

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

**Environmental and Social Management  
Framework**

**(updated for Restructuring)**

**October 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 or Project) Project* that is being financed by World Bank (WB) and Government of Uganda (GoU). The project has been under implementation since its launch in March 2022.

This ESMF update seeks to, amongst other things, also reflect and incorporate adaptive environmental and social risk management needs, lessons learned and best practices, as well as changes made to the Project during project restructuring approved in December 2024, namely:

- To reduce the project scope by removing Ajai Wildlife Reserve.
- To refine definition of the project development objective (PDO) to clarify the scope of the Project Area.

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

Original activities are being restructured, in view of implementation to date, with a view to make a more efficient use of resources during the remaining implementation period and to further enhance project performance, including on environmental and social management.

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 until August 2025 the National Forestry Authority (NFA). In August 2025, NFA was dissolved and its role and responsibilities fully absorbed by MWE. 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).

In view of the dissolution of NFA under the National Forestry and Tree Planting (Amendment) Act 2025 and its merger into MWE, the activities previously implemented by NFA until August 2025 will be undertaken by MWE.

Overall, the Project is expected to have environmental and social impacts that are highly positive. The Project 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.

**Project Development Objective** remains unchanged under the ongoing 2025 restructuring and is to “(i) improve sustainable management of forests and protected areas in target landscapes; and increase benefits to communities from forests in target landscapes”.<sup>1</sup>

**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. Following the enactment of the Anti-Homosexuality Act, 2023, the ESMF was updated in March 2024 to include specific measures to mitigate the risk of discrimination or exclusion of any affected individuals and groups. This update integrated the enhanced inclusion and non-discrimination (I&ND) measures that informed several I&ND trainings and awareness engagements. In view of adaptive risk management, previous and ongoing restructuring, the ESMF was further updated in October 2025. The update of this ESMF has been informed by the findings from relevant document reviews including reports of World Bank’s implementation support missions such as Aide Memoires, Implementation Status Reports (ISRs), and progress reports from the Government of Uganda implementing agencies.

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)<sup>2</sup>, the World Bank’s Country Partnership Framework<sup>3</sup> (CPF), the World Bank’s assessment of country systems for environmental and social risk management<sup>4</sup>, the Gender Analysis report<sup>5</sup>, the Process Framework report<sup>6</sup> 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 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. Through the proposed restructuring, the project target areas are defined to include 37 protected areas (27 central forest reserves (CFR), 7 national parks (NP), and 3 wildlife reserves (WR), as well as a 10 km radius of each of these PAs for activities related to PA management, and Refugee Hosting Areas (RHA) as defined in the legal agreement.

**Project Components:** The Project includes four 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 and monitoring.

Component 1 support focuses on underlisted gazetted protected areas managed by UWA and ex-NFA/MWE: national parks (NP) - Bwindi Impenetrable NP, Kibale NP, Murchison Falls NP,

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

<sup>2</sup> The World Bank (2017). ENVIRONMENT AND SOCIAL FRAMEWORK

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

<sup>4</sup> 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

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

<sup>6</sup> The Process Framework report.

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, 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, Kyebara CFR, Mafuga CFR, Lendu CFR, Okavureru, CFR, and Usi CFR.

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, Kitagwenda, 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).

**Baseline Environmental and Social Information:** Baseline information for the Project area had originally 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 specific investments have been and will continue to be studied and described in detail during preparation of site specific ESMPs, project briefs and ESIA.

**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 projects<sup>7</sup>. Although the assessment is not specific to forestry and climate change-related projects, it is relevant for the Project and 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 in October 2021 following the ESS 10 Stakeholder Engagement and Information disclosure requirements. The SEP was updated in 2025 and accordingly disclosed.<sup>8</sup> The Stakeholder Engagement Plan has also

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<sup>7</sup> 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.

<sup>8</sup> [https://mwe.go.ug/documents/1766743412\\_SEP-IFPA-CD-October-2025-for-disclosure.pdf](https://mwe.go.ug/documents/1766743412_SEP-IFPA-CD-October-2025-for-disclosure.pdf)

been updated to integrate risks and mitigation measures related to the enactment of the Anti-Homosexuality Act; several I&ND trainings and awareness engagements have been held with the different project stakeholders. 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 groups<sup>9</sup>. 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.

### **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 preparation and implementation of proposed environmental and social risk management plans and measures and indicated requirements for institutional capacity building.

**Grievance 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. GRCs have been formed at Range level for the interventions formerly handled by NFA (now under MWE). Responsible Local Councils Level 1 (LCI) has been sensitized on grievance management. Suggestion boxes have been installed in various project locations as another channel for receipt of feedback and grievances, including anonymous submission. In addition, the project implementing agencies operate toll free lines for grievance and feedback intake: UWA (0800 100 960), NFA (now MWE) (0800 264 036) and MWE (0762 927 511).

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 and OPM). Details on the project GRM are included in the project Stakeholder Engagement Plan.

**Potential impacts and mitigation measures:** The positive impacts of this project outweigh the potential negative impacts. These include; ecosystem services benefits; improved capacity of Project implementing entities; 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

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<sup>9</sup> Vulnerable and Marginalized Groups (VMGs) is the term used in Uganda for groups meeting the requirements of ESS7

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 in 2020 to address issues related to the Batwa engagement in project activities ([https://mwe.go.ug/documents/1766737493\\_Summary-Vulnerable-and-Marginalized-Groups-Framework-VMGF-for-Uganda-English-Version-October-2020.pdf](https://mwe.go.ug/documents/1766737493_Summary-Vulnerable-and-Marginalized-Groups-Framework-VMGF-for-Uganda-English-Version-October-2020.pdf)).

Vulnerable and Marginalized Groups Plans were prepared in 2023 and have been under implementation for specific sites where the Batwa are present as part of the planning of detailed implementation activities, which are currently being further consulted and updated. A Process Framework was prepared to cover potential impacts and mitigation measures related to restrictions of access to target protected areas ([https://mwe.go.ug/documents/1764782839\\_Process-Framework-for-disclosure.pdf](https://mwe.go.ug/documents/1764782839_Process-Framework-for-disclosure.pdf)), this is being updated. Other project documents can be accessed from the MWE website (<https://mwe.go.ug/projects/IFPA-CD>). 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 (October 17, 2025) to set out the different environmental and social actions and plans that need to be carried out in connection to the Project. 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) (updated following the December 2024 restructuring) 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 (I&ND) 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
EISM	Enhancement of Implementation Support and Monitoring
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 Mechanism
Ha:	Hectare
IDA:	International Development Association
IGA:	Income Generating Activities
I&ND	Inclusion and Non-Discrimination
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
WIP	Work in Progress
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 2015<sup>10</sup>. 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 because of high population growth; free grazing animals and wildfires that constituted 72% of the annual carbon emissions for 2015<sup>11</sup>. 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 assessment<sup>12</sup> 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 of the lack of (i) adequate access to the areas, which are large and widespread (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

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<sup>10</sup> Ministry of Water and Environment (2018). *Proposed forest reference level for Uganda*. Republic of Uganda. February 2018.

<sup>11</sup> Ministry of Water and Environment (2017). *Draft Final REDD+ National Strategy*

<sup>12</sup>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)<sup>13</sup> 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 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 until August 2025 the National Forestry Authority (NFA, which was now absorbed by MWE). 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.

## **1.2 Description of Proposed Changes under Restructuring**

This ESMF reflects changes made to the project during project restructuring approved in December 2024, namely:

- To reduce the project scope by removing Ajai Wildlife Reserve<sup>14</sup>.
- To refine definition of the project development objective (PDO) to clarify the scope of the Project Area.

The original PDO was previously expressed as a single statement; following the 2024 refinement, it has been separated into two distinct statements for greater clarity. The refined PDO is to (i) improve sustainable management of forests and protected areas in target landscapes and (ii) increase benefits to communities from forests in target landscapes.

A second restructuring was approved in November 2025 to adjust the scope of activities to enable more efficient use of project resources within the remaining project period, further refine the definition of the Project target landscapes, and mitigate risks associated with project support for infrastructure and equipment for PA management

The proposed changes under the ongoing restructuring entail adjustments in the scope of activities to allow more efficient utilization of project resources within the remaining project period, fine-tuning the definition of the project target landscapes, and further enhancing environmental and social management of some assessed risks. Also, in view of the dissolution of NFA under the National Forestry and Tree Planting (Amendment) Act 2025 and its merger into MWE, the activities previously implemented by NFA will be undertaken by MWE. The PDO will remain unchanged.

Eight Plantation Central Forest Reserves under NFA have been added to the target for plantation establishment / maintenance (Kagorra, Oruha, Kikumiro, Kyehara, Lendu, Mafuga, Okarevu and

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<sup>13</sup> World Bank (2016). *Country Partnership Framework for the Republic of Uganda for the Period FY16-21*

<sup>14</sup> The government informed the Bank of a plan for relocating Rhinos into Ajai WR; which was to involve land acquisition that would potentially lead to displacement and involuntary resettlement. The Project would not support activities entailing displacement and involuntary resettlement, so the WR was removed from the Project Area.

Usi central forest reserves). The only natural forest CFR added includes: Ozubu - which is the site for the proposed NFA offices for Mt. Kei Sector.

### **1.3 Revised activities by components**

#### **Sub-component 1. Improved Management of Protected Areas**

**Subcomponent 1.1** (a) Carrying out a program of activities designed to improve the basic management of Protected Areas, such a program to include such activities as: (i) grading and maintenance of forest roads, tracks and trails within the Protected Areas; (ii) construction of rangers' housing and posts as well as related works supervision and environmental and social due diligence activities; (iii) procurement of field vehicles, road equipment, communication equipment, field, and office equipment; (iv) support for the National Forest Monitoring System; (v) staff training; and (vi) marking of boundaries of select Central Forest Reserves with pillars, where appropriate.

**Subcomponent 1.2.** Increasing the involvement of local communities in the management of forest and wildlife resources within Protected Areas through provision of technical assistance and Training to: (a) support the execution and renewal of Collaborative Forest Management (CFM) agreements and resource management agreements, including supporting livelihood activities within such communities; (b) community awareness activities; (c) roll-out of updated Collaborative Forest Management guidelines and related new community awareness campaigns; (d) undertaking of community-oriented activities to manage human-wildlife conflict including construction of trenches, electric fencing, and renovation of a buffalo wall; and (e) roll-out of the Earth Ranger monitoring system in the Toro-Semliki Wildlife Reserve, Kibale National Park, Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, Semuliki National Park, and Rwenzori Mountains National Park.

**Subcomponent 1.3.** Restoration of degraded natural forests and habitats within Protected Areas through: (a) enclosure of areas to facilitate natural regeneration, enrichment planting and eradication of invasive vegetation species; (b) the roll-out of a Spatial Monitoring and Reporting Tool ("SMART") in Central Forest Reserves; (c) carrying out a program of activities designed to improve wildfire management in the Protected Areas, such a program to include such activities as: (i) provision of technical assistance and advisory services to support development of landscape-level strategies for fire management; (ii) fire management training; (iii) establishment and maintenance of fire breaks; (iv) procurement of equipment for fire detection and suppression; (v) community sensitization, response and monitoring of wildfires; and (vi) introduction of efficient fire management practices at the landscape level.

**Subcomponent 1.4.** Carrying out a program of activities designed to increase forest protection in Katonga and Kabwoya Wildlife Reserves, and Bugoma, Wambabya, Kagombe, Rwensambya, Mt Kei, Otzi East, Otzi West, Era, Wati, and Nyakarongo Central Forest Reserves, each located close to refugee settlements in Refugee Hosting Areas, such a program to include such activities as: (a) designing and implementing community livelihood activities including beekeeping and a guide to traditional herbs; (b) removal of invasive species, including purchase of equipment; (c) forest restoration; (d) improvements for basic Protected Area management (through provision of vehicles and equipment and construction of essential infrastructure, including roads and ranger posts as well as related supervision and environmental and social due diligence activities); (e)

improvements for wildfire management (through provision of equipment); and (f) marking of boundaries of such Central Forest Reserves with pillars, where appropriate.

## **Subcomponent 2.0 Increased Revenues and Jobs from Forests and Wildlife Protected Areas**

### **Subcomponent 2.1.**

(a) Construction and installation of infrastructure facilities and related equipment at select Protected Areas designed to improve visitor experience.

(b) Provision of support to community-based enterprises to help them add value to their overall tourism offerings.

(c) Supporting the upgrade of the existing community ecotourism site at Echuya Central Forest Reserve, including a picnic site, a craft shop, and improvements to the ecotourism office.

(d) Supporting the development of a Tourism Strategic Plan for Central Forest Reserves, which will guide the development of sustainable tourism products.

(e) Provision of Training, to staff of UWA and MWE working in select Protected Areas, on tourism development and promotion, through staff exchanges, workshops, and seminars.

**Subcomponent 2.2.** Carrying out a program of activities designed to increase forest plantation area and support processing and utilization of forest products to produce higher-value wood products such a program to include such activities as:

(a) Provision of: (i) conditional grants to private tree growers to increase the area under plantation forestry; and (ii) matching grants to investors in wood processing and wood industry value chain activities.

(b) Supporting the operation of a Plantation Scheme Operator mandated to develop, manage and monitor performance-based contracts related to the conditional grants to private tree growers.

(c) Supporting the operation of an Industry Scheme Operator mandated to: (i) develop, manage and monitor contracts for matching grants to private wood industry operators; and (ii) provide technical support for silviculture and value chain development and on safe methods of felling, extracting, and loading trees.

(d) Providing capacity-building and technical support to the MWE to enhance its capacity to oversee plantation concessions in Central Forest Reserves.

(e) Enhancement of the capacity of Nyabyeya Forestry College to offer training on processing of forestry products and training operators of equipment for processing forest products, including through provision of equipment, trainings and short courses.

(f) Preparation of a study on feasibility of harnessing revenues from plantations for future investments in production forestry.

(g) Providing capacity building for Uganda Timber Growers Association (UTGA), including on corporate governance, business planning, risk management, human resources, marketing, industry development, and on implementing the UTGA Business Plan 2022-2027; (ii) supporting the

expansion of the Forest Stewardship Council certification to more tree planters and others in the wood value chain.

(h) support to MWE for establishment and maintenance of timber plantations in Kagorra, Kikumiro, Kyehara, Lendu, Mafuga, Okavureru, Oruha and Usi Central Forest Reserves and Ozubu Central Forest Reserve in the Refugee Hosting Areas.

### **Subcomponent 3.0: Improved Landscape Management in Refugee Hosting Areas**

#### **Subcomponent 3.1.**

(a) Development of intensive, mixed-use agroforestry systems on household plots, through: (i) identifying interested households, raising awareness and providing training in agroforestry; (ii) identifying, distributing and selling site and context-appropriate species of multipurpose trees and shrubs; and (iii) extending the existing network of tree nurseries for agroforestry species and designing a commercial strategy for disseminating seedlings.

(b) Supporting development of woodlots on private land to enhance the supply of timber, poles, fuel, and other forest products through (i) supporting the supply of context-appropriate seedlings; (ii) provision of training and other extension support to woodlot owners; (iii) design and implementation of a performance-based grant scheme to incentive woodlot owners to maintain high silvicultural standards that maximize forest seedlings survival.

(c) Carrying out a program of activities designed to facilitate the implementation of Community Forests management such a program to include such activities as: (i) awareness rising activities on the Community Forestry model; (ii) supporting resource assessment, management planning, gazettement and demarcation of Community Forests; (iii) institutional development, training and design of financial sustainability plans of the Community Forests; and (iv) restoration, protection and sustainable management of Community Forests.

(d) Support to district local governments through provision of Basic Support Packages and Incremental Operating Costs to facilitate implementation of agroforestry and small-holder plantation investments.

(e) Support for meetings under the Recipient's Comprehensive Refugee Response Framework.

#### **Subcomponent 3.2**

(a) Setting up and implementation of a program to purchase fuelwood to supply to Persons with Specific Needs within refugee settlements, including additional MWE contracted field staff for management and oversight;

(b) support facilitation of field-level coordination of the fuelwood supply activity by the Office of the Prime Minister;

(c) support to plant a boundary buffer strip around selected refugee settlements;

(d) training for the community conservation staff of UWA on fuel-efficient stove technologies.

## **Subcomponent 4.0: Project Management and Monitoring**

Carrying out Project management and coordination - including undertaking procurement, financial management, monitoring and evaluation, communication, environmental and social risks management.”

### **1.4 The Environmental and Social Management Framework (ESMF)**

During preparation of IFPA-CD, an Environmental and Social Management Framework (ESMF) was developed in 2019-20 in tandem with a Process Framework (PF) in 2019 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/documents/1766737493\\_Summary-Vulnerable-and-Marginalized-Groups-Framework-VMGF-for-Uganda-English-Version-October-2020.pdf](https://mwe.go.ug/documents/1766737493_Summary-Vulnerable-and-Marginalized-Groups-Framework-VMGF-for-Uganda-English-Version-October-2020.pdf)). 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.

In July 2024, the ESMF was 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 9, 10, and 11.

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

The updated ESMF was disclosed in July 2024. A new update to the ESMF took place in October 2025 ([https://mwe.go.ug/documents/1766737818\\_P180604-IFPA-CD-AF-ESMF-May-9-2025.pdf](https://mwe.go.ug/documents/1766737818_P180604-IFPA-CD-AF-ESMF-May-9-2025.pdf)), as referenced above, to ensure that adaptive risk management, lessons learned and the agreements for the two restructurings were reflected, as needed, in the ESMF.

