

The National Environment (Noise Standards and Control) Regulations, 2003 Section 7 of these regulations requires that no person shall emit noise in excess of permissible noise levels, unless permitted by a license issued under these Regulations. Section 8 imparts responsibility onto the owner of a facility to use the best practicable means to ensure that noise does not exceed permissible noise levels. The Project is obliged to observe these Regulations by monitoring mitigation measures as they shall be proposed in the project activities to minimize noise. Monitoring shall be done by implementing agencies, with support and guidance from a dedicated environmental and social specialist who will be contracted into the Project Coordination Unit.

4.4 International Environmental and Social Instruments Ratified by Uganda

Uganda is a signatory to several international instruments on environmental management. These are summarized in Table 7 below.

TABLE 7: INTERNATIONAL LAWS AND CONVENTIONS/OBLIGATIONS APPLICABLE TO UGANDA

Convention	Objective
The African Convention on the Conservation of Nature (1968)	To encourage individual and joint action for the conservation, utilization and development of soil, water, flora and fauna for the present and future welfare of mankind, from an economic, nutritional, scientific, educational, cultural and aesthetic point of view.
The Ramsar Convention (1971) on wetlands of International Importance	To stop the progressive encroachment on and loss of wetland now and in the future, recognizing the fundamental ecological functions of wetlands and their economic, cultural, scientific and recreational values
The Protection of World and Cultural Heritage convention (1972)	To establish an effective system of collective protection of the cultural and natural heritage of outstanding universal values
The Convention on the International Trade in Endangered Species of Wild Flora and Fauna (CITES 1973)	To protect certain endangered species from overexploitation by means of a system of import/export permits
The Convention on the conservation of migratory species of wild animals (1979).	To protect those species of that migrate across or outside National boundaries
The Vienna Convention for the protection of the Ozone Layer (1985)	To protect human health and the environment against adverse effects resulting from modification of the ozone layer
Montreal Protocol on Substances that deplete the Ozone layer (1987)	To protect the ozone layer by taking precautionary measures to control global emissions of substances that deplete it.
Convention on Biological Diversity- (CBD 1992)	To promote diversity and sustainable use and encourage equitable sharing of benefits arising out of the utilization of genetic resources

Convention	Objective
United Nations Framework Convention on Climate Change (UNFCCC, 1992)	To regulate the levels of greenhouse gases concentration in the atmosphere so as to avoid the occurrence of climate change on a level that would impede sustainable economic development, or compromise initiative in food production
United Nations Convention to combat Desertification (UNCCD, 1994)	To combat desertification and mitigate the effects of drought in countries experiencing serious drought and or desertification
International Refugee Laws	The 1951 Convention Relating to the Status of Refugees and its 1967 Protocol; The 1969 Convention Governing the Specific Aspects of Refugee Problems in Africa of the Organization of African Unity (OAU) (for operations in Africa only) the 1984 Cartagena Declaration on Refugees.

4.5 Institutional Framework

This section outlines relevant institutions and authorities that are involved in specific Project implementation depending on the nature of the Project as detailed in tables 8 and 9 below.

TABLE 8: INSTITUTIONS WITH RESPECTIVE RESPONSIBILITIES IN PROJECT IMPLEMENTATION

Institution	Roles in the Project	Remarks
<i>Ministry of Water and Environment</i>	• Hosts Project coordination, implementation and managing overall Project reporting • Establish a Project Coordination Unit that will hire, amongst other positions a dedicated environmental and social specialist/officer who will support implementing agencies efforts to address social and environmental risks. • Assign and maintain executive level and technical level of the Project • Responsible for monitoring and reporting of the Project, including implementation of EISM • Provide high-level political support to FSSD to ensure multi-sectoral coordination. • Lead Project Steering Committee and technical working groups • Provides items for joint annual work program and budget approval	FSSD leads implementation on behalf of MWE and provide technical and coordination responsibility on behalf of the MWE
<i>NFA</i>	• Implement forestry activities in and around central forest reserves • Monitors and reports on activities undertakings, including implementation of EISM	NFA leads activities within and around CFRs. Responsible for implementation of activities in components that fall under NFA mandate.
<i>UWA</i>	• Implement tourism and national parks and wildlife reserves activities • Monitors and reports on activities undertakings, including implementation of EISM	Responsible for implementation of activities in and around NPs and wildlife reserves in components that fall under UWA mandate.

TABLE 9: INSTITUTIONS WITH RELEVANT MANDATES IN PROJECT IMPLEMENTATION

Institution	Roles in the Project	Remarks
<i>Ministry of Tourism, Wildlife and Antiques</i>	• A member to Project Steering Committee • Supports Project coordination and implementation • Assign and maintain executive level and technical level of the Project • Provide high-level political support.	Provides policy guidance and oversees UWA
<i>Office of Prime Minister</i>	• A member to Project Steering Committee • OPM has a coordinating role especially within refugee settlements.	The Department for Refugees will lead coordination efforts in refugee hosting areas
<i>Local Government Level (District, Sub-Count, Parish and LCI)</i>	• Oversight implementation of Project activities in the district • Supporting in supervision, advisory, coordination and planning of Project relevant activities • Liaise with the MWE and MTWA and agencies on Project implementation • Providing technical personnel for review and assessing compliance (<u>including EISM</u>), learning lessons, and improving future of Project • Handle issues and supervise issues of integration/mainstreaming of gender, vulnerable groups including VMGs/Batwa involvement in all Project activities, <u>including supervision of the implementation of EISM of the vulnerable or marginalized individuals and groups.</u> • Participate in appraisal of Project activities, <u>including appraisal of the implementation of EISM</u>	Work in close cooperation with other agencies on issues of grievance, training, reviews, integration/mainstreaming of gender, vulnerable groups including VMGs/Batwa and progress reporting and communication. Lead in activities supporting local forest reserves, forest outside protected areas, erosion control measures and household energy interventions.

4.6 Comparison of Uganda's national system for handling environmental and social risks and World Bank ESF

Table 10 below draws on the assessment that was completed by the World Bank in 2019.

TABLE 10: GAP ANALYSIS HIGHLIGHTING DISCREPANCIES BETWEEN WORLD BANK ESF AND UGANDA'S COUNTRY SYSTEM

Good International Practice	Uganda aligned?	Comments
VISION AND OVERALL GOALS		
Environmental sustainability, including action to support climate change mitigation and adaptation	YES	- Constitution (1995) requires GOU to ensure environmental protection & provides Ugandans a right to clean & healthy environment. - Vision 2040 outlines goals: political, economic, social, environmental, and cultural. Aspires to sustainable socio-economic development that ensures environmental quality and ecosystem resilience. - National Environment Management Policy (1994) calls for sustainable development that maintains and enhances environmental quality & resources to meet the needs of present & future generations. - National Land Use Policy, 2007: promote land use that ensures sustainable utilization and management of environmental, natural and cultural resources for national socio-economic development. - Climate Change Policy 2013 promotes harmonized and coordinated approach towards a climate resilient and low-carbon development for sustainable development. Promotes conservation of water, wildlife, forests and fisheries in climate change adaptation and mitigation measures. - NEA 2019 has a variety of clauses (e.g. section 69) requiring promoting of activities that improve climate change resilience, as well as preventing activities that contribute to climate change.
Social development and inclusion, equality, and non-discrimination	YES (in theory)	<i>IN THEORY:</i> - NEA 2019 defines "environment" broadly to include land, water, air, atmosphere, climate, sound, odour and taste, animals and plants; social factors of aesthetics, health, safety and wellbeing of people and human interaction with both the natural and the built environment; - NEA 2019 5(b) provides for "equitable, gender responsive and sustainable use of the environment and natural resources, including cultural and natural heritage, for the benefit of both present and future generations" - National Gender Policy 1997: mainstreams gender concerns in the national development process to improve social, legal/civic, political, economic, and cultural conditions of Ugandans, particularly women.
	PARTIAL ¹⁵ (in practice)	<i>IN PRACTICE</i> - There is still discrimination in labour, especially regarding gender and disability, in large projects, recruitment, and social stigma against persons with HIV/AIDS.¹³ - There are still a number of interventions required at every level in the country to better ensure that gender, HIV and AIDS are properly mainstreamed¹⁴.
Avoid or mitigate adverse environmental and social impacts, but	YES (in theory)	<i>IN THEORY</i> - Mitigation hierarchy is explicitly required by the NEA (2019) (section 5.2(j) and further elaborated (section 115) - (avoid, minimize, restore, offsets), but maximizing benefits is not emphasized. Implementation is variable (see later).
	PARTIAL (in practice)	<i>IN PRACTICE</i>

¹³ From UGANDA SRM technical report. Peter Cohen, 2019.

¹⁴ Conclusion from EIA barometer workshop conducted by SAIEA in 2011.

¹⁵ "partial" in this context means alignment is incomplete as there are aspects of practice that are inconsistent with policies and laws

also maximise benefits		- In practice, ESIA's are stronger regarding environmental issues, weaker on social issues, and even weaker on health and gender. - Avoidance and/or mitigation of impacts appears to be relatively well planned and implemented in World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.
Standard 1: Assessment and Management of Environmental and Social Risks and Impacts		
i. ESIA required for high-risk projects	YES	- NEA 2019 (section 110-4) requires ESIA's for projects likely to have environmental impacts. Projects needing a full EIA are stipulated in Schedule 5. Also requires monitoring and audits - Mining Act, 2003 requires EIAs for exploration and mining (in accordance with the NEA) - Investment Code Act Cap 92 requires every investment licence to take necessary steps to ensure that its business does not cause any injury to the ecology or the environment.
ii. ESIA must include all standard contents (as specified)	YES	- 1999 EIA Regs outline the requirements, which are standard - 1997 EIA guidelines establish three major phases for the EIA; Screening impact study phase and decision making. The process is standard and straightforward.
iii. Country must properly implement ESIA/ESCP/ESMP throughout the project life cycle – following the mitigation hierarchy	YES (in theory)	<i>IN THEORY</i> - The NEA (2019) (section 5.2(j)) explicitly requires the application of the mitigation hierarchy in ESIA's (avoid, minimize, restore, offsets), - Section 49(3) of the NEA requires a proponent to have and implement an “environmental Management System”, which seems similar to the more commonly used term ESMP.
	PARTIAL (in practice)	<i>IN PRACTICE</i> - implementation is variable – good in the case of donor or Bank funded projects, but modest to poor otherwise.
iv. ESIA's must include consideration of alternatives and good stakeholder engagement	YES (in theory)	<i>IN THEORY:</i> - The NEA (2019) requires the consideration of alternatives in ESIA's. Also, the 1998 regulations section 7(1) (k) (project brief), section 13(2) (g) (scoping), 14 (1)(h)(k) (ESIA contents) all require consideration of alternatives.
	PARTIAL (in practice)	<i>IN PRACTICE</i> - See ESS10 for discussion on stakeholder consideration - Consideration of alternatives appears to be relatively good for the World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.
v. ESIA's must especially consider risks to human security, escalation of conflict, violence and crime; esp. for vulnerable people	NO	- Human security is not explicitly covered by the NEA 2019, and the 1998 regulations also do not refer to issues such as risks to human security, escalation of conflict, violence and crime or violence.
ESIA must also consider risks and impacts associated with the project's primary suppliers	NO	- Not covered by the NEA nor regulations
ESCP and ESMP must allow for adaptive management if a project changes or there are unforeseen circumstances.	PARTIAL	- Current legislation allows for a license to be withdrawn if implementation is not acceptable to the authorities, but the process enabling adaptive management is unclear. - Adaptive management has been evident in World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.

ESCP and ESMP must be monitored for compliance and effectiveness	YES (in theory)	<i>IN THEORY</i> Section 28 of NEA Regs allow for cancellation of approved ESIA at any time where - - there is non-compliance with conditions in the certificate; - where there is a substantial modification of the project - where there is a substantive undesirable effect not contemplated in the approval. - A revocation under sub-regulation (1) shall lead to the automatic cancellation of the certificate issued under paragraph (c) of regulation 26. - (3) Where a certificate of approval is cancelled under sub-regulation (2) the developer shall stop further development pending rectification of adverse impact. <i>IN PRACTICE</i> - In practice the mandated institutions have limited resources to undertake monitoring, and, with some exceptions, monitoring and compliance assessment is inadequate or absent. In most cases, there is disproportionate reliance on the proponent to self-monitor and report. - Monitoring takes place for World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.
	PARTIAL (in practice)	
External/3 rd party experts should be used to verify above	NO	Independent review is not specifically required under the existing EIA Regulations ¹⁶ and as a result EIAs are commonly reviewed by Government agencies and other key stakeholders relevant in the sector under which the proposed project falls;
x. Country must have adequate technical institutional capacity and legal mandate to implement ES1	PARTIAL	The mandated institutions have limited resources to undertake monitoring, and, with some exceptions, monitoring and compliance assessment is inadequate or absent. In most cases, there is disproportionate reliance on the proponent to self-monitor and report. Monitoring takes place for World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.
Standard 2: Labour and Working Conditions		
i. Must be adequate safety and health at work.	YES (in theory)	<i>IN THEORY</i> - National Industrial Policy 2008 provides strategies for OHS. - The Workers Compensation Act, 2000 provides for the provision of financial compensation for work-related injury or illness. - The Occupational Safety and Health Act of 2006 consolidates, harmonizes and updates the law relating to occupational safety and health. It requires that every factory is clean, including floors, walls, workrooms, ceiling or top of rooms.¹⁷ <i>IN PRACTICE</i> - There is still no policy to guide its implementation of the Occupational Safety and Health Act (2006). This, along with the poor staffing and funding of MoGLSD, has left many workers in unsafe working conditions. - There are conflicts between the mandates in the OSH and the Physical Planning Acts. There is also limited coordination between DOSH, Police, and Ministry of Health on data collection and oversight of OSH compliance in the workplace.¹⁸ - The Auditor General (2016), reports a low rate of inspection and many workers continue to work in precarious conditions at risk of occupational diseases and accidents¹⁹. - HS practices are in place for World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.
	PARTIAL (in practice)	
ii. Must be fair treatment, non-discrimination and equal opportunity of project workers.	YES (in theory)	<i>IN THEORY</i> - Article 31(b) of the Constitution guarantees (inter alia) gender equality and labour rights, and equal opportunity in political, economic, and social activities, including through affirmative action. - Vision 2040 prioritizes gender equality - National Development Plan II (2015-2020) prioritizes the mainstreaming of women's empowerment and gender equality in key sectors.

¹⁶ Though this is partially rectified in the proposed draft 2018 ESIA regulations

¹⁷ From Uganda Social Risk Management (SRM) Technical Paper (2019).

¹⁸ Ibid.

¹⁹ Ibid.

	PARTIAL (in practice)	- Domestic Violence Act (2010) ensures protection of women from acts or omissions that may harm them. The 2012 Regulations of the 2006 Employment Act prohibit sexual harassment in the workplace. <i>IN PRACTICE</i> - Employment laws have weak or non-existent penalties for violations. Sections 43 to 46 of the Employment Act No 6 (2006) address the payment of wages and outlaws the making of certain deductions from an employee's pay but offers no remedy for non-compliance in the timely payment of wages or for unlawful deductions. Section 53 of the Act sets the maximum acceptable working hours per day and per week but, with the exception of overtime, the law provides no remedy for workers who are obliged to work beyond even 10 hours a day. Section 59 of the Act requires employers to provide written particulars (i.e., contracts) to their employees, but provides no penalty/fine for failures to do so.²⁰
iii. No forced or child labour.	YES (in theory)	<i>IN THEORY</i> - The Employment Act (2006) (<i>inter alia</i>) prohibits the use of child labour - Labour policies that specifically address Gender and Vulnerability include the 2012 Employment (of Children) Regulations, 2012 Employment (Sexual Harassment) Regulations, National Gender Policy, National Action Plan on Elimination of the Worst Forms of Child Labour in Uganda (2012/13-2016/17), and National Policy on HIV/AIDS and the World of Work (2007). <i>IN PRACTICE</i> - There is no applicable legislation on minimum wage. - Section 32 of the Employment Act contradicts other Ugandan laws, by allowing for the employment of children aged 14 for "light work" under adult supervision (in contradiction to Section 7 of the Children (Amendment) Act (2016) which sets the employment age at 16). - The Employment Act fails to clearly define hazardous employment. - The legal framework also fails to provide express punitive penalties for those found in violation of laws prohibiting the employment of minors, contributing to high school dropout rates, teenage pregnancies and health issues as children find work on project sites.²¹
iv. Must be freedom of association and collective bargaining of project workers consistent with national law.	YES (in theory)	<i>IN THEORY</i> - The National Constitution (1995) guarantees, in its Objective XIV(a), the right of all Ugandans to (inter alia) freedom of association, the right to collective bargaining, and paid vacation (Chapter Four). These and other rights are detailed in a set of laws that includes the Employment Act (2006), Workers' Compensation Act (2000), NSSF Act (1985), Labour Unions Act No 7 (2006), and Labour Disputes (Arbitration and Settlement) Act (2006), Occupational Safety and Health Act (2006). <i>IN PRACTICE</i> - Inadequate political space/bargaining power for ethnic minorities and vulnerable and marginalized groups²² - The casual nature of employment affects unionization, as employees paid per day are unable to make the monthly check off in support of union activities. On an individual level, employers have also deployed legal machinery to delay and subsequently deny access to justice, especially for vulnerable workers²³.
v. Project workers must have accessible means to raise workplace concerns.	PARTIAL (in practice)	See below

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

²³ Ibid.

vi. Protect project workers, including women, disabled, children (of working age) migrant workers, contracted workers, community workers and primary supply workers, as appropriate.	YES (in theory)	<i>IN THEORY</i> - The Employment Act (2006) seeks to harmonize relationships between employees and employers, protect workers’ interests and welfare, and safeguard their occupational health and safety. It provides guidance on the types of labour and conditions under which a person may be hired for project works, defines workers’ rights in the construction and post-construction phases, and prohibits sexual harassment, the use of child labour, and discrimination in recruitment and payment of wages based on gender, race, colour, religion, political affiliation, HIV/AIDS status, and disability. - The Labour Disputes (Arbitration and Settlement) Act (2006) provides for the establishment of a strong Industrial Court with more effective and expeditious disputes resolution procedures to reduce the length of dispute settlements. The Act seeks to promote social dialogue, facilitate collective bargaining, and modernize procedures to address unresolved or mismanaged labour disputes that may have adverse effects. - The 2011 Employment Regulations deter employers from the casualization of labour by granting contractual/permanent rights to any worker exceeding four (4) months of service. Having a more permanent workforce across the project cycle also reduces the risk of labour influx. ¹ <i>IN PRACTICE</i> - Most workers are either undocumented or on casual employment, allowing employers to deny them access to rights (annual leave, weekly rest, overtime pay…) and exploit them. This is common in construction projects, partly because of the temporary nature of works. - Whereas Regulation 39 of the 2011 Employment Regulations sets a ceiling on casual employment of 4 months and requires that employees thereafter be given written contracts and entitled to all benefits provided by law, this is rarely followed, due to low capacity in MoGLSD to inspect workplaces and enforce these provisions. ²⁴ - In practice, adherence is inconsistent – depending on the project, proponent, and funder.
	PARTIAL (in practice)	
vii. Written, clear and understandable contracts in place for project workers	YES (in theory)	<i>IN THEORY</i> - The Employment Act 2006 is the governing legal statutory instrument for the recruitment, contracting, deployment, remuneration, management, and compensation of workers. Mandates Labour Officers to regularly inspect the working conditions of workers to ascertain that the rights of workers and basic provisions are provided, and workers’ welfare is attended to.
	PARTIAL (in practice)	<i>IN PRACTICE</i> - Adherence is inconsistent – depending on the project, proponent, and funder.
viii. Grievance mechanisms in place	YES (in theory)	See vi
	PARTIAL (in practice)	
ix. Borrower ensure third parties who engage contracted workers are legitimate/reliable and have applicable labour management procedures	YES (in theory)	See vi
	PARTIAL (in practice)	
Standard 3: Resource Efficiency and Pollution Prevention and Management		
i. Promote the sustainable use of resources, e.g. energy, water and raw materials.	YES	- NEA 2019, Section 5 (d) includes the principle that there shall be “optimum sustainable yield in the use of renewable natural resources” - 2011 EIA Guidelines for water resources related projects assist planners, developers, practitioners safeguarding water resources through EIAs.

²⁴ Ibid.

		- Land Act Cap 227 obliges any person who owns or occupies land to manage and utilize it in accordance with the Water statute, the National Environment Act, the Forest Act and any other law.
ii. Avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities	YES (in theory)	<i>IN THEORY</i> - National Water Policy, 1999: promotes integrated water resources management. Stipulates that drainage water shall not pollute surface or ground water, prevent increase in salinity levels, prevent soil pollution. - Water Act cap 152: Provides for use, protection, supply, management of water; establishes water and sewerage authorities, facilitates devolution of water and sewerage undertakings. Regulations are Water Resources Regs (1998), Water Supply Regs (1998), Wastewater Discharge Regs (1998), Sewerage Regs (1999). - Public Health Act Cap 281 requires every local authority to take measures to prevent any pollution dangerous to public health. <i>IN PRACTICE</i> - Pollution remains a significant problem throughout Uganda (air, soil, water and noise). As with most other safeguards, adherence to best practice is relatively good for bank or donor funded projects, and those of stock-exchange listed companies, but poor when it comes to smaller proponents, many government projects and where contractors from some countries are involved.
	PARTIAL (in practice)	
iii. Avoid or minimize project-related emissions of short and long-lived climate pollutants	YES	- NEA 2019, section 69 deals extensively with climate change, while Section 5(s) includes (inter alia) the principle that in the implementation of public private and projects, approaches that increase both the environment and people's resilience to impacts of climate change, are prioritized; - NEA 2019, Section 6 creates a Parliamentary Committee on Environment to (<i>inter alia</i>) provide guidance in the formulation and implementation of environmental and climate change PPPs. Section 9(2)(a) empowers NEMA to advise on the formulation of such PPPs
iv. Avoid or minimize generation of hazardous and non-hazardous waste.	YES (in theory)	<i>IN THEORY</i> - Agricultural Chemicals (Control) Act, No. 1 of 2006 controls and regulates the manufacture, storage, distribution, and trade in, use, importation and exportation of agricultural chemicals - Uganda is a Party to the Rotterdam Convention on Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade. <i>IN PRACTICE</i> - There are still a number of challenges (e.g. in the mining sector) regarding hazardous waste management, especially in artisanal mining where the chemicals are not well regulated, and workers are not adequately protected from chemical risks. Not enough is being done by the government, the private sector, CSOs and other stakeholders to raise awareness. There is widening gap between CSOs and government and the private sector, making it difficult for the establishment of a cordial working relationship²⁵. - The oil and gas industry in Uganda has been using various chemicals during exploration and production. There are ongoing pollution concerns. - There is a general lack of awareness among consumers and collectors of the potential hazards of e-waste to human health and the environment²⁶. - It is estimated that only 20-30% of the solid waste generated in Kampala is collected and disposed of properly.
	PARTIAL (in practice)	
v. To minimize and manage the risks and impacts associated with pesticide use	YES (in theory)	<i>IN THEORY</i> - Crop Protection Department in the Ministry of Agriculture, Animal Industries and Fisheries for plant pest prevention or eradication programmes. The department is also responsible for enforcing regulations on registration and the use of pesticides and other agrochemicals. - Agricultural Chemicals Control Board (ACB) regulates herbicides and pesticides - District Agricultural Officers and District Fisheries Officers are responsible for the surveillance and monitoring with regards to pest management and pesticide use chain. - There are several NGOs that monitor pest management.
	PARTIAL (in practice)	

²⁵ <https://www.nape.or.ug/publications/chemical-management/7-chemical-management-booklet-2014/file>.

²⁶ Wasswa and Schluep 2008.

		<i>IN PRACTICE</i> - Whilst there are no gaps between international good practice on pest management and the Ugandan legal system, there are no comprehensive regulations to guide the implementation of the various Acts. This hampers the control of the use of damaging pesticides²⁷.
Standard 4: Community Health and Safety		
i. Anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from routine and non-routine circumstances.	YES (in theory) PARTIAL (in practice)	<i>IN THEORY</i> - Health and wellbeing are strongly articulated in the Constitution of Uganda and these principles have been carried through to the environmental policy and the NEA; - The EIA Regs require NEMA to send a Project Brief and/or EIA to lead agencies for comments. Lead agencies vary by activity and sector so a health-related project (or one with major health implications) is sent to the Ministry of Health (MoH). - Relevant sector legislation includes the Employment Act, No 6 of 2006, the Occupational Safety and Health Act, No 9 of 2006 and the Workers Compensation Act, No 8 of 2000. - EIA regs specifically require EIAs to consider health issues - 2008 Guidelines for OHS, Including HIV provide a framework for workplace health & safety for all workers within the health sector. - HIV/AIDS Policy 1992: recognizes HIV/AIDS is a risk in infrastructure projects, encourages employers to develop in house HIV/AIDS policies, provide awareness and prevention measures to workers and avoid discriminating against workers with HIV/AIDS. - National Health Policy, 2010 requires GOU to address the increasing burden of water borne diseases associated with safe and clean water, hygiene and environmental sanitation. - MoGLSD has a Directorate of Labour, Employment, Occupational Safety and Health, and is responsible for implementation of Labour policies and laws. <i>IN PRACTICE</i> - Health and safety issues are generally taken care of in World Bank and donor funded projects, but less so otherwise - Most EIAs conducted focus mostly on environmental issues, with social and health issues receiving considerably less attention. - As in other countries, while the impacts of the project on the receiving environment are assessed in the EIA, issues around occupational health and safety at the workplace are often neglected because worker and workplace health are considered under separate bodies of law
ii. Promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams.	PARTIAL	- 2019 NEA provides for emerging environmental issues including climate change - Principle 5(s) of the NEA requires that in the implementation of public and private projects, priority must be given to approaches that increase both the environment and people's resilience to the impacts of climate change. - Article 69 of NEA deals specifically with managing climate change impacts on ecosystems. The NEA requires ESIA's for Hydro-power generation facilities; including dams with an installed capacity of more than 1 megawatt, the construction of valley dams and valley tanks where the threshold is 1,000,000 m³ or more. - The NEA establishes the Policy Committee on Environment, whose responsibilities include providing guidance in the formulation and implementation of environmental and climate change policies, plans and programmes (PPPs) - The NEA establishes NEMA, whose functions include advising on the formulation and implementation environmental and climate change PPPs; - Uganda has a National Policy for Disaster Preparedness and Management and makes disaster preparedness and management an integral part of the development planning process. The policy calls for community participation, public awareness and education, institutional capacity building, adequate expertise and technology, vulnerability analysis,

²⁷ 2015 safeguards diagnostic report.

		human rights observance, social, environment and economic costs, climate change, partnership and coordination and regional and international partnerships. - The Uganda National Climate Change Policy 2013 aims at ensuring a harmonized and coordinated approach towards a climate resilient and low-carbon development path for sustainable development in Uganda. It seeks to promote and strengthen the conservation of water, wildlife, forests and fisheries in climate change adaptation and mitigation measures. but there is no legal framework for implementing the Policy. - However, there are substantive gaps between the international good practice requirements on the Safety of Dams and the Ugandan regulatory framework. There are inadequate competent professionals to design and supervise the construction of dams and implementation of dam safety measures through the project cycle. There is also no strong institution to regulate the safety of dams in Uganda.²⁸
iii. To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.		See 4i and 4ii
iv. To have in place effective measures to address emergency events.		See 4i and 4ii
v. Ensure safeguarding of personnel and property carried out in a manner that avoids or minimizes risks to project-affected communities.		See 4i and 4ii
vi. Ecosystem services (provisioning and regulating) not compromised	YES (in theory) PARTIAL (in practice)	<i>IN THEORY</i> - The Constitution (1995) requires GOU to ensure environmental protection & provides Ugandans a right to a clean & healthy environment. - Section 4(1) of the NEA (2019) proclaims the “nature has the right to exist, persist, maintain and regenerate its vital cycles, state functions and its processes in evolution”. Section 4(2) provides that “a person has a right to bring an action before a competent court for any infringement of rights of nature - The NEA (Art 44) empowers the Minister of the Ministry of Water and Environment (MoW&E) to prepare a National Environment Action Plan (NEAP) which will include in clause (3)(h) the maintenance of ecosystem services and measures for preventing, reversing, or mitigating any deleterious effect. - In 2011, the MoW&E set up the Environment Protection Police Unit (EPPU) to enforce environmental laws and prevent the degradation of protected areas. The functions of the EPPU are wide-ranging and include (inter alia) monitoring and enforce compliance with laws regarding the protection and maintenance of ecosystem services. - The National Environment (Wetlands, Riverbanks and Lake Shores Management) Regulations, 2000 highlight the importance of wetlands and other water bodies in the maintenance of a healthy ecosystem and state that they should be protected from the negative effects of development projects. Under Regulation 5, EIA is mandatory for all

²⁸ 2016 safeguards diagnostic report.

		activities in wetlands that could have an adverse impact. Regulation 8 provides for declaration of certain wetlands as fully protected wetlands because of national or international importance for biodiversity, ecology, natural heritage, or tourism, and it prohibits all activities in such wetlands except for research, tourism, or restoration or enhancement. Various of the regulations require protection zones of between 30 and 200 meters along riverbanks and lake shores and state that no activity shall be permitted in the protection zones without the approval of the NEMA Executive Director. Local government environmental officers have a duty to assist in the implementation of the regulations. - Art 54 of NEA 2019 (wetland management) requires the lead agency to identify wetlands of local, national, and international importance as ecosystems and habitats of species of fauna and flora - Art 67 of NEA 2019 (payment of ecosystem services) empowers NEMA to issue guidelines and prescribe measures and mechanisms for (<i>inter alia</i>): - identifying and valuing ecosystem services that are critical for the environment and human well-being; - the instruments and incentives to generate, channel, transfer and invest economic resources for the conservation, restoration, and sustainable use of the sources of ecosystem services; and - the criteria for the design of payment for ecosystem schemes that ensure ecosystem sustainability. <i>IN PRACTICE</i> - Wetland cover decreased from 13 per cent in 1990 to 8.6 per cent in 2015. It is estimated that Uganda loses 846 km² of its wetlands annually. - Fish production is depleted due to overfishing, illegal fishing gear and invasive species. - Most rural water samples do not comply with national drinking water quality standards. - Soil fertility is compromised because of nutrient mining, loss of soil cover and organic matter, low rainfall infiltration and soil compaction. - Within protected areas, most wildlife populations are stable, but human-wildlife conflicts have increased because of habitat degradation, growth in urban settlements, agriculture expansion, and infrastructure developments. Other threats are illegal wildlife trade and alien invasive species. - Cultural sites are threatened by quarrying, agriculture, and erosion. - Natural forest cover has been declining because of agriculture, charcoal and wood fuel demand, infrastructure development, and excessive harvesting. - Rangelands are under pressure from crop production, overgrazing, privatization of the communal rangelands and invasive species.²⁹
vii. Safety of dams must be ensured		See 4ii
Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement		
i. Avoid involuntary resettlement & forced eviction: When unavoidable, minimize by exploring project design alternatives	YES (in theory)	<i>IN THEORY</i> - 1995 Constitution guarantees protection of private property rights and the Government's power to compulsorily acquire private land for public use or in public interest. The terms "public use" and "public interest" however, are not clearly defined, leaving room for varied interpretations. - Article 237(3) establishes four distinct land tenure systems, but these multiple regimes require multiple approaches to compensation for land.
	PARTIAL (in practice)	<i>IN PRACTICE</i> - The law does not, however, define any corresponding tenure-specific approaches to land acquisition or compensation, which has resulted in contested compensation processes in practice³⁰.

²⁹ National State of Environment Report 2016-7.

³⁰ See UGANDA SRM technical report. Peter Cohen, 2019.

i. Mitigate impacts from land acquisition or restrictions on land use by providing timely compensation for asset loss at replacement cost and assisting displaced persons to improve or restore, their livelihoods and living standards, to pre-displacement levels or to levels prevailing prior to beginning of project implementation, whichever is higher.	YES (in theory) PARTIAL (in practice)	<i>IN THEORY</i> - The Land Acquisition Act Cap 226 governs compulsory acquisition of land for public purposes in addition to the Art 26 (2) of Constitution of Uganda and S. 42 and S.77 of the Land Act. - Compensation and resettlement rights of spouses and children are protected under the Constitution and Land Act (Cap 227). The consent of spouse and children must be acquired prior to any transaction by head of households on land on which the family lives. <i>IN PRACTICE</i> - The Above Land Acquisition Act contradicts the Constitution on several points. Law does not recognise other rights to land (e.g., the right to farm, build, hold a mortgage, occupy and grant use to another) nor the eligibility of renters, licensees, informal settlers or users of public lands for compensation when the land on which they reside or operate is compulsorily acquired, occupation or use is less than 12 years, or occupants/users have ignored calls to leave. - No legal requirement in cases of land acquisition to set a cut-off-date after which people moving into a project area are no longer entitled to compensation, regulate the management of the displacement and resettlement of project-affected persons, prioritize avoidance and minimization of land acquisition, require the special protection of vulnerable persons, require the conducting of socio-economic and cultural studies or the undertaking of stakeholder consultation, participation, and information sharing, or define the social development aspects of the resettlement process³¹. - In some case studies, resettled people were not assisted to resettle in their new communities; the resettlement policy does not have regard to the impact of the new community in which the resettled person has been resettled to³² - The 2016 Safeguard Diagnostic Report listed (<i>inter alia</i>) the following as gaps between WB requirements and Ugandan laws: - Ugandan laws do not appear to make provisions for avoidance or minimizing of involuntary resettlement - The legal right to resettlement is applicable to only those with a property interest in the affected land. Entitlement for payment of compensation is essentially based on the right of ownership or legal user/occupancy rights. - In Uganda law those without formal legal rights or claims to such lands (e.g. tenants) are not entitled to be resettled or compensated. - Those without formal legal rights or claims to such lands and/or semi-permanent structures are not entitled to resettlement assistance or compensation. - The 2019 SRM Technical report identified the following weaknesses: - Outdated, incomplete and/or overlapping laws and regulations, and lack of a clear and comprehensive national policy and guidelines; - Weak institutional arrangements and unclear mandates, roles, and responsibilities; - Multiple tenure regimes with no corresponding specific acquisition procedures; - Lack of provisions for avoiding or minimizing involuntary resettlement or ensuring that it occurs prior to displacement or restriction of access; - Lack of clear eligibility criteria for compensation and social support; - Prevalence of cash compensation, with no clear provisions for other forms of compensation (relocation assistance, transitional support or civic infrastructure...); - Failure to pay compensation at full replacement cost; - Budget shortfalls, leading to delays, negative social impacts, and non-payment of compensation - Inadequate and ineffective stakeholder engagement, community participation, and social accountability, GRM, and monitoring and evaluation; - Lack of systematic engagement with civil society or private sector actors (thereby foregoing the benefits of third-party monitoring and guidance); and - Inadequate inclusion of women and vulnerable groups.
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³¹ Ibid.

³² 2016 Diagnostic Assessment Report of Uganda's Environmental and Social Safeguards Management Systems.

Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources		
i. To protect and conserve biodiversity and habitats.	YES	- The Constitution (1995) requires GOU to ensure environmental protection & provides Ugandans a right to a clean & healthy environment. - Section 4(1) of the NEA (2019) proclaims the “nature has the right to exist, persist, maintain and regenerate its vital cycles, and functions and its processes in evolution”. Section 4(2) provides that “a person has a right to bring an action before a competent court for any infringement of rights of nature - Wildlife Act Cap 200 provides for sustainable management of wildlife, to consolidate laws relating to wildlife management, establishes the Uganda Wildlife Authority, requires developers doing projects which may affect wildlife to undertake EIAs - Wildlife Policy, 2014 aims at conserving wildlife in a manner that contributes to SD and wellbeing of people. Includes management of wildlife protected areas. - The Forestry and Tree Planting Act (2003) provides for the conservation, sustainable management and development, and use of forests for the benefit of the people. It provides that the forests shall be developed and managed so as to conserve natural resources, especially soil, air and water quality - Forestry Policy 2001 seeks to establish an integrated forestry sector that achieves sustainable increases in the economic, social and environmental benefits from forests and trees by the people of Uganda, especially the poor and vulnerable. One of the strategies is to promote the rehabilitation and conservation of forests that will protect the soil and water in the country’s key watersheds and river systems.
Where biodiversity impacts likely, apply mitigation hierarchy and precautionary approach in project design & implementation	YES (in theory)	<i>IN THEORY</i> - Mitigation hierarchy is explicitly required by the NEA (2019) (section 5.2(j) and further elaborated (section 115) - (avoid, minimize, restore, offsets), but maximizing benefits is not emphasized. Implementation is variable (see later). <i>IN PRACTICE</i> - implementation is variable – good in the case of donor or Bank funded projects, but modest to poor otherwise. - Even though screening of projects is undertaken by NEMA at an early stage to identify potential biodiverse areas, political interference puts certain natural habitats at risk especially wetlands and forests.³³ - According to NEMA, members of the district land boards are a significant contributor to environmental degradation especially of wetlands where local governments have been issuing land titles in designated wetlands in contravention of conservation laws³⁴.
	PARTIAL (in practice)	
Promote sustainable management of living natural resources.	YES (in theory)	<i>IN THEORY</i> - See 6 i - Policy for the Conservation & Management of Wetlands, 1995: seeks to maintain diversity of uses and users when using wetland resources. Include maintaining biodiversity of natural or semi-natural wetlands.
	PARTIAL (in practice)	- Fisheries Policy, 2004 aims at developing cooperation with neighbours on management of shared water bodies, and stocking to improve fisheries diversity and productivity. <i>IN PRACTICE</i> See 4 vi
Support livelihoods of local communities, including Indigenous Peoples	YES (in theory)	<i>IN THEORY</i> - See 7 regarding IPs - National Land Policy 2013 is aimed at ensuring efficient, equitable and optimal and sustainable utilization and management of land resources for poverty reduction, wealth creation and socioeconomic development.
	PARTIAL (in practice)	<i>IN PRACTICE</i> See 4 vi
v. Seek inclusive economic development that integrates	PARTIAL	- Local Government Act Cap 243 defines roles for different levels of governance for water related services and activities. Especially the provision of water services and maintenance of facilities is the responsibility of local councils in districts and urban centres with the support and guidance of relevant central government agencies.

³³ 2017 ESSA unpublished report (compiled for the World Bank by Cutler and Srivastava).

³⁴ Ibid.

conservation needs and development priorities.		
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4.7 World Bank Environmental and Social Standards Relevant to the Project

Table 11 below describes relevance of World Bank Environmental and Social Standards to the project – this is based on the Environmental and Social Review Summary.

Table 11: Relationship between the World Bank ESF and the Project

World Bank ES Standard	Summary of core requirements	Potential for Applicability	Remarks or recommendation for proposed Project
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	To identify, evaluate and manage the environment and social risks and impacts of the Project in a manner consistent with the ESSs. ESS1 applies to all Projects supported by the Bank. Therefore, an environmental and social assessment is conducted including stakeholder engagement.	Relevant	This ESMF has been prepared to ensure that the Project activities are carried out in an environmentally responsible and socially acceptable manner.
ESS2: Labor and Working Conditions	It promotes health and safety at workplaces. During Project implementation, labour management procedures such as working hours, provision of separate sanitation facilities for both males and females, lighting and provision of safe drinking water to mention a few will be developed prior to Project effectiveness.	Relevant	Labour management procedures were prepared and disclosed to be followed during Project implementation. Specific working conditions, for example, much of the work under components 1 and 2 require work in remote areas, so access to safe water, shelter etc. should be made.
ESS3: Resource Efficiency and Pollution Prevention and Management	To promote the sustainable use of resources, including energy, water and raw materials. The aim is to reduce deforestation, enhance the environmental contribution of forested areas, promote afforestation, reduce poverty, and encourage economic development. Support sustainable and conservation-oriented forestry.	Relevant	This Project is intended to bring about positive changes in the protection, management, and sustainable utilization of forests. For example, component 3 is about promoting more efficient and sustainable management of on farm wood supply and should also help reduce deforestation by providing access to on-farm grown trees and wood biomass, including through the buy and supply scheme.
ESS4: Community Health and Safety	To anticipate and avoid adverse impacts on the health and safety of Project-affected communities during the Project life cycle from both routine and non-routine circumstances.	Relevant	There are no major impacts anticipated from the Project that would cause harm to communities and the environment. To mitigate risks, provision of adequate equipment, safety awareness by contractors and implementing agencies, signage, road flaggers, proper training for operators of heavy equipment will be undertaken. UWA rangers are armed when undertaking patrol operations. Their use and handling of weapons is guided by UWA's standard operating procedures, which prescribe use of weapons only by trained personnel; adequate response levels; tracking of gun use, etc., which are consistent with the Good Practice Note on the use of security personnel. NFA utilizes the services of military personnel in forest patrols and law enforcement on a case-by-case basis. The NFA Executive Director

			may request such support of manpower if a threat assessment indicates high level of risk to safety of the NFA staff (in the past, a number of NFA staff were killed while on duty by armed encroachers). While they are attached to the NFA, the military personnel are subjected to NFA policies and guidelines / Standard Forestry Practices. The NFA the staff lead all the patrols, and the military provides the necessary support and back up.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring Project design alternatives.	Relevant	The proposed Project will not cause any resettlement or relocation of communities. There may be restrictions on access to natural resources in specific areas as a result of strengthened park management operations. To mitigate risks, the Project has allocated land within protected areas for small civil works such as constructions of fences, staff housing and offices, and gates within the boundaries which do not require land acquisition.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	To protect and conserve biodiversity and its habitats. The applicability of this ESS is established during the environmental and social assessment described in ESS1. The needs shall be applied to all project activities that potentially affect biodiversity or habitats, either positively or negatively, directly or indirectly, or that depend upon biodiversity for their success. It will include also project activities that involve primary production and/or harvesting of living natural resources.	Relevant	The Project is expected to affect natural habitats—native forests and associated ecosystems—in a positive manner. It is designed to reduce ongoing patterns of loss and degradation of natural habitats, notably forests. The Project's site-specific support for private and community forestry and smallholder agriculture includes measures to avoid/eliminate establishment of woodlots, agroforestry and small plantations in areas that could result in deforestation or forest degradation. Environmental screening of sites will be undertaken by technical service providers responsible for implementing the small plantation incentives scheme and support under component 3 for on-farm woodlots and agroforestry. Screening and environmental risk management approaches will build on existing mechanisms used by the SPGS.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	To ensure that the development process fosters full respect for the human rights, dignity, aspirations, Identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. In Uganda the term Vulnerable and Marginalized Group (VMG) is applied for groups meeting the requirements of ESS7.	Relevant	The indigenous group-Batwa inhabit forest areas in the Project area around Bwindi NP, Mgahinga NP, Semliki NP and Echuya CFR as they had used these forests for hunting and subsistence prior to their original gazettement as protected areas. MWE through REDD+ Secretariat and with the NGO PROBICOU engage with the Batwa on an ongoing basis to ensure that they part of the institutional governance

			structures for CFM/CRM groups - a request/recommendation made by Batwa groups during consultations facilitated by Probiou on behalf of MWE. Inclusion of other specific measures to engage Batwa in livelihood-related activities, such as Batwa- guided trail hikes were also proposed by the Batwa. Four site-specific Vulnerable and Marginalized Groups Plans (per each respective protected area) were prepared, consulted, and disclosed.
ESS8: Cultural Heritage	To protect cultural heritage from the adverse impacts of Project activities and support its preservation.	Relevant	No cultural heritage sites or culturally sensitive areas for communities within Project area have been cited to be in threat. The ESMF provides an opportunity for undertaking chance finds procedures in addressing possible encounters of any archaeological resources during Project implementation as per (annex 8) according to Historical Monument Act, 1967. To be determined during implementation
ESS9: Financial Intermediaries	To set out how financial intermediaries will assess and manage environmental and social risks and impacts associated with the project activities they finance.	Not relevant	The Project does not use Financial Institutions, and so this standard does not apply. However, the adequacy of E&S risk management systems for plantation matching grants will be reviewed and monitored as part of the provisions set-out in this ESMF as described above under ESS6.
ESS10: Stakeholder Engagement and Information Disclosure	To establish a systematic approach to stakeholder engagement that will help the Project identify stakeholders and build and maintain a constructive relationship with them, in particular Project-affected parties, <u>including the potentially vulnerable or marginalized individuals and groups that may be affected by exclusion and discrimination-</u> To provide Project-affected parties with accessible and inclusive means to raise issues and grievances and allow Project to respond to and manage such grievances. EISM GRM will be established as an alternative avenue for managing sensitive complaints of vulnerable or marginalized individuals and groups.	Relevant	The project is engaged in continuous stakeholder engagement from identification to date and these will continue throughout implementation. A stakeholder mapping was undertaken, and a Stakeholder Engagement Plan has been prepared to guide the project as per the ESF requirement. A GRM also forms part of implementation to address any emerging concerns and complaints from the project. <u>A EISM GRM (refer to Annex 10 and 11) will complement the project GRM as an alternative avenue to raising sensitive complaints that may be associated with exclusion and discrimination of vulnerable or marginalized persons.</u>

4.8 World Bank Policy on Disclosure of Information

The World Bank under ESF (ESS10) sets out the need to ensure that appropriate information on environment and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. In addition, it recommends the Borrower to maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder consultations, a summary of feedback received and a brief explanation of how the feedback was considered or reasons why it was not.

As part of IFPA-CD and in compliance with ESS 10, MWE has disclosed several documents, these are:

- 1) The ESMF for IFPA-CD
- 2) Stakeholder Engagement Framework (SEF)
- 3) Stakeholder Engagement Plan (SEP) (draft)
- 4) Process Framework (PF)
- 5) Environmental and Social Commitment Plan (ESCP)
- 6) Labour Management Plan (LMP)
- 7) Occupational Health and Safety Measures
- 8) Vulnerable and Marginalized Groups Framework (VMGF)
- 9) VMGPs for Echuya CFR, Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, and Semuliki National Park
- 10) ESMPs for the picnic site in Bwindi Impenetrable National Park, stone wall construction around the boundary of Mgahinga Gorilla National Park and elephant trench excavation along the boundary of Kibale National Park
- 11) Project Brief for the construction of an electric fence along the boundary of Queen Elizabeth National Park

The Stakeholder Engagement Plan is being updated concurrently with this ESMF (to enhance the implementation support and monitoring of potential exclusion and discrimination of vulnerable or marginalized individuals and groups that may be adversely affected); and will also be disclosed along the updated ESMF upon completion. Once updated, MWE shall ensure the availability of the ESMF and SEP in their Public Library and Website, including websites and offices of NEMA, NFA, UWA, MWE, and participating Districts for public access.

Documents developed in accordance with the disclosed Frameworks such as ESMPs, ESIA, Project Briefs etc. will be disclosed as they are developed.

4.9 Mainstreaming Environmental and Social Management into Implementation Arrangements

Once E&S assessments for the project and project activities are concluded, impacts identified, implementation is expected to integrate them in day-to-day operations. Various instruments/plans to be developed in line with applicable standards will be implemented as part of the project. The Bank has laid down guidance and procedures for mainstreaming in project implementation to achieve compliance. Specific guidance is set out to integrate Environmental, Social, Health and Safety (ESHS) and all mitigation measures from E&S assessments into Enhanced Standard Procurement Documents (SPDs) and Standard Bidding Documents (SBDs); which shall be applicable to all new works contracts applicable to the project. The contractors will submit monthly reports with regard to environmental and social performance. Contractors will be required to

properly dispose of all liquid and solid waste (including plastic trash) and construction waste, sanitation management, including management of any associated dust emission, and management of potential pollution of water sources and noise impacts. The contractors and sub-contractors will also be trained on the application of EISM and will report of the mitigation measures for addressing risks and impacts associated to exclusion and non-discrimination of vulnerable or marginalized individuals and groups that may be adversely affected by the project.

5.0 POTENTIAL IMPACT AND MITIGATION MEASURES

Overall Project implementation is expected to have positive environmental and social impacts. Thus, it is important to identify potential risks early in Project preparation and design, both in terms of the Project's overall design and of the specific investment activities.

Regarding risks associated with social exclusion and discrimination, the GoU observes that discrimination of any person contravenes Article 21 of the Ugandan Constitution. The GoU (the Borrower) commits to uphold the Bank's policy requirements for non-discrimination and exclusion on all World Bank financed projects. The risks were identified through a process of consultations were done in March 2023 to January 2024, with civil society organizations, donors, and other interested parties regarding the exclusions and discrimination risks and impacts, which apply to IFPA-CD and other World Bank funded project. The engagement was led by the World Bank, and included meetings with Government of Uganda representation, other Development partners and NGOs/CSOs. The identified risks and concerns are integrated in the potential impact and mitigation measures outlined in table 12 below.

Impacts can be divided into negative environmental and social impacts, and these depend specifically on the size and nature of Project activities and the environmental and social sensitivities associated with the location of these activities.

Table 12: Potential impact and mitigation measures

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
Component 1: Investments to improve the management of forest protected areas			
Sub-component 1.1: <i>Improvement of infrastructure and equipment for the management of forest protected areas</i>	(a) Grading and maintenance of tracks and trails within protected areas (b) boundary planning (including community consultations) and demarcation (using boundary markers), (c) infrastructure (such as gates and fences); (d) equipment and community-oriented activities to manage human-wildlife (e.g. trenches, fences) (e) investments in staff ranger housing, (f) communications, (g) vehicles and equipment, (h) management plan revisions and updates.	• Limitations of access due to establishment of boundaries and demarcations; new park boundary infrastructure such as gates; and establishment of trenches and setting of fences. • Localized environmental impacts associated with grading and small infrastructure development inside and adjacent to PAs, including sediment-laden run-off, noise, dust, localized erosion and gullyng. • Social issues related to exclusion and discrimination of vulnerable or marginalized groups and individuals from project benefits including consultations, employment, facilities, and to labor influx; • Occupational health and safety risks;	• Restrictions addressed by CFM and CRM agreements. • Undertaking a Social and Conflict Analysis Study to assess the existing infrastructure and capacities for handling conflicts (grievance management systems). • No inclusion of support for boundary demarcation for 4 conservation areas where are Batwa present (Bwindi, Mgahinga, Semuliki and Echuya). • Engagement of local communities through CFM and CRM groups in determining timing of access to resource and the type/nature. • Involvement of community groups in benefit sharing planning and access to opportunities without discrimination • Sensitization and capacity building of contractors, workers, and other relevant stakeholders on non-discrimination. • Strengthening of GRMs to provide for safe, ethical and confidential reporting. • Support to community-based tourism initiatives. • Accommodating controlled harvesting by locals to the extent possible in protected area management plans and CFM agreements / CRM MOUs. • Careful environmental planning (routing alignment selection) and close supervision and monitoring of grading and construction works to minimize

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
			impacts e.g. erosion, sediment-laden run-off, dust and noise management. - Workers are required to wear suitable Personal Protective Equipment (PPE), including hardhats, safety boots, and gloves as needed. - Workers will be sufficiently trained in the safe methods pertaining to their area of work to avoid injuries. <u>Enhance inclusion and non-discrimination of potential vulnerable or marginalized individuals and groups that may be identified.</u> <u>Training of application of EISM with regard to mitigating risks associated with exclusion and discrimination of the vulnerable or marginalized individuals and groups</u>
Sub-component 1.2: Increasing access to and benefit from forest and wildlife protected areas for local communities.	- Support for an increase of area under Collaborative Forest Management and resource management agreements- 45 new and 24 renewed CFM agreements and up to 120 new resource management agreements. - Provision of technical assistance to women's associations to support CFM planning and implementation that promotes women's engagement in CFM. - Technical assistance to build the skills needed to empower women for	- These activities are expected to have positive impact on enhancing communities' livelihoods due to improved access to the designated areas within national parks, wildlife reserves and central forest reserves. - Environmental risks are associated with increased disturbance in CFM and CRM areas, potential for associated increase in illegal hunting and snaring associated with increased community access. - Social risks are associated with potential of inequitable provision of livelihoods support to women and other discrimination of vulnerable or marginalized individuals or groups <u>Potential social exclusion and discrimination in accessing benefits and</u>	- General sensitization of communities and setting of livelihood activities that will contribute to increased earning and to deter illegal practices such as illegal hunting and snaring that might be associated with increased access via expansion of CFM and CRM areas. - Engagement of local communities in resource management efforts, including forest restoration ensures better sharing. - Close monitoring of CFM/CRM implementation to ensure compliance with existing CFM/CRM guidelines. - Technical assistance to build the skills for empowering women for management and leadership in CFM and producer organizations - Provision of technical assistance to women's associations - Promotion of women's engagement in CFM.

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	management and leadership in CFM and producer organizations and strengthen women-led producer organizations.	<u>opportunities from wildlife and protected areas.</u> <u>Vulnerable or marginalized individuals or groups may decline to take part in consultations for fear of being reported.</u>	- Sensitization and capacity building of contractors, workers, and other relevant stakeholders on non-discrimination. - Strengthening of GRMs to provide for safe, ethical and confidential reporting. - Enhanced monitoring of exclusion and discrimination. <u>Promotion of inclusive and non-discriminative benefit sharing and opportunity access to all including the vulnerable or marginalized individuals and groups</u> <u>Increased awareness on non-discrimination and inclusion of the vulnerable or marginalized persons and effective application of EISM mechanism</u>
Sub-component 1.3: Restoration of degraded natural forests in Wildlife and Forest Protected Areas.	Aims to restore up to 22,700 ha of forest. Restore degraded areas in key National Parks and CFRs through natural regeneration (based on enclosure of areas) and, where needed, enrichment planting, including through engaging and employing local communities based on pilot approaches applied previously by UWA.	- This will provide opportunities for work and employment and will bring substantial economic benefits through increasing forest productivity and environmental benefits through restoring ecosystem services. - Selection of inappropriate tree species for assisted regeneration / enrichment planting - Limited use of pesticides in tree nursery operations <u>Potential social exclusion and discrimination from employment opportunities as well as potential economic and environmental benefits</u> <u>Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries</u> <u>Vulnerable or marginalized individuals or groups may decline to</u>	- General sensitization of communities on improved ecosystem services provided by restored forests. - Engagement of local communities in forest restoration through contracts. - Support UWA and communities to plan and develop products hence increasing economic opportunities - Use of indigenous species naturally occurring in target areas for assisted regeneration / enrichment planting. - Use of only approved pesticides, consistent with requirements of ESS3, in accordance with manufacturers' instructions; nursery workers will be trained by the NFA staff on proper use of pesticides and hazards associated with pesticide use including the dangers in improper handling of empty pesticide containers and of excessive pesticide use; and provision of PPE to nursery staff handling pesticides.

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
		<u>take part in consultations for fear of being reported.</u>	• Strengthening of GRMs to provide for safe, ethical and confidential reporting. • Inclusion of principles of non-discrimination in contracts, CoCs, whistle-blower protocols and HR procedures. • <u>Promotion of inclusive and non-discriminative employment opportunities, selection of beneficiaries and benefit sharing to all including or vulnerable or marginalized individuals and groups</u> • <u>Increased awareness and application of EISM and enhanced monitoring of discrimination.</u>
	• Training and equipment for the avoidance, response and monitoring of wildfires and the removal of invasive species. Activities: the development of landscape-level strategies for fire management and the eradication of invasive species in PAs: fire management training; establishment and maintenance of fire breaks; construction of fire towers; equipment for firefighting and fire avoidance; community sensitization; response and monitoring; with appropriate modern approaches- more	• Overall, this will bring positive impacts through lowered fire risk and reduced loss of land to invasive species, jobs and income for local communities. • Possible localized limitations in access of communities to fire-prone areas • Health and safety risks associated with vegetation clearance work.	• Encourage participatory community involvement including community initiatives such as community monitoring of fire occurrences (e.g. reporting any community members that engage in illegal activities such as bush burning) • Instilling of community social accountability. • Employment of community members for removal of invasive species • Appropriate measures for ensuring health and safety, including provision of PPE, and through good supervision by UWA and NFA

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	efficient fire monitoring practices at the landscape level including consideration of satellite-based monitoring systems.		
Sub-component 1.4: Increased Forest protection in CFRs and WRs in close proximity of refugee settlements to protected areas is exacerbating rapid loss of forest resources.	- At a small number of locations (e.g. at Bugoma CFR and Katonga Wildlife Reserve), deployment of additional resources to improve protected area management where there are site-specific threats to high value forests. - UWA and NFA to engage local communities in resource management efforts, including forest restoration, and strengthen enforcement efforts to better-protect remaining natural forests in these protected areas. Project supported activities include: (a) community livelihood activities (such as beekeeping and wild mushroom growing); (b) removal of invasive species; (c) forest restoration; (d) improvements for basic protected area	Activities and impacts are the same as under Components 1.1-1.3, (but in specific locations within refugee-hosting areas).	Mitigation actions same as 1.1 - 1.3.

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	management (communication and other equipment, vehicles, ranger posts, essential infrastructure; (e) improvements for wildfire management (fire observation towers and equipment); and (f) boundary demarcation.		
Component 2: Investments to increase revenues and jobs from forests and wildlife protected areas			
Subcomponent 2.1: Investments in tourism Implemented by UWA and NFA, investments in tourism infrastructure and products in select NPs and CFRs.	- Potential activities include the development of a wide range of products such as picnic sites, canopy walks, hiking trails, jetties, zip lines, bird hides, and student centers, among others, to enhance diversification and overall quality of tourism products. - Tourist reception, information and interpretive facilities used to improve visitor experience in the PAs and to encourage visitors to stay longer at each site- investments include visitor centers, visitor gates, tracks, trails, bridges, and board walks. - Support the development of	- Establishment of boundaries and demarcation may cause access limitations. - Road and trail upgrading and development of small infrastructure may cause localized environmental impacts e.g. sediment-laden run-off, noise, dust, localized erosion and gullyng. - Risks of excluding communities from benefit sharing from tourism development. <u>Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries</u> <u>The possibility of exclusion from employment opportunities or involvement of in CFM and CRM groups agreements and/or Memorandum of Understandings (MoU)</u>	- Support enhancement of opportunities for boosting wildlife/nature-based tourism and alternative sustainable livelihoods for communities surrounding protected areas (through CRM arrangements). - Investment in community tourism initiatives and product development including further development of the Batwa trail. - Encourage private sector operators to engage local stakeholders in tourism activities, including as guides, visitor centre staff etc. - Supporting communities to tap into tourism value chains e.g. through supply contracts and provision of associated technical training. - Sensitization and capacity building of contractors, workers, and other relevant stakeholders on non-discrimination. - Strengthening of GRMs to provide for safe, ethical and confidential reporting. - Enhanced monitoring of discrimination. <u>Promotion of inclusive and non-discriminative selection of beneficiaries and benefit sharing from tourism development to all including the vulnerable or marginalized individuals and groups</u>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	infrastructure in the following PAs: Bwindi, Queen Elizabeth, Kibale, Rwenzori Mountains, Semliki, and Murchison Falls NPs, Kasyoha-Kitomi CFR, and Echuya CFR. Other sites added as new priorities emerge. (i) investments to construct, equip and maintain Visitor Centers, (ii) the development of new tourism products-trails, signage, interpretation panels, marketing material) in and around parks that promote 'new' tourism destination; and (iii) advanced tourism infrastructure-boardwalks and canopy walks) in and around parks.		- Increased awareness and application of <u>EISM in the creation of CFM and CRM groups including establishing appropriate agreements/MoUs.</u>
Subcomponent 2.2: Investments in productive forestry.	- Identifying and planting trees to increase on the area of plantations with commercial species - Promoting private sector and identifying appropriate technologies. - Identifying well established commercial tree growers.	- Increased land demand. - Risk of plantations replacing indigenous forests. - Localized impacts associated with land preparation and planting (vegetation clearance, sediment run-off from pitting etc). - Risk of exclusion of adjacent communities, particularly discrimination of vulnerable or marginalized individuals and groups, from labor contracts in	- Encourage broad-based engagement by communities (not just private sector forestry companies) in plantation establishment. - Introduce systematic screening (based on existing SPGS screening guidance) of all proposed planting areas to exclude areas with indigenous forests. - Training and close supervision of existing tree planting guidelines that promote good practice and minimize negative environmental impacts.

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	- Put mechanism in place for supporting identified commercial tree growers. - Identifying private tree growers. - Put mechanism in place for supporting identified private tree growers	establishment and maintenance of plantations	- Sensitization and capacity building of contractors, workers, and other relevant stakeholders on non-discrimination. - Strengthening of GRMs to provide for safe, ethical and confidential reporting. - Enhanced monitoring of discrimination.
Component 3: Improved Landscape Management in Refugee Hosting Areas			
Subcomponent 3.1: Increased tree cover on community and refugee-hosting areas	- Development of intensive, mixed-use agroforestry systems on household plots. - Support for development of woodlots on private land to enhance the supply of timber, poles, fuel, and other plantation products. - Enhanced management and protection of natural forests outside protected areas. - Support for target district local government natural resource technical teams through the provision of basic support packages of office equipment, motorbikes and operational costs, as well as capacity-building support.	This should bring strongly positive environmental and social benefits for wood supply, soil fertility and provision of fuel, fodder and food and protection of environmental services.	- Benefits to be optimized through strong focus on multi-purpose woody species to provide fruit, fodder, fencing, fuel, shade, and also fix nitrogen, in intensive, multi-layered systems suitable for small areas. - Capacity building support to DLGs will enhance/optimize implementation and benefits and will help avoid any potential adverse environmental and social impacts. - Technical service providers will also provide guidance, technical support and oversight to enhance impacts and avoid negative impacts (both social and environmental)

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
Subcomponent 3.2: Supporting farm forestry for refugee fuel supply	Establish a program to purchase fuelwood from Ugandan landowners and supply to refugees.	- Positive social and economic impacts expected by providing a market for thinning and offcuts for host communities and providing access to much needed wood biomass for refugee households. - This will also alleviate some pressures on natural forests and woodlands adjacent to refugee settlements. This will simultaneously stimulate farm forestry, provide an energy lifeline to the refugees to help them cope with increasing scarcity, and reduce pressure on natural woodlands. - Potential environmental risks of wood supply from under-pressure natural forests and from close to settlements where refugees and host communities are already over-harvesting woodland resources.	- No buying of wood supply from areas within a 10km radius of refugee settlements to eliminate risk of additional pressures on these woodlands. This provision will be included in wood supply and buying contracts. - Only eucalyptus wood will be eligible for wood buying and supply to settlements. This will eliminate risks of unsustainable exploitation of natural woodlands and forests and will limit supply to on-farm grown trees. This provision will be included in wood supply and buying contracts. - Monitoring by a Technical Service Provider and DLGs to ensure compliance with environmental provisions. <u>-including promoting inclusion and non-discrimination of the vulnerable or marginalized individuals and groups)</u> <u>Creating awareness on inclusion and non-discrimination of potential vulnerable or marginalized individuals and groups that may be adversely affected.</u> <u>Training of the CFM and CRM and all implementing entities the application of EISM of the project</u>
Component 4: Project Management and monitoring.			
Management and monitoring	Support for project management and monitoring, including of dedicated environmental and social risk specialist to support environmental and social risk focal points in MWE, NFA and UWA	<u>With regard to exclusion and discrimination the implementing entities may have limited capacity of project teams in assessing and addressing vulnerable or marginalized individuals or groups -related risks</u> <u>Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries</u>	This component will enhance national and local capacity to manage environmental and social risks through support to implementing partners and specifically support (including training and capacity building) for focal points assigned for environmental and social risk management in NFA, UWA and MWE.

Components/sub-components	Proposed Activities	Project	Potential Issues	Proposed Mitigation and Optimization Measures
			Project teams may not be equipped to adequately address complaints related to discrimination, particularly as complaints may be challenging to address without causing harm to the parties involved.	- This will include regular and systematic monitoring and reporting of environmental and social risks during implementation. - Creating awareness on inclusion and non-discrimination of potential vulnerable or marginalized individuals and groups that may be adversely affected. - Training of the CFM and CRM and all implementing entities the application of EISM of the project - The hired service provider will train the PCU, all the implementing MDAs, the LGs, CFMs and CRMs, contractors and community and forest border communities will be trained in the application of EISM - EISM GRM will be established as alternative avenues for submission of sensitive complaints pertaining to discrimination and exclusion of vulnerable or marginalized individuals and groups that may be adversely affected. - A hired Service Provider will be hired by the World Bank to support the GoU to implementation and monitoring of EISM (as per Annexes 12 and 13)

5.1 Environmental and Social Risk Assessment

Based on the analysis presented in Table 9 above, the overall social risk is considered substantial and environmental risk rating is still considered moderate. The Project risk rating has changed during IFPA-CD implementation from moderate to substantial as a result of social risks being rated substantial. The social risk is also rated substantial due to the potential assessment of risks associated with potential exclusion and discrimination of vulnerable or marginalized individuals and groups.

It is recognized that project investments under Components 1, 2 and 3 could pose localized environmental impacts arising from proposed forest restoration and management activities; as well as small infrastructure development in and on the boundaries of protected areas. Since these areas are environmentally sensitive, attention to the implementation of appropriate mitigation measures and monitoring is needed.

Additional attention is needed because of the presence of the Batwa people around 4 of the conservation areas included in project design. More detailed and specific guidance was provided in the Vulnerable and Marginalized Groups Framework (VGMF). Consequently, VMGPs for the 4 sites have been developed as a practical tool to guide the implementation of the project interventions that may affect the Batwa people.

The risk rating for the project was upgraded to substantial *for both environmental and social risks*. Hence specific mitigation measures per activity are recommended in Table 9, and these are complemented overall by capacity-building in environmental and social risk management by technical service providers, by a dedicated staff member positioned within the PCU and working closely in support of environmental and social risk focal points within each of the implementing agencies (MWE, NFA and UWA).

The World Bank and International Finance Corporation (IFC) have contracted an international firm (service provider) SREO Consulting Ltd. (SREO) to support the implementation of the mitigation measures. SREO will partner with local Civil Society Organizations (CSOs) and/or individuals with expertise and experience in inclusion and non-discrimination in Uganda.

The World Bank will support the Ugandan government in the rollout of the mitigation measures through Enhanced Implementation Support and Monitoring (EISM), targeting PIU/PCUs including various stakeholders such as contractors, subcontractors, frontline service providers, and local stakeholders, as required and set out in the environmental and social documentation. In preparation for the AF, some of these mitigation measures focused on inclusion and non-discrimination have already been executed (details in Chapter 7).

The Department of Environmental Support Services at the Ministry of Water and Environment takes overall lead for E&S risk monitoring and compliance under the Project, consistent with its government mandate.

UWA and NFA routinely undertake ESIA's consistent with the legal framework and have specialist staff assigned for this purpose. The incentive scheme for promoting small forestry plantation adopted lessons and procedures from the existing Sawlog Production Grant Scheme which includes

environmental screening and risk management procedures to ensure that plantations aren't established in areas which support natural forests and to ensure plantation management practices avoid and minimize environmental risks during implementation. The Ministry of Water and Environment is working on project implementation and environmental risk management with other projects, including a large water development investment project.

To mitigate **environmental risks** across all components of the Project, capacity to manage environmental and social risks by UWA, NFA and FSSD was strengthened through the assignment of a dedicated staff member in the Project Coordination Unit (PCU) to strengthen existing capacity for environmental risk management, and to provide oversight, monitoring and reporting support in relation to management of environmental risks. A series of relevant training courses were also organized for key implementing staff.

Social Risk Rating was upgraded to substantial. The major challenge during the implementation period so far has been lack of a functional project GRM which remains a major social risk for the project. The main social impacts anticipated under the project are to involve possible restriction of access to resources within protected areas because of more effective protected areas management capacities. Without risk avoidance measures (such as excluding support for boundary demarcation from sites where the Batwa are present) and mitigation, these could impact on livelihoods. It should be recognized that land acquisition has not been undertaken as part of IFPA-CD project and is not anticipated as part of IFPA-CD AF. Impacts associated with construction of Park infrastructure are expected to be localized and manageable. Workers' interactions with communities is limited and manageable given construction is mostly within protected areas and at a small scale. The project also identifies the potential risk of exclusion and discrimination of the vulnerable or marginalized individuals and groups that could be adversely affected by the project. Residual risks are addressed through the implementation of appropriate instruments, mitigation measures and sustained stakeholder engagement. Full details of the borrower's commitment to managing risks and impacts have been defined in the updated ESCP.

The borrower (Ministry of Water and Environment – MWE) has experience from past and on-going projects, which are supported by the World Bank. MWE has additionally gained implementation experience from the period that IFPA-CD has been implemented to date. The risk rating will continue to be reviewed during IFPA-CD AF implementation and be updated accordingly.

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

The following section relates to actions committed to preventing discrimination against vulnerable or marginalized individuals or groups:

- The Government of Uganda notes that discrimination of any person contravenes Article 2 of the Ugandan Constitution. The Republic of Uganda (the “Borrower”) has committed to uphold the Bank’s policy requirements for non-discrimination all World Bank financed projects. The measures outlined below are intended to ensure that mechanisms exist to identify potential discrimination and to promptly remediate its impacts. Specifically, these mitigation measures will ensure that:
- An individual or group with concerns or grievances would be provided appropriate avenues to submit their grievances or concerns including through the grievance mechanism corresponding to World Bank finance project.
- The implementors of the referred mechanism, the World Bank and the Government of Uganda, will do what is required of them to ensure that such concerns or grievances are addressed promptly and effectively.

Potential Risks associated with exclusion and discrimination: These risks were identified through civil society organizations, donors, and other interested parties. Stakeholder engagement on the mitigation measures and updating of instruments took place between June 1 and June 23, 2023, as well as between August 28 and September 22, 2023. This engagement was led by the World Bank and included meetings with Government of Uganda, representatives, other Development Partners and NGO /CSOs. In addition, in January 2024, the GoU led consultations on the whole World Bank portfolio with key community stakeholders.

The following potential exclusion and discrimination risks and impacts were identified:

- Limited capacity of Bank's social staff and the client in assessing and addressing risks related to the discrimination of vulnerable or marginalized individuals;
- Potential safety issues for sexual and gender minority tourists
- Potential limited access discrimination of vulnerable or marginalized individuals to project benefits (e.g. small enterprises, jobs);
- The need to meet health, safety, and security obligations for all project workers including those who may be vulnerable or marginalized;
- The possibility that PIUs may delay or complicate the provision of financial or in-kind compensation (e.g. replacement housing) to PAPs who may be vulnerable or marginalized;
- The risk of discrimination of vulnerable or marginalized individuals being excluded from stakeholder engagement activities or these individuals or groups declining to participate for fear of being reported to the police;
- The risk of discrimination against vulnerable or marginalized individuals declining to file complaints with the GRM for fear of retaliation or harassment.

Mitigation Measures: The project has integrated appropriate mitigation measures to manage the risks of exclusion and discrimination in table 12 above. The identified mitigation measures (below) will be implemented by the project implementation unit with the support of an Enhanced Implementation Support and Monitoring (EISM) firm to be hired by the World Bank and IFC with a strong track record of providing implementation support and monitoring project performance and knowledge of the Ugandan context. This entity is expected to work with NGO/CSOs and country-based development partners in implementing these mitigation measures. record of providing implementation support and monitoring project performance and knowledge of the Ugandan context.

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

Specifically, the firm will:

- Assist project teams to enhance existing project-level grievance mechanisms and develop and operate an independent mechanism that would identify, manage, and monitor cases of discrimination.
- Assist the WB in strengthening the capacity of Project Implementation Units, workers, and contractors, subcontractors, and service providers.
- Ensure contracts, codes of conduct, hiring procedures, whistle-blower protection protocols, and other measures, as needed, are in place to require remediation of cases of discrimination.
- Develop a strong data management system and process that secures personal data and information in a manner that is safe, ethical, and confidential.
- Where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the Bank, propose appropriate remediation, and follow up on agreed actions to resolve the case.
- Support the WB/IFC to monitor the efficacy of the agreed measures to mitigate the impacts on WB/IFC financed operations.