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

The purpose of this ESMF is to ensure that IFPA-CD activities are screened for any negative social and environmental impacts and mitigating measures are taken into account in investments 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 Project; and
- Prescribe project arrangements for the preparation and implementation of investments to adequately address World Bank ESF and Government of Uganda relevant requirements.

## **1.6 Environmental and Social Management Framework Methodology**

The update of this ESMF has been informed by three 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, PF, 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 9, 10 and 11.

- Lessons learnt during Project implementation, which results in the streamlining of the project GRM and also improvements in the incident reporting protocol, have been taken into account and relevant sections of this ESMF updated accordingly.

- Stakeholder consultations

It has to be noted that consultations took 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 investments and these consultations were carried out as part of the update process of the ESMF.

Table 1A: Summary of additional stakeholder consultations

No			Key Consultations undertaken
1.	November 2023	Leaders of districts bordering the CFRs (CAO, LCV, DFO, DNRO, DCDO, DEO)	Formation and capacity building of GRC members at range level (5 Range level GRCs)
2.	September 2023	Leaders of districts bordering the National Parks (CAO, LCV, DFO, DNRO, DCDO, DEO)	Formation and capacity building of GRC members at conservation level (11 Conservation level GRCs)
3.	2024	Leaders from all the Sub-counties bordering the protected areas	Formation and capacity building of GRC at the sub county levels (189 sub county GRCs formed and trained from 33 districts)
4.	2025	Local Council 1 Chairpersons from all the villages bordering the protected areas	Formation and capacity building of GRC at the Village levels is ongoing (done in 5 districts so far)
5.	2025	United Nations High Commissioner for Refugee (UNHCR) focal persons for the Feedback, Referral and Resolution Mechanism (FRRM)	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 were done though not yet concluded.

6.	2024	Community members and leaders within the areas earmarked for electric fencing sub project	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)
7.	2024	Leaders of the 19 districts hosting refugees and where fuelwood and Agroforestry interventions are planned (CAO, LCV, DFO, DNRO, DCDO, DEO)	Stakeholder consultations in the refugee hosting districts (19 consultations made)
8.	2024	Kwonga Clan leaders and Kikuube district officials	Consultation of the Kwonga clan on the proposed support (One consultation meeting with the clan members, other stakeholders and district officials held)
9.	2024	District leaders from the 46 project district were met and a focal point person for IFPA-CD was appointed	Appointment of IFPA-CD district Focal persons (Focal persons have been appointed by the districts)
10.	2025	The Batwa Civil Society Organisation (CSOs)	Follow-up meeting with Batwa NGOs (Meeting with the Batwa NGOs held and concerns raised are discussed)
11.	2025	The Batwa community including the Civil Society Organisation (CSOs)	Further engagement of the Batwa Community (Field Mission to Kisoro to further engage the Batwa was done in April 2025)
12.	2024	Leaders of the 46 project districts were trained (CAO, LCV, DFO, DNRO, DCDO, DEO)	Inclusion and Nondiscrimination training completed (472 stakeholders from 33 districts)
13.	2024	Field personnel for UWA and NFA	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)
14.	2025	Representatives from Uganda Timber Grower's Association (UTGA)	Consultations with the Uganda Timber Growers Association (UTGA) on timber processing interventions
15.	2025	Technical staff of the Nyabyeya college	Consultations with Nyabyeya Forestry College (NFC) on additional activities to be supported
16.	June 2025	Managers and Directors of service providers (fuelwood suppliers and	To understand the status of implementation

		distributors) MWE and PCU	
17.	July 2025	Managers and Directors of service providers, MWE and PCU	To discuss and share understanding of the E&S monthly reporting template
18.	July 2025	Training of district GRC members and Officials from the 19 refugee hosting districts	Establish and orientation of district GRCs on their roles and responsibilities
19.	July 2025	Staff of Uganda Refugee and Disaster Management Council, Supply Masters, Dreams of Success and Joint Energy and Environmental Project	Monitor the compliance with E&S guidelines
20.	July 2025	Refugees who received fuelwood including the refugee welfare committee chairpersons	To ascertain the level of satisfaction with the distribution exercise
21.	May 2025	Consultation with OPM on the formation of settlement GRCs and the possible use of UNHCR FRRM system	To agree on the approach and time for the formation of the settlement GRCs and to agree on scheduling a meeting with UNHCR to discuss possible use of FRRM system for grievance reporting
22.	July 2025	Monitoring the performance of district local governments. Engaged the District IFPA-CD Focal persons, Chief Finance Officer, Chief Administrative Officer of the 19 refugee hosting districts	To monitor the performance of district local government in their oversight roles of supervising service providers
23.	July 2025	District Forest Officer, suppliers (Cassius), distributors (AAID, PSN, MWE/IFPA-CD Field Monitor and PSNs in Kirydongongo and Kikuube districts	To discuss on how to fast track distribution and supply of fuelwood

Further consultations with the Batwa communities and other relevant stakeholders have been conducted in 2024 and 2025 around Echuya central forest reserve (CFR), as well as in Bwindi, Mgahinga, and Semuliki National Parks. These are outlined below.

Table 1B: Summary of additional stakeholder engagements with the Batwa communities

S/N	Dates	Groups Engaged	Venue	No. of Pax
1	22 April 2025	National Forestry Authority Meeting	NFA	05
2	23 April 2025	Batwa Stakeholder Engagement Meeting (Three Batwa organisations (BIEO, BDO, and BIDO), their staff, community members and BioVision Africa	BIDO Offices	20
3	24 April 2025	Uganda Wildlife Authority (UWA)	UWA Visitor center, Kisoro	3
4	24 April 2025	United Organization for Batwa Development in Uganda [OUBDU] Consultation	OUBDU Offices	05
5	9 July 2025	NFA Staff (Echuya CFR)	NFA offices	05
6	9 July 2025	The Kalenjeni Batwa Community at Echuya Batwa Camp	Echuya camp site	29
7	9 July 2025	The Rwamahano Batwa Community.	Rwaburindi Primary School	30
8	10 July 2025	District Technical staff and CSOs working with Batwa in Kisoro	Kisoro district council hall	27
9	10 July 2025	Abadasigana Batwa Group, Birara - Bukimbiri	Kabimbiri S/C HQs	37
10	11 July 2025	Uganda Wildlife Authority (UWA) staff	Visitor centre, Kisoro	05
11	11 July 2025	Nyacance Batwa community (Nyacance Batwa Settlement)	settlement area	50
12	12 July 2025	Nkuringo Conservation and Development Foundation (NCDF) staff	NCDF Offices	06
13	12 July, 2025	Buniga Forest Trail/ Sanuriro Batwa Community	NCDF grounds	22 (13w)
14	13 July 2025	Rushaga Batwa Community members,	Rushaga Batwa settlement	30 (15w)
15	13 July 2025	The Batwa Indigenous Empowerment Organisation (BIEO)	BIEO offices	04
16	13 July 2025	Nyabaremura Batwa Community	Nyabaremura Batwa settlement	16 (12w)
17	14 July 2025	Kashasha Batwa Community	Kashasha T/Council offices	24
18	14 July 2025	Kachereere Batwa Community	Kacherere Town Council offices	40
19	15 July 2025	Kanungu District Local Government Officials (CAO and DCDO)	CAO's office	02
20	15 July 2025	Batwa Civil Society Stakeholders – Kanungu	Kanungu district headquarters	5
21	15 July 2025	Kihembe Batwa Community members	Kihembe Batwa hall	26
22	15 July 2025	Buhamba, Kitario Batwa communities	Kitarion Batwa hall	18

23	16 <sup>th</sup> July 2025	UWA and Batwa NGOs Engagement	Buhooma UWA offices	7 Members
24	16 <sup>th</sup> July 2025	Meeting with CSOs working with Batwa	ABEG offices	4 Members
25	27 <sup>th</sup> October 2025	Bundibugyo Local Government Officers Chief Administrative Officer (CAO), District Forest Officer (DFO), District Community Development Officer (CDO), District Production Officer (DPO) MWE - Ministry of Water and Environment And the World Bank team	Bundibugyo Local Government Offices	10 members
26	27 <sup>th</sup> October 2025	Fight for the Forgotten - Karambi	Karambi Settlement	30 members
27	27 <sup>th</sup> October 2025	Uganda Wildlife Authority (UWA) Officials - Semuliki	UWA Offices	15 members
28	28 <sup>th</sup> October 2025	Community Meeting with UWA and Batwa Leadership	Mgaha Visitor Centre, Semuliki	54 members
29	28 <sup>th</sup> October 2025	Cross Cultural Foundation for Uganda (CCFU)	Nkombwe Bundibugyo	8 members

The details of the previous 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. Project teams may not be equipped to adequately address complaints related to discrimination, particularly as complaints may be challenging to address without causing harm to the parties involved.
- iv. Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries
- v. The need to provide safe spaces and other psychological support for vulnerable or marginalized individuals and groups as this may arise.

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, where needed
- Guidelines to develop and implement project briefs, ESMPs and any other relevant investment level instrument, where needed
- Grievance 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 km<sup>2</sup>. Lake Albert covers an area of 5,270 km<sup>2</sup> of which 2,850 km<sup>2</sup> (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 km<sup>3</sup>. The implementation of the Project within this WMZ targets the Districts of Hoima, Kamwenge, Kitagwenda, 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 to 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**

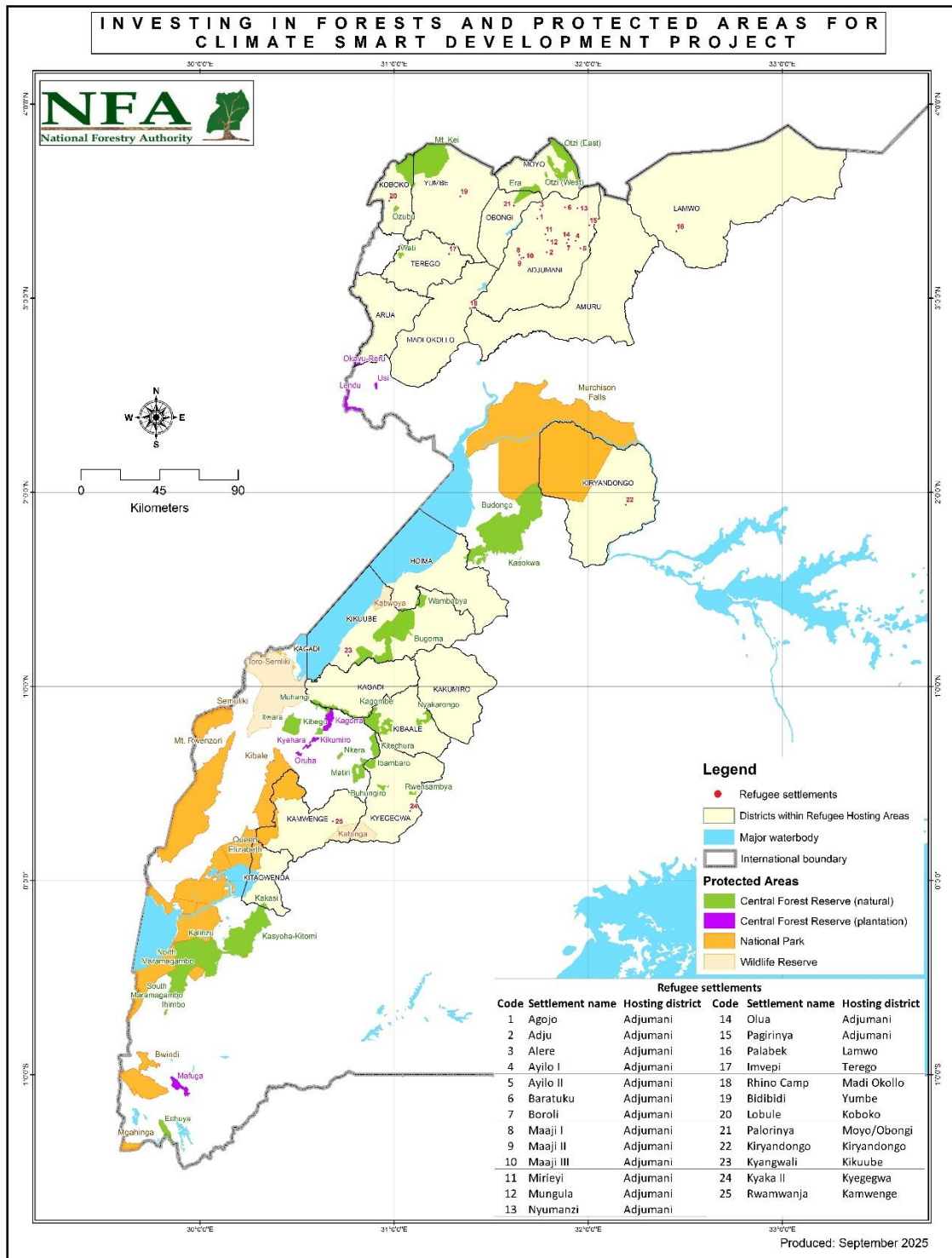
	Selected CFRs	Type of project investments
1.	Budongo	Ecotourism
2.	Kasokwa	Ecotourism
3.	Rwensama	Protection
4.	Bugoma	Ecotourism / refugee-hosting area
5.	Wambabya	Private plantation development
6.	Bujawe	Private plantation development
7.	Kasongoire	Private plantation development
8.	Kandanda-Ngobya	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	Forest Office
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 October 2025
<b><i>Albert Water Management Zone</i></b>	
1. Hoima	1. Hoima
2. Kamwenge	2. Kikuube
3. Kibaale	3. Kamwenge
4. Kiryandongo	4. Kitagwenda
5. Kyegegwa	5. Kakumiro
	6. Kagadi
	7. Kibaale
	8. Kiryandongo
	9. Kyegegwa
<b><i>West Nile / Upper Nile Water Management Zone</i></b>	
6. Adjumani	10. Adjumani
7. Amuru	11. Amuru
8. Arua	12. Arua
	13. Madi Okollo
	14. Terego
9. Koboko	15. Koboko
10. Lamwo	16. Lamwo
11. Moyo	17. Moyo
	18. Obongi
12. Yumbe	19. 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 to a distance of approx. 05 km. 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 5 below.

**TABLE 5: PROJECT COMPONENTS AND ACTIVITIES**

Components/sub-components	Activities
<b>Component 1: Improved Management of Protected Areas</b>	
<b>Sub-component 1.1:</b> Carrying out a program of activities designed to improve the basic management of Protected Areas.	<p>Implemented by UWA and ex-NFA/MWE Specific Location of the Proposed Activities</p> <p>Activities include providing investments in:</p> <ul style="list-style-type: none"> <li>a) Grading and maintenance of tracks and trails within protected areas to improve access for park management – Kalinzu CFR, Budongo CFR, Kasyoha-Kitomi CFR, MFNP and QENP;</li> <li>b) Boundary planning (including community consultations) and demarcation (using boundary markers)- Otzi CFR, Era CFR, Wati CFR, S &amp; N Maramagambo CFR, Kakasi CFR, Ihimbwa CFR, Rwensambya CFR, Kibego CFR, Nkera CFR and Mahangi CFR;</li> <li>c) Infrastructure (such as gates and fences) - MFNP, SNP, QENP, KNP, BINP and MGNP;</li> <li>d) Equipment and community-oriented activities to manage human-wildlife (e.g. trenches, fences) - Electric fences in MFNP and QENP, Trench in KNP and Stone/Buffalo wall in MGNP;</li> <li>e) Investments in staff ranger housing - MFNP, SNP, RMNP, QENP, KNP, BINP, MGNP, Kabwoya, Toro Semliki and Katonga Wildlife reserves;</li> <li>f) Communications- In all UWA and NFA PAs in the project coverage;</li> <li>g) Vehicles and equipment - In all UWA and NFA PAs in the project coverage;</li> <li>h) Management plan revisions and updates - Bugoma CFR &amp; Otzi CFR.</li> </ul>

<p><b>Sub-component 1.2:</b> Increasing the involvement of local communities in the management of forest and wildlife resources within Protected Areas through provision of technical assistance and Training</p>	<p>Implemented by UWA and ex-NFA/MWE Specific Location of the Proposed Activities</p> <p>Activities include: (a) support the execution and renewal of Collaborative Forest Management (CFM) agreements and resource management agreements, including supporting livelihood activities within such communities; (b) community awareness activities; (c) roll-out of updated Collaborative Forest Management guidelines and related new community awareness campaigns; (d) undertaking of community-oriented activities to manage human-wildlife conflict including construction of trenches, electric fencing, and renovation of a buffalo wall; and (e) roll-out of the Earth Ranger monitoring system in the Toro-Semliki Wildlife Reserve, Kibale National Park, Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, Semuliki National Park, and Rwenzori Mountains National Park.</p>
<p><b>Sub-component 1.3:</b> Restoration of degraded natural forests and habitats within Protected Areas.</p>	<p>Implemented by UWA and EX-NFA/MWE Specific Location of the Proposed Activities</p> <p>Activities include: (a) enclosure of areas to facilitate natural regeneration, enrichment planting and eradication of invasive vegetation species; (b) the roll-out of a Spatial Monitoring and Reporting Tool (“SMART”) in Central Forest Reserves; (c) carrying out a program of activities designed to improve wildfire management in the Protected Areas, such a program to include activities such as: (i) provision of technical assistance and advisory services to support development of landscape-level strategies for fire management; (ii) fire management training; (iii) establishment and maintenance of fire breaks; (iv) procurement of equipment for fire detection and suppression; (v) community sensitization, response and monitoring of wildfires; and (vi) introduction of efficient fire management practices at the landscape level.</p>
<p><b>Sub-component 1.4:</b> Carrying out a program of activities designed to increase forest protection in Katonga and Kabwoya Wildlife Reserves, and Bugoma, Wambabya, Kagombe, Rwensambya, Mt Kei, Otzi East, Otzi West, Era, Wati, and Nyakarongo Central Forest Reserves, each located close to refugee settlements in Refugee Hosting Areas, such a program to include such activities as outlined here.</p>	<p>Implemented by UWA and ex-NFA/MWE Specific Location of the Proposed Activities</p> <p><b>Activities include;</b> (a) designing and implementing community livelihood activities including beekeeping and a guide to traditional herbs; (b) removal of invasive species, including purchase of equipment; (c) forest restoration; (d) improvements for basic Protected Area management (through provision of vehicles and equipment and construction of essential infrastructure, including roads and ranger posts as well as related supervision and environmental and social due diligence activities); (e) improvements for wildfire management (through provision of equipment); and (f) marking of boundaries of such Central Forest Reserves with pillars, where appropriate.</p>
<p><b>Component 2: Increased Revenues and Jobs from Forests and Wildlife Protected Areas</b></p>	
<p><b>Subcomponent 2.1:</b> <i>Investments in tourism</i></p>	<p>Implemented by UWA and ex-NFA/MWE Specific Location of the Proposed Activities</p> <p>Activities include: (a) Construction and installation of infrastructure facilities and related equipment at select Protected Areas designed to improve visitor experience.</p> <ul style="list-style-type: none"> <li>(i) Construction of VICs in Echuya, Bugoma &amp; Budongo CFRs and Bwindi Impenetrable, Murchison Falls, Semuliki, Rwenzori and Kibaale NPs.</li> <li>(ii) Construction of Canopy walk in KNP</li> <li>(iii) Construction Bird hides in MFNP, SNP (2), KNP, QENP and BINP</li> <li>(iv) Construction of Multi-Purpose Centres in SNP and KNP</li> <li>(v) Construction of the 3-peak trail in MGNP</li> </ul>

	<ul style="list-style-type: none"> <li>(vi) Construction of tourism gates in MFNP, SNP, KNP, QENP, MGNP and BINP</li> <li>(vii) Supply of Tourism climbing ropes for Rwenzori</li> <li>(viii) Construction of tourism board walks in SNP and MGNP</li> <li>(ix) Construction of climbing ladders in MGNP</li> <li>(x) Construction of a picnic site in BINP,</li> <li>(xi) Construction of 2 Stream crossings in MFNP</li> <li>(xii) Construction of new tourism roads to concession areas in MFNP and QENP</li> <li>(xiii) Maintenance of existing tourism roads/tracks in MFNP and QENP</li> <li>(xiv) Community ecotourism site improvements (picnic site, craft shop, improvements to the office)</li> <li>(xv) Equipment (information boards, chairs, desks, screens) and information materials for visitor information centers (5 centers)</li> <li>(xvi) Safari vehicle – 8-seater covered (for use by UWA for drive up customers) – cost of procurement and vehicle insurance</li> <li>(xvii) Equipment for Visitor Information Center (exhibition materials, promotion materials, etc.)</li> </ul> <p>(b) Provision of support to community-based enterprises to help them add value to their overall tourism offerings – up to 10 enterprises under UWA and support in Echuya CFR (including a picnic site, a craft shop, and improvements to the ecotourism office).</p> <p>(c) Supporting the development of a Tourism Strategic Plan for Central Forest Reserves, which will guide the development of sustainable tourism products.</p> <p>(d) Provision of Training, to staff of UWA and MWE working in select Protected Ares, on tourism development and promotion, through staff exchanges, workshops, and seminars.</p>
<p><b>Subcomponent 2.2:</b> Carrying out a program of activities designed to increase forest plantation area and support processing and utilization of forest products to produce higher-value wood products</p>	<p>Implemented by the MWE.</p> <p>Specific Location of the Proposed Activities</p> <p>Activities include:</p> <p>(a) Provision of: (i) conditional grants to private tree growers to increase the area under plantation forestry; and (ii) matching grants to investors in wood processing and wood industry value chain activities.</p> <p>(b) Supporting the operation of a Plantation Scheme Operator mandated to develop, manage and monitor performance-based contracts related to the conditional grants to private tree growers.</p> <p>(c) Supporting the operation of an Industry Scheme Operator mandated to: (i) develop, manage and monitor contracts for matching grants to private wood industry operators; and (ii) provide technical support for silviculture and value chain development and on safe methods of felling, extracting, and loading trees.</p> <p>(d) Providing capacity-building and technical support to the MWE to enhance its capacity to oversee plantation concessions in Central Forest Reserves.</p> <p>(e) Enhancement of the capacity of Nyabyeya Forestry College to offer training on processing of forestry products and training operators of equipment for processing</p>

	<p>forest products, including through provision of equipment, trainings and short courses.</p> <p>(f) Preparation of a study on feasibility of harnessing revenues from plantations for future investments in production forestry.</p> <p>(g) Providing capacity building for Uganda Timber Growers Association (UTGA), including on corporate governance, business planning, risk management, human resources, marketing, industry development, and on implementing the UTGA Business Plan 2022-2027; (ii) supporting the expansion of the Forest Stewardship Council certification to more tree planters and others in the wood value chain.</p> <p>(h) support to MWE for establishment and maintenance of timber plantations in Kagorra, Kikumiro, Kyehara, Lendu, Mafuga, Okavureru, Oruha and Usi Central Forest Reserves and Ozubu Central Forest Reserve in the Refugee Hosting Areas.</p>
<p><b>Component 3: Improved Landscape Management in Refugee Hosting Areas</b></p>	
<p><b>Subcomponent 3.1:</b> <i>Increased tree cover on community lands</i></p>	<p>Activities include:  Specific Location of the Proposed Activities  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).</p> <p>Development of intensive, mixed-use agroforestry systems on household plots, through: (i) identifying interested households, raising awareness and providing training in agroforestry; (ii) identifying, distributing and selling site and context-appropriate species of multipurpose trees and shrubs; and (iii) extending the existing network of tree nurseries for agroforestry species and designing a commercial strategy for disseminating seedlings.</p> <p>(b) Supporting development of woodlots on private land to enhance the supply of timber, poles, fuel, and other forest products through (i) supporting the supply of context-appropriate seedlings; (ii) provision of training and other extension support to woodlot owners; (iii) design and implementation of a performance-based grant scheme to incentive woodlot owners to maintain high silvicultural standards that maximize forest seedlings survival.</p> <p>(c) Carrying out a program of activities designed to facilitate the implementation of Community Forests management such a program to include such activities as: (i) awareness rising activities on the Community Forestry model; (ii) supporting resource assessment, management planning, gazetting and demarcation of Community Forests; (iii) institutional development, training and design of financial sustainability plans of the Community Forests; and (iv) restoration, protection and sustainable management of Community Forests.</p> <p>(d) Support to district local governments through provision of Basic Support Packages and Incremental Operating Costs to facilitate implementation of agroforestry and small-holder plantation investments.</p> <p>(e) Support for meetings under the Recipient’s Comprehensive Refugee Response Framework.</p>
<p><b>Subcomponent 3.2:</b> <i>Supporting farm forestry for refugee fuel supply</i></p>	<p>Specific Location of the Proposed Activities  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).</p>

	<p>Activities include;</p> <p>a) Setting up and implementation of a program to purchase fuelwood to supply to Persons with Specific Needs within refugee settlements, including additional MWE contracted field staff for management and oversight;</p> <p>(b) support facilitation of field-level coordination of the fuelwood supply activity by the Office of the Prime Minister;</p> <p>(c) support to plant a boundary buffer strip around selected refugee settlements;</p> <p>(d) training for the community conservation staff of UWA on fuel-efficient stove technologies</p>
<p><b>Component 4: Project management support</b>  Carrying out Project management and coordination - including undertaking procurement, financial management, monitoring and evaluation, communication, environmental and social risks management.”</p>	

## 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 alternative investment options were considered and prioritized, with this project being one of them. During the project design and preparation, the GoU in close collaboration with World Bank, and following stakeholder engagement identified and prioritized suitable locations to deliver the project as designed. The prioritization of the Project was, therefore, informed by all the aforementioned processes.

## **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 vary 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 Afrotropical 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 hippopotamuses and birds. Besides land scape 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 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/ km<sup>2</sup> dropping slightly around the Ruwenzori Mountains, Kasyoha-Kitomi and Kibale to lower levels still(1-200/km<sup>2</sup>) 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 adjacent 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 site-specific Vulnerable and Marginalized Group Plans (VMGP) has been prepared, consulted upon, adopted and disclosed in 2023 for each of these four locations. These four VMGPs that have been under implementation since 2023 are currently undergoing an update following consultations in April, July and October 2025. They will be further consulted and validated with relevant stakeholders before its update is finalized.

**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 1.9 million refugees and asylum-seekers in Uganda as of September 2025; of which more than 1.5 million refugees in the Albertine Rift and West Nile, see table 6 below. Most are accommodated in large, concentrated settlements.

Table 6. Refugee and asylum seekers population in project area

Location name	Source	Data date		Population
<b>Madi Okollo &amp; Terego</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	14.0%	<b>274,359</b>
<b>Adjumani</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	11.9%	<b>232,778</b>
<b>Yumbe</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	10.7%	<b>209,104</b>
<b>Kiryandongo</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	8.4%	<b>165,140</b>
<b>Kikuube</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	7.9%	<b>154,538</b>
<b>Obongi</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	7.2%	<b>141,913</b>
<b>Kyegegwa</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	7.0%	<b>137,169</b>
<b>Kamwenge</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	5.4%	<b>105,839</b>
<b>Lamwo</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	4.8%	<b>94,416</b>
<b>Koboko</b>	Government, Office of the Prime Minister, UNHCR	31 Oct 2025	0.3%	<b>6,438</b>
	<b>TOTAL REFUGEE POPULATION</b>			<b>1,521,694</b>

UNHCR (2025) Uganda - Refugee Statistics October 31, 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 ESSs and the relevant GoU legislation are summarized although there still exist some differences between the two.

### **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 Conservation & 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.

#### **4.1.10 The "National Environment and Social Safeguards Policy, 2018"**

The objective is to minimize the negative impacts of development projects on both the environment and society. It aims to integrate environmental and social concerns into all stages of project development through a framework of 15 principles, stakeholder participation, and mechanisms for managing risks, grievances, and monitoring compliance.

## **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 (Amendment) Act, 2024**

The National Forestry and Tree Planting Act 2003 has been 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 provided guidance for afforestation and other tree nursery activities under the Project.

The amendment to the 2003 Act which was made in 2024 caused the formal dissolution of the NFA which was previously responsible for managing central forest reserves. The amendment further effected the transfer / integration of the NFA's functions (such as managing central forest reserves, promoting tree planting, and overseeing forestry services) into the Ministry of Water and Environment.

### **4.2.4 The Land Act, Cap 227**

The Acts provide 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.

#### **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 civil 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, including contractors and sub-contractors, are required to not engage any person below 18 years of age in any 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. The Project is not being implemented by Local Governments, but nevertheless many Project activities take place within its jurisdiction.

#### **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, ex-NFA/MWE 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 Museums and Monument Act, 2023**

The Act seeks to ensure the protection of cultural and natural heritage resources and the environment. It consolidates and reforms the law by repealing the Historical Monuments Act, Cap. 46 of 1967. The Act stipulates the Department of Museums and Monuments as the "Department" responsible for museums, monuments and antiquities. The Act outlines the principles for sustainable cultural heritage conservation and management which are pivotal in the protection of cultural and natural heritage resources.

It outlines the functions of Department which are pivotal to the realisation of the provisions of the Act. It further outlines the functions of the Minister responsible for museums, monuments and antiquities and the functions of Minister responsible for culture. It also outlines the roles to be played by the local governments, institution of traditional or cultural leader in the protection of cultural and natural heritage resources. The Act provides for the engagement of the communities; documentation, surveys and research for cultural and natural heritage resources

### **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 The National Environment (Environmental & Social Assessment) Regulations, 2020**

The procedures for conducting ESIA's are stipulated in the Regulations. The Regulations require environmental assessments to be conducted to determine possible environmental and social 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' have been developed and their use monitored by implementing agencies, with support and guidance from a dedicated environmental specialist and a dedicated social specialist in the Project Coordination Unit.

#### **4.3.3 The National Environment (Audit) Regulations, 2020.**

The Audit Regulations apply to environmental audits for a project or activity for which environmental and social assessment has been undertaken and any other project or activity as may be prescribed by the Authority. Environmental audits shall be undertaken to ensure the developer's compliance with the Act, regulations and standards made under the Act, conditions in permits and licences and any other applicable law, environment management systems and the environmental management and monitoring plan of the developer. The audit can be an environmental enforcement audit or a compliance audit.

#### **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.

#### **4.3.6 Guidelines for Implementing Collaborative Forest Management in Uganda (2024).**

The guidelines aim to guide stakeholders involved in forest management to voluntarily implement effective collaborative processes intended to improve forest management and local community livelihoods. The guidelines are applicable to CFRs, local forest reserves, forests on private land,

forests owned privately on government land among others. These guidelines provide directions government forest management agencies, forest owners, community-based organizations (CBOs), CSO/NGOs and other parties interested in the development of collaborative management arrangements in forests as stipulated above. The guidelines are informed by the country's different laws, regulations and policies.

The guidelines provide for:

- 1) Guiding Principles for CFM
- 2) Pre-conditions to be fulfilled for CFM
- 3) Criteria for selection of entities/NGOs intending to support the CFM process
- 4) The CFM institutional structure which is a prerequisite for effective CFM implementation.
- 5) The CFM process and participants in the different forest categories and key issues covered (among others include)
  - (i) Criteria for carrying out due diligence for CFM applicants
  - (ii) Multi-stakeholder planning team & their roles and responsibilities
  - (iii) Selection of conflict/grievance management committee

#### 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
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

Convention	Objective
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>	<ul style="list-style-type: none"> <li>• Hosts Project coordination, implementation and managing overall Project reporting</li> <li>• 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.</li> <li>• Assign and maintain executive level and technical level of the Project</li> <li>• Responsible for monitoring and reporting of the Project, including implementation of EISM</li> <li>• Provide high-level political support to FSSD to ensure multi-sectoral coordination.</li> <li>• Lead Project Steering Committee and technical working groups</li> <li>• Provides items for joint annual work program and budget approval</li> <li>• Implement forestry activities in and around central forest reserves</li> <li>• Monitor and report on activities' undertakings, including implementation of EISM'</li> <li>• Conduct law enforcement interventions for adequate protection of the CFRs</li> </ul>	<p>FSSD leads implementation on behalf of MWE and provide technical and coordination responsibility on behalf of the MWE</p> <p>The Division of Natural Forests (to take responsibility) shall lead activities within and around the CFRs. The Division shall be responsible for implementation of activities in components that fall under Ex-NFA mandate.</p>
<i>UWA</i>	<ul style="list-style-type: none"> <li>• Implement tourism and national parks and wildlife reserves activities</li> <li>• Monitors and reports on activities undertakings, including implementation of EISM</li> </ul>	Responsible for implementation of activities in and around NPs and wildlife reserves in components that fall under UWA mandate.
The Uganda People's Defence Forces (UPDF)	<ul style="list-style-type: none"> <li>• To support the enforcement activities by ensuring the safety of the law enforcement staff and equipment</li> </ul>	UPDF shall work in collaboration with MWE and UWA
Environmental Police Protection Unit (EPPU)	<ul style="list-style-type: none"> <li>• Maintain law and order during interactions with the communities at the times of law enforcement.</li> <li>• Undertake investigations of illegal Activities in the CFRs</li> <li>• Conduct arrests of suspects involved in illegal activities</li> <li>• Participate in community policing initiatives in communities around the CFRs.</li> </ul>	EPPU shall work in collaboration with MWE

**TABLE 9: INSTITUTIONS WITH RELEVANT MANDATES IN PROJECT IMPLEMENTATION**

<b>Institution</b>	<b>Roles in the Project</b>	<b>Remarks</b>
<i>Ministry of Tourism, Wildlife and Antiques</i>	<ul style="list-style-type: none"> <li>• A member to Project Steering Committee</li> <li>• Supports Project coordination and implementation</li> <li>• Assign and maintain executive level and technical level of the Project</li> <li>• Provide high-level political support.</li> </ul>	Provides policy guidance and oversees UWA
<i>Office of Prime Minister</i>	<ul style="list-style-type: none"> <li>• A member to Project Steering Committee</li> <li>• OPM has a coordinating role especially within refugee settlements.</li> </ul>	The Department for Refugees will lead coordination efforts in refugee hosting areas
<i>Local Government Level (District, Sub-Count, Parish and LCI) – consistent with government mandates</i>	<ul style="list-style-type: none"> <li>• As per general government mandate, overall oversight to implementation of Project activities within their district jurisdiction</li> <li>• Supporting in supervision, advisory and of Project relevant activities</li> <li>• Role in project Grievance Redress Mechanism</li> <li>• Participate in monitoring of Project activities, including monitoring of the implementation of EISM</li> </ul>	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.