A more detailed explanation of the enhanced implementation support of this organization will provide is found in Annex 10 and 11.

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

- Assess/review project's non-discrimination measures in consultation with entities' working with discrimination of vulnerable or marginalized individuals.
- Collaborate with key stakeholders, including NGO/CSOs to enhance access to GRMs, in particular in refugee and host communities; and Update the Stakeholder Engagement Plan to include communications and engagements of discrimination of vulnerable or marginalized individuals, including NGO/CSOs.

5.2 Lessons Learnt under IFPA-CD

The environmental and social performance for IFPA-CD has been rated Moderately Satisfactory for much of the implementation period. The environmental and social risk rating for IFPA-CD was upgraded to substantial effective May 2023, raising the cumulative ES risk for the project to Substantial.

The major challenge during the implementation period so far has been the lack of a fully functional project GRM which remains a major social risk for the project. However, GRCs have been formed, and training is now ongoing. There have also been inadequate stakeholder engagements with key project stakeholders. For example, some districts have limited information about the project. Efforts are now underway to appoint project focal persons in districts and disseminate project information in the form of simplified brochures. Based on the above two challenges, the project social performance was downgraded to Moderately Unsatisfactory in the recent AM (April 2023). As a result of downgrading the social performance, the whole E&S performance was downgraded.

The PCU is currently fully instituted with both Environmental and Social Risk Management Specialists. The PCU has received several trainings which include:

- a. Training in ESIRT. This training was attended by PCU, UWA and NFA Focal Persons and focused on the protocols for incident reporting and investigation using standardized incident forms. It also covered the incident types and classification including guidance on incidents involving Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).
- b. Grievance Redress Mechanism Training. The purpose of the trainings was to enhance skills in Grievance Redress Management and resolution. The training focused on effective and operational GRMs, distinctions with Sexual Exploitation Abuse and Sexual Harassment (SEA/SH) grievances, application of the GRM self-assessment tool and formation of GRM action plans.
- c. Environment and Social Safeguards training for Communications Specialists and Safeguard teams supporting Project Implementing Units. The training was aimed at enhancing the understanding and appreciation of Social and Environmental Risk Management in the projects and strengthening the collaboration between E&S and Communication teams and create clarity on the unique roles and contribution that each brings to the table.

5.3 Environmental assessment and screening process

5.3.1 Overview

According to the World Bank Environmental and Social Framework (ESF)³⁵ for projects involving multiple project activities that are to be identified, prepared, and implemented during the course of the project whose categorization is Substantial Risk, Moderate Risk or Low Risk, the use of National Regulations will be permitted after review by the Bank. Therefore, during project activities implementation, it is expected that the Guidelines for Environmental Impact Assessment in Uganda (1997) will be used.

³⁵ The World Bank Environmental and Social Framework. Paragraph 36 page 8.

The key regulations for environmental and social assessment in Uganda include; ³⁶*The National Environment Act, 2019, and the National Environment (Environmental and Social Impact Assessment) Regulations, 2020*. They both define the role of ESIA as a key tool in environmental management, especially in addressing potential environmental and social risks and impacts at the pre-Project stage. The Regulations define the ESIA preparation process, required contents of an ESIA, and the review and approval process including provisions for public review and comment. The regulations are interpreted for developers and practitioners through the *Guidelines for Environmental Impact Assessment in Uganda (1997)*. The steps below shall be incorporated in any future project activities' preparation and approval process.

Step 1: Screening of Activities

Project activities supported under the project will be screened for environmental and social risks through the following process:

UWA and NFA and other entities will be responsible for applying the screening checklist (including screening for potential exclusion and discrimination of vulnerable individual and groups) at site level to determine whether an ESMP and or ESIA will be required. A screening checklist for the project was developed but this has further been updated to be aligned with the ESS requirements and can be found in Annex 1.1. The Project Coordination Unit in MWE will provide support to implementing agencies and oversight of environmental and social risk screening across the project.

Step 2: Preparation of the ESMP, Project Brief or ESIA, as required

If required by the screening process, the entity shall be responsible for the preparation an ESMP, Project Brief (PB), and / or ESIA. ESMP/PB/ESIA should contain detailed information on: (1) Measures to be taken during implementation of certain activities in order to eliminate adverse environmental and social impact or reduce it to an acceptable level; (2) Actions necessary to implement the said measures.

If it is determined that an ESIA is required, then this shall be prepared by the entity and submitted to NEMA for review and approval. The preparation of the ESMP/PB/ESIA will be guided by the measures and guidance intended to ensure the mechanisms to identify potential discrimination and to promptly remediate its impacts as outlined in Annexes 11, 12 and 13. The ESMP/PB/ESIA will also be subject to the Bank's review and clearance prior to disclosure.

The Environment and Social Management Plans (ESMPs) developed in accordance with this ESMF will contain specific provisions on the management non-discrimination of discrimination of vulnerable or marginalized individuals. These provisions are consistent with recent GoU measures to ensure non-discrimination in accordance with Article 21, including circulars issued by the GOU included in Annex 9.

The purpose and objective of these provisions is to ensure that in accordance with World Bank policies and Article 21 of the Ugandan Constitution: (i) project impacts do not fall disproportionately

^{35 36} The National Environment Act, 2019, and the National Environment (Environmental Impact Assessment) Regulations, 1998.

on individuals and groups who, because of their particular circumstances, may be vulnerable or marginalized; (ii) there is no prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be vulnerable or marginalized; (iii) Bank financed operations are implemented through their respective life cycles in a manner that is aligned with the non-discrimination principles embedded in applicable Bank requirements.

To facilitate the implementation of the provisions for non-discrimination that cover discrimination against vulnerable or marginalized individuals, the PIM will be updated to specify how the mitigation measures will be implemented. The PIM will clearly lay out how the project will ensure non-discrimination of individuals and groups. The PIM will also provide details of how the mitigation measures will be implemented. Furthermore, it will specify the timelines and roles and responsibilities to implement the different mitigation measures. The PIM will also provide detailed information on how exactly the project will support and interact with the World Bank Enhanced Implementation Support and Monitoring. The PIM will be developed or updated no later than two months after the redisclosure of the project's instruments or before the Enhanced Implementation Support and Monitoring mitigation measures are agreed to and in place.

Step 3: Approval and Monitoring

For project activities subject to an ESMP as a result of limited and site-specific impacts, those ESMPs shall be approved by Bank and as required by NEMA prior to disclosure. Project activities shall be eligible for financing only after ESMP approval. ESMP approval shall follow public disclosure and completion of public consultations, as described in detail in Chapter 9 of this document. The entity will be responsible for monitoring adherence to the ESMP/ESIA.

For activities which require an ESIA, once the ESIA study is concluded the MWE will submit three (3) copies of the Environmental Impact Statement (EIS) which includes the social aspects of the assessment to NEMA for their review and approval. Once submitted to NEMA, EIS becomes a public document. Within two (2) weeks from date of receipt of the EIS, NEMA is mandated, if it finds it necessary; to publicize receipt of the EIS, identify the concerned region and stakeholders, the places for inspection of the EIS, and makes copies or summaries of the statement available for public inspection. NEMA also sends copies of the EIS within 14 days from the date on which the EIS was received to relevant agencies and experts for comments. Some of the key agencies in this Project include; MWE, NFA, UWA, MTWA, and MoLGSD amongst others. Public comments and/or objections are submitted to NEMA within 3 weeks of receipt of the EIS. It is, therefore government policy to have the Statement disclosed by NEMA during the review process but the level of disclosure is at the discretion of NEMA. The ESIA's will be subject to Bank's review and clearance before submission to NEMA. The ESIA's will be disclosed after NEMA clearance.

For activities which require a Project Brief, the IA will prepare the Project Brief. The IA will submit to NEMA three hard copies and an electronic copy of the project brief for their review and approval. The Project Briefs will be subject to the Bank's review and clearance before submission to NEMA. The Project Briefs will be disclosed after NEMA clearance.

The preparation and the review of all ESIA/PBs/ESMPs will consider mainstreaming of risks and impacts associated with exclusion and discrimination of vulnerable or marginalized individuals and groups as guided by Annexes 11, 12 and 13).

5.4 Project Institutional Implementation Arrangements and Capacity for Environmental and Social Risk Management

Capacity already exists within the central level implementing entities (MWE, UWA and NFA) for environmental and social risk management. Each of these agencies has staff assigned for environmental and risk management and these staff were assigned as focal points for ensuring that activities at site level are screened, evaluated and risk management activities implemented effectively and monitored as part of site-level ESMPs and ESIAs. To provide further robustness, the PCU was created and dedicated environmental and social risk management specialists recruited. These specialists provide capacity-building support to the implementing agencies and have overall responsibility for E&S risk oversight, monitoring and reporting.

Under component 3, environmental and social risk management is managed primarily by technical service providers hired to implement this component in close collaboration with local government groups (specifically the Natural Resources Officers – NROs at district level). The TSPs coordinate closely with the E&S risk management specialists in the PCU.

As part of the PCU, the environmental and social risk management specialists report to the National Project Coordinator at MWE and are responsible for design and operation of a tracking system to ensure that E&S risks are monitored systematically across the project and reported as part of regular project reporting requirements.In addition to the above and in response to mitigating potential risks and impacts associated with social exclusion and discrimination, the World Bank will ensure effective monitoring of these risks aimed at project beneficiaries or workers. The World Bank will hire an international credible agency/firm to strengthen the capacity and offer technical support through Enhanced Implementation Support and Monitoring (EISM) mechanism, as may be needed, for individuals or groups who may be identified as vulnerable or marginalized. Furthermore, training will be offered to all concerned parties (including the PCU and the respective participating MDAs and Local Governments as well as CFMs /CRMs) to promote sensitization against non-discrimination and exclusion. Details of EISM is found under Annex 10 and 11. The activities related to capacity strengthening and technical support (detailed in Annexes 10 and 11) include:

- Support to the World Bank on training of government staff and private sector consultants/clients, workers, and contractors on non-discrimination by developing training materials, identifying venues, providing trainers, etc.
- Support to the World Bank with training project level GRMs on non-discrimination in World Bank financed Projects by developing training materials, identifying venues, providing trainers, etc.
- Preparing training modules for call centre operators, data management personnel, and community outreach personnel on appropriate handling of sensitive information.
- Providing technical support to the GOU/PCU and implementing agencies for the development of Guidelines on Non-discrimination of Workers.

6.0 GRIEVANCE REDRESS MECHANISM (GRM)

6.1 Importance of GRM

The Grievance Redress Mechanism (GRM) provides a way to provide an effective avenue for expressing concerns and achieving remedies for communities, promote a mutually constructive relationship and enhance the achievement of Project development objectives. It has been learned from many years of experience that open dialogue and collaborative grievance resolution simply represent good business practice both in managing social and environmental risk and in furthering Project and community development objectives. In voicing their concerns, they also expect to be heard and taken seriously. Therefore, MWE must assure people that they can voice grievances, and the Project will work to resolve them without bias.

The Project GRM is augmented by the World Bank's Grievance Redress Service, which provides an easy way for Project-affected communities and individuals to bring their grievances directly to the attention of Bank Management. The GRS ensures that complaints are directed promptly to relevant Bank Task Teams and/or Managers for review and action, as appropriate. The goal is to enhance the Bank's involvement, responsiveness and accountability. In addition, the EISM GRM has been proposed as an alternative avenue for submitting sensitive complaints associated with risks of exclusion and discrimination, in a safe and ethical manner. This is further described in the section below and Annexes 12 and 13. The GRM will include provisions for confidential reporting related to sensitive issues such as SEA/SH and discrimination of vulnerable or marginalized individuals. to sensitive issues such as SEA/SH, exclusion and discrimination of vulnerable or marginalized individuals and groups.

6.2 Project GRM arrangement

There are a number of aspects that potentially could bring a dispute or conflict. These will be localized to each specific area. Therefore, the forms of settling of such disputes and conflicts are not necessarily uniform. What is important is the use of locally appropriate dispute and conflict settlement mechanisms agreeable to all parties concerned.

The GRM is grounded on existing local dispute management models/mechanisms that involve the local leaders and technical staff in providing a forum for listening to and resolving grievances. The GRM is spearheaded by Grievances Redress Committees (GRC) established at appropriate levels.

The composition of the GRC takes into consideration the technical competencies of the GRC members at all levels to receive and resolve grievances. The members are formally assigned responsibility to work with the respective committees. In choosing the members, consideration has been given to the diverse stakeholder interests in the participating project areas and the need for balancing geographical and gender distribution. The GRCs can co-opt members to the respective committees as and when the need arises.

It is expected that the majority of grievances shall be received and resolved at the lowest level (village level). However, there is provision for referrals in the case of grievances escalating to the next level.

The GRM arrangements for IFPA-CD AF are described below – the project Stakeholder Engagement Plan provides more details on GRM:

a. UWA

For UWA, GRCs have been formed at Conservation Area Level (National Parks and Wildlife Reserves are managed under a Conservation Area Structure with national parks and wildlife reserves under a specific geographic area forming a conservation area headed by a Chief Warden). GRCs have further been formed at District level, sub-county level, training of Local Council 1 Chairpersons for each village is ongoing and village level.

To date, the GRCs for Kibale National Park, Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, Katonga Wildlife Reserve and Toro-Semuliki Wildlife Reserve have been trained and operationalized.

b. NFA

For NFA, GRCs have been formed at Range Level (Central Forest Reserves are administratively grouped into ranges with a range comprising of several CFRs in a particular geographic area). GRCs have further been formed at District level, sub-county level, training of Local Council 1 Chairpersons for each villages is ongoing

c. Refugee Hosting Districts

Grievances in the refugee hosting districts have been constituted in Hoima, Kikuube, Kamwenge, Kakumiro, Kagadi, Kibaale, Kiryandongo, Kyegegwa, Adjumani, Amuru, Arua, Madi Okollo, Terego, Koboko, Lamwo, Moyo, Obongi and Yumbe. Each District GRC is composed of: Chief Administrative Officer (the Chairman), District Community Development Officer (the Secretary), District Forest Officer, District Lands Officer, District Agriculture Officer, District Environment Officer and representative of the NGO Forum

The roles of the GRC include :

- Sensitize Sub County GRC on rights and responsibilities and channels for registering a complaint;
- Follow up on complaints that have been directed to the district level and see that they are resolved;
- Conduct quarterly review meetings on Sub County GRC report; and
- Forward unresolved complaints which may require higher level solving to national level GRC.

At the lower levels in the refugee hosting districts i.e., Sub-County level and Village Level, the GRM used by DRDIP has been adopted by IFPA-CD AF to resolve grievances. The GRCs formed by DRDIP will be trained by the project and they will be able to receive and resolve grievances related to IFPA-CD AF.

Within the refugee settlements, the Inter-Agency Feedback Referral and Resolution Mechanism (FRRM) set up by UNHCR will be used to receive grievances/complaints related to a single project activity undertaken within the settlements (provision of wood fuel to persons with specific needs).

Grievances not resolved at the district level shall be handled by the National Level GRC housed at MWE with members from MWE, UWA and NFA.

Supplementary Channels to Facilitate Grievance Reporting

In view of the fact that the project stakeholders may need various avenues to report grievances, alongside the above structures and or arrangements, a simplified and cost-effective alternative Information, Education and Communication (IEC) material was developed as described below.

The Poster

The poster contains a summarized description of the different channels through which the project related grievances may be reported including use of the dedicated toll-free lines, emails and use of social media (WhatsApp) numbers. So far, the posters have been printed in English and widely circulated to local leaders and communities in the project districts purposely to create awareness among the stakeholders especially at the LC1 level for prompt reporting and handling of project related grievances. The posters are to be translated and printed in the different languages spoken in the project areas including the refugee hosting districts (Lugbara and madi language for West Nile region, Acholi and Langi languages for Northern region and Runyoro- Rutooro and Runyakore-Rukiiga for western region)

Toll Free Lines

The toll-free lines - UWA - 0800245245, NFA- 0800264036 and MWE-0800203655, WhatsApp Numbers – UWA- 0740560236, NFA – 0707608920, MWE – 0772841843 and Email Address ifpacd@mwe.go.ug are all active and are meant for receiving grievances directly from complainants.

FRRM system

The project is streamlining its grievance redress mechanisms (GRMs) to incorporate the Inter-Agency Feedback, Referral, and Resolution Mechanism (FRRM) system majorly used in refugee settlements. These arrangements are to be executed in liaison with the lead agencies involved in refugee operations (especially UNHCR), The arrangements for authorized access to this system have to be consolidated and shall majorly operate to handle grievances that arise from refugee settlements associated with fuelwood distribution.

Suggestion Boxes

Suggestion boxes are to be put in strategic locations e.g. trading centres for the stakeholders to drop in their complaints or grievances. The boxes will be opened and actions taken on the grievances reported.

Personnel

Two personnel from each implementation agency UWA, NFA and MWE have been assigned and trained to receive, register grievances in the log book and forward IFPA-CD related grievances to the social safeguards focal persons of the respective implementing agencies and to the PIU social team respectively for follow up with the field team for resolution.

EISM GRM: Additionally, as deemed necessary, differentiated consultations and/or outreach activities will be organized for vulnerable or marginalized individuals or groups. EISM GRM is an alternative to lodging complaints through a GOU led Project-level GRM. The EISM GRM shall ensure mitigation of the potential impacts of exclusion and discrimination through the following:

- Enhance existing project-level grievance redress mechanisms to safely, ethically, and confidentially receive cases related to discrimination on World Bank financed operations and refer them to an appropriate grievance handling mechanism.
- Design and operate a mechanism for receiving grievances related to discrimination on World Bank-financed operations (including from project-level grievance mechanisms noted above).
- Establish a hotline or an alternative complaint mechanism, for individuals to lodge complaints of discrimination on World Bank-financed projects or voice their concerns without fear of reprisal. As indicated earlier, a hotline (0800 333125) hosted and operated by a local NGO on behalf of the EISM firm has been established for vulnerable or marginalized individuals or groups to lodge their complaints of discrimination.

The guidelines on how the hotline will be used and cases managed are outlined in Annexes 4 &5. This will also be integrated in the Project Implementation Manual (PIM).

A description of the GRM for IFPA-CD Project is fully elaborated in the updated SEP.

Though it is expected that settlement of disputes and conflicts should as much as possible take place within the project structures, it does not replace existing legal processes. Settlement of disputes/conflict is expected to be based on consensus, guided by facts when making conclusions as a basis of action. The procedures should be inclusive and participatory in nature with an aim of facilitating communication between conflicting parties, promoting dialogue, and facilitating reasonable agreement between the parties to a dispute or conflict. It should seek to resolve issues quickly in order to expedite the receipt of what could be due or reaching settlements, without resorting to expensive and time-consuming legal actions.

It is important to note that the implementing agencies will emphasize ways of receiving not only complaints and grievances but also constructive feedback and this will be incorporated in the initial training on GRM.

6.3 The World Bank's Grievance Redress Service (GRS)

6.3.1 GRS Definition and Purpose

The GRS is the World Bank's easy way to provide PAPs and communities with an avenue to bring their complaints directly to the attention of Bank Management. The Project-level GRM will remain the primary tool to raise and address grievances in Bank-supported operations except issues that cannot be resolved at the Project level. The GRS facilitates corporate review and resolution of grievances by screening and registering complaints and referring them to the responsible Task Teams/Managers. The GRS undertakes the follow functions within defined time frame:

- a) Receives complaints from stakeholders;
- c) Evaluates and determines their eligibility and category;
- d) Refers complaints to appropriate Task Teams/Managers;
- e) Follows up with Task Teams to ensure complaints are resolved;
- f) Refers PAPs to the Borrower or other parties where appropriate.

6.3.2 Submitting a Complaint to GRS

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

By email: grievances@worldbank.org;

By fax: +12026147313

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

Through the World Bank Uganda Country Office in Kampala – Plot 18 Prince Charles Drive,
Kololo, P.O. Box 4463, Kampala (U); Tel: +256 414 3022 00.

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

In addition to the enhanced project-level GRM (described above), the World Bank has developed a specific window under its existing Grievance Redress Service (GRS) to manage exclusion or discrimination associated complaints related to any World Bank project globally. A protocol has been developed to process all complaints related to exclusion or discrimination in the Uganda portfolio

7.0 STAKEHOLDERS ENGAGEMENT

7.1 Overview

Meaningful engagement with stakeholders is necessary for the project's social license of operation and sustainability. Engagements to date have been guided by ESS 10 Stakeholder Engagement and Information disclosure. Guidelines for inclusion and working with stakeholders including vulnerable or marginalized individuals or groups, have been discussed, with additional guidance given in Annexes 11, 12 and 13. The project has had extensive stakeholder engagement from early stages of the project identification and preparation, with project affected parties and other interested parties. Additionally, stakeholder consultations have been undertaken in the 6 additional districts. These included beneficiary populations and communities, district technical officers and politicians from lower-level local councils (LCs 1) to Constituency (LC1V), private sector representatives, civil society organizations including faith based and cultural institutions, forest dependent communities, officials at the Water Management Zone level, stakeholders from key sectoral ministries at the central level, and Members of Parliament (MPs).

7.2 Stakeholder Engagement carried out during Preparation of the ESMF

It can be observed that there was limited direct consultation during the actual preparation of the original ESMF as the framework benefited from and made references to environment and social issues that were raised in the various stakeholder engagements carried during project identification and preparation. The original ESMF relied on extensive consultations that conducted as part of the preparation of the Forest Investment Plan (which identified this landscape-level intervention) and for the REDD+ strategy (for which this is a REDD+ strategy implementation project). However, direct consultations (including conversations regarding risks and impacts associated with exclusion and marginalized individuals and groups) were undertaken during the update of the ESMF in the additional districts that will be included under the project scope.

As part of the original ESMF, over 30 stakeholder engagement reports were reviewed, pertinent issues sieved out, and areas in the report that addressed the issues summarized and documented. The tables and annexes below show all the stakeholder engagements that have taken place:

- i Table 13 below shows all the stakeholder engagements/meetings that have taken place since 2016, including engagements carried out at the time of preparation of this ESMF.
- ii Annex 6 shows a summary of key issues raised during the consultations, stakeholders, date and place where the engagement took place.
- iii Annex 7 shows comprehensive lists of all stakeholders engaged.
- iv Annex 9 show the actions taken by GoU to ensure inclusion and non-discrimination, resulting out of consultation
- v Annex 10 outlining the Enhanced Implementation Support and Monitoring on Non-Discrimination (EISM), which came out of the process of consultation on exclusion and discrimination of vulnerable or marginalized individuals and groups.
- vi Annex 11 outlines guidelines for implementing mitigation Measures to address exclusion and discrimination -related risk
- vii

TABLE 13: LISTING ALL STAKEHOLDER ENGAGEMENTS THAT HAVE TAKEN PLACE SINCE 2016

S/N	Date	Stakeholder	Location
1.	12 th November 2019	Senior Conservation Officer	Uganda Wildlife Authority
2.	4 th November 2019	Partnership Officer	National Forestry Authority
3.	4 th November 2019	Environment and Social Safeguard Specialist	Ministry of Water and Environment
4.	July 2019	Forest Dependent People Community consultative meetings in Kisoro District	Bukimbiri Church of Uganda Kisoro District
5.	July 2019	Forest Dependent People Community consultative meetings Bundibugyo District	King Nzito Premises Bundibugyo District
6.	July 2019	Forest Dependent People Community consultative meetings Rubanda District	NFA Offices at Rubanda District
7.	12 th - 17 th June 2019	Stakeholders engaged during June 2019 World Bank Mission Local Government District Officials, UWA, NFA, WMZO Officials and Refugee Camps Commandants	Rubanda District Headquarters Echuya Central Forest Reserve Kisoro District Hqtr. UWA (Kisoro Meeting/Mgahinga NP) NFA Forest Station/ Community Tourism Camp – Karengyere, Karinja Forest Station Rubirizi District Hqtr, QENP Hqtr Albert WMZO Fort Portal, Kibale NP Hqtr Rwamwanja Refugee Scheme, Kamwengye District Hqtr, Kagombe CFR, Nyabyeya FC Budongo CFR, Hoima District Hqtr Kyangwari Refugee Scheme
8.	2/March /2019	³⁷ Communities of Nyabaremure and Batwa	Nkuringo Cultural Centre, Kisoro
9.	29 th November 2017	National Stakeholders on BSA	Kampala, Fairway Hotel
10.	17 th – 18 th May 2017	³⁸ Second Consultative Workshop on the REDD+ Strategy for Uganda 52 Participants from Government MDAs, CSOs MPs, LG Officials.	Hotel Africana, Kampala
11.	10 th April 2017	National with representation from the Albertine Region on SESA	Kampala, NFA Meeting Room
12.	March 2017	³⁹ National workshop had around 30 participants	Kampala (City Royale)
13.	16 th February 2017	Forest dependent communities- the Batwa communities around Bwindi, Mgahinga National parks and Echuya Forest Reserve on RSO of Kisoro District	Rugeshi Church of Uganda Kisoro District

³⁷ BUILDING THE CAPACITY OF INDEGENOUS PEOPLES TO ACTIVELY PARTICIPATE IN REDD+ PROCESSES IN UGANDA, A REPORT OF A COMMUNITY MEETING WITH NYABAREMURA BATWA HELD AT NKURINGO CULTURAL CENTRE, KISORO ON 2/03/2019

³⁸ Second Consultative Workshop on REDD+ Strategy for Uganda. Stakeholder Consultation Report/D7. May 2017.

³⁹ First Stakeholders Consultation Report/D4. CONSULTANCY SERVICES FOR PREPARATION OF REDD+ STRATEGY FOR UGANDA'S NATIONAL REDD+ PROGRAMME-MWE/CONS/14-15/00439. March 2017

14.	14 th March 2017	National with representation from the Albertine Region on FGRM	Kampala Hotel Africana
15.	14 th February 2017	Vulnerable and marginalized groups - the Basua and Bambuti ⁴⁰ Communities on RSO of Bundibugyo District	Ntandi Town Council Bundibugyo
16.	2 -17 th February 2019	Western: Bushenyi , Ibanda, Mbarara, Ntungamo, Lyantonde, Kiruhura, Isingiro, Buhweju, Rubirizi, Ruhinda, Sheema, Kabale, Kisoro, Kanungu, Rukungiri	Mbarara town
17.	14 th -16 th February 2017	Western: Masindi , Hoima, Kibaale, Buliisa, Kabarole, Kyenjojo, Kamwenge, Kyegegwa, Kasese, Bundibugyo, Ntoroko, Mubende	Fort portal town
18.	February, 2017	⁴¹ IPs and local communities on FIP Priorities and Projects	Batwa Communities in the villages of: Bitegyengyere, Murubindi, Kagano, Karehe Rwamahano, Giyebe, Murora Biizi, Rugeshi, Birara, Kanaba Kitahurira, Kayonza, Bikuto,.
19.	3rd – 7 th February 2017	West Nile and Northern region: Agago, Amuru, Gulu, Pader, Kitgum, Lamwo, Nwoya, Apac, Amolatar, Alebtong, Lira, Otuke, Oyam, Kole, Dokolo, Arua, Adjumani, Moyo, Nebbi, Yumbe, Koboko, Maracha, Zombo	Dove's nest hotel, Gulu town
20.	20th January 2017	49 Civil Society Organizations ⁴²	Colline Hotel, Mukono
21.	29th August 2016	⁴³ Government or mandated institutions at central and local levels, civil society and NGOs, academia and research institutions, private sector players, Indigenous people/minority groups and forest dependent communities as well as development partners	Desert Breeze Hotel, Arua Town Maracha, Arua, Koboko, Nebbi, Yumbe and Moyo) was convened in Arua Town on 28th August 2016
22.	Monday 29.08.2016	⁴⁴ Government or mandated institutions at central and local levels, civil society and NGOs, academia and research institutions, private sector players, Indigenous people/minority groups and forest dependent communities as well as development partners	White Horse Inn, Kabale Kabale, Rubanda, Kisoro, Kanungu, Rukungiri) and Ntungamo Districts was convened in Kabale Town on 28th August 2016.
23.	Wednesday 31.08.2016	⁴⁵ Government or mandated institutions at central and local levels, civil society and NGOs, academia and research institutions, private sector players, Indigenous people/minority groups and forest dependent communities as well as development partners	Sandton Hotel Kasese Kasese, Ntoroko, Bundibugyo, Kabarole and Kyenjojo) was convened in Kasese Town on 30th August 2016

In addition, to this ESMF, the following instruments have been updated to include mitigation

⁴⁰ Basua and Bambuti are other names used to refer to Batwa. Some people in Western Uganda refer to the Batwa as Basua or Bambuti.

⁴¹ Views of targeted IPs and local communities on FIP Priorities and Projects; Opportunities and Challenges for IP participation in FIP design and implementation. Activity Report; Feb 2017.

⁴² Report on the CSOs consultations on the Forest Investment Plan Program (FIP) for Uganda held on 20th January 2017 at Colline Hotel, Mukono

⁴³ REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR WEST-NILE REGION (Desert Breeze Hotel, Arua Town (29th August 2016))

⁴⁴ REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR SOUTH-WESTERN UGANDA (WHITE HORSE INN, KABALE; Monday 29.08.2016)

⁴⁵ REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR WESTERN UGANDA (Sandton Hotel Kasese, Wednesday 31.08.2016)

measures on inclusion and non-discrimination of vulnerable or marginalized individuals: A-ESRS SEP, ESCP and the Labor Management Procedures.

In addition to the consultations above, a separate stakeholder engagement was conducted from March 2023 – January 2024 with civil society organizations (CSOs), donors, and other interested parties. Stakeholder engagement on the mitigation measures and updating of instruments took place between June 12 - June 23, 2023, as well as between August 28 – September 22, 2023. The process of this engagement was by the World Bank; and it included meeting with Government of Uganda (GoU) representatives, other Development Partners and NGO/CSOs. In addition, in January 2024, the GoU led consultations on the whole World Bank with key community stakeholders. The updated instruments have been redisclosed and will be widely disseminated. Further consultations will take place at the community level during the implementation of the mitigation measures.

7.3 Key and Most Commonly Raised Issues and How the Project Design Has Tried to Address These Concerns

Stakeholders raised several pertinent issues that were used in generating some of the project components in response to the recommendations provided during stakeholder engagements. Table 11 below shows a summary of issues raised and how the Project design has tried to address them.

TABLE 14: SUMMARY OF KEY ISSUES & HOW PROJECT DESIGN HAS TRIED TO ADDRESS THEM

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has tried to Address the Issue
Strengthening of the Capacities of Implementing Agencies	☐ Low capacity for District technical departments (Forestry, Environment, Agriculture, community development, Tourism, etc. in terms of no of personnel, office and field equipment's (including transport), extension workers, operational budget ☐ Capacity is low in CFM and communities to manage and implement agreements; and NFA capacity is also low. ☐ Institutional structures are in place and available, but they need considerable strengthening from both financial and human resource perspectives. ☐ Coordination between the different government agencies was also noted to need improvements. ☐ The inadequacy of forestry extension services, which was reported in all regions. This is attributed to insufficient staff, where districts have Forestry Officer Officers is only at district level but not at the Sub County at it is with the agriculture sector. ☐ More extension and support from government institutions is needed. forest governance and capacity for law enforcement, regulation and compliance monitoring.	Support for district local governments through capacity building, provision of basic support packages of office equipment, for mobility and operational costs. Capacity building of NFA staff and forest officers in the field Technical service providers (TSP) engaged to support the CFM and CRM agenda and create and support communities Development and promulgation of Community Forest Regulations, through a consultative process that builds on existing guidelines and experiences, working with legal experts and GoU to secure assent and ensure dissemination and awareness-raising Sub-component 1.1: <i>Improvement of infrastructure and equipment for the management of forest protected areas & Subcomponent 3.1: Increased tree cover on community land in refugee-hosting areas</i>

Challenges in Formation and Management of CFM	☐ There is also very slowly start up processes for collaborative forest management. This may be related to either corruption at county level or within DFs or to lack of funds for technical assistance. Due to these issues NGOs are normally considered more effective and trusted partners by the communities.	TSP engaged to support the CFM agenda and create and support communities in the adoption of the CFM programs including capacity building for the district Funding is provided for communities through the TSP as well as training for forest officers
	☐ The following are key challenges: (i) Formation of CFM is time consuming; (ii)Balancing between conservation and livelihoods; (iii) Funding inadequacies; (iv) compliances; (v) Expectations are high among CFM communities; ☐ Collaborative forest management- support is needed from district community development officers, forest officers for mobilizations and technical support, plan implementation, management of groups, settlement of governance issues and in the formation of CFM. ☐ Funding- There are community development driven funds which are obtainable in the districts. These funds do boost CFM activities.	Component 1: Sub-component 1.2: <i>increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas.</i>
Wildfire Management	Stakeholders further highlighted the urgent need for fire management, which they recognize as being a serious problem across the three sub regions of West Nile, Acholi, and Lango. ☐ Wildfires specially in the grassland portions of Kadapa National Park	Support development of landscape-level strategy for fire management and training in fire management Establishment and maintenance of fire breaks, equipment and construction of fire towers for fire detection and suppression community sensitization response and monitoring introduction of appropriate modern approaches that could help introduce more efficient fire management practices at the landscape level.

		Component 1: Sub-component 1.4: <i>Increased Forest protection in CFRs and WRs in close proximity to refugee settlements</i> (e) improvements for wildfire management (fire observation towers and equipment)
Increasing pressures on forest and fragile ecosystems due to Immigrants and Refugees	In the Northern and West Nile Regions refugees were considered as a ☐ major cause of deforestation and forest degradation. ☐ Refugees: Since the influx of refugees is high, REDD+ should consider including the areas with refugee concentration in the planning perspectives. ☐ Not practical to form CFM among refugee communities. Refugees look at themselves as temporal. ☐ Refugee settlement impacts negatively on forestry especially in Yumbe District.	Component 3: Improved tree cover, forest management and landscape resilience on private and customary land, including refugee hosting areas. Encourage establishment of greater tree cover in refugee-hosting landscapes outside protected areas, supporting sustainable forest management and landscape resilience on private and customary land. Component 1: Sub-component 1.4: <i>Increased Forest protection in CFRs and WRs in close proximity to refugee settlements</i> Subcomponent 3.2: <i>Supporting farm forestry for refugee fuel supply</i>
Stakeholder Engagement	There is a need for community consultations. This is important for ☐ ownership and addressing specific conditions rather than generalizing. ☐ The new Uganda Wildlife Act 2019 and Wildlife Policy provide for the engagement of the community. The Community Resource Committees (CRM) are provided for. The new Act 2019, has brought in a creation of	TSP will provide communities training to develop the skills at community level to actively participate and benefit from the management of forest and wildlife resources targeted support for women to empower them to participate and take leadership roles in natural resources management. establishment of up to 75
	Community Wildlife Committee (CWC) in each conservation area,	new CRM groups, at least 28 new CFM groups, and support of livelihood

	reinforcing the management of resources, sharing of benefits and utilization of benefits. ☐ Collaboration between NFA and the local people should be improved even to the point where locals manage the central forest reserves on behalf of NFA.	activities within existing groups. Sub-component 1.2: <i>Increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas</i>
Promotion of Conservation	☐ A component should be considered for promoting incentives for conservation of natural forests on private land and planting of indigenous species. This would encourage private forest owners to conserve natural trees and forest on their land but also planting indigenous tree species. Thus, this will contribute towards addressing the very high deforestation rates of the remaining private forests.	The project will restore up to 15,000 ha of forest. Restoration will be implemented through natural regeneration (based on enclosure of areas) and, where needed, enrichment planting, to enhance integrity of forests and their mitigation capacity, including through engaging and employing local communities and creating incentives on private land to conserve tree cover Sub-component 1.3: <i>Restoration of degraded natural forests and habitats in forest reserves</i>
Demarcation of PAs boundaries	☐ Boundaries of protected areas need be clearly and permanently marked. ☐ Boundary surveys- the involvement of DLG political and civil leaderships is very important.	Permanent boundary marking will be supported in PA, consultation with communities and local government will be part of the process of this activity Sub-component 1.1: <i>Improvement of infrastructure and equipment for the management of forest protected</i>
Policy and Law Enforcement	☐ Policy and law enforcement is needed, especially on private lands and regulations (licenses & certifications) for commercial charcoal production	Local communities living adjacent to forests will be supported to organize themselves into CFM groups to help manage and deter illegal charcoal

	from exotics only were considered needed and to be included into the Land Act. ☐ These communities would welcome more law enforcers present, as many times it's the people outside the forest dependent communities, who cause the deforestation and forest degradation.	burning and unauthorized use of forest resources
Grievance Redress Management	☐ There is need to expand the district FGRM team to include all relevant stakeholders in the FGRM, including NFA, UWA, NEMA, the district land board, district staff surveyor, district planner, security agencies, a district-level political leader, such as the district chairperson, magistrates, district land officer, district community development officer (DCDO), the private sector ☐ Human Wildlife Conflicts due to problem animals/vermin especially with regards to Kyambura Wildlife Reserve (elephants, chimpanzees, hippos) and disease transmission to livestock	A project GRM will be developed for the project and supported by the MWE and UWA and NFA Issues of human wildlife conflict are being addressed through provision of infrastructure such as buffalo walls and elephant trenches as well as capacity building at UWA and NFA and at the community level to address issues of human wildlife conflict
	☐ This needs the following: (i) transparency; (ii) bring in mediators like community development officers who help in settling conflicts within the groups; (iii) define areas of possible conflicts and remedies. ☐ There is tendency not to comply and adhere to agreements. Some members of the community turn resources into commercial exploitation for income. This results into enforcement by park authority. However, there is a need for: (i) transparency; (ii) engagement of communities and park offices.	
Promotion of	☐ Increase in tourist visits but with limited tourism infrastructure	Support for increased tourism infrastructure and private sector investment

Tourism	(Accommodation and hospitality services, trails, solid waste management, limited tourism products...in addition to primate /chimp viewing) ☐ High incidences of Problem animal attacks on human beings (elephants, crocodiles, hippos, and lions) ☐ Increasing coverage of invasive plant species limiting pasture and limiting tourism activity ☐ Emergence of new forms of poaching (armed poaching) and resultant illicit trade of wildlife products	Reduction of HWC will be addressed through infrastructure investment in buffalo walls and elephant trenches as well as other approaches to reduce HWC Landscape level invasive species eradication strategy developed and financed Sub-component 1.1: Improvement of infrastructure and equipment for the management of forest protected areas and Subcomponent 2.1: Investments in tourism
Gender Relations	☐ Gender strategies; It was expressed at the workshop that gender should be mainstreamed in the REDD+ strategy ☐ Land tenure and governance; Support governments in developing land tenure frameworks that officially recognize women's rights to forest products and carbon from forests. ☐ Gender-sensitive REDD+ programming; A gender analysis should inform the design of REDD+ projects and strategies to ensure the design is responsive to the different needs and roles of men and women. Gender-sensitive monitoring and evaluation tools should be used for REDD+ projects, requiring collection and analysis of sex-disaggregated data and social indicators that measure changes in status and levels of inequality.	Gender Assessment and Action Plan was prepared for the Project, and aspects of gender have been incorporated in the project in all components and will be mainstreamed into all project activities Gender specific indicators are included in the Results Framework, data disaggregated by sex will be collected and monitored
The issues of Vulnerable and Marginalized Groups	☐ Batwa should be made aware of a mechanism through which REDD+ benefits could be delivered from the – national level (reference was made to	A Vulnerable and Marginalized Groups Framework was prepared for the project and site specific Vulnerable and Marginalized Groups Plans have been prepared for each area where the Batwa reside. The plans address issues of participation in decision making, access to resources,

	tourism revenue sharing). However, they proposed a parallel system whereby REDD+ benefits could directly flow to the community level. ☐ Limited participation in decision making regarding forest resources use, limited access to land and land ownership rights, Problem animals	capacity building and long-term support to the Batwa to engage in resource management and livelihood support for their communities.
	(vermin/crop raiding) in specific forest dependent Indigenous peoples communities, loss of access to cultural /traditional assets, loss of Indigenous people's knowledge and Languages, limited access to forest resources for their livelihood (Such as building materials, water, medicine, timber), domestic violence, Gender based violence, and Benefit sharing for REDD+ Proceeds. ☐ No incentives for long-term investments (e.g., due to land tenure issues) and some of the strategies were regarded not realistic due to extremely limited access to funding/loans. ☐ This category of people requires much monetary and non-monetary support, if the REDD+ strategy options are to be relevant to them and well implemented.	A Process Framework has been developed for the Project to address issues of access to protected areas
Availability of quality tree seedlings	☐ Limited access to quality tree seedlings and planting materials and low extension services due limited district capacity (transport, to meet demand and provide extension services and technical guidance	Nurseries are being established to provide high quality seedlings both exotic and indigenous Support will be provided the TSP natural and assisted regeneration
Management of livelihood	☐ Require diversification of livelihood not necessarily related to forests e.g., agriculture.	Investments to increase revenues and jobs from forests and wildlife protected areas through support for more tourism opportunities including

enterprises	☐ Form associations based on the livelihood alternatives ☐ Need to look at: (a) forest based- (i) apiculture (beehives); (ii) agroforestry- fast growing trees and leguminous crops; (iii) establishment of woodlots; (iv) afforestation. ☐ (b) small piece of landholding- (i)home gardens; (ii)rearing of domestic animals- pigs and goats; (iii) poultry and turkeys ☐ ©Fishing farming- this takes at least 8 months. Not very preferable for households. ☐ (d)Commercial – (i) salons- concern their sustainability; (ii) non-timber forest products- crafts; (iii) Sacco’s- encouragement, making available for funding and also it can be alternative funding sources.	training for guides, development of new attractions, increases in tourism numbers Livelihood activities supported through the creation of CFM and CRM groups and Support for more productive forestry and jobs related to added value in the wood value chain
Enhance Access to Resources	☐ UWA allows community to carry out some of the following among others; - bee keeping at the edges of park (it serves as income source as well as protection from elephants), fishing where there are water sources, collection of firewood collection of herb medicine, collection of handcraft materials, etc. ☐ Access to resources tend to be regulated more especially where there are boundary disputes.	Sub-component 1.2: <i>Increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas.</i> A Process Framework has been developed for the Project to address issues of access to protected areas Support provided for the creation of CRM groups and involvement of communities in decision making about the PA

7.4 Continuous Stakeholder Engagement

Stakeholder engagement will continue according to the Stakeholder Engagement Plan that was prepared for IFPA- CD but is being updated in light of AF. It will build upon the already established communication channels set out in the previous engagements with identified stakeholders. After identification of specific project activities, feedback regarding the environment and social performance and implementation of mitigation measures as elaborated in the updated ESCP will be sought from the stakeholders. In case of any significant changes to the project activities that may result in additional risks and impacts (including risks relating to exclusion and discrimination of vulnerable or marginalized individuals and groups), especially to the project affected parties, more information on such risks and impacts will be obtained and mitigation measures identified through continuous engagements with the affected parties or entities.

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

During these consultations, key issues raised relating to this project included:

- The need to adequately address tourism-related risks to discrimination of vulnerable or marginalized individuals.
- The need to ensure proper mitigation measures are in place to protect discrimination of vulnerable or marginalized individuals from being arrested;
- The need to ensure that training manuals and activities are inclusive;
- The need to ensure that the GRM is secure, confidential and anonymous and available at the community level; and
- Risks regarding discrimination, victimization and sexual harassment in accessing services and employment.

The approach to managing these issues and other issues raised during the consultations are found at Section 5 and Annex 10 of this ESMF. A summary of these additional consultations is posted on the World Bank website under Uganda Consultations on Non-discrimination and Inclusion. For more information see: <https://www.worldbank.org/en/country/uganda/brief/consultations>.

7.4.1 Field visit and engagements at Nyabyeya Forestry College (NFC)

A field visit conducted to Nyabyeya Forestry College (NFC) aimed at assessing the investment needs for support that will scale-up NFC to become an educational facility of significance in wood processing and value addition. The key action points of this visit and the engagements held are: (i) A proposal was reviewed to support an upgraded wood processing facility with better practical capability for student training. This will involve acquisition of equipment to enhance operations aimed at improving wood processing. (ii) Most of the academic staff at NFC are educated in production forestry, and there is a lack of wood processing expertise. The project has already supported new curriculum development in wood value addition, and this could be expanded to include topics such as saw pattern design and log orientation, which are key to developing efficient wood processing. These interventions are to be executed during AF through additional fund allocation. The E&S requirements shall be handled in line with the project's protocols.

7.4.2 Field visit and engagements with the Batwa CSOs and Batwa Community

The field visit was conducted by MWE (together with the Bank team) to engage three Batwa-led organisations and the Batwa community (April 23, 2025) and appreciate the activities supported by the Project in the Batwa community. Other meetings were held with NFA, (April 22, 2025) and UWA (April 24, 2025).

The following action points were agreed with the Batwa-led CSOs: (i) Review and validation of VMGPs, including activities, training modules and stakeholder engagement processes; (ii) UWA and NFA to streamline the management and benefit-sharing mechanisms, particularly on tourism trails where Batwa-initiated efforts were side-lined; (iii) Explore establishment of a Batwa Cultural Centre, potentially under this project or through other donors; (iv) Establishment of Batwa-only CFM and CRM groups; and (vi) Land ownership and compensation issue was dropped, and the Batwa representatives agreed to discuss with the Ministry of Water and Environment, not World Bank. These agreed actions are to be fast-tracked during the AF.

7.4.3 Engagement with Uganda Timber Grower's Association (UTGA)

Engagements were held with the representatives from Uganda Timber Grower's Association (UTGA) aimed at assessing their capacity to implement activities involving wood processing. The key action points from this engagement are: (i) Provide capacity building for UTGA in areas of corporate governance, business planning, risk management, human resources, marketing, industry development, and on implementing the UTGA Business Plan 2022-2027; (ii) support the enhancement of an existing model nursery development, including purchase of tree seeds to allow supply of good quality seeds for the Ugandan timber market; and (iii) acquire vehicles and office equipment. The project team (PCU) needs to offer support to UTGA with regards to E&S requirements in line with the established protocols.

7.4.4 Engagements and capacity enhancements on inclusion and non-discrimination

Consultations and capacity enhancements on inclusion and non-discrimination were conducted in the period Mar – May 2025; these involved the technical staff for all the 03 implementing entities (MWE, UWA and NFA); the staff to Service Providers (Fuelwood Suppliers & Distributors); and stakeholders from the project districts (CAOs, LCVs, DFOs, DEOs, DCDOs and sub county officials). These sensitization and capacity strengthening sessions were spearheaded by the Enhanced Implementation Support and Monitoring (EISM) firm contracted by the World Bank. A total of 472 stakeholders were sensitized; The Service Providers have been asked to cascade the training to staff members who were not able to attend and also ensure that each staff engaged in the implementation of the IFPA-CD project signs the revised codes of conducts (CoC). These engagements shall be carried on for the subsequent Service Providers who shall be contracted to offer different services under the project during the AF period.

8.0 MONITORING AND EVALUATION

8.1 Overview

The purpose of environmental and social safeguards monitoring includes:

- i. Ensure that proper appraisals on the effects of project activities takes place and that proper measures are put in place to mitigate the effects;
- ii. Set out the basis for compliance and enforcement of terms and conditions for approval;
- iii. Design compliance strategies;
- iv. Assess compliance with and management of the environment and social safeguards.
- v. Ensure that all stakeholders participate in the sub-Project processes.

8.2 Monitoring

The environmental and social safeguards monitoring is carried out by UWA, NFA, MWE and TSPs (the latter, working closely with District Local Governments to carry and ensure effective monitoring of environmental and social risks). These entities are supported by dedicated contract staff engaged by MWE and hosted as part of the PCU. Monitoring of environmental and social standards covers all project activities.

In addition, the World Bank will provide support for enhanced monitoring of the risk of exclusion or discrimination for individuals or groups who may be vulnerable or marginalized. Further details of this support are found at Annex 10.

Regular Reporting to the World Bank: Being the coordinating Government Ministry, MWE on a quarterly basis prepares and submits to the World Bank monitoring progress reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, and the functioning of the grievance mechanism.

As of today, eight reports have been submitted to the Bank as part of quarterly reporting by IFPA-CD.

MWE also carries out annual reporting on E&S risk management. The purpose of these reports is to provide:

- i. An assessment of extent of compliance with ESMF procedures, lessons learned, and improve future ESMF performance;
- ii. To assess the occurrence of, and potential for, cumulative impacts due to Project-funded and other development activities; and
- iii. A record of progress, experiences, challenges encountered, lessons learnt and emerging issues from year-to-year implementation of ESMF that can be used to improve performance

The report includes the following key information:

1. An introduction, Reporting period and monitoring locations;

2. Scope of works and status of implementation of activity being reported on;
3. ESMF management actions undertaken during the reporting period;
4. Progress to date in implementing the ESMF, including key aspects monitored: such as waste management, health and safety practices, procurement/storage/and use of pesticides including their disposal, dust management, water quality, other environmental incidents and accidents, environmental awareness and training undertaken, etc.;
5. Key recommended follow up issues, actions, time frame and responsibility center.

Reporting of Incidents and Accidents: MWE will establish systems to track and report 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 sexual exploitation and abuse (SEA), sexual harassment (SH), 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, according to the Incident Reporting Protocol in Annex 2. The Protocol describes the types of incidents subject to reporting and the level of information necessary when reporting an incident; process and timeframe to respond to and report such incidents to the Bank; regular monitoring for the possible increase in the frequency, range, and/or severity of violent incidents resulting from project activities (e.g., enhanced patrols, better demarcation or enforcement of PA boundaries); and verification that follow-up actions are complete.

In September 2022, an incident was reported where it was alleged that a local community member disappeared within Bwindi Impenetrable National Park around 2nd June 2022 and UWA Rangers were suspected to have been involved in his disappearance. The incident was reported through the Bank's ESIRT. However, it was later discovered that the incident was not specifically related to the implementation of IFPA-CD.

Submission of Contractors' monthly reports: MWE shall, within 5 days upon receipt of Contractors' monthly monitoring reports, submit the reports to the Association. As of today, no reports have been submitted to the Bank, and this is attributed to the fact that no contractor has been hired as part of IFPA-CD project activities.

The World bank will also hire a credible firm/agency with strong knowledge of Uganda context and track record of enhancing third party implementation support and performance monitoring (EISM). The firm will support the World Bank to monitor the efficacy of the agreed measures to mitigate the impacts on World Bank financed operations. Regarding enhanced monitoring and evaluation, the entity will support the PCU and all implementing entities by undertaking the following activities:

- Developing a system to regularly monitor WB/IFC projects for 1) implementation of agreed GoU actions to mitigate the risk of discrimination on WB/ IFC projects, 2) incidents of discrimination on World WB/IFC financed projects.
- Regularly evaluating the effectiveness of mitigation measures to determine whether and how well the mitigation measures are functioning to improve WB/IFC awareness of incidents of discrimination on WB/IFC financed operations.
- Recommending and supporting the implementation of adjustments to mitigation measures based on regular evaluations and their impact.

8.3 ESMF Budget

8.3.1 Indicative budget for implementing the ESMF

Key mitigation actions required for implementation of specific activities in the original project were budgeted for as part of these activities (e.g. provision of personal protective gear, etc.). Component 1 included a dedicated budget of 52,000 USD for financing E&S due diligence requirements for construction of forest roads. Consultation budget for CFM and CRM activities, as well as boundary demarcation, was included in Component 1. Budget allocations for civil works under Components 1 and 2 include provisions for E&S due diligence.

Monitoring and training budget related to ESMF implementation is included under Component 4. Annual costs of these activities were estimated at US\$45,000 and were included as a budget line for the project coordination unit at the Ministry of Water and Environment. Additional budget of US\$10,000 was required in year 1 of the project for preparing a brief summary of the ESMF in simple plain English and for translating it into key local languages in the project areas. The preparation of the brief summary and translation into key local languages is still pending. However, this updated ESMF will be translated into key local languages and disseminated in the project areas.

In addition, Component 1 of the project includes a budget for supporting formation of the CFM groups / CRM groups and for implementing livelihoods activities in CFM and CRM groups around target protected area (as envisaged in the Process Framework).

In the proposed IFPA-CD AF period, the E&S activities have been provided for in the cost allocations for each entity (MWE, NFA and UWA). Over this period, each entity has been provided with US\$ 150,000. This dedicated to E&S considering the fact that this period shall mainly be a period for extensive implementations and calls for sustained support supervision, technical support, capacity enhancement and stakeholder engagements among others.

8.3.2 ESMF Disclosure

The ESMF and accompanying E&S documents and all the subsequent E&S management plans including the ESCP have been disclosed to the public and disclosure is continuous. The disclosure process involves presentation to the district technical teams, communities in the area of operation and other interested parties.

In addition, it was envisaged that the ESMF would be placed in strategic locations at central and local government level, MWE, NFA central and field offices, MTWA and field offices; as well as adverts of the summary of ESMF and E&S risks and impacts and associated mitigation measures be placed in public newspapers for broad access and information. However, this was not undertaken for the original ESMF but will be carried out for the updated ESMF.

The ESMF was placed on MWE's website; and on the World Bank's external website in compliance with relevant Ugandan regulations and the World Bank ESS Framework. MWE and implementing agencies will provide copies of the respective ESIA's disclosed on the World Bank *external website* for public access once such are prepared in subsequent project activities when such arise.

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12. International Resources Group Uganda Biodiversity and Tropical Forest Assessment EPIQ II Task Order No. 351 July 2016.
13. Project Area District Development Plans.
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15. Process Framework for Uganda Investing in Forests and Protected Areas for Climate-Smart Development Project December 2019.

ANNEXES

Annex 1: Environmental and Social Management Plan

Annex 1.1: Environmental and Social Screening Form



THE REPUBLIC OF UGANDA

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

ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

SECTION A: Contact Details

Person Responsible for Filling out the Form	
Name	
Position	
Contact details	
Date	
Signature	
Person Responsible for Checking/Validation	
Name	
Position	
Contact details	
Date	
Signature	

SECTION B: Subproject Description

Subproject name		
BID No (if applicable)		
Name of the Contractor (if applicable)		
Estimated cost (if applicable)		
Location of the subproject		Attached Site Map Y ☐ N ☐
Type and scale of the subproject		
Approximate size of the subproject in land area		

SECTION C: Environmental and Social Sensitivity of the Subproject Area

1	Labor Working Conditions (ESS 2)	
1.1	Is the project likely to engage the use of any forms of forced labor and child labor?	
1.2	Will the proposed subproject activities likely to generate occupational, health and safety risks to project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers?	
1.3	Is the subproject activity likely to result in discrimination in employment to project workers which	

	nullify or impair equality of opportunity or treatment in employment?	
2	Resource Efficiency, Pollution Prevention and Management (ESS 3)	Answer (Yes/No)
2.1	Will the subproject involve the use, storage, transport or handling of substances or materials which could be harmful to human health or environment?	
2.2	Would the proposed project result in the generation of waste that cannot be recovered, reused, or disposed of in an environmentally and socially sound manner?	
2.3	Will the subproject potentially result in the generation of waste (both hazardous and non-hazardous)?	
2.4	Will the subproject involve the handling and/or use of chemicals and hazardous materials subject to international action bans or phase-outs? <i>For example, asbestos containing material (ACMs), polychlorinated biphenyls (PCBs) and other chemicals listed in international conventions such as the Stockholm Convention on Persistent Organic Pollutants, or the Montreal Protocol.</i>	
2.5	Will the subproject involve potential use of chemicals, pesticides, fungicides, herbicides in the civil works?	
2.6	Is there a potential for the release, in the environment, of hazardous materials resulting from their production, transportation, handling, storage and use for project activities?	
2.7	Will the subproject produce wastewater that require drainage?	
2.8	Is the subproject located near water sources used for domestic consumption such as boreholes, water wells or springs?	
2.9	Does the subproject include activities that require significant consumption of raw materials, energy, and/or water?	
3	Community Health and Safety (ESS 4)	Answer (Yes/No)
3.1	Will the subproject require the use of heavy machinery or equipment?	
3.2	Is the subproject located in an area where there has already been demining, accidents or confrontation during a civil war?	
3.4	Would elements of the subproject construction/rehabilitation, operation, or decommissioning pose potential safety risks to local communities or ecosystem services? ⁴⁶	
3.5	Does the subproject involve construction, rehabilitation activities or other equipment which can lead to traffic and road safety risks?	
3.6	Would the subproject result in potential increased health risks (e.g. from water-borne or other vector-borne diseases or communicable infections such as Covid-19 or HIV/AIDS)?	
3.7	Will the subproject result in gender-based violence (GBV) Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and child and forced labor due to temporary induced Labor Influx of people to the subproject area?	

3.8	Is the subproject likely to increase demand and competition for local social and health services due to the potential influx of workers and followers?	
3.9	Based upon on the available information, is there any known prevalence of gender-based violence (GBV)/Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and child and forced labor in the subproject area?	
3.10	Is the subproject likely to involve quarries or excavation works, such as rock falls or hazardous substances?	
3.11	Is the subproject likely to engage military personnel, police force or private security to protect the project's personnel or property?	
4	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5)	Answer (Yes/No)
4.1	Will the subproject result in physical or economic displacement – i.e., temporary or permanent loss of access to livelihood resources (such as land), loss of household infrastructure, assets or access to assets?	
4.2	Will the subproject result in the permanent or temporary loss of income sources or means of livelihood (such as crops, fruit trees, etc.)?	
4.3	Will the subproject result in disproportionate impacts on the poor, women and children or other vulnerable groups?	
5	Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6)	Answer (Yes/No)
5.1	Are there any environmentally sensitive areas (intact natural forest, rivers or wetland) or threatened species (specify below) that could be adversely affected by the subproject?	
5.2	Is the subproject area within/adjacent to any protected area designated by the government (national park or reserve)?	
5.3	Would the proposed subproject result in the conversion or degradation of natural habitat or critical habitat?	
5.4	Are there areas of possible geologic or soil instability (prone to erosion, landslide and subsidence)?	
5.5	Does the subproject pose a risk of degrading soils?	
5.6	Does the subproject involve significant extraction, diversion or containment of surface or ground water? <i>For example, construction of dams, reservoirs, river basin developments, groundwater extraction.</i>	
5.7	Will the subproject (during construction or operation) use large amounts of local natural resources such as water, timber, gravel, stones, especially any resources which are non-renewable, or which exist in small quantity?	
6	Vulnerable and Marginalized Groups (ESS7)	Answer (Yes/No)
	Is the subproject likely to adversely impact vulnerable and marginalized groups of a distinct indigenous social and cultural group and recognition of this identity by others, that are collectively attached to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas.	
7	Cultural Heritage (ESS8)	Answer (Yes/No)

7.1	Is the subproject area within/adjacent to any legally protected/known Cultural Heritage site or legally defined buffer zone?	
7.2	Will the proposed subproject result in interventions that would potentially adversely impact sites, structures, or objects with historical, archaeological, or cultural values (tangible and intangible)?	
7.3	Will the subproject involve excavations, demolition, movement of earth, flooding, or other changes in the physical environment?	
7.4	Is the subproject activity specifically designed to support the conservation, management, and use of cultural heritage?	

SECTION D: Proposed Actions

If all answers are “NO”, then there is no need for further action in addition to the Health and Safety Plan (HSP), and Construction Site Plan for those subprojects involving minor civil work activities.

If there are “YES” answers to the questions in Section C, then describe the recommended actions for each of the YES answer.

Question number	Recommended actions
	-

SECTION E: Environmental and Social Risk Screening Outcome

Select from the following the appropriate E&S Risk Classification for the subproject based on the answers provided on the Section C

☐ High Risk	The Project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment that are impossible to avoid entirely due to the nature of the Project. This could be because of the complex nature of the Project, the scale (large to very large) or the sensitivity of the location(s) of the Project, including long-term, permanent and/or irreversible impacts (e.g., loss of major natural habitat or conversion of wetland, complex involuntary resettlement, or land acquisition, impacts on cultural heritage or densely populated urban areas). Some of the significant adverse ES risk and impacts of the Project cannot be mitigated or specific mitigation measures require complex and/or unproven mitigation, compensatory measures or technology, or sophisticated social analysis and implementation.
☐ Substantial Risk	The proposed subproject is likely to have less adverse impacts on human populations or environmentally sensitive areas than those of <i>High-Risk</i> subprojects, its ES scale and impact may be smaller (large to medium). Likely impacts are mostly temporary, predictable and/or reversible, and the nature of the Project does not preclude the possibility of avoiding or reversing them. They are medium in magnitude and/or in spatial extent (the geographical area and size of the population likely to be affected are medium to large);
☐ Moderate Risk	The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the Project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. Likely impacts are mostly predictable and expected to be low in magnitude, temporary and/or reversible, site-specific, without likelihood of impacts beyond the actual footprint of the Project.
☐ Low Risk	The potential adverse risks to and impacts on human populations and/or the environment are likely to be minimal or negligible. These sub-Projects, with few or no adverse risks and impacts and issues, do not require further ES assessment following the initial screening.

SECTION F: Environmental and Social Risk Recommendation

Present a brief description of the overall ES Risk Classification of the selected subproject and provide recommendations for subsequent steps, based on the outcome of the selected option for Section E.

Annex 1.2 Sample TOR for Preparing Environmental & Social Impact Assessment Statement

a) Background

The Introduction indicates the purpose of the ESIA, presents an overview of the proposed Project to be assessed, as well as the Project's purpose and needs. It shall also briefly give the background information on the sub-project as well as the need for the ESIA in line with national environmental policies and legislations.

b) Objectives of ESIA study

The main objective of the ESIA should be stated. The environmental and social impacts study should take into consideration all environmental and social impacts of the proposed sub-project activities and identify the main environmental and social aspects that are likely to be raised by key stakeholders in order to optimize the Project from the environmental and social point of view, by avoiding, minimizing, reducing or off-setting negative and enhancing positive impacts.

c) ESIA Study Methodology

i) *Desk Research and Literature Review*

The consultant shall perform a comprehensive literature review of key documents related to environmental, security, occupational health and safety legislation, policies, guidelines, manuals, procedures, practices, international best practices related to the Project. The appropriate Field tools including questionnaires, data collection forms etc. shall then be developed.

ii) *Site Investigation*

The consultant shall visit the Project area with the aim of identifying the following:

- a. Physical-cultural and historical sites
- b. Noise sensitive areas
- c. Wildlife habitats, feeding, and crossing areas
- d. Proximity to residential places, road network, recreational activities etc.
- e. Hydrological setting

iii) *Public and Institutional Consultations*

The consultant shall carry out extensive consultations with all key stakeholders as appropriate. These may include but not limited to the following:

- a. NEMA
- b. MWE
- c. MTWA
- d. MoLG
- e. OPM
- f. District Local Government Officials
- g. NFA
- h. UNHCR

d). Analysis of Project Alternatives

The Consultant shall identify and systematically, undertake comparison of the potential Project Alternatives taking into account environmental and social factors such as:

- a. Sites – Assess suitability of the site and potential alternative sites;
- b. No-Project Scenario: This will include the alternative of not having the Project to demonstrate environmental, social, and economic conditions without it.

e). Impact Analysis

The consultant shall evaluate potential Project impacts considering planning, construction, and operation stages which shall cover social, ecological, and environmental issues. Identification of impacts shall include positive and negative impacts, direct and indirect impacts, and immediate and long-term impacts, unavoidable or irreversible impacts. The assessment of the potential impacts will also include; landscape impacts of excavations and construction, loss of

nature features habitats and species by construction and operation, soil contamination impacts, noise pollution, soil waste, and socio-economic and cultural impacts.

f). Preparation of the ESMP

Depending on the relevance of each impact identified, specific corrective measures have to be identified in order to mitigate the potential negative impacts and eventually to strengthen the positive ones. Mitigation measures could consist of the integration of proposed actions into the designs of the respective components. Besides, appropriate measures can be taken to compensate negative impacts that can occur and cannot be avoided, design appropriate measures to reduce/eliminate the negative identified impacts, to tackle needs and problems pointed out by consultation with stakeholders, to improve local living conditions and to promote local development. The Consultant will identify the appropriate measures that can be taken to maximize and/or enhance the positive impacts and avoid, reduce or minimize the negative impacts. He shall prescribe and present detailed tangible, practical relevant management/mitigation measures bearing in mind capacity restraints for those who have to implement and monitor their implementation, also bearing in mind the need to first avoid these impacts altogether, or to reverse them and then when these are not possible to manage them in a sustainable way. The ESMP will include measures to avoid, prevent, reduce, mitigate, remedy or compensate any adverse effects on the environment and social in relation to the respective construction and operation activities.

g). Capacity and Training Needs

The Consultant shall identify the institutional needs to implement the environmental and social assessment recommendations by reviewing the institutional mandates and capability of implementing institutions at local/district and national levels and recommend steps to strengthen or expand them so that the management and monitoring plans in the ESIA can be effectively implemented. The recommendations may extend to management procedures and training, staffing, and financial support.

h). Preparation of Environmental and Social Monitoring Plan

The Consultant will prepare a specific description, and details, of monitoring measures for the Environmental and Social Monitoring Plan including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, and definition of thresholds that will signal the need for corrective actions as well as deliver a monitoring and reporting procedure. The monitoring program would enable verification of the adequacy of the management plans and other mitigation measures identified in the ESMP, and would provide a basis for determination of any remedial measures or adjustments to management aspects if required. The Consultant should provide a time frame and implementation mechanism, staffing requirements, training and cost outlays.

i). Team Composition

The ESIA Experts for Project activities shall comprise of experts proposed herewith. It is important that, the ESIA teams are constituted taking into account the prevailing conditions on the proposed sub-project sites.

1. Environmental Management Specialist (Team Leader)

Key Qualifications: He/she should possess the following qualifications:

- i) At least an MSc. Environmental Management, Natural Resource Management or Environmental Engineering and four years of experience or a good BSc degree with experience of at least 6 years in conducting EIAs for infrastructure Projects and familiarity with World Bank safeguards and / or ESF
- ii) Should be registered with NEMA as an Environmental Practitioner and also certified as a Team Leader.

Tasks:

He/she will perform the following roles:

- i) Provide overall coordination and leadership to an ESIA team;
- ii) Take a leadership role in steering stakeholder consultations during ESIA for slaughterhouse Projects;
- iii) Play an inter-phase role between client, NEMA and other stakeholders during EIA process;
- iv) Conduct site visits of planned project activities;
- v) Identify impacts of the Project activities on the social and associated environment items;

- vi) Participate in the elaboration of technical, legal and regulatory norms to comply with environmental requirements in all the chain of Project activities;
- vii) Identify, assess and propose environmental mitigation measures for the Project sub-project under study; and
- viii) Prepare an ESMP for the Project.

2. Occupational Health and Safety

Specialist Tasks:

- i) provide OSH input throughout the assignment;
- ii) provide public health aspects in the assignment;
- iii) Participate in development ESIA for Projects and participate in stakeholders' workshop.

Key qualifications:

- i. In addition to relevant formal training, should have undertaken training in OHS;
- ii. Should have undertaken trainings in ESIA and or Environmental Audits;
- iii. Familiarity with World Bank safeguards and / or ESF

Ecologist

Key qualifications:

- Must have a postgraduate training in natural sciences (forestry, botany or zoology);
- Must have undertaken an ESIA training;
- Conducted at least 5 ESIA studies in development Projects.
- Familiarity with World Bank safeguards and / or ESF

Tasks:

- i) Take a lead in the ecological investigations of the Project;
- ii) Consult with stakeholder institutions on ecological aspects of the Project;
- iii) Review various literature sources on ecological matters of the Projects; and
- iv) Participate in write up of Environmental Impact Report.

Socio-economist

Key qualifications:

- i) He/she should have undertaken postgraduate training in the fields of sociology, anthropology or social work or related social sciences;
- ii) He/she should have conducted ESIA studies with experience of at least 5 years; and
- iii) Must be registered with NEMA.
- iv) Familiarity with World Bank safeguards and / or ESF

Tasks:

- i) Take a lead in stakeholder consultations especially with the key stakeholders, local residents etc.;
- ii) Provide socio-economic input/expertise throughout the assignment;
- iii) Lead in the formulation of social survey instruments;
- iv) Prepare reports relating to RAP and compensations; and
- v) Provide social input in the Environmental Impact Report.

j). Expected Deliverables

The Consultant shall produce an ESIA report acceptable to MWE, NEMA and the funding institution and the report shall include the following as per the requirements of Regulation 14 of the National (Environmental Impact Assessment) Regulations of Uganda:

- i) The Project description and the activities it is likely to generate;
- ii) The proposed site and reasons for rejecting alternative sites;
- iii) A description of the potentially affected environment including specific information necessary for identifying and assessing the environmental effects of the Project;
- iv) The material in-puts into the Project and their potential environmental effects;
- v) The technology and processes that shall be used, and a description of alternative technologies and processes, and the reasons for not selecting them;
- vi) The products and by-products of the Project;

- vii) The environmental and social effects of the Project including the direct, indirect, cumulative, short-term and long-term effects;
- viii) The measures proposed for eliminating, minimizing, or mitigating adverse impacts;
- ix) An identification of gaps in knowledge and uncertainties which were encountered in compiling the required information;
- x) An indication of whether the environment of any other State is likely to be affected and the available alternatives and mitigating measures.

Annex 1.3: Sample ToR for Preparing Environmental & Social Management Plan

The ESMP should be formulated in such a way that it is easy to use. References within the plan should be clearly and readily identifiable. Also, the main text of the ESMP needs to be kept as clear and concise as possible, with detailed information relegated to annexes. The ESMP should identify linkages to other relevant plans relating to the Project, such as plans dealing with resettlement issues. The following aspects should typically be addressed within ESMPs.

Summary of impacts: The predicted adverse environmental and social impacts for which mitigation is required should be identified and briefly summarized.

Description of mitigation measures: The ESMP identifies feasible and cost-effective measures to reduce potentially significant adverse environmental and social impacts to acceptable levels. Each mitigation measure should be briefly described with reference to the impact to which it relates and the conditions under which it is required (for example, continuously or in the event of contingencies). These should be accompanied by, or referenced to, designs, equipment descriptions, and operating procedures which elaborate on the technical aspects of implementing the various measures. Where the mitigation measures may result in secondary impacts, their significance should be evaluated.

Description of monitoring program: Environmental performance monitoring should be designed to ensure that mitigation measures are implemented, have the intended result, and that remedial measures are undertaken if mitigation measures are inadequate or the impacts have been underestimated within the ESIA report. It should also assess compliance with national standards and World Bank Group requirements or guidelines.

The monitoring program should clearly indicate the linkages between impacts identified in the ESIA report, indicators to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions, and so forth. Although not essential to have complete details of monitoring in the ESMP, it should describe the means by which final monitoring arrangements will be agreed.

Institutional arrangements: Responsibilities for mitigation and monitoring should be clearly defined. The ESMP should identify arrangements for coordination between the various actors responsible for mitigation. Budget: Outline the estimated costs for implementation of the mitigation and monitoring measures.

A FRAMEWORK ESMP

A. Mitigation

Project Activity	Potential Environmental and Social Impacts	Proposed Mitigation Measures (Incl. legislation & regulations)	Responsibilities	Cost Estimates	Comments (e.g. secondary impacts)
Pre-Construction Phase					
Construction Phase					
Operation and Maintenance Phase					

B. Monitoring

Proposed Mitigation Measure	Parameters to be monitored	Location	Measurements (incl. methods & equipment)	Frequency of measurement	Responsibilities (Incl. review and reporting)	Cost (equipment & individuals)
Pre-Construction Phase						
Construction Phase						
Operation and Maintenance Phase						
Total Cost for all Phases						

Annex 2: Incident Reporting Protocol for Reporting to the Bank on Project-Related Incidents

1. Description of the Incident reporting system

The Ministry of Water and Environment will report all activities outlined in 1.1.2 below that take place in the project-supported parks to the World Bank on a quarterly basis. However, when incidents meet the criteria of “reportable incident,” more immediate and follow-up action is required. This protocol spells out the criteria for an incident to be deemed reportable to the Bank, the information that will be sent in the reports, and the steps that will be taken when a reportable incident occurs in order to reduce the risk of similar incidents recurring.