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

The World Bank’s ESF and Uganda’s environmental and social risk management framework are the instruments that are supposed to be used in the implementation of the IFPA-CD Project. However, there are parities and disparities between the Country and the Bank’s instruments; where shortfalls appear, then the Bank’s instruments shall take precedence.

The major areas of attention are:

- (i) Assessment and Management of Environmental and Social Risks and Impacts - there is largely parity between the WB ESF and GoU E&S instruments. However, ESIA’s in some cases strongly articulate environmental issues, but weakly do so for social issues; human security is not explicitly covered by the NEA 2019.
- (ii) Labour and Working Conditions - there is largely parity between the WB ESF and GoU E&S instruments. The major shortfalls are - cases of discrimination in labour, especially regarding gender and disability in large projects, recruitment, and social stigma against persons with HIV/AIDS which have been noted; there is no applicable legislation on minimum wage; Employment Act fails to clearly define hazardous employment; and there is discrepancy on the age of employment between the Employment Act and Children (Amendment) Act (2016)
- (iii) Resource Efficiency and Pollution Prevention and Management - There is parity between the WB ESF and GoU E&S instruments. The major areas of concern are on the area of pollution and waste management which have remained as a formidable problem in Uganda.
- (iv) Community Health and Safety: Generally, there is parity between the WB ESF and GoU E&S instruments. The major area of concern is where ESIA’s strongly articulate environmental issues, but weakly do so for health and safety issues.

- (v) Land Acquisition, Restrictions on Land Use and Involuntary Resettlement: There is largely disparity and the major area of concern is that the Land Acquisition Act contradicts the Constitution on several points. There are however areas of parity as well.
- (vi) Biodiversity Conservation and Sustainable Management of Living Natural Resources: There is parity between the WB ESF and GoU E&S instruments. The major area of concern is where some government structures on the other part operate in a way that facilitates destruction of natural resources and degradation of ecosystems.
- (vii) Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities - Although national legislation reflects some elements of ESS7, several challenges remain in implementation and monitoring, and there is no explicit legal protection for IP in Uganda. The mapping and participation of the marginalized groups may have limitations due to the intrinsic limitations that confer and facilitate the marginalization on such communities; and some of the imbalances being experienced by the indigenous peoples were caused way back in time and now the quagmire is being experienced when the WB ESF is being operationalized in the currently implemented projects.
- (viii) Cultural Heritage: Though there is generally parity on this, the major points of concern are: Meaningful consultations for cultural heritages is an area that is still less understood by the several stakeholders; the Department of Museums and Monuments is not adequately facilitated to undertake comprehensive stakeholder consultations on cultural heritages;
- (ix) Stakeholder Engagement and Information Disclosure: There are considerable disparities between the WB ESF and GoU E&S instruments; the major areas of concern are: partnerships that are established between communities and project proponents are not sustained throughout the project; engagements with project affected parties have been complicated by absentee landlords / parents; and the borrowers' commitment to respond to grievances from project-affected parties has shortfalls that have left some issues reverberating to the detriment of projects. There are however areas of parity.

The details of areas of parity and disparity have been explicitly provided in Annex 12.

#### 4.7 World Bank Environmental and Social Standards Relevant to the Project

Table 10 below describes relevance of World Bank Environmental and Social Standards to the project – this is based on the Environmental and Social Review Summary.

**Table 10: 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	Relevant	Labour management procedures were prepared and disclosed to be followed during Project implementation. Specific working conditions, for example, much of the work under

	water to mention a few will be developed prior to Project effectiveness.		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	<p>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.</p> <p>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.</p> <p>MWE (for the ex-NFA) utilizes the services of military personnel in forest patrols and law enforcement on a case-by-case basis. The PS MWE may request such support of manpower if a threat assessment indicates high level of risk to safety of the staff in the Division of Natural Forests (in the past, a number of NFA staff were killed while on duty by armed encroachers). While they are attached to the MWE, the military personnel are subjected to MWE's policies and guidelines / Standard Forestry Practices. The MWE staff from the Division of Natural Forests lead all the patrols, and the military provides the necessary support and back up.</p> <p>The institutional assessment for both UWA and MWE is being undertaken to ascertain the structural capacity and improvements necessary. Similarly, the SOPs especially for the use of armed personnel are being updated. These shall inform the modus operandi</p>

			for the Project's interaction with the communities.
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	<p>The proposed Project will not cause any resettlement or relocation of communities. There may be restrictions on access to natural resources in specific areas and given these potential impacts a Process framework was prepared and adopted and is being updated.</p> <p>Other mitigation measures to consider include the access provide by the infrastructure being established; participation of locals in CRMs and CFMs as a way to mitigate these potential impacts and maintain an improved access; and that boundaries for NPs and CFRs are neither established nor changed.</p>
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	<p>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.</p>
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	<p>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 several decades prior to the Project. In consultation with the Batwa communities, MWE designed the Vulnerable and Marginalised Group Framework (VMGF). Based on the VMGF, Four site-specific Vulnerable and Marginalized Groups Plans (per respective protected area) were prepared, consulted, and disclosed in 2023. This was intended to ensure the inclusion of specific</p>

			measures and interventions to engage Batwa community in the institutional governance structures for CFM/CRM as well as their participation in the implementation of project activities including livelihood-related activities. These specific VMGPs have been implemented since 2023 and are being updated in 2025, following additional consultations with Batwa and other stakeholders.
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 under threat. The ESMF provides an opportunity for following the 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	<p>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></p> <p>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.</p>	Relevant	<p>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 Framework and then a Stakeholder engagement Plan has been prepared to guide the project as per the ESF requirement. A GRM with multiple channels at different levels also forms part of implementation to address any emerging concerns and complaints from the project. GRM details are provided in chapter 6 below.</p> <p><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></p>

#### 4.8 World Bank ESS10 on Stakeholder Engagement

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, UWA and ex-NFA have disclosed several environmental and social documents as summarized below. The Links to the project pages are: <https://mwe.go.ug/projects/IFPA-CD> (for MWE); <https://nfa.go.ug/projects/> (for ex-NFA) and <https://ugandawildlife.org/uwa-projects/investing-in-forest-and-protected-areas-for-climate-smart-development-project/> (for UWA) where these and other project documents can be accessed.

- 1) The ESMF for IFPA-CD
- 2) Stakeholder Engagement Framework (SEF)
- 3) Stakeholder Engagement Plan (SEP)
- 4) Process Framework (PF)
- 5) Environmental and Social Commitment Plan (ESCP)
- 6) Labour Management Plan (LMP)
- 7) Vulnerable and Marginalized Groups Framework (VMGF)
- 8) Four VMGPs for Echuya CFR, Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, and Semuliki National Park; once these are updated, the updated versions shall be disclosed
- 9) 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
- 10) Project Brief for the construction of an electric fence along the boundary of Queen Elizabeth National Park
- 11) Project Brief for the construction of an electric fence along the boundary of Murchison Falls National Park

The Project Briefs/ESIAs for the following sub projects have also been finalized; these shall be disclosed.

- i. Construction of Visitor Information Centre (VIC) at Semuliki National Park, Bundibugyo District;
- ii. Construction of 01 VIC at Murchison Falls National Park, Buliisa District;
- iii. Construction of VIC at Bwindi Impenetrable National Park, Kanungu District
- iv. Construction of VIC at Rwenzori Mountains National Park, Kasese District
- v. Construction of VIC at Kibale National Park, Kamwenge District
- vi. Construction of VIC at Budongo CFR, Masindi District.
- vii. Construction of VIC at Bugoma CFR, Kikuube District
- viii. Construction of VIC at Echuya CFR, Rubanda District
- ix. Construction of office building & staff accommodation at Nyakarongo CFR in Kibale District
- x. Construction of office building & staff accommodation at Mt Kei CFR in Koboko District (Ozubu & Lima)
- xi. Construction of office building & staff accommodation at Itwara CFR in Kabarole District
- xii. Construction of office building & staff accommodation at Era CFR in Moyo District
- xiii. Construction of office building & staff accommodation at Bugoma CFR in Kikuube District

- xiv. Construction of office building & staff accommodation at Rwensambya CFR in Kyegegwa District
- xv. Construction of office building & staff accommodation at Budongo CFR in Masindi District
- xvi. Construction of office building & staff accommodation at Kasyoha-Kitomi CFR in Ibanda District
- xvii. Construction of office building & staff accommodation at Kagombe CFR in Kagadi District

The Stakeholder Engagement Plan is being updated concurrently with this ESMF; and will also be disclosed along the updated ESMF upon completion of its update. Once updated, MWE shall ensure the availability of the ESMF and SEP in their Public Library and Website, including websites and offices of NEMA, UWA, MWE, and participating Districts for public access.

Documents developed in accordance with the disclosed ES Frameworks such as ESMPs, ESAs, Project Briefs etc. will continue being 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 and various environmental and social frameworks for the Project 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 and sub-contractors will submit monthly reports with regard to environmental and social performance. Contractors and sub-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 continue being 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 11 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 11: Potential impact and mitigation measures**

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
<b>Component 1: Investments to improve the management of forest protected areas</b>			
<p><b>Sub-component 1.1:</b> <i>Improvement of infrastructure and equipment for the management of forest protected areas</i></p>	<p>(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.</p>	<ul style="list-style-type: none"> <li>• Demarcation activities in a few select protected areas (no change in any protected area boundary); new park boundary infrastructure such as gates; and establishment of trenches and setting of fences.</li> <li>• 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.</li> <li>• 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;</li> <li>• Occupational health and safety risks;</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Potential protected areas restrictions addressed by CFM and CRM collaborative agreements with park-adjacent communities.</li> <li>• No inclusion of support for boundary demarcation activities, or new trenches/gates/fences for 4 conservation areas where Batwa are present (Bwindi, Mgahinga, Semuliki and Echuya).</li> <li>• Engagement of local communities through CFM and CRM groups in determining timing of access to resource and the type/nature.</li> <li>• Involvement of community groups in benefit sharing planning and access to opportunities without discrimination</li> <li>• Sensitization and capacity building of contractors, workers, and other relevant stakeholders on non-discrimination.</li> <li>• Strengthening of GRMs to provide for safe, ethical and confidential reporting.</li> <li>• Support to community-based tourism initiatives.</li> <li>• Accommodating controlled harvesting by locals to the extent possible in protected area management plans and CFM agreements / CRM MOUs.</li> <li>• Careful environmental planning (routing alignment selection) and close supervision and monitoring of grading and construction works to minimize impacts e.g. erosion, sediment-laden run-off, dust and noise management.</li> <li>• All workers will be provided with adequate PPE like helmets, gumboots, gloves, overalls etc. and</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
			<p>it will be mandatory for workers to wear protective clothing while on duty.</p> <ul style="list-style-type: none"> <li>• The PPE shall be inspected regularly and maintained or replaced as necessary.</li> <li>• There shall be safety awareness / induction training for workers before commencement of works.</li> <li>• A fully equipped first aid kit will be available on site.</li> <li>• Orient the contractor on the Project Environment and Social Incident Reporting Toolkit (ESIRT) procedures especially in case of major/serious incidents that may occur at the project site.</li> <li>• Contractors to prioritize local recruitment to minimize labor influx;</li> <li>• Contractor to organise adequate camp facilities and housekeeping for workers</li> <li>• Ensure trenches are fenced off with strong barriers and signaling for vehicles and machines;</li> <li>• Inclusion of ESHS requirements for contractors</li> <li>• Enhance inclusion and non-discrimination of potential vulnerable or marginalized individuals and groups that may be identified.</li> <li>• Training of application of EISM with regard to mitigating risks associated with exclusion and discrimination of the vulnerable or marginalized individuals and groups</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Sub-component 1.2:</b> Increasing access to and benefit from forest and wildlife protected areas for local communities.</li> </ul>	<ul style="list-style-type: none"> <li>• Support for an increase of area under Collaborative Forest Management and resource management agreements - 19 new and 53 renewed (=72 CFM agreements) and up to 40 collaborative</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Environmental risks are associated with increased disturbance in CFM and CRM areas, potential for associated increase in</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• The design of the Vulnerable and Marginalised Group Plans (VMGPs) intended to scale up Batwa led interventions.</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	<p>resource management agreements</p> <ul style="list-style-type: none"> <li>• Provision of technical assistance to women’s associations to support CFM planning and implementation that promotes women’s engagement in CFM.</li> <li>• Technical assistance to build the skills needed to empower women for management and leadership in CFM and producer organizations and strengthen women-led producer organizations.</li> </ul>	<p>illegal hunting and snaring associated with increased community access.</p> <ul style="list-style-type: none"> <li>• Social risks are associated with potential of inequitable provision of livelihoods support to women and other discrimination of vulnerable or marginalized individuals or groups</li> <li>• Potential social exclusion and discrimination in accessing benefits and opportunities from wildlife and protected areas.</li> <li>• Vulnerable or marginalized individuals or groups may decline to take part in consultations for fear of being reported.</li> <li>•</li> </ul>	<p>Implementation of the VMGPs commenced in 2023 and they are currently being reviewed to include lessons learnt and new priorities for the Batwa communities.</p> <ul style="list-style-type: none"> <li>• Engagement of local communities in resource management efforts, including forest restoration ensures better sharing.</li> <li>• Close monitoring of CFM/CRM implementation to ensure compliance with existing CFM/CRM guidelines.</li> <li>• Technical assistance to build the skills for empowering women for management and leadership in CFM and producer organizations</li> <li>• Provision of technical assistance to women’s associations</li> <li>• Promotion of women’s engagement in CFM.</li> <li>• Sensitization and capacity building of contractors, workers, and other relevant stakeholders on non-discrimination.</li> <li>• Strengthening of GRMs to provide for safe, ethical and confidential reporting.</li> <li>• Enhanced monitoring of exclusion and discrimination.</li> <li>• Promotion of inclusive and non-discriminative benefit sharing and opportunity access to all including the vulnerable or marginalized individuals and groups</li> <li>• Increased awareness on non-discrimination and inclusion of the vulnerable or marginalized persons and effective application of EISM mechanism</li> </ul>
<ul style="list-style-type: none"> <li>• Sub-component 1.3: Restoration of degraded natural forests in Wildlife and</li> </ul>	<ul style="list-style-type: none"> <li>• Aims to restore up to 22,700 ha of forest. Restore degraded areas in key National Parks</li> </ul>	<ul style="list-style-type: none"> <li>• This will provide opportunities for work and employment and will bring substantial economic benefits through increasing forest productivity and</li> </ul>	<ul style="list-style-type: none"> <li>• General sensitization of communities on improved ecosystem services provided by restored forests.</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
<p>Forest Protected Areas.</p>	<p>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.</p>	<p>environmental benefits through restoring ecosystem services.</p> <ul style="list-style-type: none"> <li>• Selection of inappropriate tree species for assisted regeneration / enrichment planting</li> <li>• Limited use of pesticides in tree nursery operations</li> <li>• Potential social exclusion and discrimination from employment opportunities as well as potential economic and environmental benefits</li> <li>• Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries</li> <li>• Vulnerable or marginalized individuals or groups may decline to take part in consultations for fear of being reported.</li> </ul>	<ul style="list-style-type: none"> <li>• Engagement of local communities in forest restoration through contracts.</li> <li>• Support UWA and communities to plan and develop products hence increasing economic opportunities</li> <li>• Use of indigenous species naturally occurring in target areas for assisted regeneration / enrichment planting.</li> <li>• Use of only approved pesticides, consistent with requirements of ESS3, in accordance with manufacturers' instructions; nursery workers will be trained by the MWE 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.</li> <li>• Strengthening of GRMs to provide for safe, ethical and confidential reporting.</li> <li>• Inclusion of principles of non-discrimination in contracts, CoCs, whistleblower protocols and HR procedures.</li> <li>• Promotion of inclusive and non-discriminative employment opportunities, selection of beneficiaries and benefit sharing to all including or vulnerable or marginalized individuals and groups</li> <li>• Increased awareness and application of EISM and enhanced monitoring of discrimination.</li> </ul>
	<ul style="list-style-type: none"> <li>• Training and equipment for the avoidance, response and monitoring of wildfires and the removal of invasive species. Activities: the</li> </ul>	<ul style="list-style-type: none"> <li>• Overall, this will bring positive impacts through lowered fire risk and reduced loss of land to invasive species, jobs and income for local communities.</li> </ul>	<ul style="list-style-type: none"> <li>• 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)</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	<p>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 efficient fire monitoring practices at the landscape level including consideration of satellite-based monitoring systems.</p>	<ul style="list-style-type: none"> <li>• Possible localized limitations in accessing of communities to fire-prone areas</li> <li>• Health and safety risks associated with vegetation clearance work.</li> </ul>	<ul style="list-style-type: none"> <li>• Instilling community social accountability.</li> <li>• Employment of community members for removal of invasive species</li> <li>• Appropriate measures for ensuring health and safety, including provision of PPE, and through good supervision by UWA and MWE</li> </ul>
<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• UWA and MWE (Division of Natural Forests) to engage local communities in resource</li> </ul>	<ul style="list-style-type: none"> <li>• Activities and impacts are the same as under Components 1.1-1.3, (but in specific locations within refugee-hosting areas).</li> </ul>	<ul style="list-style-type: none"> <li>• Mitigation actions same as 1.1 - 1.3.</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	<p>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) small 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.</p>		
<b>Component 2: Investments to increase revenues and jobs from forests and wildlife protected areas</b>			
<ul style="list-style-type: none"> <li>Subcomponent 2.1: Investments in tourism Implemented by UWA and MWE (for ex-NFA), investments in tourism infrastructure and products in select NPs and CFRs.</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>Demarcation activities (no new boundaries established).</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Support enhancement of opportunities for boosting wildlife/nature-based tourism and alternative sustainable livelihoods for communities surrounding protected areas (through CRM arrangements).</li> <li>Investment in community tourism initiatives and product development including further development of the Batwa trail.</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	<p>diversification and overall quality of tourism products.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Support the development of 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.</li> <li>• (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</li> </ul>	<ul style="list-style-type: none"> <li>• Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries Occupational, health and safety risks and impacts/ Accidents and injuries of workers</li> <li>• Induced domestic violence as a result of empowering women through employment</li> <li>• Non-payment of workers or unreasonable delays in payment</li> <li>• The possibility of exclusion from employment opportunities or involvement of in CFM and CRM groups agreements and/or Memorandum of Understandings (MoU)</li> </ul>	<ul style="list-style-type: none"> <li>• Documentation of herbal medicinal plants used by the Batwa communities, the Batwa cultural and historical data, the Batwa trials, training of the Batwa as tour guides, improvement of local ecotourism sites</li> <li>• Provide and establish a Project GRC upon recruitment of project workers and ensure adequate representation of project. The GRC should be maintained throughout project implementation.</li> <li>• All workers must sign contracts that indicate payment conditions and enforce to ensure contractors adhere to this.</li> <li>• All workers will be provided with adequate PPE like helmets, gumboots, gloves, overalls etc. and it will be mandatory for workers to wear protective clothing while on duty.</li> <li>• The PPE shall be inspected regularly and maintained or replaced as necessary.</li> <li>• There shall be a safety awareness/ induction training for workers before commencement of works.</li> <li>• A fully equipped first aid kit will be available on site.</li> <li>• Orient the contractor on the Project Environment and Social Incident Reporting Toolkit (ESIRT) procedures especially in case of major/serious incidents that may occur at the project site.</li> <li>• Contractor to ensure that equipment used are well maintained to avert noise pollution.</li> <li>• Restricting noisy operations to day time when the impact is less disruptive</li> <li>• Incorporate dust suppression measures during any civil works.</li> <li>• Put in place erosion control measures (such as bunds, ridges) in areas of high risks</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	<p>‘new’ tourism destination; and (iii) advanced tourism infrastructure-boardwalks and canopy walks) in and around parks.</p>		<ul style="list-style-type: none"> <li>• Encourage private sector operators to engage local stakeholders in tourism activities, including as guides, visitor centre staff etc.</li> <li>• Supporting communities to tap into tourism value chains e.g. through supply contracts and provision of associated technical training.</li> <li>• Sensitization and capacity building of contractors, workers, and other relevant stakeholders on non-discrimination.</li> <li>• Strengthening of GRMs to provide for safe, ethical and confidential reporting.</li> <li>• Enhanced monitoring of discrimination.</li> <li>• 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 increased awareness and application of EISM in the creation of CFM and CRM groups including establishing appropriate agreements/MoUs.</li> </ul>
<ul style="list-style-type: none"> <li>• Subcomponent 2.2: Investments in productive forestry.</li> </ul>	<ul style="list-style-type: none"> <li>• Identifying and planting trees to increase on the area of plantations with commercial species</li> <li>• Promoting private sector and identifying appropriate technologies.</li> <li>• Identifying well established commercial tree growers.</li> <li>• Put mechanism in place for supporting identified commercial tree growers.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased land demand.</li> <li>• Risk of plantations replacing indigenous forests.</li> <li>• Localized impacts associated with land preparation and planting (vegetation clearance, sediment run-off from pitting etc.).</li> <li>• Risk of exclusion of adjacent communities, particularly discrimination of vulnerable or marginalized individuals and groups, from labor contracts in establishment and maintenance of plantations</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage broad-based engagement by communities (not just private sector forestry companies) in plantation establishment.</li> <li>• Introduce systematic screening (based on existing SPGS screening guidance) of all proposed planting areas to exclude areas with indigenous forests.</li> <li>• Training and close supervision of existing tree planting guidelines that promote good practice and minimize negative environmental impacts.</li> <li>• Sensitization and capacity building of contractors, workers, and other relevant stakeholders on non-discrimination.</li> <li>• Strengthening of GRMs to provide for safe, ethical and confidential reporting.</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
	<ul style="list-style-type: none"> <li>Identifying private tree growers.</li> <li>Put mechanism in place for supporting identified private tree growers</li> </ul>		<ul style="list-style-type: none"> <li>Enhanced monitoring of discrimination.</li> </ul>
<b>Component 3: Improved Landscape Management in Refugee Hosting Areas</b>			
<ul style="list-style-type: none"> <li>Subcomponent 3.1: Increased tree cover on community and refugee-hosting areas</li> </ul>	<ul style="list-style-type: none"> <li>Development of intensive, mixed-use agroforestry systems on household plots.</li> <li>Support for development of woodlots on private land to enhance the supply of timber, poles, fuel, and other plantation products.</li> <li>Enhanced management and protection of natural forests outside protected areas.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>Capacity building support to DLGs will enhance/optimize implementation and benefits and will help avoid any potential adverse environmental and social impacts.</li> <li>Technical service providers will also provide guidance, technical support and oversight to enhance impacts and avoid negative impacts (both social and environmental)</li> </ul>
<ul style="list-style-type: none"> <li>Subcomponent 3.2: Supporting farm forestry for refugee fuel supply</li> </ul>	<ul style="list-style-type: none"> <li>Establish a program to purchase fuelwood from Ugandan landowners and supply to refugees.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>

Components/sub-components	Proposed Activities	Project	Potential Issues	Proposed Mitigation and Optimization Measures
			<ul style="list-style-type: none"> <li>• 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.</li> <li>▪ Potential environmental and Social risks of wood supply and distribution from under-pressure natural forests and from close to settlements where refugees and host communities are already over-harvesting woodland resources and during distribution of wood fuel including Site Access Issues particularly in remote or flood-prone areas, there could be delays in fuelwood delivery and distribution, .</li> <li>▪ Identification of inappropriate or Unsafe Locations for Storage and Distribution. Selecting locations that are unsafe, hard to access, or inappropriate for firewood storage could hinder the distribution process and create safety hazards for beneficiaries and staff, physical injuries, fire outbreaks, theft.</li> <li>▪ Possibility of children getting involved,</li> <li>▪ Cases of GBV, SEA &amp; SH</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Monitoring by a Technical Service Provider and DLGs to ensure compliance with environmental and social provisions including promoting inclusion and non-discrimination of the vulnerable or marginalized individuals and groups)</li> <li>• Creating awareness on inclusion and non-discrimination of potential vulnerable or marginalized individuals and groups that may be adversely affected.</li> <li>• District GRCs have been established and trained</li> <li>• The Ministry signed a data sharing agreement with UNHCR for the FRRM to improve grievance management in refugee areas, project staff have been trained and accounts opened for each staff in the FRRM system to receive and respond to project related grievances</li> <li>• Work with local experts, including local authorities and community representatives, to identify the safest and most accessible sites.</li> <li>• Conduct a thorough safety and accessibility assessment before finalizing locations of fuelwood containment points. Ensure locations are secure and protect against theft or damage to firewood.</li> <li>• -Ensure the site meets all local safety and health regulations e.g., fire hazards, proximity to residential areas.</li> <li>• Use of protective gears e.g. helmets, gloves, gumboots while offloading, stockpiling and distributing fuelwood.</li> </ul>

Components/sub-components	Proposed Project Activities	Potential Issues	Proposed Mitigation and Optimization Measures
			<ul style="list-style-type: none"> <li>• Sensitise on safe working procedures</li> <li>• Supervise the fuelwood distribution exercise to ensure caution and safe work</li> <li>• Engage community / sensitize on child protection, GBV, SEA &amp; SH</li> </ul>
<b>Component 4: Project Management and monitoring.</b>			
<ul style="list-style-type: none"> <li>• Management and monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Support for project management and monitoring, including of dedicated environmental and social risk specialist to support environmental and social risk focal points in MWE, Division of Natural Forests (ex-NFA) and UWA</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Risk of exclusion of vulnerable or marginalized individuals or groups in the selection of beneficiaries</li> <li>• 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.</li> <li>• The merging of NFA with MWE may pose project implementation challenges including delayed finalization of the process thereby affecting contract signing, activity implementation, staff moral and loss of technical staff with institutional memory of the project</li> </ul>	<ul style="list-style-type: none"> <li>• 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 ex-NFA (Division of Natural Forests), UWA and MWE.</li> <li>• This will include regular and systematic monitoring and reporting of environmental and social risks during implementation.</li> <li>• Fast tracking formalization of the merging process to ensure the smooth implementation of the project</li> <li>• Transfer experienced Ex-NFA staff to MWE to continue with project implementation</li> <li>• Creating awareness on inclusion and non-discrimination of potential vulnerable or marginalized individuals and groups that may be adversely affected.</li> <li>• Training of the CFM and CRM and all implementing entities the application of EISM of the project</li> <li>• The hired service provider will train the PCU, all the implementing MDAs, the LGs, CFMs and CRMs, contractors and community and forest border communities on the application of EISM</li> <li>• EISM GRM will be established as alternative avenues for submission of sensitive complaints pertaining to</li> </ul>

Components/sub-components	Proposed Activities	Project	Potential Issues	Proposed Mitigation and Optimization Measures
				<p>discrimination and exclusion of vulnerable or marginalized individuals and groups that may be adversely affected.</p> <ul style="list-style-type: none"> <li>• 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)</li> </ul>

## 5.1 Environmental and Social Risk Assessment

**Based on the analysis presented in Table 11 above, the overall social risk is considered High and environmental risk rating is considered Substantial. The Project risk rating has changed during IFPA-CD implementation from moderate, in line with adaptive risk management under the ESSs..**

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, implemented and are currently being updated as a practical tool to guide the ongoing implementation of the project interventions where the Batwa people are present.

The risk rating for the project was upgraded to substantial *for environmental risk*. Hence specific mitigation measures per activity are recommended in Table 11, and these are complemented overall by site-specific ESMPs, ESIAAs and PBs, 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 and UWA). To maintain the E&S operations under the Ex-NFA, the staff who were directly responsible for E&S shall be at the forefront in advancing the same for the sub-projects that were under Ex-NFA.

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. During implementation, 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 MWE routinely undertake ESIAAs consistent with the legal framework and the ESSs 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, ex-NFA (now Department of Natural Forests) 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 High.** The main social challenge during the implementation period so far has been issues around stakeholder engagement, associated primarily to feedback and complaints received by a few Batwa CSOs in connection with their involvement and perception of project and other legacy issues. Additionally, other social risks and potential impacts are connected to restriction of access to resources within protected areas, risks of SEA/SH and GBV, timely follow up and resolution of management and potential risks of accidents and incidents, including as part of overall management and enforcement of PAS. It should be recognized that land acquisition has not been undertaken as part of IFPA-CD project and is not anticipated. Impacts associated with construction of Park infrastructure are expected to be localized and manageable. Workers' interactions with communities are 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 continuous 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 implementation and be updated accordingly during restructuring, in line with adaptive risk management.

**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 forwarded to appropriate avenues to submit their grievances or concerns including through the grievance mechanism corresponding to World Bank finance project.
- The implementers 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 11 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

One of the most significant E&S challenge during the implementation period so far has been the slow rollout of a fully functional project GRM and lack of a consolidated register of grievances received through different channels under the project. However, since this issue has been identified, actions have been taken by the Project, including GRCs have been formed, and training is now ongoing. Toll free lines are functional, and IEC materials popularizing information about them have been made available at all project locations. There have also been limitations in stakeholder engagements with some key project stakeholders. For example, some districts have limited information about the project. Efforts have been made to appoint project focal persons in districts and disseminate project information in the form of simplified brochures.

The PCU is currently fully instituted with both Environmental and Social Risk Management Specialists and overall E&S coordinator, who is a MWE staff. There are designated E&S focal points at UWA and at NFA (now being merged into MWE). The PCU and E&S focal points have received several trainings which include:

- a. Training in ESIRT. This training was attended by PCU, UWA and Ex-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 Mechanism Training. The purpose of the training was to enhance skills in Grievance 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.
- d. Enhanced inclusion and non-discrimination. Various trainings on this have been delivered to the implementing agencies' staff as well as their service providers and contractors.

Other lessons learnt that can contribute to implementation adjustments and guide the subsequent interventions of the project or future operations of related projects are as outlined below:

- (i) The need to have comprehensive consultations and involvement of the vulnerable & marginalised communities and associated actors in project activities need to be thoroughly done early during project design.
- (ii) When communities are adequately structured during project design, chances of achieving conservation success and the success of their livelihood enterprises are high. This was clearly demonstrated by one of the CFM groups in Itwara CFR that had progressed in their livelihood project supported activities and as well contributed immensely to the conservation of the forest.
- (iii) Uncoordinated changes / alteration in the composition of the implementing agencies during project implementation risks to jeopardise project progress; this is because the mandates and agreements conditions attached to such entities get affected.

- (iv) The changes in the conservation status of PAs under the project where there are no clear documentations and which are uncoordinated with the funding agency risk the project progression.
- (v) The involvement of district local governments in the monitoring of field level project activities inculcates the spirit of ownership and builds up a collective effort towards the project success.
- (vi) The execution of the fuelwood component for the refugees seems not to have had adequate analysis of the market to ensure seamless operation. The suppliers have grappled to deliver on this assignment thereby necessitating complementary service providers to come on board. There has been a challenge to synchronise supplies and distribution; thus raising redundant workforce for the Distributors which then complicates the remuneration of such workers.
- (vii) The altercations that occurred between the members of the public and armed personnel of the law enforcement teams operated by the project implementing entities demonstrates the need for a comprehensive review of the operations of these law enforcement teams; and the protocols that are implemented by these teams. This goes deep into the institutional assessments of the implementing entities and the need to support the entities have feasible law enforcement protocols which when applied avoid or minimise the loss of lives.

## 5.3 Environmental assessment and screening process

### 5.3.1 Overview

According to the World Bank Environmental and Social Framework (ESF)<sup>15</sup> 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.

The key regulations for environmental and social assessment in Uganda include; <sup>16</sup>*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

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<sup>15</sup> The World Bank Environmental and Social Framework. Paragraph 36 page 8.

<sup>3516</sup> The National Environment Act, 2019, and the National Environment (Environmental Impact Assessment) Regulations, 1998.

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

UWA and MWE 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 of 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 9, 10 and 11. 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 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 re-disclosure 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 adoption and 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, UWA, MTWA, and MLGSD 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 implementing agency (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 9, 10, and 11).

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

Capacity already exists within the central level implementing entities (MWE and UWA) 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 ESIA's. 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 2025, the project conducted an institutional assessment of the enforcement activities in all the protected areas purposely to assess the capacity of UWA and MWE including i) community outreach, ii) law enforcement, iii) incident management and iv) collaboration with other agencies, in this case primarily with the Uganda People’s Defence Force (UPDF) and the Uganda Police Force (UPF) to perform their multiple institutional roles, training programs, and operational frameworks required to meet their expectations considering ongoing challenges such as human-wildlife conflict, poaching, and resource exploitation and proposes solutions to bring these down to realistically acceptable levels and to operate in line with the internationally accepted standards. The assessment recommended strict adherence to UWA and MWE guideline frameworks and protocols to manage critical aspects, such as the Use of Force (UOF) and human rights requirements by the UPDF and UPF under the command and control of UWA and MWE

In addition, the assessment recommended the upgrading and completion of existing and proposed/draft regulations, policies, and SOPs; establishing and embedding human rights requirements to achieve minimum internationally acceptable levels, reviewing and updating use of force (and de-escalation) and recruitment requirements policies; improving partner engagement; overhauling of UWA and MWE current training curriculum to support training improvements and their wider accessibility, including at the UWA Academy, the appropriate equipping and training of staff to ‘fit for purpose’ levels, (re)aligning practices with current international standards, thus establishing new best practices, and efforts to ensure the integrity and long-term viability and sustainability of Uganda’s protected areas. The review of operational and governance documents, along with the enhancement of training programs, is currently in progress and nearing completion. These ongoing efforts are expected to deliver stronger operational frameworks and practical tools that will help align UWA and MWE’s enforcement activities with international standards. Key focus areas include enabling the proportionate use of force and fostering improved community engagement.

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. The EISM is an ongoing activity and details of what has been done and what is planned to be done 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 MECHANISM (GRM)**

### **6.1 Importance of GRM**

The Grievance 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 10 and 11. 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 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 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). To date, the GRCs for all the 11 conservation areas have been established, trained and operationalized. GRCs have further been formed at District level, sub-county level, training of Local Council 1 Chairpersons for each village is ongoing.

b. Ex-NFA/MWE

For Ex-NFA, GRCs have been established, trained and operationalized for all the 5 ranges headed by the Range Manager 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 village is ongoing

c. Refugee Hosting Districts

GRCs in the refugee hosting districts have been constituted in all the 19 refugee hosting districts including 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

Grievances from the conservation, range and districts levels not resolved at those respective levels shall be handled by the National Level GRC housed at MWE with members from MWE and UWA.