1.1 Definition of reportable incident under IFPA-CD

An incident is reportable under the Project if it is sufficiently serious and the project could be a cause or contributing factor.

Accordingly, an incident is reportable if it involves individuals from at least one of the groups in Section 1.1.1, **and** at least one of the types of events in Section 1.1.2 below.

1.1.1 The incident involves individuals from among these groups:

- **Contractors and/or other individuals on their work sites, or consultant staff** (e.g., incidents in construction sites, whether affecting contractor workers or a community member; incidents affecting contractor’s or consultant’s personnel or equipment/machinery, etc.); **or**
- **Government officials and/or authorized officers, while on duty, implementing the objectives of the project** (from any implementing agencies or other project implementing partners) (e.g., incidents while operating equipment, or caused by wildlife, or during any altercation while enforcing park regulations, asset seizure, property removal, apprehension of poachers, displacement of people or communities, etc.); **or**
- **Project beneficiaries while implementing project-supported activities** (e.g., accidents while executing livelihood sub-projects, attending project trainings, etc.); **or**
- **Other individuals who may be affected by project activities** (to be determined by Bank team on a case-by-case basis, e.g., community members, tourists, researchers).

AND

1.1.2 The incident is one of the following types of events:

- **Fatality:** Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins); **or**
- **Lost time injury:** Injury or occupational disease/illness that results in a worker requiring 3 or more days off work, or an injury or release of substance that results in a member of the community needing medical treatment; **or**
- **Act of violence/protest:** Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite; **or**
- **Disease outbreak:** The occurrence of a disease in excess of normal expectancy of number of cases; **or**

- **Displacement without due process:** The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan; **or**
- **Child labor:** An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development; **or**
- **Forced labor:** An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project; **or**
- **Unexpected impacts on heritage resources:** An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or national PAs that was not foreseen or predicted as part of the project design or the environmental and social assessment; **or**
- **Unexpected impacts on biodiversity resources:** An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species; **or**
- **Environmental pollution incident:** Exceedances of emission standards to land, water, or air that have persisted for more than 24hrs or have resulted in harm to the environment; **or**
- **Dam failure:** A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures; **or**
- **IPs/SSAHUTLCs and local communities:** The incident was related to conflict between PA authorities and IPs/SSAHUTLCs and local communities or between IPs/SSALHUTLCs and local communities and other encroachers related to resource access, use, restrictions and/or displacement; **or**
- **Violence on the basis of sexual orientation or gender identity (SOGI):** The threat or use of physical force that injures or abuses a person, or damages or destroys property, and that is motivated in whole or in part by the victim's real or perceived sexual orientation, gender identity, gender expression, or sex characteristics; **or**
- **Discrimination on the basis of SOGI:** Discrimination means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person from being on an equal basis with others based on their real or perceived sexual orientation, gender identity, gender expression, or sex characteristics; **or**
- **Sexual exploitation:** Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual exploitation occurs when access to or benefit from a Bank-financed Goods, Works, Non-consulting Services or Consulting Services is used to extract sexual gain; **or**

- **Sexual abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. In Bank financed operations/projects, sexual abuse occurs when a project-related worker (contractor staff, subcontractor staff, supervising engineer) uses force or unequal power vis-a-vis a community member or colleague to perpetrate or threaten to perpetrate an unwanted sexual act; **or**
- **Sexual harassment:** Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment. In Bank-financed operations/projects, sexual harassment occurs among the employees of a contractor or subcontractor and relates to employees of the same company experiencing unwelcome sexual advances or requests for sexual favors or acts of a sexual nature that are offensive and humiliating; **or**
- **Other:** Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the Bank team deems needing the attention of Bank management.

2. Description of the existing client and contractor processes that collect information about incident(s)

2.1 [Borrower] system that tracks incidents relating to law enforcement personnel, from which the project-defined reportable incidents are taken.

[insert description of Borrower's current system for internal reporting and follow up on incidents. This may be in the form of occurrences books, procedures outlined in CoCs or others].

2.2. [Borrower] system for recording and following up on contractor incidents

[insert description of contractual requirements and remedies as well as how contractor-related incidents are reported to the project implementing unit, where and how each incident is documented, and how the progress on each incident is reported and tracked, including incident investigation, root cause analysis, corrective actions and incident closure].

3. Description of steps taken, and timing, once an incident occurs

When an incident that meets the criteria in section 1 above is identified through the system described in section 2 above, the implementing agency or contractor takes the following steps:

- Contractor or [Borrower/agency] reports incident to [Borrower] within 24 hours;
- The [Borrower] reports incident to the World Bank team leader within 24 hours of learning of the incident;
- The [Borrower] supervises as contractor/implementing agency investigates, determines root causes and recommends corrective actions. The [Borrower] informs the World Bank team leader accordingly. World Bank reviews and government and Bank agree on corrective actions and timing of their implementation. The normal timeframe for this is within 10 working days;
- The [Borrower] implements corrective actions, and the Bank verifies that these are implemented;
- The [Borrower] sends notification to World Bank team leader confirming that corrective actions have been completed, and incident is closed.

4. Forms to be filled in in case of reportable incident

ESIRT Template for non-GBV incidents

Part B: To be completed by Borrower within 24 hours

B1: Incident Details			
Date of Incident:	Time:	Date Reported to PIU:	Date Reported to WB:
Reported to PIU by:	Reported to WB by:	Notification Type: Email/'phone call/media notice/other	
Full Name of Main Contractor:		Full Name of Subcontractor:	

B2: Type of incident (please check all that apply) ¹
Fatality ☐ Lost Time Injury ☐ Displacement Without Due Process ☐ Child Labor ☐ Acts of Violence/Protest ☐ Disease Outbreaks ☐ Forced Labor ☐ Unexpected Impacts on heritage resources ☐ Unexpected impacts on biodiversity resources ☐ Environmental pollution incident ☐ Dam failure ☐ Other ☐

¹See Annex 1 for definitions

B3: Description/Narrative of Incident
Please replace text in italics with brief description, noting for example: I. <i>What is the incident?</i> II. <i>What were the conditions or circumstances under which the incident occurred (if known)?</i> III. <i>Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?</i> IV. <i>Is the incident still ongoing or is it contained?</i> V. <i>Have any relevant authorities been informed?</i>

B4: Actions taken to contain the incident			
Short Description of Action	Responsible Party	Expected Date	Status
For incidents involving a contractor: Have the works been suspended (for example, under GCC8.9 of Works Contract)? Yes ☐ ; No ☐ ; Trading name of Contractor (if different from B1): Please attach a copy of the instruction suspending the works.			

B5: What support has been provided to affected people

Annex 1: Incident Types

The following are incident types to be reported using the environmental and social incident response process:

Fatality: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).

Lost Time Injury: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

Acts of Violence/Protest: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

Disease Outbreaks: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.

Displacement Without Due Process: The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

Child Labor: An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

Forced Labor: An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.

Unexpected Impacts on heritage resources: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.

Unexpected impacts on biodiversity resources: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.

Environmental pollution incident: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hrs or have resulted in harm to the environment.

Dam failure: A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures.

Other: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated

non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

Part C: To be completed by Borrower (following investigation)

C1: Investigation Findings

Please replace text in italics with findings, noting for example:

- I. *where and when the incident took place,*
- II. *who was involved, and how many people/households were affected,*
- III. *what happened and what conditions and actions influenced the incident,*
- IV. *what were the expected working procedures and were they followed,*
- V. *did the organization or arrangement of the work influence the incident,*
- VI. *were there adequate training/competent persons for the job, and was necessary and suitable equipment available,*
- VII. *what were the underlying causes; where there any absent risk control measures or any system failures,*

C2: Corrective Actions from the investigation to be implemented (To be fully described in Corrective Action Plan)

Action	Responsible Party	Expected Date

Part C cont.: To be completed by Borrower (following investigation)

C3a: Fatality/Lost time Injury information

Immediate cause of fatality/injury for worker or member of the public (please check all that apply) ²:

1. Caught in or between objects ☐ 2. Struck by falling objects ☐ 3. Stepping on, striking against, or struck by objects ☐
 4. Drowning ☐ 5. Chemical, biochemical, material exposure ☐ 6. Falls, trips, slips ☐ 7. Fire & explosion ☐
 8. Electrocution ☐ 9. Homicide ☐ 10. Medical Issue ☐ 11. Suicide ☐ 12. Others ☐
Vehicle Traffic: 13. Project Vehicle Work Travel ☐ 14. Non-project Vehicle Work Travel ☐
 15. Project Vehicle Commuting ☐ 16. Non-project Vehicle Commuting ☐ 17. Vehicle Traffic Accident (Members of Public Only) ☐

Name	Age/DOB	Date of Death/Injury	Gender	Nationality	Cause of Fatality/Injury	Worker (Employer)/Public

²See Annex 2 for definitions

C3b: Financial Support/Compensation Types (To be fully described in Corrective Action Plan template)

1. Contractor Direct ☐ 2. Contractor Insurance ☐ 3. Workman's Compensation/National Insurance ☐
 4. Court Determined Judicial Process ☐ 5. Other ☐ 6. No Compensation Required ☐

Name	Compensation Type	Amount (US\$)	Responsible Party

C4: Supplementary Narrative

Annex 2: Definition of fatality/injury immediate causes

1. **Caught in or between objects:** caught in an object; caught between a stationary object and moving object; caught between moving objects (except flying or falling objects).
2. **Struck by falling objects:** slides and cave-ins (earth, rocks, stones, snow, etc.); collapse (buildings, walls, scaffolds, ladders, etc.); struck by falling objects during handling; struck by falling objects.
3. **Stepping on, striking against, or struck by objects:** stepping on objects; striking against stationary objects (except impacts due to a previous fall); Striking against moving objects; Struck by moving objects (including flying fragments and particles) excluding falling objects.
4. **Drowning:** respiratory impairment from submersion/emersion in liquid.
5. **Chemical, biochemical, material exposure:** exposure to or contact with harmful substances or radiations.
6. **Falls, trips, slips:** falls of persons from heights (e.g., trees, buildings, scaffolds, ladders, etc.) and into depths (e.g., wells, ditches, excavations, holes, etc.) or falls of persons on the same level.
7. **Fire & explosion:** exposure to or contact with fires or explosions.
8. **Electrocution:** exposure to or contact with electric current.
9. **Homicide:** a killing of one human being by another.
10. **Medical Issue:** a bodily disorder or chronic disease.
11. **Suicide:** the act or an instance of taking, or attempting to take, one's own life voluntarily and intentionally.
12. **Others:** any other cause that resulted in a fatality or injury to workers or members of the public.

Vehicle Traffic

13. **Project Vehicle Work Travel:** traffic accidents in which project workers, using project vehicles, are involved during working hours and which occur in the course of paid work.
14. **Non-project Vehicle Work Travel:** traffic accidents in which project workers, using non-project vehicles, are involved during working hours and which occur in the course of paid work.
15. **Project Vehicle Commuting:** traffic accidents in which project workers, using project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.
16. **Non-project Vehicle Commuting:** traffic accidents in which project workers, using non-project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.
17. **Vehicle Traffic Accident (Members of Public Only):** traffic accidents in which non-project workers/members of the public are involved in an accident while travelling for any purpose.

ESIRT Template for GBV incidents

Incident Details- To be shared with the World Bank with 24 hours from the incident		
Date of incident intake by the project/GRM:	Date Reported to PIU:	Date Reported to WBG:
Reported to project/GRM by: Survivor ☐ Third party ☐ Other:	Reported to PIU by: GRM operator ☐ Directly, by Survivor ☐ Directly, by third party ☐ Other:	Reported to WBG by: PIU ☐ Directly, by Survivor ☐ Directly, by third party ☐ Other:
Is a record of this incident in GRM? Yes ☐ No ☐		
Provide the following details from the GM record		
Age of survivor (if recorded in GRM):	Have the national legislation or mandatory reporting requirements been followed? Yes ☐ No ☐	
Sex of survivor (if recorded in GRM): Male ☐ Female ☐ Other ☐	Was the survivor referred to service provision? (When a complaint is filed by a third party, or the survivor has not reached out to the project, the project may not be able to confirm this information. In these cases, it may not be advisable for the project GM to attempt to reach the survivor, as this may jeopardize confidentiality, safety, and agency. Projects may attempt to find safe ways to pass information indirectly (such as through broad efforts to inform) about services available. Yes ☐ No ☐	
Is the survivor employed by the project (including the mainstream government agencies staff in IAs and UPDF staff used by NFA to support patrol operations) (as indicated by the survivor or complainant and reported in the GRM)? Yes ☐ No ☐	Is the alleged perpetrator employed by the project (as indicated by the survivor or complainant and reported in the GRM)? Yes ☐ No ☐	
Basis for further action		
a. Has the complainant provided informed consent to lodge a formal complaint? Yes ☐ No ☐	c. Has the survivor provided informed consent to be part of an investigation into misconduct? Yes ☐ No ☐	
b. Does the employer have a suitable administrative process and capacity in place to investigate misconduct relating to SEA/SH in a survivor-centered way? Yes ☐ No ☐	d. Has the complaint been filed anonymously or through a third party? Yes ☐ No ☐	
If the answer to any of these questions is “no”, has the GM assessed the risks and benefits of carrying out an investigation into the alleged misconduct, considering the survivor’s safety and wellbeing? Yes ☐ No ☐		
Will an investigation into misconduct be undertaken in addition to an investigation into adequacy of project systems, processes, or procedures? Yes ☐ No ☐		
In case an investigation will take place please fill the below after the investigation is concluded		
Findings of the investigation		

Have sanctions against a perpetrator been recommended as part of an investigation into misconduct? Yes ☐ No ☐	Has an investigation into adequacy of project systems, processes or procedures been undertaken? Yes ☐ No ☐	
Corrective actions to be implemented (to be fully described in Corrective Action Plan)		
Short Description of Action (<i>Examples: Please replace text in italics below with brief description of actions to be taken</i>)	Responsible Party	Timeline for completion/Status
<i>Referral of Survivor to holistic care services</i>		
<i>Undertake disciplinary investigation in accordance with GM timelines and confirmed process</i>		
<i>Disciplinary actions, including sanctions, to be applied following misconduct investigation by Employer</i>		
<i>Increased training on Codes of Conduct (CoC)</i>		
<i>Audit implementation of SEA/SH safety mitigation</i>		
<i>Strengthened awareness training on project-related risks, CoC and how to report incidents for project-affected community</i>		
<i>Training for project supervisors on the need to follow guidelines of behavior in CoC and in their supervisory responsibilities</i>		
<i>Plan to improve coverage/quality of service provision</i>		
<i>Any other system strengthening measures or corrections for system failures that are necessary</i>		

Annex 3: Pest Management Plan

Overview

Pest Management is envisaged in some project supported activities, therefore there is a need for an effective/practical pest management plan. The pest management procedure shall be site specific depending on the prevailing conditions at a given site. In order to ensure effective and environmentally sensitive approach as well as controlling biodiversity injury an Integrated pest management (IPM) will be considered first option. This Plan will also be implemented in a manner that ensures that the world bank ESF objectives (Resource efficiency and pollution prevention and management (ESS3) and community health and safety (ESS3) are well addressed during pest chemical control/pesticide utilization on the project.

IPM procedures for efficient project pest management activities;

Classify and Monitor Pests

Classification of pests and effective monitoring to ensure appropriate control decisions can be made. Monitoring and identification ensure that the right pesticides are applied and only when required. The classification enables the understanding of the pests in the project area since It is well known that not all insects, weeds, and other living organisms require control and hence avoid unnecessary pesticides applications

Set Action Thresholds

Pest Application threshold should be established for every project site. This will provide an indication for the need for commencement of pesticide application

Prevention of pest Attack

The use of Preventive methods as per the SPGS pest's management guidelines will be helpful depending on the site situation. In case a site is not yet colonized by pests, the methods below will be deployed; I) Careful selection and breeding; Breeding of resistant plants with a diverse genetic base to avoid rapid spread of pests, II) Silviculture: Careful site-species matching coupled with good planting practices, timely weeding to create best growing environment, III) Post planting weed control using mechanical methods like spot hoeing and slashing, IV) Biological control; The use of integrated pest management strategy-reduction of pest populations through introduction of control agents like predators, parasitoids, pathogens or competitors, V) **Quarantine**; Isolation of suspected trees while tests are performed to detect the presence of a pest VI) Sanitation; Removing all affected materials in the nurseries.

Control

Once identification, monitoring and action thresholds indicate that a pest control is required, and preventive methods are no longer effective then it is necessary to follow a control method based on the type of pests and nature of pesticide selected. More effective and less risky pest controls shall be given first priority. In an incidence that a less, risky control is not effective, then additional pest control methods would be employed, such as targeted spraying of pesticides with broadcast spraying of non-specific pesticides as a last resort.

Pesticides application /Chemical Control

Pesticide application should be efficiently managed at all stages right from selection of the right pesticides, procurement appropriate packaging requirements, transportation, storage, application and disposal as detailed below;

Selection and Procurement; the pesticide to be used shall be determined by several factors including the target pests, environmental setting, effectiveness, and the net possible impact as advised by technical personnel's. Any procurement of pesticide equipment should take into consideration the availability of local repair services and users' knowledge of equipment.

Tenders for procurement of pesticide equipment shall set very specific and high quality standards to avoid compromising on the quality.

Packaging requirements.

Careful selection of packaging will be done. Designs and materials of packaging that withstand required levels of handling, climatic conditions and prolonged storage. According to the World Bank ESS2, safety and health at work is key therefore, requirements for personal protection should be indicated on the pesticide label.

Transportation: Specific risks include storage and transport through densely populated or protected areas. A hazard assessment may be appropriate for transport of large volumes of pesticides that pose risks to human health or the environment.

Storage: A Proper storage facility for storing of pesticides will be set up in every project area/district. Setting up of pesticide storage facility will consider the aspects below;

- Facilities for pesticide storage will be located at safe distance from water and human dwellings;
- Access of the facility shall be limited to authorized staff;
- The facility will have adequate ventilation; doors under lock; emergency shower facilities;
- Must be well equipped with first aid kits and protective gear to deal with emergencies,
- Storage in air-tight storage containers, and post treatment caution will be additional safer and good environmental practice.

- Storage facility should be air-tight storage with post treatment caution and good environmental practice procedures.
- The storage facility will be subjected to periodic Audits to ensure the stipulated conditions are adhered too.

Application and monitoring

The application methods based on the manufacture guidelines should be used to avoid unnecessarily high use of pesticides. Where necessary it is encouraged to use spot application method where pesticides are sprayed only on affected plants instead of the over-blanket applications. Common Pesticides poisoning like dermal absorption, ingestion or inhalation of vapors should be avoided through use of appropriate storage facility, use of protective wear when handling or using pesticides; avoiding leaking back-pack sprayers; appropriate application of pesticides; avoid entering fields too soon after application; avoid exposure of bystanders through drift; professional handling of spills and leaks avoid use of pesticide containers for food or water storage.

Protective gear:

Depending on the level of hazard, protective gear may range from long-sleeved shirts, long pants, and enclosed shoes, to chemical resistant gloves, footwear, headgear and apron, plus goggles and respiratory protection ranging from simple dust masks to fully enclosed gas masks. Protective gear will be regularly replaced. Particularly respiratory protection masks or filter cartridges need to be replaced according to recommended replacement schedules (humid and dusty environments may require daily changes).

Monitoring:

The World Bank ESS3 requires resource efficiency and pollution prevention and Management. Monitoring of pesticides handling and application is key as it enables detection of pollution which is likely to lead to health and environmental impacts. Depending on the circumstances, this may include monitoring of appropriate use of protective gear, poisoning incident management, pesticide residues in food crops and drinking water, contamination of surface water and ground water, impact on non-target organisms, ranging from beneficial insects to wildlife and efficacy.

Obsolete pesticides and their disposal: Disposal for project obsolete pesticides will be done by incineration at a dedicated hazardous waste incineration plant.

Training:

Training of different stakeholders in the handling and use of pesticides as well as their hazards is key. Training will encompass all stakeholders likely to implement project activities using the pesticides and the community close to the fields where pesticides will be applied. Stakeholders to be trained include responsible NFA and UWA staff, district NR officers, workers applying the pesticides, and community members close to the area of application. Based on the SPGS tree plantation guidelines, training on recognition and interpretation of pest symptoms is key for effective management of pests and hence should be included in the training program.

Monitoring and reporting:

Periodic report on the progress of pest management for tree planting and agroforestry activities will be prepared by the NFA, UWA and technical services providers, as applicable. This will form part of the environmental and social reporting framework for the project. The PMP information will include common pests identified or declared in the project areas, common pesticides used by project implementers / farmers, sources of pesticides used by project implementers / farmers, level of success of treatment of pests under the project, the amount and type of herbicide used, IPM knowledge and practices among farmers, etc.

Annex 4: Chance Finds Procedures

Overview

Cultural resources are important as sources of valuable historical and scientific information, as Assets for economic and social development, and as integral parts of people's cultural identity and practices. The loss of such resources is irreversible, but fortunately, it is often avoidable.

The World Bank **ESS8; Cultural heritage** requires the Identification of stakeholders and carrying out of meaningful consultations with local or national authorities for cultural heritage. It further stipulates the need to attend to the chance finds and identify mitigation measures thereafter. Its objective is to 1) Protect cultural heritage from the adverse impacts of project activities and support its preservation, 2) Address cultural heritage as an integral aspect of sustainable development, 3) Promote meaningful consultation with stakeholders regarding cultural heritage. 4) Promote the equitable sharing of benefits from the use of cultural heritage.

Protection of Cultural Heritage

Cultural heritage in the project context includes cultural sites within and outside the forests, sites of significance points of view, and other defined assets and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This also includes cemeteries, graveyards and graves.

A systematic procedure for protection and treatment of discovered artefacts during project implementation will be taken according to the Ugandan cultural and national requirements, and an adequate provision for handling of chance finds will be included in all contracts for civil works Workers will be instructed to remain vigilant during excavation works, identify chance finds immediately and alert the site foreman.

If the chance finds occur, they will be handled according to the Historical Monuments Act, Cap 46. Under the Act, any chance finds should be reported to the Department of Museums and Monuments (DoMM) of the Ministry of Tourism, Wildlife and Antiquities and the Chief Administrative Officer. If the finds are not of interest to the DoMM, they should be reburied on a site set aside for such purpose. If they are unknown human remains, police need to be alerted and remains will be handled according to their instructions. All relocation and reburial costs shall be borne by the contractor.

Chance Find Procedures

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.

Annex 5: Other relevant Project area Baseline Information

Annex 5.1: Topography

Adjumani District lies at an approximate altitude ranging from 900 to 1500 meters above sea level. It is principally gentle undulating land merging into rock outcrops. The southern part of the district, especially the area occupied by Ciforo Sub-county comprises of highlands dropping into broad flat-bottomed valleys while the north stands at a low slope gradient. The district is mainly underlain by a complex formation consisting of highly weathered and exposed hardcore rocks, quartzite sandstones, and clay gneiss.

Koboko District comprises mainly of flat rolling plains occurring at 3,160 to 5,283 feet above sea level with isolated undulating hills mainly in the western and northern parts of the District towards the Sudan border, with a slight slope towards the east. The area where the three international borders meet consists mainly of hills and rocks hosting remains of some indigenous savannah woodlands.

Moyo District topography is characterized by low plains and rolling hills along the Nile River, at 8900m above sea level rising to a series of hills and peaks. The highest peak is Mt. Otze at 1500m above sea level. The Nile River bank raises sharply upwards producing a landscape characterized by plateaus, flat topped hills, inter sparse with deep valleys and giving rise to steep slopes.

Arua District comprises mainly of rolling plains rising from the Nile floor in the rift valley (600m above sea level) to the - Nile water divide (1200 to 1400 meters above sea level).

Yumbe District is mainly flat with the eastern part having several hills and two hills namely Midigo and Kei in the northern district.

Amuru District altitude ranges between 600 and 1,200 m above sea level. The altitude of the south- western area that is a part of Western Rift Valley is relatively low and ranges between 600 and 800 m above sea level.

Lamwo District is located at an average elevation of 3,547 ft with a maximum variation in elevation as 200 feet. Within 10 miles' radius of the district is an average elevation of 2,575 feet while in the 50 miles' radius there is large variations in elevation (8,366 feet).

Hoima District is generally elevated at 1,120 m with hills and valleys as established morphological features due to erosion and weathering processes which and the significance of these features and processes on overall slope development in the region.

Kamwenge District low lying zones begin from about 1200m above sea level to 1350m while the highland zones range from 1350m and rising to slightly above 2500 m above sea level in Kabalore district.

Kibaale District is part of the central plateau with an altitudinal range of about 2000-4000 ft. above sea level. The hilly and rocky relief presents the favorable climate and hence good conditions for tourists.

Kiryandongo District lies at 3,514 ft elevation with modest variations in elevation. The maximum elevation variation is 190 feet. Within a radius of 10 miles the elevation variation is 453 feet while a radius of 50 miles contains variations in elevation of 2,697 feet.

Kyegegwa District topography within 2 miles' radius contains significant variations in elevation, with a maximum elevation change of 492 feet and an average elevation above sea level of 4,464 feet. Within a radius of 10 miles, it contains significant variations in elevation (1,053 feet) while within 50 miles contains very significant variations in elevation (3,934 feet).

Annex 5.2: Socioeconomic Environment

Hoima District

Hoima District is located in the mid-western region of Uganda. It shares borders with Masindi and Buliisa Districts in the North, Kyankwazi District in the East, and Kibaale District in the South. The district stretches to the national boundary of DRC in the Western. The District Headquarters is situated at Hoima Municipal Council, a road distance of about 220 km from Kampala. It has risen to become a major destination for the country thought after investment following the discovery of crude oil. The district has a total area of 5,735.3km² with a land area of 3,612.17km². The western border is completely covered by Lake Albert amounting to 2,123.13km² of water.

Population

According to population and housing census 2014 provisional results, Hoima District is among the most populated districts in Uganda, with total population was 573,903 persons, comprising of 49.95% males (286,705) and 50.04% females (287,198). The findings show that the distribution of the population by Sub County is uneven. Among the rural sub-counties, Kyangwali is the most populated with a population of 97,366 persons, followed by Kigorobya with 68,402 persons and Kabwoya with 63,118 persons. Kahoora Division, in Hoima Municipality, was most populous among the Urban Divisions. On the other hand, Kigorobya Town Council had the smallest population of 5,867 persons.

Refugees are hosted in Kyangwali refugee settlement located in the South West of the district. This now falls under newly created district of Kikuube. Given its proximity to Eastern Congo, more than 80% of the settlement's population are Congolese. Hoima promotes the government's exemplary refugee settlement model that allows refugees to interact freely and set up investments, which provides an opportunity to harness their potential to accelerate local economic development. Generally, the refugee and host communities enjoy a cordial relationship, which offers a favorable environment for doing business.

Economic Activities

About 90% of the whole population of Hoima district lives in rural areas, socio-economic welfare depends almost largely on the effective and efficient use of its substantial agricultural resource base. Subsistence farming with minimal inputs is the main system practiced, while market-oriented cultivation other than coffee and rice is negligible. The above pattern of agricultural practices is reflected in very low average incomes in Hoima District, the annual average income per capita is estimated to be USD 554, representing almost 75% of the national average. In this situation, while the incidence of hunger is not common, 24% of the rural population in Hoima district is estimated to live below the poverty line. Majority of the people (over 70%) are subsistence farmers who live marginally. This poses challenges to sustainable development of the communities. Women play a major role in productive pursuits, including crop and livestock production, processing and small enterprise operation, as well as in domestic and social activities. 2. Women play a pivotal role in natural resources management in Uganda including the Albertine Region. Wide-ranging participation by women/girls and men/boys in forest landscape-related activities, as well as the intensity of those activities, determine the differentiated drivers of deforestation and forest degradation, which require sustainable livelihood options for both genders to reduce associated impacts. CIFOR recognizes and firms up that indeed women equally use and need forest. Although their work in forest as is the homes often remain invisible in the mainstream forestry, it is absolutely critical to sustaining the forests as well as the communities who live in and around them.

Health

Hoima District Local Government is committed to facilitating the attainment of a good standard of health for all the people of Hoima district in order to promote a healthy and productive life enshrined in the district vision. The goal of the Health Sector therefore is to reduce morbidity and mortality from the major cause of ill health as a contribution to poverty reduction, economic and social development of the people of Hoima. Hoima District Health service delivery is implemented at five levels under the following facilities; 1 Regional Referral Hospital, 3 HCIVs, 20 HCIs and VHTs. The district also has 9 private not for profit health facilities and 4 private for profit health facilities. This is in addition to services provided by Health implementing partners including; Infectious Diseases Institute (IDI), Meeting Point, HUDIPU, Eco-Agriculture, UNASO, CARITAS, THETA, among others. The information available suggests that the highest mortality in Hoima is caused by malaria, followed by respiratory infections, anemia, AIDS, meningitis and dysentery. Although the Health indicators in the district have improved over the years, most indicators are still below the national average. These indicators could be further improved with the current high levels of immunization for BCG (95%), Polio 3 (88%), DPT 3 (85%) and measles (80%).

Kiryandongo District

Kiryandongo district is located in the mid-western part of Uganda, with its headquarters 218 Km from Kampala. It borders Nwoya District in the North, Oyam in the North East, Apac in the East, Masindi in the South and South West and Buliisa in the North West. The District has a land area of 3,624.1 km² of which 1,747km² is arable. Kiryandongo refugee settlement is located near the town of Bweyale in Kiryandongo District, Western Uganda and hosts refugees predominantly from South Sudan and Kenya.

Population

The 2014 Population and Housing Census recorded Kiryandongo population at 266,197 of which, 133,701 (50.3%) are males and 132,496 (49.7%) are females. The population density stands at 74 persons/km². UBOS 2014, reveals that Kigumba sub-county in Kiryandongo District had the highest number of household (9,260) and population (45,250) with Masindi Port with the lowest number of households (1,165) and population (4,810) in the district. The findings further revealed that, out of the 4 sub-counties in Kiryandongo district, Mutunda, and Kiryandongo had more females than males. To provide comparison, the total number of household for Census 2002 and total population Projection for 2009 from the Census 2002 benchmark has been included.

Economic Activities

The majority of household members that were involved in agriculture was mainly from Mutunda (75.1%) sub-county while Masindi Port registered the least (45.6%) being engaged in agriculture. UBOS 2014 reports that, Mutunda sub-county had the highest percentage of people that were involved in trade (7.4%) and Masindi Port Sub-County had the least (1.1%). Manufacturing as a main economic activity was carried out in a very small scale with Masindi Port (1.3%) taking the highest proportion while the least was in Kigumba Subcounty (0.2%). Provision of Services as a main economic activity was mostly done in Masindi Port (16.8%) and the least was in Kiryandongo (3.9%).

Kiryandongo has abundant natural resources including fertile land, water resources, able to support commercial agricultural production. Kiryandongo district has a land area of 3,624.1 km² which is largely arable with adequate surface and subsurface water reserves which can be harnessed and utilized for commercial agriculture and livestock. The findings from UBOS 2014 showed that the households in Kiryandongo district participated mainly in the growing of four major crops namely; maize (67.2%), beans (43.8%), cassava (45.8%) and sweet potatoes (20.7%). The highest proportion of household that grow maize was registered in Mutunda sub-county with 92.6% and the lowest was in Masindi Port with 31.5%. While for beans and cassava still the highest was in Mutunda with 82.7% and 72.3% respectively and the lowest was still in Masindi Port (10.9% and 16.7% respectively). For sweet potatoes, Mutunda still registered the highest growth proportion of 34.7% with the least being Masindi T/C (0.7%).

Coffee as a main cash crop is less grown in the district (2.6%) with Masindi Port being with the highest proportion of households (6.3%) that grew it while Kigumba sub county had the least proportion. The category of the main food crops that registered the lowest proportion of growth in the district were rice (0.9%), Irish potatoes (0.2%), sorghum (5.1%) and bananas (6.4%). Masindi Port was the sub-county that had the highest proportion of household that grew rice (2.1%) and the lowest was Mutunda SC (0.3%). Irish potatoes were mainly grown in Kigumba and Mutunda SCs at a smaller rate of 0.3% in the two sub counties and lowest grown in Kiryandongo SC (0.1%) and Masindi port didn't grow at all (0.0%). Sorghum was highest grown in Mutunda SC (10.4%) and least grown in Kigumba (0.8%). For banana, the highest growing sub-county was Masindi Port (12.2%) and least grown in Kigumba SC at 0.9 percent.

Other major activities carried out include livestock rearing and fishing. In particular, women engage in activities such as road-side groceries/vending, market vending, restaurants, hair care, and health care clinics. Men also engage in wholesale and retail merchandising, metal fabrication, carpentry work, motor vehicle repair workshops, taxi driving and *boda boda* (motorcycle and bicycle) for-hire transportation. A large percentage of the refugees (74%) are involved in economic activities, agriculture being the main activity at 50% and others being retail business and working as casual laborer to generate income.

Health

Kiryandongo Hospital is a government owned hospital with a status of a district hospital. It has a Projected population of 400,000 with a service area covering the areas of Kiryandongo, Masindi, Nakasongola, Oyam, Apac, Amuru, and Nwoya District. It has a bed capacity of about 109 beds. Challenges faced by the hospital include: under staffing; under funding; inadequate infrastructure and unstable supply of electricity and electricity which have affected delivery of services.

The UBOS 2014 reports for Kiryandongo District Community Information System reveals that, of the persons that suffered from malaria, those below 5 years took up the higher percentage of 39%. Incidence of diarrhea among those aged above 5 years was least in Kiryandongo S/C (8%) and most in Masindi Port S/C (11%). As for those aged below 5 years, diarrhea affected more children in Masindi Port (18%) with the least incidence recorded in Kigumba SC (15%).

Education

The highest education attained was categorized in 3 groups (primary, secondary and tertiary levels). Kigumba Sub County registered the highest population proportion of 1.9% and the lowest proportion under this category was in Masindi Port (0.2%). This result shows that by the time of the CIS exercise, most people in the district had stopped in primary and very few had gone beyond senior six.

Schooling Status

Depicts the percentage distribution of schooling status by selected age groups at different administrative levels. Data collected was grouped into three age groups i.e. 6-12 years, 13-18 years and 19+. The schooling status was also grouped in three categories i.e. currently schooling,

left school and never attended school. As for age group 19+, the biggest number of people who left school in both sub counties is about 68%. Findings also reveal that of the total population currently attending school; those under age group 13-18 take on the biggest percentage of above 68% in all the sub counties.

Data was collected on the literacy level of all household members (aged 6 years and above) in Kiryandongo district and it was grouped into three age groups i.e. 10-12 years, 13-18 years and 19 years and above. It is observed that members who are 13–18 years are more literate (81%) than the rest of the other groups (65% and 40% respectively).

Kyegegwa District

Kyegegwa District is located in Western Region of Uganda and bordered by Kibaale District to the north, Mubende District to the east, Kiruhura District to the south, Kamwenge District to the southwest and Kyenjojo District to the northwest.

Population

The 2014 Population and Housing Census results reported Kyegegwa population of 281,637. 141,043 (50.1%) people were males and 140,594 (49.9%) were females. The reported population was 92 persons/km². Kyegegwa is one of the Ugandan districts that are hosting refugees from Democratic Republic of Congo, Rwanda and Burundi. The refugees are registered in a reception center, allocated plots of land in a refugee settlement and supported to build homes, farm and establish income generating business. This effort is in line with Uganda's transformational approach of making refugees in Uganda self-reliant and locally integrated with the host communities thus alleviating their restriction, lack and uncertainty.