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 to resolve grievances. The GRCs formed by DRDIP have been by the project and they will be able to receive and resolve grievances related to IFPA-CD.

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

### **Community access to the GRMs**

Awareness creation meetings shall be conducted in the project areas to popularise the project activities. In these meetings, the GRMs (established through community meetings) shall be

popularised. The members of the public shall be informed of the modalities for registering / submitting grievances (verbal, phone call, written submission or anonymous submissions) at the established points where the GRCs operate (community, district or national level). The communities shall as much as possible be encouraged to make use of the community GRM structures to handle any project-related grievances. The GRCs shall be encouraged to make their operations visible and accessible so that members of the public can make use of their services.

### **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 GRM 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 have been 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, Ex-NFA- 0800264036 and MWE-0800203655, WhatsApp Numbers – UWA- 0740560236, Ex-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 streamlined its grievance redress mechanisms (GRMs) to incorporate the Inter-Agency Feedback, Referral, and Resolution Mechanism (FRRM) system majorly used in refugee settlements and hosted by UNHCR. These arrangements is being executed in liaison with the lead agencies involved in refugee operations (especially UNHCR), The arrangements for authorized access to this system have been finalized and MWE staff both at HQ and field offices can now access the system and respond to grievances. Through the system quarterly complaints are shared with all partners in the system and MWE staff are to focus on grievances that arise from refugee settlements associated with fuelwood distribution.

#### **Suggestion Boxes**

Suggestion boxes been procured and distributed to UWA and CRS to put in strategic locations e.g. LC1 Chairpersons residence, 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, Ex-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 possibly take place within the project structures, the Ministry is developing a centralized log system for recording and following up all grievances. These structures do 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.

## **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 9, 10 and 11. 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 (LCIV), 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**

The original ESMF relied on extensive consultations that were 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 follow up updates 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 12 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

**TABLE 12: LISTING ALL STAKEHOLDER ENGAGEMENTS THAT HAVE TAKEN PLACE SINCE 2016**

**CONSULTATIONS UNDER REDD+ PROCESS**

S/No	Dates	Stakeholders Met	Purpose of Consultations
1.	29th August 2016	<sup>17</sup> 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
2.	Monday 29.08.2016	<sup>18</sup> 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.
3.	Wednesday 31.08.2016	<sup>19</sup> 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
4.	29th November 2017	National Stakeholders on BSA	Kampala, Fairway Hotel
5.	17 <sup>th</sup> – 18 <sup>th</sup> May 2017	<sup>20</sup> Second Consultative Workshop on the REDD+ Strategy for Uganda 52 Participants from Government MDAs, CSOs MPs, LG Officials.	Hotel Africana, Kampala
6.	10th April 2017	National with representation from the Albertine Region on SESA	Kampala, Ex-NFA Meeting Room
7.	March 2017	<sup>21</sup> National workshop had around 30 participants	Kampala (City Royale)

<sup>17</sup> REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR WEST-NILE REGION (Desert Breeze Hotel, Arua Town (29<sup>th</sup> August 2016))

<sup>18</sup> REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR SOUTH-WESTERN UGANDA (WHITE HORSE INN, KABALE; Monday 29.08.2016)

<sup>19</sup> REPORT ON REGIONAL STAKEHOLDER CONSULTATIONS FOR WESTERN UGANDA (Sandton Hotel Kasese, Wednesday 31.08.2016)

<sup>20</sup> Second Consultative Workshop on REDD+ Strategy for Uganda. Stakeholder Consultation Report/D7. May 2017.

<sup>21</sup> 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

8.	14 <sup>th</sup> March 2017	National with representation from the Albertine Region on FGRM	Kampala Hotel Africana
9.	14 <sup>th</sup> February 2017	Vulnerable and marginalized groups - the Basua and Bambuti <sup>22</sup> Communities on RSO of Bundibugyo District	Ntandi Town Council Bundibugyo
10.	3rd – 7 <sup>th</sup> February 2017	<b>West Nile and Northern region:</b> 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
11.	20th January 2017	49 Civil Society Organizations <sup>23</sup>	Colline Hotel, Mukono
12.	February 2017	Implementing Partners and local communities	To agree on FIP Priorities and Projects with the Batwa Communities in the villages of: Bitegyenyere, Murubindi, Kagano, Karehe Rwamahano, Giyebe, Murora Biizi, Rugeshi, Birara, Kanaba Kitahurira, Kayonza, Bikuto,.
13.	14 <sup>th</sup> February 2017	Forest dependent communities - the Basua and Bambuti Communities	To provide updates and seek their views for project design
14.	16 <sup>th</sup> February 2017	Forest dependent communities- the Batwa communities around Bwindi, Mgahinga National parks and Echuya Forest Reserve	To provide updates and seek their views for the design of REDD+ project
15.	14 <sup>th</sup> -16 <sup>th</sup> February 2017	Project stakeholders from Masindi, Hoima, Kibaale, Buliisa, Kabarole, Kyenjojo, Kamwenge, Kyegegwa, Kasese, Bundibugyo, Ntoroko, Mubende	To provide updates and seek their views for project design
16.	14 <sup>th</sup> March 2017	National representatives from the Albertine Region	To provide updates and seek their views on FGRM
17.	10th April 2017	National representatives from the Albertine Region	To deliberate on the Smart Energy Solutions for Africa (Strategic Environmental and Social Assessment)
18.	17 <sup>th</sup> – 18 <sup>th</sup> May 2017	52 Participants from Government MDAs, CSOs MPs, LG Officials.	Second Consultative Workshop on the REDD+ Strategy for Uganda
19.	2013-2018	Consultations/engagement at national, district and community levels, including engagements with the Forest dependent (VMGs) the Batwa community in the Albertine Rift.	REDD+ Stakeholder engagement processes that led to the preparation of Uganda's REDD+ Strategy and Action Plan (2017) and Forest Investment Plan (2017).
20.	1 <sup>st</sup> March 2018	Water and Environment Sector working Group (WESWG)	The meeting of WESWG endorsed the original concept note and recommended its approval by Ministry of Finance, Planning and Economic Development (MoFPED) and onward submission to Green Climate Fund (GCF) and World Bank for funding consideration

<sup>22</sup> Basua and Bambuti are other names used to refer to Batwa. Some people in Western Uganda refer to the Batwa as Basua or Bambuti.

<sup>23</sup> Report on the CSOs consultations on the Forest Investment Plan Program (FIP) for Uganda held on 20th January 2017 at Colline Hotel, Mukono

21.	March and May 2018	Local Government officials. Field Staff of NFA, UWA, DWRM. CSO/NGOs, Media and Private Sector representatives	To discuss project implementation challenges of REDD+ project and devise solutions
22.	30 <sup>th</sup> August 2018	Joint meeting of the Water and Environment Working Group and Tourism Working Group	To harmonize the priorities for the IFPA-CD Project and recommended further IFPA-CD project development as a joint IFPA-CD project for MWE and Ministry of Tourism, Wildlife and Antiquities (MTWA).
23.	2 March 2019	Communities of Nyabaremure and Batwa	To agree on plans to enhance participation of Marginalised groups
24.	June 2019	Engagements in the project landscape during Project Formulation Mission	To get inputs and views of stakeholders for in cooperation in the project design
25.	12-17 June 2019	Local Government Officials, UWA, NFA, WMZO Officials and Refugee Camps Commandants	To provide updates and seek their views for project design
26.	September 2019	Stakeholder engagements during Project Formulation Mission	To get inputs and views of stakeholders for in cooperation in the project design
	12 <sup>th</sup> November 2019	Senior Conservation Officer	Uganda Wildlife Authority
27.	4 <sup>th</sup> November 2019	Partnership Officer	National Forestry Authority
28.	4 <sup>th</sup> November 2019	Environment and Social Safeguard Specialist	Ministry of Water and Environment
29.	July 2019	Forest Dependent People Community consultative meetings in Kisoro District	Bukimbiri Church of Uganda Kisoro District
30.	July 2019	Forest Dependent People Community consultative meetings Bundibugyo District	King Nzito Premises Bundibugyo District
31.	July 2019	Forest Dependent People Community consultative meetings Rubanda District	Ex-NFA Offices (now Division of Natural Forests) at Rubanda District
32.	12 <sup>th</sup> - 17 <sup>th</sup> June 2019	Stakeholders engaged during June 2019 Local Government District Officials, UWA, MWE, WMZO Officials and Refugee Camps Commandants	Rubanda District Headquarters Echuya Central Forest Reserve Kisoro District Hqtr. UWA (Kisoro Meeting/Mgahinga NP) Division of Natural Forests 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
33.	2 -17 <sup>th</sup> February 2019	project stakeholders from <b>Bushenyi</b> , Ibanda, Mbarara, Ntungamo, Lyantonde, Kiruhura, Isingiro, Buhweju, Rubirizi, Ruhinda, Sheema, Kabale, Kisoro, Kanungu, Rukungiri	To provide updates and seek their views for project design

34.	2 <sup>nd</sup> March 2019	Leaders of all Batwa communities	Consultations on REDD+ Strategy options held on at Nkuringo Cultural Centre, Kisoro
35.	July 2019	The REDD+ Secretariat, in Southwestern Uganda (In Rubanda and Kisoro District), Bundibugyo, Kween and Moroto District.	Landscape consultation and participation platforms. Community consultative meetings for Implementing Partners to discuss strategies to enhance participation of Vulnerable and Marginalised Groups (VMG)
36.	2 <sup>nd</sup> December 2019.	Members of Parliament of Uganda	Consultations meeting on REDD+ with Members of Parliament of Uganda
37.	June 2019- January 2020	Stakeholders at national levels, selected districts and communities	IFPA-CD project formulation Missions

### CONSULTATIONS FOR THE DESIGN OF IFPA-CD PROJECT

S/No	Dates	Stakeholders Met	Purpose of Consultations
1.	January 2020	Stakeholder engagements during Project Formulation Mission	To get inputs and views of stakeholders for in cooperation in the project design
2.	March 2020	Consultations with UNHCR and Office of the Prime Minister	To get views from refugees' agencies for the design of IFPA-CD activities in the refugee hosting districts
3.	March 2020	Members of Parliament	Members of Parliament Visit to Project area in early
4.	March 2020	Members of Parliament	Stakeholder engagement during Project negotiations
5.	June 2021	The Bwindi Batwa Development Association (BBDA) and community members	To seek their views in the design of the VMGP for Bwindi
6.	June 2022	The Batwa community living in the Southern sector of Bwindi Impenetrable Forest National Park <sup>24</sup>	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa.
7.	June 2022	The Batwa community living adjacent to the Northern Sector of Bwindi Impenetrable National Park	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa.
8.	June 2022	Project stakeholders (NGOs, UWA, District Local Government and community groups) working with the Batwa community in the Southern and Northern sector of Bwindi Impenetrable Forest National Park <sup>25</sup>	To seek their views regarding key issues to be considered in project design to address the concerns of the Batwa community
9.	September 2022	Special consultation with the Batwa around Echuya CFM was carried out	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa community in Echuya CFR

<sup>24</sup> A total of 3 meetings with the Batwa were organized in the Southern Sector of Bwindi alone.

<sup>25</sup> A total of 3 meetings were organized in the Southern Sector of Bwindi alone.

10.	September 2022	Project stakeholders (NGOs, UWA, District Local Government and community groups) working with the Batwa community in the Echuya CFR	To seek their views regarding key issues to be considered in project design to address the concerns of the Batwa community within Echuya CFR
11.	September 2022	Special consultation with the Batwa around Mgahinga Gorilla National Park (MGNP) was carried out	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa community in Mgahinga Gorilla National Park (MGNP)
12.	September 2022	Project stakeholders (NGOs, UWA, District Local Government and community groups) working with the Batwa community in the Mgahinga Gorilla National Park (MGNP)	To seek their views regarding key issues to be considered in project design to address the concerns of the Batwa community within Mgahinga Gorilla National Park (MGNP)
13.	October 2022	Special consultation with the Batwa around SNP was carried out	To learn about their concerns and preferences regarding the design and proposed implementation of the IFPA-CD project to give them equitable access to project benefits and minimize any unfavourable outcomes for the Batwa community in Semuliki National Park
14.	October 2022	Project stakeholders (NGOs, UWA, District Local Government and community groups) working with the Batwa community in the Semuliki National Park	To seek their views in regard to key issues to be considered in project design to address the concerns of the Batwa community within Semuliki National Park
15.	2025	Technical staff of the Nyabyeya college	To assess the investment needs for support that will scale-up NFC to become an educational facility of significance in wood processing and value addition.
16.	2025	Representatives from Uganda Timber Grower's Association (UTGA)	assessing their capacity to implement activities involving wood processing. The key action points from this engagement are
17.	June 2025	Managers and Directors of service providers (fuelwood suppliers and distributors) MWE and PCU	To understand the status of implementation
18.	July 2025	Managers and Directors of service providers, MWE and PCU	To discuss and share understanding of the E&S monthly reporting template
19.	July 2025	Training of district GRC members and Officials from the 19 refugee hosting districts	Establish and orientation of district GRCs on their roles and responsibilities
20.	July 2025	Staff of Uganda Refugee and Disaster Management Council, Supply Masters, Dreams of Success and Joint Energy and Environmental Project	Monitor the compliance with E&S guidelines
21.	July 2025	Refugees who received fuelwood including the refugee welfare committee chairpersons	To ascertain the level of satisfaction with the distribution exercise
22.	May 2025	Consultation with OPM on the formation of settlement GRCs	To agree on the approach and time for the formation of the settlement GRCs and to agree on scheduling a

		and the possible use of UNHCR FRRM system	meeting with UNHCR to discuss possible use of FRRM system for grievance reporting
23.	July 2025	Monitoring the performance of district local governments. Engaged the District IFPA-CD Focal persons, Chief Finance Officer, Chief Administrative Officer of the 19 refugee hosting districts	To monitor the performance of district local government in their oversight roles of supervising service providers
24.	July 2025	District Forest Officer, suppliers (Cassius), distributors(AAID, PSN, MWE/IFPA-CD Field Monitor and PSNs in Kirydongongo and Kikuube districts	To discuss on how to fast track distribution and supply of fuelwood

Further consultations with the Batwa communities and other relevant stakeholders have been conducted in 2024 and 2025 around Echuya central forest reserve (CFR), as well as in Bwindi, Mgahinga, and Semuliki National Parks. These are outlined below

S/N	Dates	Groups Engaged	Venue	No. of Pax
1	22 April 2025	National Forestry Authority Meeting	NFA	05
2	23 April 2025	Batwa Stakeholder Engagement Meeting (Three Batwa organisations (BIEO, BDO, and BIDO), their staff, community members and BioVision Africa	BIDO Offices	20
3	24 April 2025	Uganda Wildlife Authority (UWA)	UWA Visitor center, Kisoro	3
4	24 April 2025	United Organization for Batwa Development in Uganda [OUBDU] Consultation	OUBDU Offices	05
5	9 July 2025	NFA Staff (Echuya CFR)	NFA offices	05
6	9 July 2025	The Kalenjeni Batwa Community at Echuya Batwa Camp	Echuya camp site	29
7	9 July 2025	The Rwamahano Batwa Community.	Rwaburindi Primary School	30
8	10 July 2025	District Technical staff and CSOs working with Batwa in Kisoro	Kisoro district council hall	27
9	10 July 2025	Abadasigana Batwa Group, Birara - Bukimbiri	Kabimbiri S/C HQs	37
10	11 July 2025	Uganda Wildlife Authority (UWA) staff	Visitor centre, Kisoro	05
11	11 July 2025	Nyacance Batwa community (Nyacance Batwa Settlement)	settlement area	50
12	12 July 2025	Nkuringo Conservation and Development Foundation (NCDF) staff	NCDF Offices	06
13	12 July, 2025	Buniga Forest Trail/ Sanuriro Batwa Community	NCDF grounds	22 (13w)
14	13 July 2025	Rushaga Batwa Community members,	Rushaga Batwa settlement	30 (15w)
15	13 July 2025	The Batwa Indigenous Empowerment Organisation (BIEO)	BIEO offices	04
16	13 July 2025	Nyabaremura Batwa Community	Nyabaremura Batwa settlement	16 (12w)
17	14 July 2025	Kashasha Batwa Community	Kashasha Touncil offices	24
18	14 July 2025	Kachereere Batwa Community	Kacherere Town Council offices	40

19	15 July 2025	Kanungu District Local Government Officials (CAO and DCDO)	CAO's office	02
20	15 July 2025	Batwa Civil Society Stakeholders – Kanungu	Kanungu district headquarters	5
21	15 July 2025	Kihembe Batwa Community members	Kihembe Batwa hall	26
22	15 July 2025	Buhamba, Kitario Batwa communities	Kitarion Batwa hall	18
23	16 <sup>th</sup> July 2025	UWA and Batwa NGOs Engagement	Buhooma UWA offices	7 Members
24	16 <sup>th</sup> July 2025	Meeting with 04 Batwa CSOs	ABEG offices	4 Members
25	27 <sup>th</sup> October 2025	Bundibugyo Local Government Officers Chief Administrative Officer (CAO), District Forest Officer (DFO), District Community Development Officer (CDO), District Production Officer (DPO) MWE - Ministry of Water and Environment And the World Bank team	Bundibugyo Local Government Offices	10 members
26	27 <sup>th</sup> October 2025	Fight for the Forgotten - Karambi	Karambi Settlement	30 members
27	27 <sup>th</sup> October 2025	Uganda Wildlife Authority (UWA) Officials - Semuliki	UWA Offices	15 members
28	28 <sup>th</sup> October 2025	Community Meeting with UWA and Batwa Leadership	Mgaha Visitor Centre, Semuliki	54 members
29	28 <sup>th</sup> October 2025	Cross Cultural Foundation for Uganda (CCFU)	Nkombwe - Bundibugyo	8 members

In addition, to this ESMF, the SEP was updated (in 2025) to include mitigation measures on inclusion and non-discrimination of vulnerable or marginalized individuals.