Economic Activities

The main occupation of the people of Kyegegwa is crop and livestock farming. Small scale farmers working on an average of two acres per household dominate the farming community. They cultivate mainly maize, bananas, beans, groundnuts, cassava, millet, potatoes, sweet potatoes citrus fruits and pineapples for food and sale. A few large-scale farmers with farms of more than 6 acres are emerging, growing pineapples, citrus fruit, and bananas for the market. Other major income generating activities are: Aquaculture/Fish farming; Trade in agricultural produce and livestock; Beekeeping and honey processing.

Kyegegwa has abundant natural resources including fertile arable land covering a total area of 1,747 km². The district has fairly well distributed rainfall throughout the year with annual rainfall ranging from 1,200mm–1,500mm. The Temperatures range from 20°C–25°C in all parts of the district. Two rivers Katonga and Muzizi flow through the district. These rivers and the Ngata, Hapuyo and Kakabala Wetlands are sufficient water sources which should be sustainably harnessed to enable commercial agricultural and livestock production.

Social Challenges

Kyegegwa district is destination for refugees that enter from Tanzania, Burundi, Rwanda and DRC, and are hosted in the Kyaka Refugee Settlement. The presence of refugees impinges on food security and poses a strain on land and socio-economic services. There is potential risk for social unrest if the pressure on resources and opportunities is not addressed swiftly.

Health

The most common disease in the host communities and refugees in Kyegegwa is malaria. AHA operates 2 health centers in Kyaka II: Bujubuli health center III and Mukondo health center II serving a catchment area of about 23,185 nationals (host communities) and 21,923 refugees each with around 10% of patients in Mukondo HC being Ugandan nationals and 55% at Bujubuli. AHA intervenes and supports awareness messages on HIV/AIDS, other communicable diseases, health promotion campaigns, and capacity building of Community Health Workers. As a result, there has been an improvement in ANC attendance, maternal child health and family planning response. All indicators in morbidity and mortality are also within accepted standard. Cases that need further management are referred to secondary and tertiary health facilities including Kyegegwa H/C IV, Fort portal district hospital and Mulago national referral hospital.

Adjumani District

Adjumani district hosts up to 67,000 refugees in 8 different camps as Nyumanzi, Mireyi, Alero 1 and 2, Location and size Adjumani is one of the districts in the north-western region of Uganda. It is bordered by Moyo district in the North, Arua and Yumbe in the west, and Amuru District in the south and east. It has an average altitude of 1200m above sea level. Adjumani District headquarters are situated in Adjumani TC, Central Parish, Molokpoda village. Adjumani district has a total area of about 3128km² of which land area is 3081.2km².

Population

The 2014 Population and Housing Census established the total population of Adjumani District (East Moyo county) at 231,623, of which 52.2% were female and 47.8% were male. This conforms to the country situation where there are more female than males. Pakele

sub-county has the highest population in the district, while Arinyapi Sub-county has the lowest. The total land area for Adjumani District is 3,128km² and its population density was 74persons/km² per km² of land in 2014. It is believed, the population density has increased from 16 persons/km² in 1980 to what it is now.

Water

The main water supply technologies in the district are deep boreholes, shallow wells and protected springs. Boreholes are spread throughout the district while springs are found mainly in southern part of the district. There are 646 boreholes in the district (both deep and shallow), 17 protected springs and 157-yard taps. Of the 646 boreholes, 50 are situated in Adjumani Town Council and 596 in the nine sub-counties. Functionality of the boreholes stands at 92% while latrine coverage stands at 84% for the district. Functionality has not reached 100% because some water points do not have active committee members and therefore are not collecting funds regularly. For water points where the committees are still active, they endeavor to hold meetings and collect money regularly. However, what they collect is still very low and not all households contribute to the Operation and maintenance funds. In some instances, the money collected is not accounted for properly, thereby discouraging others from making their contributions.

Sanitation

Latrine coverage is used as a proxy to measure for access to appropriate sanitation facilities. In 2013 the number of households with access to covered pit latrine stood at 87%. Latrine coverage in the district has slightly increased from 67% in 2010 to 68% in 2013. However, the availability of hand washing facility is still below the district target of 71% which should be in line with the national aspirations. A reliable water source is one capable of supplying its beneficiaries, a minimum of 20 litres *per capita* per day as per the WHO recommended standards. According to the 2012 population census, 98% of the people in the district can access water within a reasonable walking distance of up to 5kms

Gender Issues

Gender equity is a critical building block in sustainable development in any society. However, there are a lot of gender issues which are not mainstreamed in development programmes/activities in the district. Employment status of men and women in the district departments at senior level reveals that there is high gender disparity standing at 57.2%. This reflects the low level of education and little priority accorded to the girl children. Further still the fewer number of women at senior levels translates into gender biases and insensitivity. There is dominance (70% men and 30% women) in local leadership positions especially in Project management. Contrary, there is low participation and commitment of men compared to women in the sustenance of local development initiatives in the community. Most women (95%) are prone to domestic and sexual gender-based violence compared to men (5%). It has been observed that there is low participation of men (20%) in both provision of care and support to children.

In the district, most women (95%) do not own productive resources (land, animals etc.) compare to men (5%). Other gender issues include; low participation of men (approx. 900 males & 3000 females) in providing health care services to children compare to women, more boys (50.9%) enrolment than girls (49.1%) in schools at upper levels, low participation of women in deciding on community facilities and their locations compare to men (35%-65% of female in water users' committee, 100% of decisions are made by men in the district water office.

A number of factors, mainly cultural in nature has denied women access to education or forced them to drop out of school. UBOS survey (2014) puts the illiterate rate among women at 47% and that of men at 22%. This indicates that most women are general illiterate in the district compared to their counterparts, the men. The rural women are worse off in this situation with their illiteracy standing at 49% compare to the urban ones at 33%. This trend is due to the traditional attitude that gives preference to boys' education than girls' education where girls are expected to get married off at an early age for source of wealth in form of bride price. This partly explains the gender imbalances in the enrolment of both the boy and girl children both at higher primary and secondary level.

Vulnerability

Women remain economically marginalized: among Ugandans, 90% of all rural women work in agriculture, as opposed to 53% of rural men. As a result, women in both refugee and host communities are disproportionately affected by changing livelihood patterns, conflict, natural disasters and climate change. It is known that low education levels among girls is one of the factors contributing to early marriage, with ensuing complications for maternal health. In Adjumani, both within the host communities and in the refugees' areas, boys are preferred over girls on a number of aspects which leads to their marginalization with respect to allocation of resources and decisions.

Arua District

Arua district lies in the North-Western Corner of Uganda. It is bordered by Maracha district in the North West; Yumbe in the North East; Democratic Republic of Congo in the West; Nebbi in the South; Zombo in the South East; and Amuru district in the East. In total the district covers an area of 4,274.13km², of which about 87% is arable. It is located 520 km from Kampala and only 80 km from the South Sudan Border.

Population

As at 2016, the district had an estimated population of 820,500, of which 36,731 (4.5%) were refugees. By May 2017, Arua hosted 151,039 refugees, accounting for 18 percent of the district population. The refugees, mainly from South Sudan are of diverse ethnic backgrounds; Dinkas, Kuku, Nuer, Kakwa, Madi, and Siluk and have close ethnicity with the locals who are Kakwa, Madi, Alur and Lugbara. This partly explains the peaceful coexistence in the community. Arua promotes the government's exemplary refugee settlement model that allows refugees to interact freely and set up investments, which provides an opportunity to harness their potential to accelerate local economic development. Generally, the refugee and host communities enjoy a cordial relationship, which offers a favorable environment for doing business.

Education

Arua District has a total of 311 Government Grant aided primary schools and 48 Licensed Community Schools. Registration at the beginning of the year stood at 362,000 pupils but by the end of year, attendance dropped to 227,000 pupils causing a net non-attendance of 135,000. At the beginning of the year, boys stood at 185,000 while the girls stood at 175,000. Of the 175,000 girls, 121,000 were from the lower classes of P1-P4. Of the 135,000 children that dropped out, the percentage drop out stood at 68% for girls and 32% for boys. Arua District has a total of 480 permanent classrooms. Taking 40 pupils per classroom. Arua District has a total of 32,000 desks that means it can only sit 96,000 pupils. A total of 266,000 pupils sit on the floor. Most of the schools (about 98%) have no staff houses with about 2% of the staff houses being of a temporary nature. To-date there are 30 permanent houses. This means 5,337 teachers are not staying in permanent houses.

Water & Sanitation

The water supply in Arua district is inadequate not only in the refugee settlements but also in the host communities. The safe water access rates in Arua on sub-county basis is 42 % in Pawor Sub-County to 95 % in Okollo Sub-County. Arua has 2,579 domestic water points which serve a total of 653,573 people – 592,053 in rural areas. 364 water points have been non-functional for over 5 years and are considered abandoned. It is important to note that, the district is witnessing rapid growth with its critical challenge being safe water coverage. Its major water supply is from River Enyau system which is increasingly being affected by growing water demands largely due to growing numbers of upstream users exacerbating the flow conditions during the dry season.

Economic Activities

The economy of Arua depends mainly on agriculture which employs over 80% of the households. Of those employed in agriculture, 86% are engaged in the crop sector, 0.6% in animal rearing, and 0.9% in fishing. Both food and cash crops are grown. The major food crops include cassava, beans, groundnuts, simsim, millet and maize. Tobacco is the major cash crop and is the main source of livelihood for majority of the population in the district. There is renewed interest in the promotion of coffee production in many areas of the district now. With the total production volume of 275,994 metric tons of major crops, Arua has a strong agricultural raw material supply base for value adding agro-processing industries. Other nonagricultural activities include: general retail and whole sale, metal and wood fabrication, art and crafts production, fish farming and livestock farming. Tobacco is also grown extensively for income generation. Honey production and trade is a known income generating activity.

Moyo District

Moyo District is located in the north-western corner, or West Nile region of Uganda. In total the district covers an area of 2,059 km², of which 192km² is rivers and swamps, 172km² is gazetted forest and game reserves. Approximately 78.9% of the districts' land is arable or suitable for cattle grazing and a population density of 115 persons per km². The distance from the district headquarters to Kampala via Arua and Gulu are 640 and 480km respectively.

Population

Moyo District had a population of 194,778 according to the 2002 Population and Housing Census Report. The mid-year Projection 2012 now puts the district's population at 382,400 of which 201,300 are males and 181,100 are females. The average annual population growth rate of the district, between 1991 and 2012, was 7.7% compared to the national average annual population growth rate of 3.2%. Children below 18 years constituted 55% of the population and nearly half of the district population is below the age of 15 years. This population structure is expected to be youthful for the next 15 years and this poses a big population problem of high dependency ratio.

Economic Activities

According to the census report about 80% of the households in Moyo District depend mainly on subsistence agriculture as their main economic activity. Only 9.7% of the population was dependent on earned incomes and 0.4% on property income. The major crops grown include sweet potatoes, sorghum, cassava, simsim, groundnut, finger millet, maize, cowpeas and beans. Fishing is another main economic activity in the district. The Nile River is the main source of fish within the district.

Gender Aspects

Gender imbalances still do exist in the district especially in ownership and access to productive assets such as land. Generally, women do not own nor control land. They only have access to the land but the decisions on what to produce and in what quantities remain the domain of men. Furthermore, although it is estimated that about 70% of the work force in agriculture are women they do not control proceed of neither whatever is produced nor what they sell in the market. Gender Based Domestic Violence (GBV) is also common. Although there is no clear statistics on this matter but from the crime rate in Moyo District for 2010 it is clear that assault, defilement and rape have been common and most of the assault cases were directed towards women. According to Uganda HIV Sero-Behavioral Survey conducted in 2014/2015 the HIV prevalence rate is also higher among women 7.5% than it is among men 5%.

The percentage of girls in total primary school enrolment is still low at only 48.9% for girls compared to 51.1% for boys as per 2009 school enrolment statistics. Although, this has improved, there is low retention which also exhibits gender disparity with about 45% of boys and 35% of girls completing primary seven. Girls also lag behind boys in grade promotion and learning achievements. The percentage of passes among boys in PLE stands at 95.1% for boys compared to 92.9% for girls mainly due to many domestic works given to the girl child. According to Uganda Demographic Health Survey (UDHS) Report 2012 fewer girls are still enrolled at secondary level. The report shows that just one third of the girls who enrolled in primary are still in school at the age of 18 compared to half of the boys.

At household level, women's participation in decision making is low. Only about 35% of women in the district participate in making major household purchases and men believed that a husband should play the major role in making most household decision. These social vulnerabilities are as a result of demographic characteristics like age, disability, culture, unemployment as well as poverty and disaster.

Education

Moyo District has 74 primary schools in total with community schools. Pupil teacher ratio stands at 1:45 slightly below the national standard of 1:50. The primary schools are more or less evenly distributed in the sub-counties and parishes unlike secondary and tertiary institutions.

Health

Under health, the district currently has a total of 38 health facilities namely (1 district Hospital, 1 Health Centre IV and 8 Health Centre III and 28 Health Centre II). Although about 90% of the households are within a 5km radius to a health facility, there are some households particularly in hard to reach areas who can hardly access health care services and this situation has been worsen with the erratic drug supply in most of the health facilities due to delay by National Medical Stores.

HIV and AIDS

HIV and AIDS continue to pose a big challenge to the development of Moyo District. Most people in Moyo District today know HIV and AIDS as a life threatening sexually transmitted infection. Every household has at least lost a member, relative, or a friend to HIV and AIDS. In spite of awareness about the scourge there exist a big gap between knowledge and desired behavioral change. The National Sero-behavioural Survey conducted in 2004/2005 puts the prevalence rate at 2.6% for West Nile region of which Moyo District is part. The District has tried to scale up efforts in providing HIV/AIDS services in most of its Health Centers.

Poverty

The people Moyo view poverty as lack of means to satisfy basic material and social needs, as well as a feeling of powerlessness. There is gender and location specific variations in the way the local people define poverty. Source of monetary livelihood and comfort of accommodation like good sanitation are paramount in urban areas while possession of productive assets like land and livestock are more critical in the rural areas. Women are concerned more with lack of land, water, family planning services resulting in large family size, lacking assistance, household food and poor welfare of children when they define poverty. Men relate poverty mostly to the inability to engage in meaningful employment and lack of productive assets. To the youth, the degree and extend of social connectedness and family welfare indicate the level of poverty. Therefore, the strategy to address poverty requires multi-faceted approaches.

The people of Moyo use a number of indicators that give meaning to the above characteristics. These indicators are generally grouped under material and non-material indicators. The most common material indicators include lack of food, clothing, shelter, money and inability to send children to school or for health services. In both rural and urban communities' men were more concerned about income and assets of production—land and livestock as material indicators. Women on the other hand were mostly concerned with assets for domestic use and consumption such as lack of food, bedding, gardens and spending much on treatment of children.

Water

The district in total has 977 safe water points including household connections and the safe water coverage declined from 61.4% in June 2010 to only 47.0% by March 2011 below the national average of 63.0% due to drying up of water sources following climate change and decommissioning of 40 water sources that are non-functional for a long period of times. This implies about 53.0% of the population

in Moyo do not have access to clean and safe water. Table 13 below presents the safe water coverage by sub-county. Aliba and Gimara sub-counties have the worst safe water coverage below 20%. While Lefori and Itula sub-counties are average at only about 50%. This implies that more than 65% of the population from Aliba and Gimara sub-counties do not have access to clean and safe water and they are very far from reaching the national safe water coverage which stands at 63%. While the sub-counties of Moyo, Dufile, Metu and MTC have better safe water coverage above the national percentage. All these limits the people access to safe drinking water leading to ill health and increase in household poverty

Sanitation

The sanitation coverage in the district has been fluctuating with changes in weather. It often improves during dry season and decreases during rainy season. The average household latrine coverage is 75.0%. While the average school latrine coverage is 88.5%. Girls have a lower coverage 67.2% compared to Boys 109.7%. Over 25% of the households do not have latrines. Gimara and Aliba sub-counties have lower latrine coverage and even average safe water coverage. With the low safe water coverage, cases of diseases and poor health are common among the communities which are a typical characteristic of the poor. The key poverty pocket in the district could be easily seen in the sub-counties of Aliba, Gimara, Itula, Lefori, Metu and Dufile. This is basically due to their remoteness, low coverage of social services and unfavorable weather patterns within their locality as in the above analysis.

Annex: 6: Consolidated record of consultations - when these took place, who was engaged and a summary of key issues raised during each consultation

No.	Stakeholder Engaged, Date & Place	Issues Raised
1.	Uganda Wildlife Authority Date: 12 th November 2019 Place: Uganda Wildlife Authority	- Access to resources tend to be regulated more especially where there are boundary disputes - There is tendency not to comply and adhere to agreements. Some members of the community turn resources into commercial exploitation for income. This results into enforcement by park authority. However, there is a need for: (i) transparency; (ii) engagement of communities and park offices.
2.	Environment and Social Safeguard Specialist Date: 4 th November 2019 Place: Ministry of Water and Environment	- There is a need for community consultations. This is important for ownership and addressing specific conditions rather than generalizing. - Important to have the following documented: (i) register of PAP; (ii) clear eligibility criteria; (iii) use and adherence to guidelines; (iv) establishing committees among PAP and chosen by them; (v) Registering of the formed committees.
3.	Partnership Officer National Date: 4 th November 2019 Place: Forestry Authority	- Boundary surveys- the involvement of DLG political and civil leaderships is very important. - Collaborative forest management- support is needed from district community development officers, forest officers for mobilizations and technical support, plan implementation, management of groups, settlement of governance issues and in the formation of CFM. - Funding- There are community development driven funds which are obtainable in the districts. These funds do boost CFM activities. - The following are key challenges: (i) Formation of CFM is time consuming; (ii) Balancing between conservation and livelihoods; (iii) Funding inadequacies; (iv) compliances; (v) Expectations are high among CFM and communities; (vi) Capacity is low in CFM and communities to manage and implement agreements; and NFA capacity is also low.
4.	The REDD+ Secretariat, two landscape consultation and participation platforms, and three forest dependent people's platforms. Community consultative meetings for IPs were organised in South Western Uganda (In Rubanda and Kisoro District), Bundibugyo, Kween and Moroto District. Date: July 2019	- Gender relations among the Batwa, Benet, Tepeth and LiK are therefore constituted through the patriarchal and patrilineal systems where the male is dominant, and the female is subordinate. - The youth, the elderly, people living with disabilities, vulnerable men, women, are likely to have little or no endowments, entitlements, no bargaining power and no fall-back position, and face intersecting forms of gender-based discrimination. - These indigenous forest dependent people do not consider that men and women play different roles and responsibilities and have different needs. As such, majority of women and a few vulnerable men, the youth, people living with disabilities, etc are marginalized. They therefore have no access (by right), and no control of productive resources such as forests and do not participate in decision making in their governance. - Limited participation in decision making regarding forest resources use, limited access to land and land ownership rights, Problem animals (vermin/crop raiding) in specific forest dependent Indigenous peoples communities, loss of access to cultural /traditional assets, loss of Indigenous peoples knowledge and Languages, limited access to forest resources for their livelihood (Such as building materials, water, medicine, timber), domestic violence, Gender based violence, and Benefit sharing for REDD+ Proceeds. - Land tenure and governance; Support governments in developing land tenure frameworks that officially recognize women's rights to forest products and carbon from forests. - Gender-sensitive REDD+ programming; A gender analysis should inform the design of REDD+ projects and strategies to ensure the design is responsive to the different needs and roles of men and women. Gender-sensitive monitoring and evaluation tools should be used for REDD+ projects, requiring collection and analysis of sex-disaggregated data and social indicators that measure changes in status and levels of inequality.

5.	Local Government District Officials, UWA, NFA, WMZO Officials and Refugee Camps Commandants Date: 12-17 June 2019 Places: Rubanda District Headquarters Echuya Central Forest Reserve Kisoro District Hqtr. UWA (Kisoro Meeting/Mgahinga NP) NFA Forest Station/ Community Tourism Camp – Karengyere Karinju Forest Station Rubirizi District Hqtr QENP Hqtr Albert WMZO Fort Portal Kibale NP Hqtr Rwamwanja Refugee Scheme Kamwengye District Hqtr Kagombe CFR Nyabyeya FC Budongo CFR Hoima District Hqtr Kyangwari Refugee Scheme	- Low capacity for District technical departments (Forestry, Environment, Agriculture, community development, Tourism, etc. in terms of no of personnel, office and field equipment's (including transport), extension workers, operational budget - Forest revenue (from timber) increasing, but still low due to weak revenue management - Increasing risk of dominance of Eucalyptus and Pine, including the concern about effect of eucalyptus on water resources - Ongoing community initiatives supported through UWA's Revenue sharing scheme. Initiative focus on livelihoods at household level, Problem Animal management, boundary management and Community goods e.g., health facilities, access roads, water and sanitation facilities, etc - Human Wildlife Conflicts due to problem animals/vermin especially with regards to Kyambura Wildlife Reserve (elephants, chimpanzees, hippos) and disease transmission to livestock - Limited access to quality tree seedlings and planting materials and low extension services due limited district capacity (transport, to meet demand and provide extension services and technical guidance - High incidences of Problem animal attacks on human beings (elephants, crocodiles, hippos, and lions) - Increasing coverage of invasive plant species limiting pasture and limiting tourism activity - Emergence of new forms of poaching (armed poaching) and resultant illicit trade of wildlife products - Wildfires specially in the grassland portions of KNP - Increase in tourist visits but with limited tourism infrastructure (accommodation and hospitality services, trails, solid waste management, limited tourism products...in addition to primate /chimp viewing) - Access to adequate wood for firewood and construction by the refugees - Increasing pressures on forest and fragile ecosystems due to high population (natural growth, immigrants, refugees)
6.	Communities of Nyabarembure and Batwa Date: 2/March /2019 Place: Nkuringo Cultural Centre, Kisoro	- Batwa should be made aware of a mechanism through which REDD+ benefits could be delivered from the – national level (reference was made to tourism revenue sharing). However, they proposed a parallel system whereby REDD+ benefits could directly flow to the community level. - Batwa think that the benefits from national level had been going through a very bureaucratic process and do not effectively respond to their unique needs. They proposed that setting up a special fund targeted at the Batwa themselves would increase the benefits directly within their communities.
7.	52 Participants from Government MDAs, CSOs MPs, LG Officials. Date: 17th – 18th May 2017 Place: Hotel Africana, Kampala	Gender strategies; It was expressed at the workshop that gender should be mainstreamed in the REDD+ strategy Refugees: Since the influx of refugees is high, REDD+ should consider including the concentration areas with the planning perspectives.
8.	Local Government (District) officials. Field Staff of NFA, UWA, DWRM. CSO/NGOs, Media and Private Sector representatives. Date: March and May 2018 Places: Kabale, Kasese, Hoima, Arua, Lira and Mbale	- The role of District/Local governments in FIP implementation and mechanism for accessing FIP budget and for integration in departmental activity plans and budgets. - Capacity for implementing FIP at Local Government level, protected areas level and across the landscape. - Forest governance and capacity for law enforcement, regulation and compliance monitoring. - Relationship between FIP and other forestry programmes of GoU (FIEFOC, REDD+, etc.) and NGOs such as IUCN, WWF, WCS, Nature Uganda, ECOTRUST, etc. - Other incentives (in addition to PES+ payments for carbon trees) - Forestry data and information and utilization technology - Access to quality seed and planting materials - Safeguards in relation to evictions, access/use of cultural assets, conflicts
9.	Stakeholders on BSA, RSO, FGRM & SESA Date: November 2016-May 2017	Some of the Batwa do not own land since they used to live the forest and were evicted from there

	Places: Kampala, Fairway Hotel Bundibugyo District Kisoro Mbarara/Fortportal Mbarara, Lake View Hotel Kampala, Hotel Africana Kampala, NFA Meeting Room	• They are very poor and vulnerable to socioeconomic and environmental threats and risks. • Their livelihood is extremely dependent on the forest resources (i.e. located 200 m away from the forest or national park boundaries) • This category of people requires much monetary and non-monetary support, if the REDD+ strategy options are to be relevant to them and well implemented. • providing proper extension services in agriculture, forestry and wood energy etc., so that the rural farmers and other households know exactly how to improve their livelihoods. Without technical knowledge and vision, it will be hard to reform of Ugandan rural economy in particular • There is need to expand the district FGRM team to include all relevant stakeholders in the FGRM, including NFA, UWA, NEMA, the district land board, district staff surveyor, district planner, security agencies, a district-level political leader, such as the district chairperson, magistrates, district land officer, district community development officer (DCDO), the private sector • Boundaries of protected areas need be clearly and permanently marked in the terrain • Clear roles and responsibilities need be defined and well understood for all implementing units
10.	49 Civil Society Organizations Date: 20th January 2017 Place: Colline Hotel, Mukono	• Is there a possibility of doing further prioritization of the investment options under the FIP? Thus, the focus could be on 1 or 2 options, especially those where not much engagements have been done. Hence, the focus should be on forestry based industry investments and the others could be Uganda's contribution. • Refugee settlement impacts negatively on forestry. Taking a case of the refugee in Yumbe, what measures are being put in place to address the deteriorating state of Natural resources in Yumbe district and settlement of Refugee in camps in Yumbe District? What's is the Government doing about this? Are there any benefits from hosting these refugees? • The proposed FIP investments will be implemented is selected water management zones in the country. What about the mountain ecosystems? • What is the role of CSOs during the implementation of the FIP? • A component should be considered for promoting incentives for conservation of natural forests on private land and planting of indigenous species. This would encourage private forest owners to conserve natural trees and forest on their land but also planting indigenous tree species. Thus, this will contribute towards addressing the very high deforestation rates of the remaining private forests. • The CSOs recommended that an all-inclusive National Steering Committee to oversee FIP operations be constituted to deal with FIP issues. This will play the oversight role for effective FIP implementation.
11.	Government or mandated Institutions at Central and Local levels, Civil Society and NGOs, Academia and Research Institutions, Private sector players, Indigenous people/minority groups and forest dependent communities as well as development partners Date: 28th August 2016 Place: Desert Breeze Hotel, Arua Town	• FIP preparation ends with a national FIP document, and issue of preparation of FIP at district level was discussed • Need to promote other energy sources like Biogas, briquettes • Preparation of this plan(FIP) best supported with provision of funds to DFS through conditional grant • Population is ever rising, yet the forest lands are constant so FIP development should look into aspects of SLM working with the Agriculture sector • FIP should address issues of quality planting materials
12.	Government or mandated Institutions at Central and Local levels, Civil Society and NGOs, Academia and Research Institutions, Private sector players, Indigenous people/minority groups and forest dependent communities as well as development partners Date: 28th August 2016. Place: White Horse Inn Kabala	• Among the activities there is still a gap on species of trees and the Forest Service has always neglected that. Eucalyptus trees have caused drying up of water sources and we need to come up with a solution of eliminating Eucalyptus trees. • To this particular comment one of the participants responded saying that eucalyptus is not a bad species, only farmers of it have learn more on species matching; eucalyptus needs deep soils of those areas that have been used for long, others thus opt for pines. The question is that are we lacking promotion of catchment friendly species; silviculture and forest extension services • Much as we have policies; workshops we have not intensified the issue of coming up with defined boundaries. Though it was noted that in Bwindi there are clear marks that can be seen, we therefore have to come up with more data. Some areas because of laxity on the private sector, the communities are encroaching. In the NFTP 2003 for

		an area to be gazetted it has to be rich in natural resource. Some areas can be degazetted but not rich in natural biodiversity; Migera is rich in biodiversity. There is mineral wetlands action plan but not sure how far. • Our land tenure systems are still a challenge; we don't have free hold titles. Now that this project has come; how will advocate for it. • Stake holder contribution to management of forest services; how feasible is that? Which forest good or service is the right candidate for this? How do we go about disbursement some of the forest reserves shared by districts, we can't look at one side of the forest and ignore the other? • Managing political interests; there is a problem of development versus protection of catchment areas. The forest in Ntungamo was encroached on by other individuals, while top officials watched on. Boundaries of protected forests, are they known, and are they visible? Actions are required at the central and local level.
13.	Government or mandated institutions at central and local levels, civil society and NGOs, academia and research institutions, private sector players, Indigenous people/minority groups and forest dependent communities as well as development partners Date: 31.08.2016 Place: Sandton Hotel Kasese	• There is needed to talk about the practicability but not theory of the management of forests. Therefore, how the villages and parishes are going to be alert putting forestry in their plans. • Trans-border is it an issue of concern; as the insecurity is fueling it. • Need to advise on the status of forest regulations 2014. • Wood land /savannah forests, are they priority areas in National parks and Wetland reserves? • River line forests, how do they come into the equation of REDD+ and storing carbon in trees? • Incentive measures for community engagement on efficient utilization of forest products. Look into management plans of respective FRs and find out which are beneficial. • NFTP-2003 objectives to have in place a fund supporting tree planting but it has not performed well. • Operationalizing National tree funds; are there such funds in any of the districts? The fund will come in every year however little. What we get as the district should be improved upon though let us think beyond the National tree fund. The districts work should be different instead of it being lump sum. • Community forests, list some; no community forests in Budibugyo, but private land with forests growing. Find another way to call it, forests private land? Forests on private land; fragile forest systems, list some. • Confirm status of management responses to; Mpanga management planning and implementation. (it is there) we have to think about supporting the implementation • Hot spot areas in Port Fortal- Kyenjojo have been destroyed by deforestation, established nursery bed, trained farmers and gave them seedlings and they were more engaged. Measures of success; indicate the balance and targets/outputs/results/outcomes/impact. This has not yet been worked on, still mobilizing what has to be worked on. • Uganda's system for MRV. Some countries have indicators for measuring their foot prints. System for designing that tool is getting ready; hopefully it will be ready next year. We should thus give specific examples.
14.	National workshop had around 30 participants Date: March 2017 Place: Kampala (City Royale)	• Institutional structures were considered to be in place and available, but they need considerable strengthening from both financial and human resource perspectives. Coordination between the different government agencies was also noted to need improvements. There was also a general feeling that the collaboration between NFA and the local people should be improved even to the point where locals manage the central forest reserves on behalf of NFA. • the inadequacy of forestry extension services, which was reported in all regions. This is attributed to insufficient staff, where districts have Forestry Officer Officers only at district level but not at the Sub County at it is with the Agriculture sector. • Policy and law enforcement is needed, especially on private lands and regulations (licenses & certifications) for commercial charcoal production from exotics only were considered needed and to be included into the Land Act.

		- In general uptake of new technology especially the energy saving stoves was reported to be low among communities. Whereas there have been efforts mainly by NGOs to promote use of energy saving cook stoves, their use in households is still limited. The need for extension work and technical support to them was highlighted, including a need for quality seeds and seedlings. - A common concern was also, that the rural households are currently not benefitting much from the rural electrification programme due to high tariffs and that government should subsidize electricity. Here one could also argue to the contrary that maybe it is the income generation of rural people which should be increased to such a level that people can afford already subsidized rural electricity prices.
15.	Lower East: Benet at Mount Elgon; IPs and local Communities from Karamoja and Mt. Elgon Bukwo, Kapchorwa, Kween, Mbale, Manafwa, Sironko, Bulambuli, Bududa, Moroto, Kotido, Kaabong, Abim, Amudat, Nakapiripirit, Napaak Date: 31st January – 2nd February 2017 Place: Wash and Wills hotel, Mbale	In the Eastern Region (Mbale workshop) the biggest concerns were related to lack of land for commercial plantations and lack of forests for commercial charcoal production. Participants were further seeking for land use planning.
16.	Northern region West Nile and Northern region Agago, Amuru, Gulu, Pader, Kitgum, Lamwo, Nwoya, Apac, Amolatar, Alebtong, Lira, Otuke, Oyam, Kole, Dokolo, Arua, Adjumani, Moyo, Nebbi, Yumbe, Koboko, Maracha, Zombo Date: 3rd – 7th February 2017 Place: Dove's nest hotel, Gulu town	- In the Northern Region (Gulu workshop) refugees were considered as a major cause of deforestation and forest degradation, though they are only found in a few boarder districts. The region is endowed with wetlands and woodlands, which were both recognized by stakeholders as having potential for contributing towards REDD+, and hence requested for strategic options that specifically target these two resources (such as bee keeping for woodlands). - Stakeholders further highlighted the urgent need for fire management, which they recognize as being a serious problem across the three sub regions of West Nile, Acholi, and Lango. On the contrary, livestock management was not considered a top priority in Northern region. - There were also concerns that due to growing social changes in communities from community approach towards more individual household approach, whether communal approaches would properly work anymore as people now prefer to act more often individually. Participants also raised ideas and recommended use of bamboo for charcoal production
17.	Kampala Central Buikwe, Bukomansimbi, Butambala, Buvuma, Gomba, Kalangala, Kalungu, Kampala, Kayunga, Kiboga, Kyankwanzi, Luweero, Mityana, Mpigi, Mukono, Nakaseke, Nakasongola, Rakai, Ssembabule, Wakiso Date: 9th January 2017 Place: City Royale Hotel Kampala	- In the Central Region (Kampala) participants were concerned about role of local governments giving away forestlands to commercial enterprises and this concern is consequently causing conflicts with the central government. - Furthermore, there are some conflicts between cattle rangers and tree growers, which might have negative impact on strategy options implementation. - On the positive side, it was recommended that one should tap into indigenous knowledge especially when selecting species for tree planting on different types of soils. However, any commercial wood or wood fuel selling should focus on exotic tree species as such species are easier to guarantee that they come from legal sources. - In addition, stakeholders noted that in central region where Mailo land tenure is predominant, there seems to be two land owners namely; the landlords and tenants, both recognized by law. Stakeholders recommended re-alignment of the land policy with existing land tenure, to eliminate this ambiguity.
18.	Western Masindi, Hoima, Kibaale, Buliisa, Kabarole, Kyenjojo, Kamwenge, Kyegegwa, Kasese, Bundibugyo, Ntoroko, Mubende Date: 14th -16th February 2017 Place: Fort portal town	- Western Region (Fort Portal) specific concerns were raised about some large communal grazing lands which cannot be planted with trees, while there are also some too small grazing areas where tree planting and ranging simultaneously will not work. - The question of insect attacks on eucalyptus plantations (e.g. bronze bug or Eucalyptus lice) was further raised as an issue that needs urgent attention. - In this region cocoa farming is now promoted (with good commodity price of cocoa) at the lower altitudes where coffee suffers from changing climate and raising temperatures. Both cocoa and coffee provide a great opportunity for agroforestry, and as a strategic option.

		It was also noted that in this region, commercial tree planting has already been embraced, and indeed there was evidence of this from observation of the landscapes. An idea was also raised whether forest plantation owners would be persuaded to fund the fire management activities at village level.
19.	Western Bushenyi, Ibanda, Mbarara, Ntungamo, Lyantonde, Kiruhura, Isingiro, Buhweju, Rubirizi, Ruhinda, Sheema, Kabale, Kisoro, Kanungu, Rukungiri Date: 2 -17th Feb 2017 Place: Mbarara town	- In Southern Region (Mbarara) cattle thefts were major concern and taxation on charcoal production was proposed. - Further, needs for environmental education was highlighted (e.g. schools should establish demonstration woodlots) and the need of government officials to show front row leadership Vis a Vis environmental matters (e.g. by planting trees). - This region had a particular attachment to livestock (Mainly Ankole sub region), and they reported having the necessary institutions in place to support dairy development. However, loss of palatable grasses due to invasive species was reported as the main problem. Stakeholders recommended an increase in valley dams to manage drought, in addition to a revision of the land carrying capacity for livestock.
20.	Forest dependent communities Benet; Ik at Kaabong District; Acholi at Lamwo District; Kalangala at Sese Islands; Baswa at Bundibugyo District and Batwa at Kisoro District Date: 1st -16th February 2017	- The visited forest dependent communities were found to be very dependent on forest and wildlife resources. Land tenure was highlighted as the biggest problem in all visited communities. According to people interviewed the Government institutions have not followed laws themselves and are ineffective - evicted people are for instance not compensated. - There is also very slow start up processes for Collaborative Forest Management. This may be related to either corruption at county level or within DFS or to lack of funds for technical assistance. Due to these issues NGOs are normally considered more effective and trusted partners by the communities. - The consulted forest dependent communities were positive to REDD+ strategies, but they have no incentives for long-term investments (e.g due to land tenure issues) and some of the strategies were regarded not realistic due to extremely limited access to funding/loans. - More extension and support from government institutions is needed. These communities would welcome more law enforcers present, as many times it's the people outside the forest dependent communities, who cause the deforestation and forest degradation.

Annex 7. List of Persons consulted

1. *Stakeholder Engagements: List of Officials from Government Organizations met during the Preparation of the ESMF and PF November 2019*

November 2019

No.	Names	Designation	Organization
1.	Dr. Adonia K. Bintooro	Senior Conservation Officer	Uganda Wildlife Authority
2.	Christine Mugenyi,	Partnership Officer	National Forestry Authority
3.	Vincent Kakuru Orisingura,	Environment and Social Safeguard	Ministry of Water and Environment

2. *Consultations: Draft Scoping report (priority gender and capacity issues for IPs in ERP areas); For Mainstreaming Gender into REDD+ processes and strengthening capacity of Forest Dependent Indigenous People to actively engage in REDD+ Strategy Implementation; Submitted to the Ministry of Water and Environment (MWE); by Ms. Pro-biodiversity Conservationists in Uganda (PROBICOU); July 2019*

July 2019

List of participants that attended Benet consultative meeting at Benet church of Uganda Kween district.

NO.	NAMES	SEX	OCCUPATION	DISTRICT
1.	YEKO BENNA	F	PEASANT	KWEEN
2.	YEKO JANET	F	PEASANT	KWEEN
3.	IRENE MWANGA	F	HOUSEWIFE	KWEEN
4.	CATHERINE KITIYO	F	HOUSEWIFE	KWEEN
5.	OLIVIA YESHO	F	HOUSEWIFE	KWEEN
6.	LYDIA KISSA	F	HOUSEWIFE	KWEEN
7.	CHEROP SENNA	F	HOUSEWIFE	KWEEN
8.	CHEROP LYDIA	F	HOUSEWIFE	KWEEN
9.	JESCA CHEMTAI	F	HOUSEWIFE	KWEEN
10.	JULIET CHELANGAT	F	HOUSEWIFE	KWEEN
11.	KOKOP AUGUSTINE	F	HOUSEWIFE	KWEEN
12.	CARO CHEBET	F	HOUSEWIFE	KWEEN
13.	SCOVIA CHEMOS	F	HOUSEWIFE	KWEEN
14.	CHEROTICH MARY	F	HOUSEWIFE	KWEEN
15.	NAIT MADINA	F	HOUSEWIFE	KWEEN
16.	EUNICE MUSOBO	F	HOUSEWIFE	KWEEN
17.	ROSE YESHO	F	HOUSEWIFE	KWEEN
18.	KOKOP DAN	F	HOUSEWIFE	KWEEN
19.	CHEKWOTI JOVIA	F	HOUSEWIFE	KWEEN
20.	VIOLET CHEPSIKOR	F	HOUSEWIFE	KWEEN
21.	KOKOP ERIC	F	HOUSEWIFE	KWEEN

July 2019

List of participants that attended Batwa consultative meeting at Bukimbiri church grounds
 BUKIMBIRI SUBCOUNTY Kisoro district.

NO.	NAME	SEX	OCCUPATION	DISTRICT
1.	DEVSI MUJAGA	M	PEASANT	KISORO
2.	RAMANZI STEVEN	M	PEASANT	KISORO
3.	SENDEGEYA EMMANUEL	M	PEASANT	KISORO
4.	KARUHUNGU SIPIRIANO	M	PEASANT	KISORO
5.	IRAKUNDA JOSEPH	M	PEASANT	KISORO
6.	SEBAKUNZI WILLIAM	M	PEASANT	KISORO
7.	TUKYASIIMA GERALD	M	PEASANT	KISORO
8.	NTAWIIHA MOSES	M	PEASANT	KISORO
9.	ZIKAKURANTA BERND	M	WORKING FOR NON BATWA	KISORO
10.	KANDOGO FREND	M	PEASANT	KISORO
11.	YOWANA BIDAGAZA	M	PEASANT	KISORO
12.	HABOMUGISHA BOSCO	M	PEASANT	KISORO
13.	TWIZERIMANA SIMON	M	STUDENT	KISORO
14.	WOMO BENON	M	PEASANT	KISORO
15.	OWOMUGISHA BANABASI	M	STUDENT	KISORO
16.	BUKYERIMAZA RASTA	M	PEASANT	KISORO
17.	ROYINI SIPIRIANO	M	MUSICIAN	KISORO
18.	ZAMBA CHARITY	F	PEASANT	KISORO
19.	SERINA YIRAMATEKYE	F	PEASANT	KISORO
20.	MUKADEYI SEGWA PETRONIA	F	PEASANT	KISORO
21.	NYIRATENGYE JENET	F	PEASANT	KISORO
22.	BUNDERIYA KABAMI	F	PEASANT	KISORO

July 2019

List of participants that attended Batwa consultative meeting at King Nzito premises in Bundibugyo district.

NO.	NAME	SEX	OCCUPATION	DISTRICT
1.	KING NZITO GEOFREY	M	KING OF BATWA	BUNDIBUGYO
2.	NJOROMINA MASIKA	F	PEASANT	BUNDIBUGYO
3.	EYORAMU AKUMENYA	M	PEASANT	BUNDIBUGYO
4.	BARIKAMAYA MANTEDIYASI	M	PEASANT	BUNDIBUGYO
5.	MAHANGA BENEFASI	M	PEASANT	BUNDIBUGYO
6.	ASHURE JACKSON	M	PEASANT	BUNDIBUGYO
7.	KAMBABA JAMES	M	PEASANT	BUNDIBUGYO
8.	BALYEBULYA JULIUS	M	SPEAKER	BUNDIBUGYO
9.	GRACE NKWATINA	F	PEASANT	BUNDIBUGYO
10.	DINDORO EDELED	F	PEASANT	BUNDIBUGYO
11.	TABITA JANET	F	PEASANT	BUNDIBUGYO
12.	BALUNNGI PATIC	M	PEASANT	BUNDIBUGYO
13.	KABANAKO ROSE	F	PEASANT	BUNDIBUGYO
14.	BUNJEI ROSE	F	PEASANT	BUNDIBUGYO
15.	ROSET KABANYORO	F	PEASANT	BUNDIBUGYO
16.	SIBUTEMBA RES	M	PEASANT	BUNDIBUGYO
17.	BENDERA STEPHEN	M	PEASANT	BUNDIBUGYO
18.	ALAFERI AURANGAMA	M	PEASANT	BUNDIBUGYO
19.	BUSINGE KOBET	M	PEASANT	BUNDIBUGYO
20.	ALIGANYIRA JULIUS	M	PEASANT	BUNDIBUGYO

July 2019

List of Participants that attended Batwa consultative meeting at NFA offices Rubanda district

	NAME	SEX	OCCUPATION	DISTRICT
1	NTIFAYO JAMES	M	PEASANT	RUBANDA
2.	KAMONDI ISAKA	M	PEASANT	RUBANDA
3.	KADOGO JOWUBO	M	PEASANT	RUBANDA
4	KINYAMU IRIKIZANDA	M	PEASANT	RUBANDA
5	BANWIRIZA EDWARD	M	PEASANT	RUBANDA
6	KYABAZANGA NORAH	F	PEASANT	RUBANDA
7	KAYARI JACK	M	PEASANT	RUBANDA
8	KOBUSINGYE MARIA	F	PEASANT	RUBANDA
9	NYIRABUSONJI JULINI	F	PEASANT	RUBANDA
10	KAMUBWERA BIRIMENTA	F	PEASANT	RUBANDA
11	TUSHABIBWE BRIDGET	F	PEASANT	RUBANDA
12	MUKUNDAFITE FUVERA	F	PEASANT	RUBANDA
13	BINAGERA AIRINE	M	PEASANT	RUBANDA
14.	NYAMISHANA KEDURESU	F	PEASANT	RUBANDA
15.	DAMURA AMON	M	PEASANT	RUBANDA
16.	KAMPONYI GESIKA	M	PEASANT	RUBANDA
17.	NYABERA GRACE	F	PEASANT	RUBANDA
18.	BIRUNGI NOUME	F	PEASANT	RUBANDA
19.	SIMAKO AMOS	M	PEASANT	RUBANDA
20.	RWANYARAME PHILEMON	M	PEASANT	RUBANDA
21.	RUYEYE RAUBEN	M	PEASANT	RUBANDA
22.	JACKLINE NYANJURA	F	PEASANT	RUBANDA
23.	MARINE KISUMURUJO	F	PEASANT	RUBANDA
24	BIRAARO JOHN	M	PEASANT	RUBANDA
25.	KUGEJA MAYIKORO	M	PEASANT	RUBANDA
26.	KEDNESI TENZIKI	F	PEASANT	RUBANDA
27.	NYARUGABA ROBERT	M	PEASANT	RUBANDA
28.	BANDASHE SYLVIA	F	PEASANT	RUBANDA
29.	MANUEL KOMUGISHA	M	PEASANT	RUBANDA
30.	LILLIAN MUNYAKYABE	F	PEASANT	RUBANDA
31.	BANTUMANYIHO RAHNINA	F	PEASANT	RUBANDA
32.	KUKUBWE AGABA	M	PEASANT	RUBANDA
33.	KERODO GILBERT	M	PEASANT	RUBANDA
34.	KYIKORO EVLIN	F	PEASANT	RUBANDA
35	KABORANGO AINAMAN	M	PEASANT	RUBANDA
36.	MPANGAZINE EDWARD	M	PEASANT	RUBANDA
37.	BAGENDA ABOROZI	M	PEASANT	RUBANDA
38.	RYARIBU TIGETA	M	PEASANT	RUBANDA
39.	KORUTARO PROVIA	F	PEASANT	RUBANDA

July 2019

List of Participants List of participants that attended Tepeth consultative meeting at Tapac sub county hall in Moroto district

NO.	NAME	SEX	OCCUPATION	DISTRICT
1.	LOBOOT PETER	M	LC3	MOROTO
2.	NAKOROI ANNA	F	ELDER	MOROTO
3.	ILUK REBECCA	F	WOMAN COUNCILLOR	MOROTO
4.	KODA ELIZABETH	F	LC1	MOROTO
5.	ADONDA MONICA	F	ELDER	MOROTO
6.	NAKONG JOYCE	F	ELDER	MOROTO
7.	ICHUKA MADALENA	F	ELDER	MOROTO
8.	LOMOKOL VERONICA	F	ELDER	MOROTO
9.	NABUR MARGRETE	F	ELDER	MOROTO
10.	NAKUT CHRISTINE	F	WOMEN REPRESENTATIVE	MOROTO
11.	NAMER REGINA	F	ELDER	MOROTO
12.	NANGIRO REGINA	F	ELDER	MOROTO
13.	NAUSE REBECCA	F	ELDER	MOROTO
14.	AMODOI MARIA	F	YOUTH REPRESENTATIVE	MOROTO
15.	AKOL MARIA	F	WOMEN REP	MOROTO
16.	NABOLIA MARIA	F	YOUTH	MOROTO
17.	ADUPA ANNA	F	ELDER	MOROTO
18.	NAPEYOK PASKA	F	ELDER	MOROTO
19.	NAUSE MARGARET	F	ELDER	MOROTO
20.	ALINGA LOCHOTO	M	ELDER	MOROTO
21.	NACHAP SABINA	F	WOMEN REPRESENTATIVE	MOROTO

3. *Lists of Persons and Institutions in Albertine rift who were engaged during the field trip (11-17 June 2019) 2019 World Bank Mission*

1. Meeting held at Rubanda District Headquarter 12th June)

NAME	ADDRESS	CONTACT
SIMON ASIMWE	IG KABALE REGIONAL OFFICE	782074733
JOHN DIISI	NFA KAMPALA	772410523
SYLVIA TUMUSIME	NFA KAMPALA	776325959
MARCO VAN DER LINDEN	WORLD BANK	
GALIMA STEPHEN	NFA KAMPALA	772925762
LESYA VERHEIJEN	WORLD BANK	
IAIN SHUKER	WORLD BANK	
ROSS HUGHES	WORLD BANK	
XAVIER MUGUMYA NYINDO	NFA	-
ISSA KATWESIGE	FSSD	782432048
KAPERER RICHARD	UWA	772688875
JOHN JUSHA TIBESIGWA	UWA/BMCA	772590018
MUTAREMWA ARCHIBALD	RUBANDA LG	789461379
VALENCE ARINEITWE	FSSD	774194705
DR. ALALO BIRUNGI	VETERINARY OFFICER, RUBANDA LG	-
TUMUKURATIRE. B	ASSIST. CAO RUBANDA LG	
KAKURU PHARES	BMCT	771604608
STEPHEN FRED OKIROR	MTWA	772931963
ALEX MUHWEEZI	FSSD/REDD+	772221499

2. Meeting held at Echuya Central Forest Reserve (12 June 2019)

NAME	ADDRESS
VALENCE ARINETWE	FSSD/MWE
ALEX MUHWEEZI	FSSD/MWE
SYLVIA TUMUSIIME	ETO/NFA
JOHN DIISI	NFA
ZOMEWA KENESI	KIWOCEDU
DR.HALUNA MUTABAZI	MECDA
TWEHEYO BAKER	ECOTA
AINEMBABAZI ISAAC	NATURE UGANDA
MUTABAZI MARK	NATURE UGANDA
RUBWIBWI	
NSABIMANA ZIEI KASECA	KADECA
TUMWESIGWE	ENETCOFA
NZAVUGA BENON	
TUMUSHIME EMMANUEL	MEFCPAA
ISSA KATWESIGYE	FSSD/MWE
HERBERT OULE	WORLD BANK
MARCO VAN DER LINDER	WORLD BANK

GALIMA STEPHEN	NFA
OKIROR STEPHEN FRED	MTWA
TUSHEMERIRWE SYLVIA	NFA
ZENEB MUSUIWE	NU
TUMWESIGYE SEZ	EMET COFA
AINEMBABAZI ISAAC	NU
NZAVUGA BENON	MECDA
DR. HALUNA MUTABAZI	MECDA
TUMUSHIME EMMAUEL	MEFCPAA

3. Kisoro District Hqtr (12 June 2019)

NAME	DESIGNATION	CONTACT
ALEX MUHWEEZI	FSSD/MWE	0772221499
VALANCE ARINEITWE	FSSD	0774194705
ROSS HUGHES	WORLDBANK	
AKANKWASA EUNICE	ENV OFFICER KISORO LG	0774243152
JOHN DIISI	NFA	0772 410523
JUSTUS RWAKARE		0772614907
RICHARD MUNEZERO	TOURISM OFFICER KISORO LG	0772932018
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STEPHEN GALIMA	NFA	0772925762
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4. *A Community Meeting with Nyabaremura Batwa Held at Nkuringo Cultural Centre, Kisoro On 2/03/2019 Building The Capacity of Indigenous Peoples to Actively Participate In Redd+ Processes In Uganda. (Lists missing from the report.)*

5. *list of participants for Second Consultation for the National REDD+ Strategy for Uganda, held on 17th – 18th May 2017 at Hotel Africana, Kampala*

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6. Views of targeted IPs and local communities on FIP Priorities and Projects; Opportunities and Challenges for IP participation in FIP design and implementation. Activity Report; Feb 2017.

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1. Fred Mugisha Lay Reader AICM Elias	1. Meburo Nshemereirwe
2. Habyarimana Chairman Batwa	2. Kifende
3. Benon Mudishiri	3. Promise Nyamihanda
4. Wilber Sabiti	4. Ngenerasi Baranga
5. Wilber Kaara	5. Nohiri Banegura
6. Rauben Kaberu	6. Nora Basigirenda
7. Bernard Ndishwye	7. Jacklini Kampire
8. Bosco Bavakura	8. Meburo Charity
9. Judith Maudi	9. Joseph Bazima
10. Verario Hop	10. John Sesavu
11. Mwerinde	11. Jackson Kikuka Shekabuhoro
12. Judith Nairobi	12. Hope Cleave
13. Ivas Nyamarwa	13. Benon Serugyendo
14. Hope Nyirakacaca	14. Fiona
15. Kedreth	15. John Kurikira
16. Midias Habyara	16. Jackson Boringo
17. Kedreth Kobusingye	17. Edinasi Zomukunda
18. Peace Ruzabera	
19. Joy	
20. Nyasande	
21. Annet Arinaitwe	
22. Jovia Nyirasaba	
23. Kazida	
24. Enosi	
25. Mani	
Rwamahano Village	Giyebe Village Murora
1. Kedress Nteziki	1. Vastah Nyirasagamba
2. Molly Bisara	2. Zenah Nyirabikari

3. Sylvia Banduse	3. Jackline Nyiramugisha
4. Hadi Nyiramasaka	4. Kezia Mahoro
5. Rebecca Bicenyeri	5. Allen Nyiradone
6. Jaribu Tigeta	6. Jeninah Nyirarukundo
7. Fayida duda	7. Anthony Nizeyimana
8. Kabara Bagurinzira	8. Amos Basenti
9. Prudence Kisasi	9. Bosco Karwemera
10. Yohana Biraro	10. John Yotamu
11. Nora Ngiragacaca	11. James Ntabugabumwe
12. James Ntifayo	12. Livi Hagumaimana
13. Happy Mukyenzimana	13. Daniel Ndimubakunzi
14. Ambrose Bayenda	14. Lohane Semahane
15. Paulina Batumanyaho	15. James Rukongi
16. Lydia Hope Nyiramahane	16. Jovia Nyamvura
17. Priska Nyirarurwiro	17. Peninah Maniriho
18. Filimoni Rwanyarare	18. Patience Karanzambye
19. Kaboroga Boy	19. Wari Muhawe
20. Robert Byarugaba	20. Annet Mahoro
Biizi and Rugeshi Villages	Birara Kanaba
1. Robert Bakaine	1. Francis Sembagare
2. John Byarugaba	2. Pasikazia Nyirakaromba
3. Kedress Ntawiha	3. Aireti Furaha
4. Medius Bakuza	4. Buderiya
5. Richard Zimbihire	5. Efrasi Gashanga
6. Elda Mahugire	6. Ntawenderundi
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8. Sylvia Nyirabayazana	8. Justine Tumuhimbise
9. Scovia Nyiransaba	9. Olivius Mugabirwe
10. Elkana Sebudunduri	10. Jolly Night
11. Violet Mukamuganga	11. Nyirakarasha
12. Mebra Ntamusobera	12. Rosette Tumuhimbise

13. Edward Gakombe 14. Annet Twinobusingye 15. Enock Byarugaba 16. Abel Mugabe	13. Jeska Burora 14. Yohana Bizagaja 15. Spina Karihungu 16. Zadoka Mawazi 17. Peter Bizimana 18. Gelida Senziga 19. Robert Twishuche 20. Richard Birihanza
Kitahurira Village	Kayonza Village
1. Wini Mugabirwe 2. Justus Kamara 3. Annah Mparana 4. Milton Tumwebaze 5. Scovia Akaasa 6. D. Kakuru 7. Godiriva Ntereye 8. Ariura	1. Prize Tindimwebwa 2. Iren Tindimwebwa 3. David Kajura 4. Mary Nshekanabo 5. Annet Kesande 6. Dan Bijutsya 7. Jolly Nyiranza 8. Banader Rutandekire 9. Trust Byamugisha 10. Isabera Kyomuhendo 11. Grace Tindimurekura
Bikuto Village	Karehe Village
1. Burni Moses 2. Grolia 3. Baseme Bibi 4. Catherine Tumwikirize 5. Allen Kembabazi 6. Lex Tambi 7. Gadise Nyabitaka 8. Jecent Mutume 9. Penninah Tumwine 10. Ledia Baseme	1. Florence 2. Jackline 3. Firida 4. Jolly 5. Shalon 6. Milton Baryakareba 7. Sifa Jackline 8. Nosi Nyamabayivu 9. Peninah 10. Confidence

11. Naume Nyakakye	11. Peterenia Kyitarinyeba
12. Jani Nyabahika	
13. Christine Nyinakuza	
14. Simon Maniho	
15. Justus Kamuhanda	
16. Gerald Arinaitwe	
17. Barnard Maguru	
18. Yamalenye	
19. Ishmeal Tumuhimbise	
20. Julius Tumwikirize	
21. Isaiah Wycliffe	
22. Medius Kyarisiima	

7. Report on the CSOs consultations on the Forest Investment Plan Program (FIP) for Uganda held on 20th January 2017 at Colline Hotel, Mukono; Participants list for the CSO consultation meeting on FIP priorities; Compiled by Environmental Alert, the Secretariat of the UFWG, February 2017.

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9. Northern region: West Nile and Northern region districts of Agago, Amuru, Gulu, Pader, Kitgum, Lamwo, Nwoya, Apac, Amolatar, Alebtong, Lira, Otuke, Oyam, Kole, Dokolo, Arua, Adjumani, Moyo, Nebbi, Yumbe, Koboko, Maracha, Zombo on 3rd – 7th February 2017 at Dove's nest hotel, Gulu town.

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12. Western Region: Bushenyi, Ibanda, Mbarara, Ntungamo, Lyantonde, Kiruhura, Isingiro, Buhweju, Rubirizi, Ruhinda, Sheema, Kabale, Kisoro, Kanungu, Rukungiri on 2 -17th Feb 2017 at Mbarara Town

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13. National workshop had around 30 participants on March 2017 at Kampala City Royale Hotel

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14. UGANDA FOREST INVESTMENT PROGRAMME; MINISTRY OF WATER AND ENVIRONMENT; REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR SOUTH-WESTERN UGANDA (WHITE HORSE INN, KABALE; Monday 29.08.2016)

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15. UGANDA FOREST INVESTMENT PROGRAMME; MINISTRY OF WATER AND ENVIRONMENT; REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR WEST-NILE REGION. (Desert Breeze Hotel, Arua Town (29th August 2016))

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16. UGANDA FOREST INVESTMENT PROGRAMME; MINISTRY OF WATER AND ENVIRONMENT; REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR WESTERN UGANDA; (Sandton Hotel Kasese, Wednesday 31.08.2016)

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Annex 8: Uganda Country Systems for Environmental and Social Risk Management and the ESF: Summary of Findings from the Gap Analysis

The Government of Uganda in close collaboration with The World Bank and other development partners undertook broad country systems assessment for management of environmental and social risks and impacts throughout projects. Although the assessment is broad and not specific to forestry and climate change related projects, it is noted that Uganda provides adequate policies and laws regarding management of environmental and social risks/impacts; but most of them are not backed by relevant legal provisions for ensuring effective implementation and enforcement. The area is also affected by inadequate capacity for ensuring that environmental and social issues are properly addressed, enforcement of conditions of approval, and penalizing non-compliance. This is evident in inadequate prioritization of environmental and social aspects in development area, with under-resourced institutions and inconsistent application of environmental and social safeguards. This is more so with projects that are not supported with international financing institutions/donors not conforming with international best practices.

The Ministry of Water and Environment and the Ministry of Tourism, Wildlife and Antiquities sectors have in place the following instruments to guide management of environmental and social impacts and risks: 1) MWE 2016 - Environment and Natural Resources Sub-Sector Gender Mainstreaming Strategy 2016-2021; ii) MWE 2018 - Environmental and Social Safeguards Policy; iii) MWE 2019 - Process Framework for REDD+; iv) MWE 2019 - Safeguards Information System (SIS); and v) MTWA - Tourism Development Master Plan 2014-2024.

To strengthen the management of environmental and social risks and impacts, in respect to the challenges identified in the Assessment of Uganda's Country systems report, this project has undertaken the following: i) instituted meaningful stakeholder consultation and developed a Stakeholder Engagement Plan (SEP); ii) joint inter-ministerial implementing team – strengthening coordination; iii) planning for strengthening capacity of the implementing entities including Local Government teams involved; iv) undertaking gender analysis and mainstreaming in the project including monitoring; v) Inclusion of ESMPs in all bidding documents and contracts;

Once specific projects are specified and definite environmental and social impact assessments are defined, ESAs will assess the legal and policy gaps especially the social aspects/impacts of each activity and recommend appropriate action plans. A detailed analysis of the alignment of ESF with Ugandan system was done, to which reference will be made in future project/activity specific E&S impact assessments.

A comprehensive analysis of gaps and full or partial alignment with WB ESF and good international practice is provided in Annex. The following summary highlights the most noteworthy gaps:

- Whilst Uganda's ESIA systems are relatively strong on biophysical considerations, they are weaker regarding assessment of social and related issues. Human security, health risks, and gender are not explicitly covered by NEA 2019. Also, the 1998 EIA regulations do not refer to risks associated with human security, escalation of conflict, violence, and crime. There are no provisions regarding the risks and impacts associated with project's suppliers, and no legal requirement for independent review of ESIA reports⁴⁷.
- There is no applicable legislation on a minimum wage.
- Aspects of the Employment Act contradict other Ugandan laws, by allowing for the employment of children aged 14 for "light work" under adult supervision, in contradiction to Section 7 of the Children (Amendment) Act (2016) which sets the employment age at 16.
- The legal framework also fails to provide penalties for the violation of laws prohibiting the employment of minors, contributing to high school drop-out rates, teenage pregnancies, and health issues as children find work on project sites.⁴⁸
- The Employment Act does not clearly define hazardous employment.
- There is inadequate capacity (personnel, skills, vehicles, equipment, offices, etc.) within National Environment Management Authority (NEMA) and Lead Agencies to guide, review and monitor ESAs/ Environmental and Social Management Plans (ESMPs) and conduct post-implementation audits;
- There is inadequate coordination between NEMA and key partner institutions, such as Ministry of Gender, Labour and Social Development (MoGLSD). The National Environment Act 2019 Sections 10 and 11 provide for coordination mechanisms between NEMA and Lead Agencies. This provision should be used to strengthen the weak institutional coordination and collaboration between and among the different environmental segments.
- Capacity and skills at local government levels are limited, especially among the District Environmental Officers (DEO) who are supposed to support NEMA regarding ESIA review and monitoring functions and also within Urban Councils (UC) and Lead Agencies.

⁴⁷ The proposed 2018 draft ESIA regulations rectify this

⁴⁸ Uganda Social Risk Management (SRM) Technical Paper (2019)

- The Uganda Association for Impact Assessment (UAIA), whilst established and active, does not have a strong-enough legal backing to regulate the full range of professionals that conduct ESIA's; and
- Most lead agencies have limited capacity regarding environmental and social (including health and gender) issues. Where there are Environmental Units, they are not taken seriously⁴⁹.

Recommendations: Addressing Key Gaps

In the short term, the following project-by-project arrangements are recommended:

- For each high/substantial risk project, the ToRs for the ESIA need to be very specific about the process to be followed (including meaningful stakeholder consultation) and the expected contents of the ESIA.
- For high/substantial risk projects, NEMA should establish and facilitate the work of a multi-agency “steering committee” to oversee the ESIA and support NEMA and partner Lead Agencies.
- Where applicable, ESMPs must be included as a key component of bidding documents and contracts. They must be specific about roles and responsibilities for implementing the ESMP, performance indicators, triggers for remedial actions and reporting arrangements.
- Where applicable, NEMA must insist that the ESIA-ESMP sequence leads to an effective Environmental and Social Management System (ESMS) which provides fine detail of roles, responsibilities, and actions that will ensure that social and environmental safeguards, as well as occupational health and safety requirements, are properly addressed on a day-to-day basis. An important aspect of the ESMS is the inclusion of “early warning triggers” to prevent a problem or non-compliance only being noticed when its already too late to prevent or manage the problem.
- Special arrangements need to be put in place to facilitate an independent expert review of the ESIA reports (and ESMPs) for high-risk projects.
- Special arrangements are needed to ensure post ESIA compliance and effectiveness monitoring.
- Develop mechanisms to improve institutional coordination (such as joint assessments monitoring) and collaboration with investors (such as compliance assistance programs).

Recommendations: Legislation changes and policy alignment⁵⁰

Revisit the proposed draft 2018 ESIA and subsequently audit regulations, with the main recommended improvements being:

- Further strengthen the balance between environmental, social, health and gender components. Much progress has been made but there is still room for further improvements.
- Include a clause enabling NEMA to outsource the review of ESIA reports to a third party (independent experts) at the cost of the proponent. This will immediately improve the quality of ESIA's as consultants will “up their game” knowing that their work will be properly scrutinized. It will also relieve pressure on NEMA.
- Include criteria for ESIA's to assess the extent to which projects contribute towards (or not) social-ecological resilience to climate change (or compile guidelines).
- Revise and/or update ESIA Guidelines to ensure that they clearly provide adequate coverage of environmental, social, health and safety aspects during the ESIA process, including but not limited to the following aspects:
 - gender, HIV and AIDS are properly mainstreamed.
 - risks to human security, escalation of conflict, violence and crime or violence, are adequately addressed.
 - risks and impacts associated with the project's primary suppliers, are adequately addressed.
 - Free, Prior and Informed Consent (FPIC) needs to be obtained prior to an activity being implemented
 - Cumulative impact assessment.
 - Harmonize the provisions of health and safety in the ESIA Regulations with those of the draft Health and Safety Regulations being developed by the Ministry of Gender Labour and Social Development.
- Include a mechanism for stakeholders (including ordinary citizens) to submit evidence of non-compliance to NEMA (e.g. electronically, even as a photograph with a GPS coordinate and time reference). Citizen involvement in post-implementation monitoring needs to be encouraged and facilitated. This is especially important given that government agencies have limited resources for monitoring.
- Develop regulations/ guidelines to operationalize Section 47 NEA 2019 on Strategic Environmental and Social Assessment.

⁴⁹ ibid

⁵⁰ See separate SRM report for recommendations relating to social aspects

With regards to other environmental legislation⁵¹:

- Revise (and rename) the National Environment (Conduct and Certification of Environment Practitioners) Regulations, 2003 to make it explicit that practitioners include environmental, social, health, gender and other types of practitioners.
- Support development/review of comprehensive regulations required to operationalize key provisions of the NEA 2019, such as air quality standards, waste management (including municipal, hazardous and electronic-wastes), cumulative impact assessment.

Recommendations: Capacity building⁵²

Building the capacity of institutions and the individuals within them is not time-bound, but this remains an immediate, ongoing and long-term priority. There have been many capacity building efforts by government and donors over the years, and these need to continue. Subject Matter specific trainings (for example on Health and Safety) should be delivered through internationally accredited institutions, firms or individuals. On weak enforcement, the following measures have been recommended: Strengthening Capacity of key Institutions, targeting Environmental and Safety Inspectors in NEMA and MGLSD; Training Environmental Protection Police on environmental enforcement monitoring and compliance assistance; Supporting decentralized environmental management at NEMA regional Offices and District Local Governments. This will also require provision of necessary monitoring equipment and tools.

The immediate priorities from an environmental perspective are as follows:

- Provide training to NEMA, District Local Governments, other ministries and agencies on compliance/enforcement, including refresher training on ESIA reviews, audits and monitoring.
- Provide training to ESIA practitioners to enable them to provide adequate analysis of all the relevant components of project impacts, such as environmental, social, health, gender, heritage and others, including adequate coverage of good international practice.
- NEMA to streamline set-up and operationalization of regional offices in order to improve assessment, approval, implementation and monitoring of development projects at lower levels.
- Support to government ministries and agencies undertaking implementation of development projects to develop and operationalize Environmental and Social Management Systems (ESMS) and learning from positive lessons registered by Uganda National Roads Authority.

⁵¹ See the Uganda Social Risk Management (SRM) report for recommendations for revising legislation linked to social aspects.

⁵² More comprehensive capacity building recommendations appear in Chapter 5

Annex 9: Actions taken by the GOU to Ensure Non-discrimination

Annex 9 highlight recent actions taken by the GOU to ensure non-discrimination. It also includes transcripts of relevant Guidelines and Circulars issued by the GOU. The Anti-Homosexuality Act was passed on May 26, 2023. The GOU has continued to ensure non-discrimination in all its projects and consistent with this, the GOU has taken the following measures: its projects and consistent with this, the GOU has taken the following measures:

Letter of Assurance (Sept 21, 2023) to all Ministries, Agencies, and local governments to implement mitigation measures on non-discrimination in WB-financed operations.

Budget execution circular (July 10, 2023) to all public servants to ensure that projects are in line with Ugandan Constitution which emphasizes equality of all persons without prejudice or discrimination.

Circular on provision of health services (June 5, 2023) that includes measures not to discriminate or stigmatize any individuals who seek health care for any reason.

Circular on provision of education (August 18, 2023) services to all people without discrimination and exclusion in the delivery of education services, programs, and projects.

Circular issued by the Director of Public Prosecutions (August 25, 2023) stating that prosecutors should seek guidance from ODPP before decision is made to charge persons.

Of particular importance is the Letter of Assurance of September 21, 2023, from the Permanent Secretary/Secretary to the Treasury on Uganda's Social Safeguard Policies following excerpts:

Following the World Bank Group's concern with Uganda's enactment of the Anti-Homosexuality Act, 2023 and as communicated in the budget Execution Circular 2023 of FY 2023/2024 on 18th July 2023, we guide:

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

The following transcripts of relevant Guidelines and Circular issued by the GOU are included in this annex: Letter of Assurance; Circular on provision of health services; Circular on provision of education; Circular issued by the Director of Public Prosecutions, and relevant excerpts from the Circular on Budget Execution.



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ALD 141/259/01 TC

21st September 2023

All Accounting Officers

All Ministries, Departments and Agencies

All Local Governments



UGANDA'S SOCIAL SAFEGUARD POLICIES

I am writing in reference to the above subject. Further reference is made to the Anti-Homosexuality Act, 2023 (AHA) that came into force on 30th May 2023.

Following the World Bank Group's concern with Uganda's enactment of the Anti-Homosexuality Act, 2023 and as communicated in the Budget Execution Circular of FY 2023/2024 on 18th July 2023, we guide that;

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

Mission

"To formulate sound economic policies, maximize revenue mobilization, ensure efficient allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development"

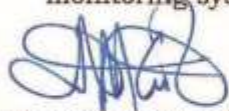
Specific Measures for High Risk Sectors

Health

- The Ministry of Health issued a circular on August 8, 2023 that guarantees access to health care services for all and prohibits the discrimination or stigmatization of any individual who seeks health care services on any grounds.
- The Ministry of Health will widely disseminate and socialize health sector guidelines for the effective implementation of the circular.
- Implementing entities should strengthen grievance redress mechanisms, and third-party monitoring systems in collaboration with national and international partners.

Education

- The Permanent Secretary in the Ministry of Education and Sports on 18th August 2023 issued a circular stating that the Ministry of Education and Sports does not permit any form of discrimination against any persons in the delivery of education services, programs and projects.
- In light of that circular, the Ministry should ensure that there is no discrimination (including any form of bullying) against teachers and students on any grounds.
- The Ministry of Education and Sports will prepare project specific guidelines to address non-discrimination.
- Implementing entities should strengthen grievance redress mechanisms, including an independent hotline and third-party monitoring systems where necessary.



Ramathan Ggoobi

PERMANENT SECRETARY/SECRETARY TO THE TREASURY

Rt. Hon. Prime Minister, Office of the Prime Minister

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender, Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

The Solicitor General, Ministry of Justice and Constitutional Affairs

The Permanent Secretary, Ministry of Health

The Permanent Secretary, Ministry of Education and Sports

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BPD 86/179/01



Ministry of Finance, Planning &
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10th July, 2023

All Accounting Officers (Central Government, Missions Abroad, and Local Governments)

All Chief Executive Officers of State-Owned Enterprises and Public Corporations

THE BUDGET EXECUTION CIRCULAR (BEC) FOR FINANCIAL YEAR 2023/2024

A. INTRODUCTION

1. This Circular is issued in fulfilment of Article 155 (1) of the Constitution, and Sections 13 (5) and 14 (1) of the Public Finance Management Act, 2015 (Amended).
2. The theme for the FY 2023/2024 Budget has been retained as: ***"Full Monetization of the Ugandan Economy through Commercial Agriculture, Industrialization, Expanding and Broadening Services, Digital Transformation and Market Access"***. The Budget for FY 2023/2024 was approved to address the strategic mission of facilitating more Ugandans to join the money economy.
3. The purpose of this Circular is to communicate the following:
 - i. The FY 2023/2024 Annual Cash Flow Plan (**Annex 1**);
 - ii. The Policy, Operational and Administrative Guidelines for execution of the Budget in FY 2023/2024.
4. As you execute the Budget for FY 2023/2024, I urge all Accounting Officers to ensure that all program activities contribute towards addressing the following objectives:
 - i. Completion of public investments with higher multiplier effects on attainment of NDP III and the NRM 2021-2026 Manifesto;
 - ii. Full-scale implementation of the Parish Development Model (PDM);
 - iii. Enhanced revenue mobilization and collection; and



Minister

"To formulate sound economic policies, strengthen revenue mobilization, ensure efficient allocation and accountability for public resources so as to achieve the most rapid and sustainable economic growth and development."