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 re-disclosed and 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 by Stakeholders and How the Project Design or other Measures 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 13 below shows a summary of issues raised and how the Project design has tried to address them.

**TABLE 13: SUMMARY OF KEY ISSUES & HOW PROJECT DESIGN HAS ADDRESSED / IS ADDRESSING THEM**

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has Addressed / is Addressing the Issue	What has been done / what remains to be done
Strengthening of the Capacities of Implementing Agencies	<ul style="list-style-type: none"> <li>□ 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</li> <li>□ Capacity is low in CFM and communities to manage and implement agreements; and Ex-NFA capacity (now to be Division of Natural Forests under MWE) is also low.</li> <li>□ Institutional structures are in place and available, but they need considerable strengthening from both financial and human resource perspectives.</li> <li>□ Coordination between the different government agencies was also noted to need improvements.</li> <li>□ 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.</li> <li>□ More extension and support from government institutions is needed. Forest governance and capacity for law enforcement, regulation and compliance monitoring.</li> <li>□ 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 funds for technical assistance. Due to these issues NGOS are normally considered more effective and trusted partners by the communities.</li> </ul>	<ul style="list-style-type: none"> <li>(i) Support for district local governments through capacity building,</li> <li>(ii) Provision of basic support packages of office equipment, for mobility and Operational costs.</li> <li>(iii) Capacity building of Ex-NFA staff and forest officers in the field</li> <li>(iv) Technical service providers (TSP) engaged to support the CFM and CRM agenda and create and support communities 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</li> <li>(v) <b>Sub-component 1.1:</b> Improvement of infrastructure and equipment for the management of forest protected areas &amp;</li> <li>(vi) <b>Subcomponent 3.1:</b> Increased tree cover on community land in refugee-hosting areas</li> </ul>	<p>Interventions (i) – (iv) have been delivered and this support is continuous throughout the project implementation period.</p> <p>Interventions (v) – (vi) is work in progress (WIP). 02 TSPs have been crafted to support agro-forestry and woodlot establishment in the refugee-hosting areas</p>

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has Addressed / is Addressing the Issue	What has been done / what remains to be done
Challenges in Formation and Management of CFM	<ul style="list-style-type: none"> <li>□ 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;</li> <li>□ 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.</li> <li>□ Funding- There are community development driven funds which are obtainable in the districts. These funds do boost CFM activities.</li> </ul>	<ul style="list-style-type: none"> <li>(i) 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</li> <li>(ii) Funding is provided for communities through the TSP as well as training for Forest Officers</li> </ul> <p><b>Component 1:</b> <b>Sub-component 1.2:</b> increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas.</p>	<p>Interventions (i) and (ii) have been implemented; 72 CFM agreements (19 new and 53 renewed) have been supported and the different livelihood support interventions and ecosystem improvement interventions have been funded. The Forest Officers working in collaboration with the TSPs have also been trained.</p>
Wildfire Management	<ul style="list-style-type: none"> <li>□ 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.</li> <li>□ Wildfires specially in the grassland portions of Kadapa National Park</li> </ul>	<ul style="list-style-type: none"> <li>(i) Support development of landscape-level strategy for fire management and training in fire management</li> <li>(ii) Establishment and maintenance of fire breaks, equipment and construction of fire towers for fire detection and suppression, community sensitization response and monitoring.</li> <li>(iii) Introduction of appropriate modern approaches that could help introduce more efficient fire management practices at the landscape level.</li> </ul> <p><b>Component 1:</b> <i>Sub-component 1.4: Increased Forest protection in CFRs and WRs in close proximity to refugee settlements</i></p>	<p>Interventions (i) and (ii) is under progress; feasibility study is underway.</p> <p>Interventions (ii) fire-fighting equipment including fire truck and personal fire-fighting protective equipment procured and deployed. Fire towers dropped and fire breaks constructed by the road construction equipment</p>

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has Addressed / is Addressing the Issue	What has been done / what remains to be done
		Improvements for wildfire management (fire observation towers and equipment)	
Increasing pressures on forest and fragile ecosystems due to Immigrants and Refugees	<ul style="list-style-type: none"> <li>□ In the Northern and West Nile Regions refugees were considered as a major cause of deforestation and forest degradation.</li> <li>□ Refugees: Since the influx of refugees is high, REDD+ should consider including the areas with refugee concentration in the planning perspectives.</li> <li>□ Not practical to form CFM among refugee communities. Refugees look at themselves as temporal.</li> <li>□ Refugee settlement impacts negatively on forestry especially in Yumbe District.</li> </ul>	<p><b>Component 3: Improved tree cover, forest management and landscape resilience on private and customary land, including refugee hosting areas.</b></p> <ul style="list-style-type: none"> <li>(i) 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.</li> <li>(ii) Support refugees with fuelwood provision to alleviate the pressure on the riparian landscapes</li> </ul> <p><b>Component 1:</b></p> <ul style="list-style-type: none"> <li>(iii) <i>Sub-component 1.4:</i> Increased Forest protection in CFRs and WRs in close proximity to refugee settlements</li> <li>(iv) <i>Subcomponent 3.2:</i> Supporting farm forestry for refugee fuel supply</li> </ul>	<p>Interventions (i) is WIP; 02 TSPs have been engaged to support agro-forestry and woodlot establishment in refugee-hosting landscapes</p> <p>Interventions (i) commenced in the first quarter of 2025 (Jan-Mar) and it is WIP. 05 Fuelwood Suppliers and 05 Fuelwood Distributors were contracted for the task. In the last quarter of 2025 (Oct-Dec), additional 04 Fuelwood Suppliers were engaged to ensure sustained fuelwood distribution to the refugees</p>
Stakeholder Engagement	<ul style="list-style-type: none"> <li>□ There is a need for community consultations. This is important for ownership and addressing specific conditions rather than generalizing.</li> <li>□ 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 Community Wildlife Committee (CWC) in each conservation area, reinforcing the management of resources, sharing of benefits and utilization of benefits.</li> </ul>	<p>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 40 new CRM groups, at least 19 new CFM groups, and support of livelihood activities within existing groups.</p> <p><i>Sub-component 1.2: Increasing the involvement of local communities in the</i></p>	<p>This intervention has been implemented; 40 new CRM groups and 19 CFM agreements have been supported / funded by the IFPA-CD Project with different livelihood activities implemented (e.g. Bee keeping; Tree Nurseries; Tailoring and Crafts making; Shoe Polish making etc.)</p> <p>Further community awareness on CRM and CFM initiatives are</p>

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has Addressed / is Addressing the Issue	What has been done / what remains to be done
	<input type="checkbox"/> Collaboration between MWE and the local people should be improved even to the point where locals manage the central forest reserves on behalf of MWE.	<i>management of forest and wildlife areas by increasing their access and benefits from these areas</i>	ongoing and planned in PAs where VMGs reside nearby
Promotion of Conservation	<input type="checkbox"/> 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.	<p>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</p> <p><b>Sub-component 1.3:</b> <i>Restoration of degraded natural forests and habitats in forest reserves</i></p>	Enrichment planting to facilitate forest restoration have been undertaken in 16 CFRs (4,954 ha) under component 1.3 and restoration of 03 CFRs (2,245 ha) under component 1.4. The targets were reduced to 5,000 and 3,000 ha respectively.
Demarcation of PAs boundaries	<input type="checkbox"/> Boundaries of protected areas need to be clearly and permanently marked. <input type="checkbox"/> Boundary surveys- the involvement of DLG political and civil leaderships is very important.	<p>Permanent boundary marking (but no change in gazette boundaries) will be supported in PA, consultation with communities and local government will be part of the process of this activity</p> <p><b>Sub-component 1.1:</b> <i>Improvement of infrastructure and equipment for the management of forest protected</i></p>	Boundary demarcations have been accomplished in 12 CFRs - Rwesambya, Kibego, Nkera, Muhangi, Kakasi, Ihimbo, Era, Wait, Otzi East, Otzi West, North Maramagambo and South Maramagambo.
Policy and Law Enforcement	<input type="checkbox"/> 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. <input type="checkbox"/> These communities would welcome more law enforcers present, as many times it's the people	Local communities living adjacent to forests will be supported to organize themselves into CFM groups to help manage and deter illegal charcoal burning and unauthorized use of forest resources	72 CFM agreements (19 new and 53 renewed) have been supported; these have immensely contributed to successful rallying of the locals to support conservation activities in the forest reserves.

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has Addressed / is Addressing the Issue	What has been done / what remains to be done
	outside the forest dependent communities, who cause deforestation and forest degradation.		
Grievance Management	<ul style="list-style-type: none"> <li>□ There is need to expand the district FGRM team to include all relevant stakeholders in the FGRM, including 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</li> <li>□ Human Wildlife Conflicts due to problem animals especially with regards to Kyambura Wildlife Reserve (elephants, chimpanzees, hippos) and disease transmission to livestock</li> <li>□ 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.</li> <li>□ There is a tendency not to comply and adhere to agreements. Some members of the community turn resources into commercial exploitation for income. This results in enforcement by the park authority. However, there is a need for: (i) transparency; (ii) engagement of communities and park offices.</li> </ul>	<ul style="list-style-type: none"> <li>(i) A project GRM will be developed for the project and supported by the MWE and UWA 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 MWE (Division of Natural Forests) and at the community level to address issues of human wildlife conflict.</li> <li>(ii) Provide tollfree telephone contacts (for MWE, Ex-NFA and UWA) for the members of the public to raise any grievances related to the project.</li> <li>(iii) Procure suggestion boxes and distribute to the project areas for the public to drop in their concerns</li> <li>(iv) I&amp;ND specific TSP to receive, collate and report to the Bank on grievances related to I&amp;ND</li> </ul>	All the interventions (i) – (iv) have been accomplished and their operations are ongoing. GRMs have been established at all levels. Infrastructure to minimize human-wildlife conflicts (electric fences in 02 MFNP and QENP, buffalo walls and elephant trenches); tollfree telephone contacts for MWE, Ex-NFA and UWA were secured and these have been disseminated to the project areas (issues from the tollfree lines have been included in E&S reports); up to 400 suggestion boxes were procured & distributed to different project areas; several I&ND capacity building sessions have been held and the tollfree line for I&ND related incidences has been disseminated.
Promotion of Tourism	<ul style="list-style-type: none"> <li>□ 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)</li> <li>□ High incidences of animal attacks on human beings (elephants, crocodiles, hippos, and lions)</li> <li>□ Increasing coverage of invasive plant species limiting pasture and limiting tourism activity</li> </ul>	<ul style="list-style-type: none"> <li>(i) Support for increased tourism infrastructure and private sector investment</li> <li>(ii) Reduction of HWC will be addressed through infrastructure investment in buffalo walls and elephant trenches as well as other approaches to reduce HWC</li> </ul>	Interventions (i) are being executed; 05 Visitor Information Centres and related tourist facilities are under construction;  Intervention (ii) has been accomplished as stated above

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has Addressed / is Addressing the Issue	What has been done / what remains to be done
	<input type="checkbox"/> Emergence of new forms of poaching (armed poaching) and resultant illicit trade of wildlife products	(iii) Landscape level invasive species eradication strategy developed and financed  <i>Sub-component 1.1:</i> Improvement of infrastructure and equipment for the management of forest protected areas; And <i>Subcomponent 2.1:</i> Investments in tourism	Intervention (iii) has been accomplished; removal of invasive weeds has been undertaken in CFRs and NPs; this is still WIP
Gender Relations	<input type="checkbox"/> Gender strategies; It was expressed at the workshop that gender should be mainstreamed in the REDD+ strategy <input type="checkbox"/> Land tenure and governance; Support governments in developing land tenure frameworks that officially recognize women's rights to forest products and carbon from forests. <input type="checkbox"/> 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.	(i) 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. (ii) Gender specific indicators are included in the Results Framework, data disaggregated by sex will be collected and monitored	All interventions (i) and (ii) have been accomplished; the gender specific indicators in the Results Framework have been reported in the progress reports
The issues of Vulnerable and Marginalized Groups under ESS7	<input type="checkbox"/> Limited participation in decision making regarding forest resources use, limited access to land and land ownership rights, (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	(i) 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 (these have been updated to reflect the current scope of needs from the	Interventions (i) and (ii) have been accomplished  The Frameworks were prepared and Plans for each area where the Batwa reside were prepared; the plans have been implemented; their implementation is still WIP.

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has Addressed / is Addressing the Issue	What has been done / what remains to be done
	<p>building materials, water, medicine, timber), domestic violence, Gender based violence, and</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 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.</li> </ul>	<p>Batwa). The plans address issues of participation in decision making, access to resources, capacity building and long-term support to the Batwa to engage in resource management and livelihood support for their communities.</p> <p>(ii) A Process Framework based on existing laws (CRMs/CFMs) has been developed for the Project to address issues of potential restrictions in access to protected areas</p>	<p>The VMGPs were recently updated and disclosed; an updated PF is being finalized.</p> <p>The VMGF and the 04 VMGPs are the specific instruments that guide the preparation and implementation of Project interventions that may affect the Batwa communities, including on issues related to resource access and livelihoods. The PF, however, further describes the Uganda's collaborative management framework for PAs (i.e CRM and CFM), established under the national law, that allow for regularized and sustainable access as well as other benefits for local communities, including the Batwa.</p>
Availability of quality tree seedlings	<ul style="list-style-type: none"> <li><input type="checkbox"/> 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</li> </ul>	<p>(i) Nurseries are being established to provide high quality seedlings both exotic and indigenous</p> <p>(ii) Support will be provided by the TSP - natural and assisted regeneration</p>	Interventions (i) and (ii) is WIP by the TSPs
Management of livelihood enterprises	<ul style="list-style-type: none"> <li><input type="checkbox"/> Require diversification of livelihood not necessarily related to forests e.g. agriculture.</li> <li><input type="checkbox"/> Form associations based on the livelihood alternatives</li> <li><input type="checkbox"/> Need to look at: <ul style="list-style-type: none"> <li>(a) forest based- (i) apiculture (beehives); (ii) agroforestry-fast growing trees and</li> </ul> </li> </ul>	<p>(iii) Investments to increase revenues and jobs from forests and wildlife protected areas through support for more tourism opportunities including training for guides,</p>	<p>Interventions (iii) - (iv) have been accomplished</p> <p>Several persons (including from the Batwa communities) have been trained in tour guiding; several opportunities related to art &amp; crafts, traditional dances and</p>

Area of Concern	Key and Most Commonly Raised Issues	How the Project Design has Addressed / is Addressing the Issue	What has been done / what remains to be done
	<p>leguminous crops; (iii) establishment of woodlots; (iv) afforestation.</p> <p>(b) small piece of landholding- (i) home gardens; (ii) rearing of domestic animals- pigs and goats; (iii) poultry and turkeys</p> <p>(c) Fishing farming- this takes at least 8 months. Not very preferable for households.</p> <p>(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.</p>	<p>development of new attractions, increases in tourism Numbers</p> <p>(iv) Livelihood activities supported through the creation of CFM and CRM groups; and</p> <p>(v) Support for more productive forestry and jobs related to added value in the wood value chain</p>	<p>employment opportunities in tourism related activities have been conferred to communities; different livelihood activities have been extended through the CFMs and CRMs.</p> <p>Interventions (v) is WIP; interventions involving Nyabyeya Forestry College and UTGA shall deliver the intended results.</p>
Enhance Access to Resources	<p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> Access to resources tend to be regulated more especially where there are boundary disputes.</p>	<p><b>Sub-component 1.2:</b> <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></p> <p>(i) A Process Framework has been developed for the Project to address issues of access to protected areas.</p> <p>(ii) Support provided for the creation of CRM groups and involvement of communities in decision making about the PA.</p>	<p>These interventions have been accomplished; Process Framework was developed and has been used to guide access to resources by the public; the PF is being updated to account for lessons learnt during project implementation, incorporate stakeholder's insights and better identify potential access restrictions and collaborative processes to address it.</p> <p>40 CRM groups were formed and these participated in decision making (in addition to receiving livelihood support)</p>

## 7.4 Continuous Stakeholder Engagement

Stakeholder engagement will continue according to the Stakeholder Engagement Plan that was prepared for IFPA- CD and is being updated in light of the ongoing restructuring. 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>.