- iv. Ensuring efficiency and effectiveness of Government through rationalization of public expenditure.
5. The key priorities to achieve the above objectives are detailed in the approved Budget for FY 2023/2024. For ease of reference, please follow the link <https://www.budget.finance.go.ug> to access the following key documents, among others:
 - i. The Budget Speech for FY 2023/2024;
 - ii. Approved Estimates of Revenue and Expenditure Volume I (Central Government Votes and Missions Abroad);
 - iii. Approved Estimates of Revenue and Expenditure Volume II (Local Governments); and
 - iv. Approved Estimates of Revenue and Expenditure Volume III for the State-Owned Enterprises and Public Corporations.

B. THE ANNUAL CASH FLOW PLAN FOR FY 2023/2024

6. In accordance with Section 36 (b) of the PFM Act 2015 (Amended), the Annual Cash Flow Plan for FY 2023/2024 has been generated off the Program Budgeting System (PBS) based on the quarterly projections in your respective Vote work plans for FY 2023/2024.
7. The purpose of the Cash Flow Plan is to guide and ensure that Government maintains sufficient liquidity to be able to sustain and make timely payments to meet service delivery requirements by aligning Vote cash inflows and outflows to your respective Program Implementation Action Plans (PIAPs).
8. In view of the above, and in line with Sections 15 and 21 (i) of the PFM Act, 2015 (Amended), all Accounting Officers are urged NOT to overcommit the vote budgets beyond the Annual Cash Flow Plan issued in this Circular. Furthermore, you should submit expenditure commitments, in line with the PIAPs, indicating the actual forecast commitments and the cash position of your respective Votes as per Section 16 (i) of the PFMA, 2015 (Amended) to inform decision-making on the subsequent quarterly expenditure releases.



C. POLICY DIRECTIVES, ADMINISTRATIVE AND OPERATIONAL GUIDELINES FOR IMPLEMENTATION OF THE BUDGET FOR FY 2023/2024

Policy Directives

9. The FY 2023/2024 Budget allocations directed resources to program areas meant for enhanced socio-economic transformation for all Ugandans through job and wealth creation, and increasing household incomes, by targeting the 39% of Ugandans still in the non-money economy. All Accounting Officers are urged to adhere to the following policy directives that guided the preparation of the Budget for FY 2023/24:
- i. Fund key Government priorities to increase the momentum in socio-economic transformation, for example: the standard-gauge railway, the meter-gauge railway, solar-powered irrigation, PDM, *Emyooga*, road maintenance, coffee value addition, vaccines and pharmaceutical manufacturing etc.;
 - ii. Support development initiatives that drive private sector growth;
 - iii. Implement only ongoing projects and other multi-year commitments as approved in the Budget;
 - iv. Halt new non-concessional projects, except those already provided for in the fiscal framework, or those with no direct or indirect claim on the Consolidated Fund;
 - v. Hold back any recruitment plans in FY 2023/2024 except on a replacement basis where the resources are already available;
 - vi. No travel abroad, except for critical positions of the Executive, Legislature, Judiciary, security, diplomatic relations and resource mobilization; and
 - vii. **NO** purchase of new vehicles except hospital ambulances, tailored vehicles for medical supplies/distribution, and for agricultural extension services, security and revenue mobilization.

Non-Discrimination

10. Accounting Officers should ensure that all projects (whether Government of Uganda or externally funded) are implemented within the provisions of Article 21 (1) and (2) of the Constitution and Section 13 (1) (e) (i-ii) of the Public Finance Management Act, 2015 (Amended). This emphasizes equality of all persons in access to all opportunities and benefits presented by the above projects, without prejudice and discrimination on the ground of sex, race,



color, ethnic origin, tribe, birth, creed or religion, social or economic standing, political opinion or disability.

Advertising by Ministries, Agencies and Local Governments

11. In his letter of Ref. No. PO/3 dated 6th March 2023, H.E. The President directed that in FY 2023/2024, **“all Government advertising must be through the Uganda Broadcasting Corporation. Any Accounting Officer who deviates from this will be sanctioned including dismissal”**. Print media advertising should be done through the New Vision. I therefore urge all Accounting Officers to strictly adhere to this directive.

Contracting in Ugandan Shillings versus Foreign Currencies

12. I have received numerous requests from a number of Ministries, Departments and Agencies (MDAs) to undertake contracts in foreign currency, especially in United States Dollars and Euros. In line with the fiscal and monetary policies agreed with Bank of Uganda, I wish to reiterate this Ministry's position that no procurements should be undertaken in foreign currency as previously communicated in FY 2016/17, FY 2017/18 and FY 2018/19. Contracting in the local currency, is meant to preserve the sanctity and value of the Shilling since the budget is appropriated in the local currency which is easily convertible.
13. Therefore, this is to guide all Accounting Officers as follows:
 - i. That all contracts for works, goods and services shall be awarded in Ugandan Shillings to hedge against cost overruns due to global forex rates fluctuations that impact on the stability of the Shilling; and
 - ii. All contracts, including those that follow international competitive bidding procedures, shall be quoted in Ugandan Shillings. The only exemption will be where it is clearly expressed in the financing agreements with Development Partners to use other currencies in the bidding process, if necessary. This should be strictly the exception and not the norm. I request the Honorable Attorney General's chambers to take note and enforce this guideline while approving agreements.





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IN ANY CORRESPONDENCE ON



Ministry of Health
 P. O. Box 7272
 Plot 6, Lourdel Road
 KAMPALA
 UGANDA

THIS SUBJECT PLEASE QUOTE NO. **ADM:180/01**

THE REPUBLIC OF UGANDA

5th June 2023

Circular

All Hospital Directors, National and Regional Referral Hospitals
 All District Health Officers
 All Medical Superintendents
 All Health Facility In-charges
 Executive Directors of Implementing Partners
 Executive Directors of Faith Based Medical Bureaus
 The Executive Director Uganda Healthcare Federation

PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

The constitution of the republic of Uganda recognises that health is a fundamental right and guarantees access to health care services for all. The Ministry of Health is mandated to provide Preventive, Promotive, Curative and Rehabilitative Health Services to all people in Uganda in their diversity **without any form of discrimination**. Furthermore, all services should be provided in a manner that ensures **Safety, Privacy and Confidentiality to all clients that seek health services in all facilities, both Public and Private.**

The Ministry of Health therefore reminds all health care workers and stakeholders about the above National commitments, and reiterates the following:

- **Not to deny services to ANY client who present themselves for services.**
- **Not to discriminate or stigmatize any individual who seeks health care services, for any reason – gender, religion, tribe, economic status, social status or sexual orientation.**
- **Patient rights and ethical values – Confidentiality, Privacy, Patient Safety as stipulated in the Patient's Charter should be upheld each time a patient seeks health care services at your facility**

Your cooperation in this matter is of great importance to improving access to service delivery for all our people.



Dr. Henry G. Mwebesa
DIRECTOR GENERAL HEALTH SERVICES

cc. Hon. Minister of Health
Hon. Minister of State for Health (GD)
Hon. Minister of State for Health (PHC)
Permanent Secretary, Ministry of Health
All UN Agencies
PEPFAR Coordinator
Head Country Team Global Fund, Geneva
Country Manager, World Bank
Country Director – CDC, USAID, DOD
Director General, Uganda AIDS Commission
Directors, Ministry of Health
All Chief Administrative Officers
Registrars, Health Professional Councils



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In any correspondence on
 this subject please quote: EPD 191/336/03



THE REPUBLIC OF UGANDA

Ministry of Education and Sports
 Embassy House
 P.O. Box 7063
 E-Mail: permassec@education.go.ug
 Website: www.education.go.ug
 Kampala, Uganda

18th August 2023

All Heads of Education Institutions

PROVISION OF EDUCATION SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

The Government of Uganda recognizes the Constitutional social objective to ensure all Ugandans enjoy rights, opportunities and access to education. Under our education objectives, the State is obligated to promote free and compulsory basic education, afford every citizen equal opportunity to attain the highest educational standard possible, and facilitate individuals, religious bodies and other non-governmental organizations to found and operate educational institutions if they comply with the general educational policy of the country and maintain national standards.

The Ministry is implementing the Gender in Education Policy which provides for equitable access to education for all without discrimination. To operationalize the Policy a number of policy strategies and guidelines exist including the National Strategy of Elimination of Violence Against Children, the Life Skills Toolkit, manuals on growth and sexual maturation. In addition, the Ministry has incorporated Sexuality Education into the curriculum to ensure age-appropriate information to enable young people to maneuver through the different challenges of life.

The purpose of this Circular, therefore, is to reiterate Article 21 (1) of our constitution with states that "All persons are equal before and under the law in all spheres of political, economic, social and cultural life and in every other respect and shall enjoy equal protection of the law". The Ministry does not condone any forms of discrimination and exclusion of any persons, in delivery of education services, programs and projects.

You are, therefore, called upon to observe and ensure the above standards in the delivery of education services, programmes and projects.

Ketty Lamaro
PERMANENT SECRETARY

Cc: First Lady and Hon Minister of Education and Sports
 Ministers of State, Education and Sports

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THE REPUBLIC OF UGANDA

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Our Ref: ADM 12/01
Your Ref:

Date: 25th August, 2023

CIRCULAR NO.18/2023

All Prosecutors,
Office of the Director of Public Prosecutions.

RE: MANAGEMENT OF CASES WITH CHARGES PREFERRED UNDER THE ANTI-HOMOSEXUALITY ACT 2023.

The Anti-Homosexuality Act (AHA) came into force on 30th May 2023. It has come to the attention of management that a number of charges of Homosexuality and Aggravated Homosexuality are now being preferred by some officers without internalizing some crucial aspects of the act.

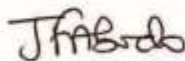
It is important to note that the AHA only criminalises offences where a sexual act has been performed. The term "sexual act" is defined under Section 1 of the Act.

It is also important to note that Sections 2 (5) and 3 (5) of the AHA provide that "*for the avoidance of doubt, a person who is alleged or suspected of being a homosexual, who has not committed a sexual act with another person of the same sex, does not commit the offence of homosexuality under this section*".

Officers are therefore advised to peruse files with offences under the AHA cautiously while taking into account the abovementioned provisions.

You are hereby directed to ensure that all files with charges preferred under the AHA should first be submitted to Headquarters with a written legal opinion for further guidance before a decision to charge is made.

Management will soon organize sensitization meetings for all officers on the key aspects of the AHA.



Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS

ANNEX 10: Enhanced Implementation Support and Monitoring of Non-Discrimination

The World Bank and IFC will hire an international and credible entity (firm, agency) with a strong knowledge of the Ugandan context and a track record of enhanced third-party implementation support and performance monitoring to undertake the tasks described in this section for all projects presently being implemented in the Uganda portfolio. The entity is expected to work with NGO/CSOs and country-based development partners. The Enhanced Implementation Support and Monitoring (EISM) will primarily focus on supporting project teams to implement mitigation measures to address grievances and concerns from beneficiaries, communities, and workers relating to discrimination from project benefits.

The objectives of the Enhanced Implementation Support and Monitoring include:

- Assisting project teams to enhance existing project-level grievance mechanisms and develop and operate an independent mechanism that would identify, manage, and monitor cases of discrimination.
- Assisting the WB in strengthening the capacity of Project Implementation Units (PIUs), workers, and contractors, subcontractors, and service providers.
- Ensuring contracts, codes of conduct, hiring procedures, whistle-blower protection protocols, and other measures, as needed, are in place to allow remediation of cases of discrimination.
- Develop a strong data management system and process that secures personal data and information in a manner that is safe, ethical, and confidential.
- Where cases of discrimination are reported through the above mechanism, the EISM will report the grievances to the Bank, propose appropriate remediation, and follow up on agreed actions to resolve the case.
- Support the WB/IFC to monitor the efficacy of the agreed measures to mitigate the impacts on WB/IFC financed operations.

Figure 2 illustrates the enhanced implementation support and monitoring steps. Figure 3 contains the enhanced implementation support and monitoring process. Figure 4 contains the Complaint Management for discrimination of vulnerable or marginalized individuals.

SCOPE OF WORK AND ACTIVITIES

To provide enhanced implementation and monitoring support to the World Bank/IFC operations in Uganda the EISM will:

Establish an effective and confidential mechanism to receive, manage, refer, and monitor grievances related to discrimination across the WB/IFC portfolio.

To do so the EISM will:

- Enhance existing project-level grievance redress mechanisms to safely, ethically, and confidentially receive cases related to discrimination on World Bank/IFC financed operations and refer them to an appropriate grievance handling mechanism.
- Design and operate a mechanism for receiving grievances related to discrimination on WB/IFC financed operations (including from project level grievance mechanisms noted above).
- Establish a hotline or an alternative complaint mechanism, for individuals to lodge complaints of discrimination on WB/IFC financed projects or voice their concerns without fear of reprisal. The EISM is an alternative to lodging complaints through a GoU-led project-level GRMs.

Outreach and sensitization to project beneficiaries and communities involved with the World Bank/IFC Portfolios

Activities related to Outreach and sensitization to project beneficiaries and communities include:

- Assist the WB/IFC to prepare and implement a plan to disseminate information about the support provided by the entity including support to existent GRMs.
- community/beneficiary information materials on their rights within the Constitution of Uganda and World Bank/IFC policies informed by various official circulars issued by the GoU on non-discrimination and World Bank/IFC policies.
- Develop and implement a methodology to conduct periodic outreach to beneficiaries/communities to hold consultations on non-discrimination to identify issues and risks in a safe, ethical, and confidential manner.

Capacity strengthening and technical support.

Activities related to capacity strengthening and technical support include:

- Support to the WB/IFC on training of government staff and private sector consultants/clients, workers, and contractors on non-discrimination by developing training materials, identifying venues, providing trainers, etc.
- Support to the WB/IFC with training project level GRMs on non-discrimination in World Bank and IFC financed Projects by developing training materials, identifying venues, providing trainers, etc.
- Preparing training modules for call center operators, data management personnel, and community outreach personnel on appropriate handling of sensitive information.
- Providing technical support to the GoU for the development of Guidelines on Non-discrimination of Workers.

Monitoring and Evaluation

Activities related to monitoring and evaluation include:

- Developing a system to regularly monitor WB/IFC projects for 1) implementation of agreed GoU actions to mitigate the risk of discrimination on WB/ IFC projects, 2) incidents of discrimination on World WB/IFC financed projects.
- Regularly evaluating the effectiveness of mitigation measures to determine whether and how well the mitigation measures are functioning to improve WB/IFC awareness of incidents of discrimination on WB/IFC financed operations.
- Recommending and supporting the implementation of adjustments to mitigation measures based on regular evaluations and their impact.

Figure 2: Enhanced Implementation Support and Monitoring Steps

Enhanced Implementation Support and Monitoring	
Act as a key first step in the referral process from project-level GRMs	Designed specifically to handle complaints restricted to WB/IFC projects
Step 1	Receives and document complaints of discrimination in accessing WB/IFC projects' benefits, services, and opportunities,
Step 2	Develops specific security protocols to ensure that communications are safe, ethical, and confidential.
Step 3	Establishes a data management system on an international server guaranteed by the provider as safe and secure encryption and privacy.
Step 4	Implements a data privacy and protection policy to include confidentiality clauses to be signed by all personnel entrusted with managing referrals or referral-related information.
Step 5	Handles complaints in a confidential, anonymous, and non-judgmental manner which is sensitive to local context and in local languages
Step 6	Provides detailed monthly reports of complaints received to the WB/IFC
Step 7	Provides ad hoc incident reports of all allegations to WB/IFC within 48 hours of receipt
Step 8	Reports grievances to the WB/IFC, proposes appropriate remediation, and follows up on agreed actions to resolve the case.
Step 9	Maps available services for discrimination of vulnerable or marginalized individuals including counselling, legal services, protection, and other services,
Step 10	Refers individuals to the appropriate local services or organizations as needed
Step 11	Regularly evaluates the effectiveness of mitigation measures to determine whether and how well the mitigation measures are functioning.
Step 12	Recommends and supports the implementation of adjustments to mitigation measures based on regular evaluations and their impact.

ROLES AND RESPONSIBILITIES

The GOU and its PIUs remain responsible for the implementation of all project activities including mitigation measures supported by the EISM. The enhanced implementation and monitoring support mandate is specifically focused on:

1. Supporting the WB/IFC to ensure the agreed measures on non-discrimination in the portfolio are implemented fully, ethically, safely, and to an appropriate standard of quality; and
2. Supporting the WB/IFC to enhance our awareness of cases of discrimination across the WB/IFC portfolio.

The GOU will facilitate the work of the entity and collaborate as needed on all activities requiring their direct involvement, such as outreach and sensitization activities, capacity strengthening and technical support as well as the monitoring and evaluation of mitigation measures. The GoU will also ensure that the work under the EISM can be undertaken safely in accordance with existing circulars and their dissemination.

Figure 3: Description of Enhanced Implementation Support and Monitoring (EISM) Process

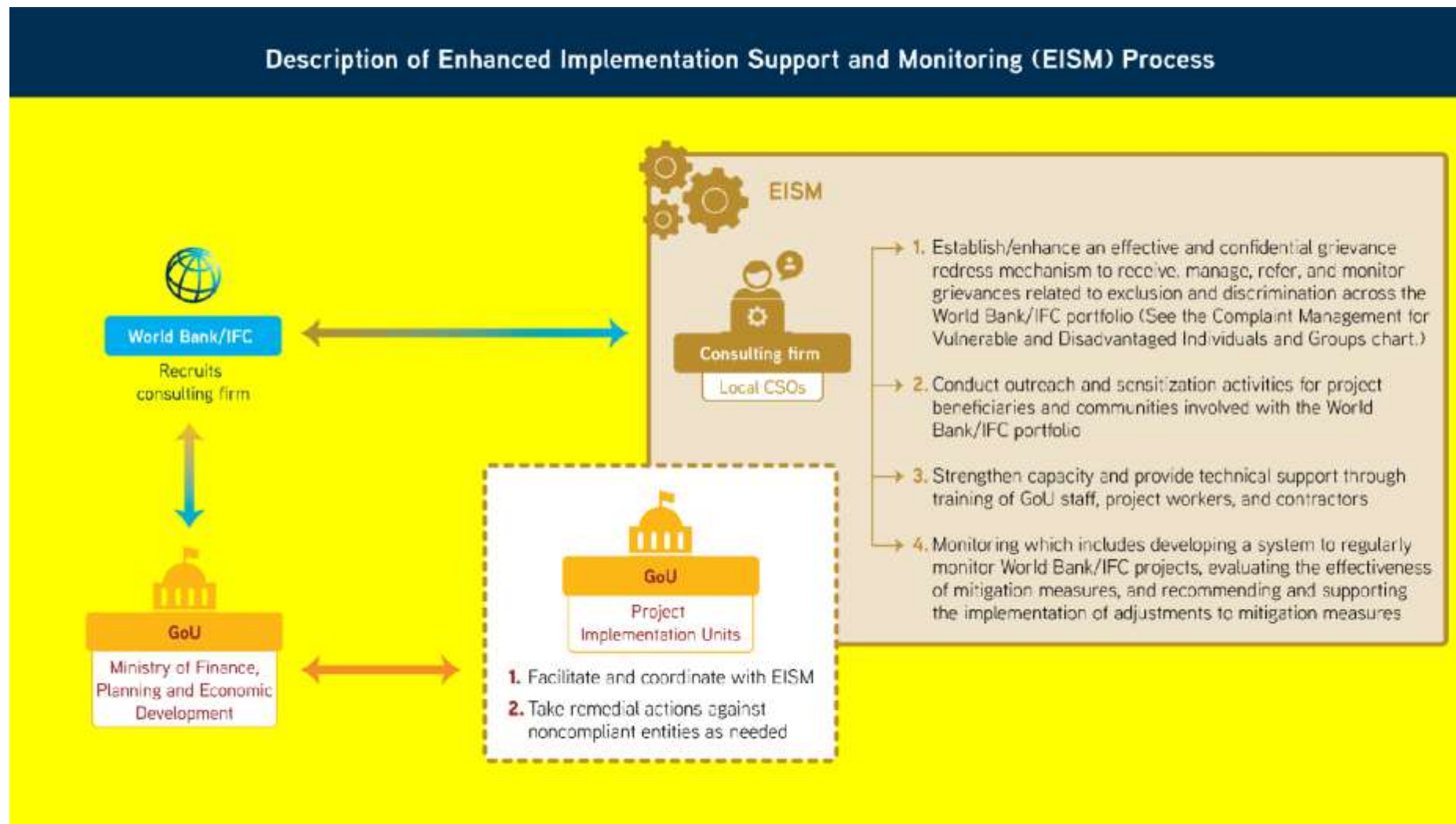
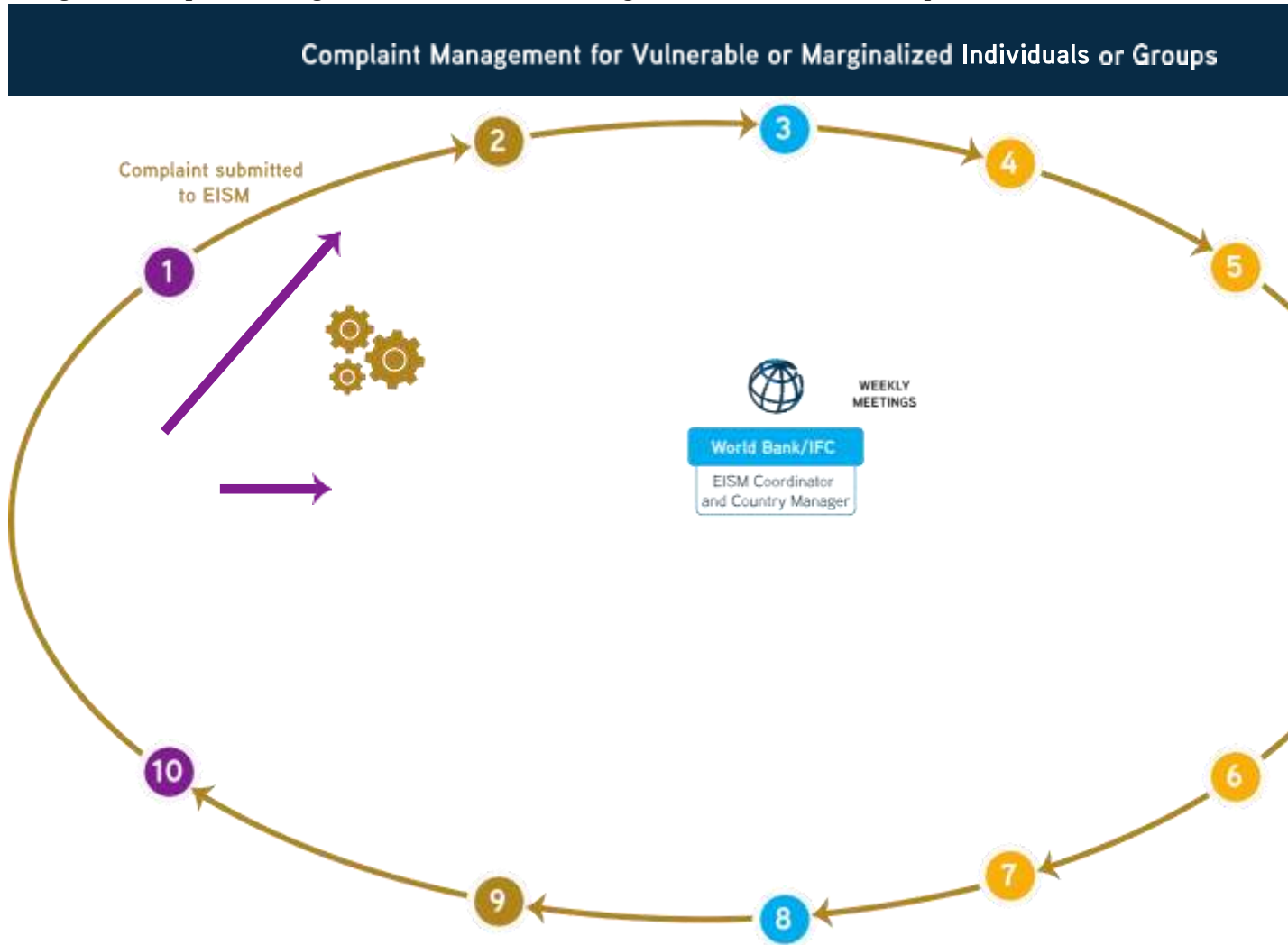


Figure 4: Complaint Management for Vulnerable or Marginalized Individuals or Groups



Note: For the IFC, the complaint management process is similar, but instead of government, it is done through private sector borrowers.

ANNEX 11: Guidelines For Implementing Mitigation Measures To Address Exclusion and Discrimination - Related Risk

In July 2024, the Environmental and Social documentation and its annexes including ESMF, VLD guideline, SEPs, POMS etc. for all ongoing projects in the Ugandan portfolio were updated to include specific measures to mitigate the risk of discrimination against or exclusion of any affected individuals and groups in providing or receiving benefits in World Bank-financed projects and programs in Uganda. The ESMF for IFPA-CD includes such mitigation measures in various sections as appropriate.

The measures involve ensuring access to a project-level Grievance Redress Mechanism (GRM), establishing a dedicated hotline for receiving exclusion and discrimination-related complaints, requiring contract clauses and codes of conduct on nondiscrimination, and training project workers and contractors and community outreach activities on Inclusion and Nondiscrimination (IND).

Through a competitive process, the World Bank and International Finance Corporation (IFC) have contracted an international firm SREO Consulting Ltd. (SREO) to support the implementation of the mitigation measures. SREO will partner with local Civil Society Organizations (CSOs) and/or individuals with expertise and experience in inclusion and nondiscrimination in Uganda.

The World Bank will support the Ugandan government in the rollout of the mitigation measures through Enhanced Implementation Support and Monitoring (EISM), targeting PIUs/PCUs including contractors, subcontractors, frontline service providers, and local stakeholders, as required and set out in the environmental and social documentation.

This annex presents guidelines on how to implement the mitigation measures, including main steps and the roles and responsibilities of task teams, the Ugandan government, PIUs/PISTs, the World Bank, CSOs, SREO, and other stakeholders.

Steps for Implementing Mitigation Measures

Depending on the status of a particular project, the following steps may or may not be followed sequentially. One or more of the steps might not be relevant to a project, or it might be possible to accomplish two or more steps at the same time.

SREO and the relevant World Bank task team leader, social development specialist, and PIU/PIST should discuss and agree on the relevance and sequence of steps prior to their implementation.

1. Assess the Status of the Project

The approach, type, and level of effort will vary depending on a project's implementation status:

- **Ongoing projects.** Ongoing projects require retrofitting to include mitigation measures. Such projects should be considered high priority for monitoring because of the existing risk of discrimination.
- **Early-stage projects.** Projects at an early stage of implementation require retrofitting to include mitigation measures, but the need for monitoring is not as urgent as for ongoing projects. The priority level for early-stage projects will depend on the status of activities on the ground and whether or not a PIU and service providers are in place.
- **Closing and closed projects.** Projects that have closed since June 2023 or that will be closing in the next six months require a due diligence review to assess if there are any outstanding complaints or issues related to the discrimination of vulnerable or marginalized individuals or groups and if any remedial measures are needed.
The results of the due diligence should be incorporated into the standard environmental and social closure review unless it has been completed already. No further action is needed.
- **Pipeline projects.** A project that has not yet begun implementation provides the opportunity to integrate exclusion and discrimination related risk mitigation measures and monitoring into its design.

PIMPLUS as a pipeline project has presented such an opportunity to integrate these mitigation measures and monitoring into its design.

2. Enhance Existing Project-Level Grievance Redress Mechanisms and Establish a Hotline

SREO will distribute a questionnaire to World Bank and PIU/PIST social development specialists to assess existing project-level GRMs. Based on a review of responses, it will recommend actions that the PIU/PIST or service providers can take to improve the GRMs.

With the support of SREO, the PIU/PIST and the social development specialist will revise the project GRMs to include effective, safe, ethical, and confidential referral pathways, ensuring that individuals or groups feel secure reporting incidents and that grievances are addressed quickly, efficiently, and appropriately.

SREO will provide training to GRM staff so they can recognize social exclusion and discrimination-related complaints and route them to the EISM. The enhanced process will enable the PIU/PIST to identify complaints of exclusion or discrimination sent to the GRM and forward them to SREO within 48 hours of receipt.

Hotline on Discrimination and Exclusion

SREO has designed and operates a hotline (0800 333125) as an alternative way to receive complaints about the exclusion or discrimination of vulnerable or marginalized individuals or groups related to accessing benefits, services, or opportunities in World Bank/IFC operations. The design of the hotline will allow it to:

- Receive complaints in a confidential, anonymous, and nonjudgmental manner that is sensitive to local context and available in local languages.
- Compile detailed monthly reports of complaints.
- Advise complainants on remedial actions.
- Map available services for vulnerable or marginalized individuals or groups, including counseling, legal services, and protection.
- Refer individuals to appropriate local services or organizations.
- Implement a data privacy and protection policy that includes confidentiality clauses which must be signed by all personnel handling referrals
- Establish a data management system that guarantees safety through secure encryption and privacy protocols.
- Develop specific security protocols to ensure communications are safe, ethical, and confidential.
- Ensure all grievance mechanisms have appropriate whistle-blower protection protocols in place that enable safe reporting.

World Bank's Grievance Redress Service. In addition to the enhanced project-level GRM and the dedicated hotline, the World Bank has developed a specific window under its existing Grievance Redress Service (GRS) to manage complaints related to any World Bank project globally. A protocol has been developed to process all complaints related to exclusion or discrimination in the Uganda portfolio.

3. Conduct Outreach and Sensitization Activities

The World Bank team, PIUs/PISTs, and service providers should contact SREO to assist with:

- The preparation and implementation of a plan to disseminate information about existing GRMs and the dedicated hotline.
- The development and implementation of outreach activities on nondiscrimination delivered to beneficiaries and communities in a safe, ethical, and confidential manner.

4. Strengthen Capacity and Deliver Technical Support

The World Bank team, PIUs/PISTs/PCUs, and service providers should contact SREO to assist with:

- Training workers, contractors, and project-level GRM staff on nondiscrimination and inclusion, including developing training materials, identifying venues, and hiring trainers.
- Delivering any other needed technical support related to the implementation of the mitigation measures.

SREO will prepare training modules for call center operators, data management personnel, and community outreach personnel on the appropriate handling of sensitive information given the exclusion and discrimination context.

5. Conduct Monitoring and Evaluation

Task team leaders, social development specialists, PIUs/PISTs, and service providers should contact SREO to:

- Support the monthly and quarterly monitoring and evaluation of the implementation of agreed measures and actions to mitigate the risk of exclusion and discrimination and to reduce incidents of due to the same.
- Provide comments on regular evaluations of the effectiveness of mitigation measures.
- Offer feedback on recommendations and support the implementation of adjustments to mitigation measures based on their effectiveness.

6. Take Remedial Action

When a discrimination or exclusion complaint is reported to the dedicated hotline, the following process should be followed:

- SREO will report the grievance to the World Bank, propose appropriate remedial actions, and follow up on agreed actions to resolve the case.
- The World Bank's EISM coordinator and country manager will assess the complaint and then forward it to the Ministry of Finance, Planning and Economic Development. If the Ministry does not object to the World Bank's recommendations, they will be forwarded to the PIU/PIST/PCU.
- The PIU/PIST is responsible for implementing the agreed measures, which might include training and retraining, hiring, offering financial compensation, providing service referrals, taking disciplinary actions, and providing access to project services and benefits.

Roles and responsibilities for the Implementation of Mitigation Measures

The different steps presented are guidance on the how to do and the sequencing for the implementation of the mitigation measures bearing in mind that the sequencing can vary from one project to another, and activities done in parallel in some instances. Each Step identifies the roles and responsibilities of the GOU, PIU/PIST, WBG, CSOs and SREO. The roles and responsibilities are summarized in this section in the box below.

This section also provides more specific information on roles and responsibilities to implement the mitigation measures of the EISM firm RSEO and the PIUs/PIST. The mitigations measures identified in the Projects' environment and social instruments will be implemented by the GOU through the PIU/PIST with the support of the EISM firm RSEO hired by the World Bank with NGO/CSOs and country-based development partners in implementing these mitigation measures. SREO's specific responsibilities include:

- Helping project teams improve existing project-level grievance redress mechanisms, and developing and operating an independent mechanism to identify, manage, and monitor cases of discrimination.
- Developing a robust data management system and process that secures personal data and information safely, ethically, and confidentially.
- Working with the World Bank to strengthen the capacity of PIUs/PISTs, workers, contractors, subcontractors, and service providers.
- Ensuring that contracts, codes of conduct, hiring procedures, whistle-blower protections, and all other needed protocols are in place to remediate cases of discrimination.
- Supporting the World Bank in monitoring the efficacy of the agreed mitigation measures.
- Reporting complaints of discrimination to the World Bank, proposing appropriate remedial actions, and following up on agreed actions to resolve cases.

With the support of SREO, PIUs/PISTs are responsible for implementing mitigation measures as described in the environmental and social instruments, including:

- Developing training, sensitization, information, educational, and communication materials on the principle of nondiscrimination of individuals or groups who are vulnerable or marginalized.
- Conducting consultations on nondiscrimination with targeted external stakeholders, including NGOs, CSOs, local governments, and other stakeholders, as appropriate.
- Integrating clauses on nondiscrimination and codes of conduct on nondiscrimination into all project contracts, which must be signed by all contractors, subcontractors, and service provider staff.
- Reviewing all relevant policy and protocol documents, including those for human resources and whistle-blower protections.
- Facilitating the monitoring of all measures to ensure their implementation, that all reported incidents are shared with the World Bank, and that they are addressed promptly.

Box 1: Roles and Responsibilities for the Implementation of Mitigation Measures
Government of Uganda

- Facilitating the implementation of mitigation measures under the leadership of the Ministry of Finance, Planning and Economic Development and through PIUs.
- Following up on reported cases of discrimination in coordination with the World Bank EISM coordinator and country manager.
- Achieving agreement with the World Bank on remedial actions and forwarding recommendations to PIUs.

Project Implementation Units/Project Implementation Support Teams

- Reviewing and enhancing project-level GRMs.
- Ensuring the implementation of mitigation measures.
- Facilitating capacity strengthening and community outreach efforts.
- Implementing agreed-on remedial actions and measures.

World Bank (task team leaders, social development specialists, and the EISM Coordinator)

- Supporting capacity strengthening and training sessions.
- Facilitating communication between SREO and the Ugandan government, SREO and task team leaders, and SREO and PIUs/PISTs.
- Overseeing the remediation of reported cases, makes recommendations, and follows up to ensure their resolution.

Civil Society Organizations

- Hired by the EISM firm (SREO) to coordinate the monitoring of activities in Uganda.
- Participate in capacity-building and outreach activities to disseminate information about the hotline and the GRS to relevant populations.
- Receive and manage referrals for issues outside the EISM's scope.

SREO Consulting Ltd.

- Establishes a dedicated hotline and assists PIUs/PISTs in improving existing GRMs.
- Conducts outreach and sensitization activities.
- Provides capacity-strengthening and technical support to PIUs/PISTs.

Monitors and evaluates discrimination complaints.