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

The engagement was conducted by MWE with the Bank team participating as Observers) to engage three Batwa-led organisations and the Batwa community in Mgahinga, Bwindi, Semuliki NPs and Echuya CFR (April 23, 2025) and hear their feedback on the activities supported by the Project in the Batwa community. Other meetings were held with NFA (now merged to MWE), (April 22, 2025) and UWA (April 24, 2025). as a result of such meetings, MWE agreed with the Batwa-led CSOs to Review, consult, and update as needed the VMGPs, including activities, training modules and stakeholder engagement processes. These stakeholders recognized that land ownership and compensation issues for legacy events in the 1990s were outside the remit of the Project, and the Batwa representatives agreed to discuss these with the Government of Uganda separately.

#### ***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 March – May 2025; these involved the technical staff for all the 03 implementing entities (MWE, UWA and Ex-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.

## 8.0 MONITORING AND EVALUATION

### 8.1 Overview

The purpose of environmental and social safeguards monitoring includes:

- i. Ensure that proper assessments of the ES risks and impacts of project activities takes place and that proper measures are put in place to mitigate such risks and impacts;
- ii. Set out the basis for compliance and enforcement of terms and conditions for approval of site specific investments;
- iii. Design compliance strategies;
- iv. Assess compliance with and management of the environment and social risks in line with the ESSs and relevant laws of Uganda.
- v. Ensure that all stakeholders participate in the Project processes.

### 8.2 Monitoring

The environmental and social monitoring is carried out by UWA, 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 and for each completed subproject, Environmental and Social Audit will be undertaken in line with conditions of ESIA certificate of approval by NEMA. Regular field inspections will be conducted with the view to recommend corrective actions before it escalates. Analysis of the monitoring data from routine monitoring and the audit exercise will be done by use of E&S Checklists and Audit Correction Action Plans which shall inform the interventions to be undertaken.

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 in 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, regular quarterly reports, monthly stock-take meetings and regular catch up calls and meetings with the Bank team are being undertaken as part of 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 has established 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 for the Project detailed in Annex 2. The Reporting 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., incidents as a result of enforcement activities in the Project area ); analysis of root causes, adoption of corrective actions and verification that follow-up actions are complete.

**Submission of Contractors' monthly reports:** Implementing agencies shall, within 5 days upon receipt of Contractors' monthly monitoring reports, synthesise summary progress reports and submit to the Bank. As of today, no such reports have been submitted to the Bank, and this is attributed to the fact that contractors have only been hired in September 2025 as part of IFPA-CD project activities.

The World bank has also hired 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 remaining IFPA-CD period, the E&S activities have been provided for in the cost allocations for each entity (MWE including Ex-NFA and UWA). Over this period, each entity has been provided with US\$ 150,000. This budget is dedicated to E&S risk management 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. The budget allocations and performance shall be regularly reviewed based on the emerging issues and appropriate action shall be taken to avail resources as deemed necessary.

### **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, Ex-NFA (now Division of Natural Forests) regional 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, UWA website, and Ex-NFA 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 ESIs 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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6. Uganda Forests and Resilient Landscapes Project Process Framework November 2019 Project Appraisal Document (PAD).
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10. Andrew J. Plumptre et Al 2007, The Biodiversity of the Albertine Rift.
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12. International Resources Group Uganda Biodiversity and Tropical Forest Assessment EPIQ II Task Order No. 351 July 2016.
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## 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 <input type="checkbox"/> N <input type="checkbox"/>
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?	
<b>2</b>	<b>Resource Efficiency, Pollution Prevention and Management (ESS 3)</b>	<b>Answer (Yes/No)</b>
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 requires 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?	
<b>3</b>	<b>Community Health and Safety (ESS 4)</b>	<b>Answer (Yes/No)</b>
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? <sup>26</sup>	
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?	
<b>4</b>	<b>Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5)a</b>	<b>Answer (Yes/No)</b>
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?	
4.4	Will the subproject result in restrictions on land use and access to natural resources that may cause a community to lose access to resource use where they have traditional or customary tenure, or recognizable use rights?	
<b>5</b>	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6)</b>	<b>Answer (Yes/No)</b>
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?	
<b>6</b>	<b>Vulnerable and Marginalized Groups (ESS7)</b>	<b>Answer (Yes/No)</b>
	Are 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, in line with the four cumulative criteria set out in ESS7.	
<b>7</b>	<b>Cultural Heritage (ESS8)</b>	<b>Answer (Yes/No)</b>
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 answers.	
<b>Question number</b>	<b>Recommended actions</b>
	-

**SECTION E: Environmental and Social Risk Screening Outcome**

<b>Select from the following the appropriate E&amp;S Risk Classification for the subproject based on the answers provided on the Section C</b>	
<input type="checkbox"/> 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.
<input type="checkbox"/> 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);
<input type="checkbox"/> 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.



## **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 (now merged to MWE)
- h. UNHCR
- i. Local communities and representatives
- j. Vulnerable and marginalized groups, as relevant

### **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 be comprised 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 and social 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 it is 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

### Incident Reporting System

#### 1. Criteria for a “Reportable Incident”

The MWE and UWA will promptly report to the Bank (within 24 hours of occurrence or awareness of occurrence of the event) all incidents that meet the following criteria:

- A. The incident was one of the types of reportable incidents listed in Annex A-1 , **and**
- B. The incident took place during the **Project execution period, and**
- C. The incident relates to one or more of the Project activities involving the following:
  1. **It involved contractors and/or their work sites, contractors / community members involved in tree planting, implementation of human wildlife conflict prevention measures, wildlife scouts, community informers, and community patrols or consultant staff** (e.g., incidents in or pertaining to construction sites, whether affecting a contractor staff or a community member; incidents involving or affecting contractors' or consultant's personnel or equipment/machinery, etc.);
  2. **It involved government officials and/or authorized officers including range managers, rangers, wardens, forest supervisors, forest patrol men, sector managers, while on duty, implementing the objectives of the project** (from any implementing agencies including PIU members, and staff of MWE, UWA, Ex-NFA (now Division of Natural Forests), or other Project Implementing Partners) (e.g., delivery of goods purchased under the project, incidents while operating equipment, or caused by or impacting seriously on wildlife, or during any altercation while enforcing Park or Forest regulations – cattle seizure, settlement clearance, property removal, apprehension of poachers, etc.);
  3. **It involved Project beneficiaries while implementing Project-supported activities** (e.g., accidents while executing livelihood sub-projects, attending Project trainings, implementing any construction or project-financed maintenance, activities driving or transporting materials to and from project sites etc.);

## 2. Notification format

Reports will follow the template provided below with as much (or as little) information as is available. Two formats are provided below; one for general incidents and another for GBV incidents. Only one form needs to be filled out by MWE, with information and support from various relevant implementing agencies, such as UWA, and other stakeholders as needed, depending on the type of incident. For each incident, an *initial notification form* should be submitted within 24 hours of occurrence or awareness of occurrence of the event, followed by *Information to be provided following investigations* as more information becomes available through further queries / analysis / investigations.

### Format for general incidents

Initial Notification	
A. Type of incident	Fatality <input type="checkbox"/> Lost Time Injury <input type="checkbox"/> Violence <input type="checkbox"/>
B. Description of incident	1. Time and date of incident: 2. Please provide coordinates and satellite images for the location of the incident 3. Please provide sketch, drawing or photographs of the incident site (as applicable), showing any property, tools, or equipment or machinery involved. 4. Age and affiliation of victim(s) (MWE, UWA, contractor workers, farmers, community members ... etc.): 5. What was the involvement of MWE, UWA? 6. Job titles of the personnel involved (MWE, UWA or contractor) and of the personnel in the vicinity of the incident: 7. Number of community members involved in the vicinity of the incident: 8. Weapons or other implements used (if any): 9. Details of the tools/machinery/equipment involved (if any): 10. Any damage to property resulting from the incident? If yes, please describe. 11. Environmental conditions (weather, visibility, site, and ground conditions ... etc.): 12. Was the incident because of a confrontation? if yes, what was the cause of the confrontation and how long did it last and how did it end? 13. Have there been other related incidents prior or after? 14. What were the rescue/first aid/medical evacuation and treatment arrangements implemented? 15. What activities were being undertaken at the time of the incident by the various stakeholders? - project contractor's workers, community members, MWE, UWA, etc.: 16. Were there method statements/SOPs and risk assessments for this type of activity being undertaken prior to the incident? 17. What different types of training did MWE, UWA or contractor workers involved in the incident receive? 18. Description of the incident details in chronological sequence
Additional information needed for fatalities	19. Immediate cause of death: 20. After how long were fatalities discovered? 21. Where were the bodies found/discovered? 22. When and where were the bodies buried?
Additional information needed for lost time injuries	23. Immediate cause of injury 24. After how long were injuries reported? 25. Please describe the injuries 26. How long did the medical treatment take? 27. What is the monetary value of medical treatment? How (by whom) was this cost covered?
Additional information needed for acts of violence	28. Please describe type of violence: 29. Was there any damage or loss associated with the violence and what is the value?
Associated violation of the Uganda Wildlife Act	Unauthorised entry into gazetted areas <input type="checkbox"/> Illegal extraction of wood <input type="checkbox"/> Poaching of animals <input type="checkbox"/>

2019/National Forestry and Tree Planting Act 2003	Illegal extraction of other resources <input type="checkbox"/> Other (please specify) <input type="checkbox"/> No associated violation of the Act <input type="checkbox"/>
Violation location if separate from the incident location	30. Please provide coordinates and satellite image 31. Please provide sketch, drawing or photographs of the violation site, showing any property, tools, or equipment or machinery involved.
Additional Information needed for livestock seizure	32. Type and number of livestock taken. 33. How many herders were involved? 35. Where were the herders coming from? Do they live in/near the park? 36. What are the approximate ages of the herder? 37. What time of day was the seizure carried out? 38. Where and how were the seized livestock being held? 39. How many rangers were involved in the seizure?
Additional information needed for equipment/asset seizure	40. What type of equipment/asset was involved? 41. What is/are the activity(ies) the seized equipment /asset(s) involved in at the time of the seizure (crop, area ... etc.)? 43. Where do the equipment/asset users come from? Do the equipment/asset users live in/near the park? 44. What are the ages of the equipment/asset users? 45. What time of day was the seizure carried out? 46. Where and how were the seized equipment/assets being held? 47. How many rangers were involved in the seizure?
Additional information needed for poaching	48. What type of vehicles and poaching tools were involved? 49. How many poachers were involved? 51. Where did the poachers come from? Do the poachers live in/near the park? 52. What are the approximate ages of the poachers? 53. What time of day did the poaching occur? 54. How and where were the vehicles/equipment held? 55. How many rangers noticed the violation? 56. What was the action taken by the rangers?
<b>Information to be provided by MWE following investigations</b>	
D. Measures taken after the incident	57. Was an investigation carried out? If yes by whom and when? 58. What were the conclusions of the investigation i.e., the root causes of the incident? 59. What were the recommended corrective measures to prevent incident/accident recurrence. 60. Were the recommended corrective measures implemented? By whom and when? 61. Was there operational review (e.g., operating procedures, personnel training or equipment used) included in the corrective measures? 62. Were there similar incidents/near misses reported after implementation of corrective measures?
E. Judicial proceedings	63. Did the incident result in judicial proceedings? If yes in which forum and what is the status? 64. If yes, what is the ruling/judgement with respect to personnel (UWA, MWE or contractor workers) or community members involved (whether indicted, acquitted, convicted/sanctioned)?
F. Disciplinary procedures deemed necessary?	65. If yes, please describe.

## Format for SEA/SH incidents

Incident Details- To be shared with the World Bank with 24 hours from the incident		
<b>Date of incident intake by the project/GRM:</b>	<b>Date Reported to PIU:</b>	<b>Date Reported to WBG:</b>
<b>Reported to project/GRM by:</b> Survivor <input type="checkbox"/> Third party <input type="checkbox"/> Other:	<b>Reported to PIU by:</b> GRM operator <input type="checkbox"/> Directly, by Survivor <input type="checkbox"/> Directly, by third party <input type="checkbox"/> Other:	<b>Reported to WBG by:</b> PIU <input type="checkbox"/> Directly, by Survivor <input type="checkbox"/> Directly, by third party <input type="checkbox"/> Other:
<b>Is a record of this incident in GRM?</b> Yes <input type="checkbox"/> No <input type="checkbox"/>		
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 <input type="checkbox"/> No <input type="checkbox"/>	
Sex of survivor (if recorded in GRM): Male <input type="checkbox"/> Female <input type="checkbox"/> Other <input type="checkbox"/>	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 <input type="checkbox"/> No <input type="checkbox"/>	
Is the survivor employed by the project (including the mainstream government agencies staff in IAs and UPDF staff used by MWE to support patrol operations) (as indicated by the survivor or complainant and reported in the GRM)? Yes <input type="checkbox"/> No <input type="checkbox"/>	Is the alleged perpetrator employed by the project (as indicated by the survivor or complainant and reported in the GRM)? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Basis for further action		
a. Has the complainant provided informed consent to lodge a formal complaint? Yes <input type="checkbox"/> No <input type="checkbox"/>	c. Has the survivor provided informed consent to be part of an investigation into misconduct? Yes <input type="checkbox"/> No <input type="checkbox"/>	
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 <input type="checkbox"/> No <input type="checkbox"/>	d. Has the complaint been filed anonymously or through a third party? Yes <input type="checkbox"/> No <input type="checkbox"/>	
<b>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?</b> Yes <input type="checkbox"/> No <input type="checkbox"/>		
<b>Will an investigation into misconduct be undertaken in addition to an investigation into adequacy of project systems, processes, or procedures?</b> Yes <input type="checkbox"/> No <input type="checkbox"/>		
<b>In case an investigation will take place please fill the below after the investigation is concluded</b>		
Findings of the investigation		
Have sanctions against a perpetrator been recommended as part of an investigation into misconduct? Yes <input type="checkbox"/> No <input type="checkbox"/>	Has an investigation into adequacy of project systems, processes or procedures been undertaken? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Corrective actions to be implemented (to be fully described in Corrective Action Plan)		

<b>Short Description of Action</b> <i>(Examples: Please replace text in italics below with brief description of actions to be taken)</i>	<b>Responsible Party</b>	<b>Timeline for completion/Status</b>
<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: Incident Types

## A-1 : Severe Incidents to be reported to the Bank in line with this Incident Reporting System

Environmental	Social	Health & Safety
<p><b>Environmental pollution incident:</b> Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24hrs or have resulted in harm to the environment.</p>	<p>Forced evictions or resettlement of communities without due process or compensation</p> <p><b>Displacement Without Due Process:</b> 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.</p>	<p><b>Fatality:</b> 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).</p> <p><b>Lost Time Injury:</b> Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring <b>3 or more days off work</b>, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.</p> <p>Permanent disability</p>
<p>Poaching or hunting and trafficking of threatened or endangered species</p>	<p>Abuses of community members (including vulnerable groups e.g., women, children, youth, elderly, disabled/sick, LGBT) by site security forces or other Project workers, including but not limited to SEA/SH</p>	<p><b>Disease Outbreaks:</b> 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</p>
<p>Sediment, pesticide, or herbicide runoff causing permanent damage to waterways</p>	<p>Significant damage to nationally protected areas or to UNESCO World Heritage sites</p>	<p>Criminal and political attacks at worksite</p>
<p>Destruction of internationally recognized critical habitat or major impact on endangered wildlife</p>	<p>Human trafficking</p> <p><b>Child labor :</b> An incident of child labor occurs when a child under the age of 18 is employed or engaged in connection with a project</p>	<p>Forced labor by Project's Works Contractor</p>
<p>Major river contamination causing decimation of fish population or other aquatic resources</p>	<p>Violent community protests against the Project</p>	<p>Works Contractor is unresponsive regarding ongoing worksite risks of bodily injury</p>

Environmental	Social	Health & Safety
	<p>Significant impacts on Indigenous Peoples’ land/natural resources and/or culture and there is no evidence of consultation, broad community support, mitigation of harm and/or culturally appropriate benefit-sharing</p>	<p>Persistent non-compliance and/or inability or unwillingness to remedy non-compliance that could result in bodily injury or harm Murders, kidnappings, manslaughter and assaults, while criminal matters and not safeguards incidents per se, have occurred in Bank Projects and should be treated as severe incidents. These incidents would be referred to local authorities with notification to WB Security</p>
<p><b>Unexpected impacts on heritage resources:</b> 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 that was not foreseen or predicted as part of the project design or the environmental or social assessment.</p>	<p><b>Acts of Violence/Protest:</b> 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.</p>	<p>.</p>
<p><b>Unexpected impacts on biodiversity resources:</b> 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.</p>	<p><b>Forced Labor:</b> 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.</p>	

Environmental	Social	Health & Safety
	<p><b>Sexual Exploitation:</b> 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. In Bank financed operations/projects, 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.</p> <p><b>Sexual Abuse:</b> 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 threat to perpetrate an unwanted sexual act.</p> <p><b>Sexual Harassment:</b> 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 within the context of a subcontractor or contractor and relates to employees of the company experiencing unwelcome sexual advances or requests for sexual favor or acts of a sexual nature that are offensive and humiliating among the same company’s employees.</p>	

Environmental	Social	Health & Safety
	<p><b>Violence on the basis of SOGI:</b> 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.</p> <p><b>Discrimination on the basis of SOGI:</b> Discrimination means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person based on their real or perceived sexual orientation, gender identity, gender expression, or sex characteristics from being on an equal basis with others.</p>	

**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 need attention.

**A-2: Incidents that do not require reporting to the Bank but should be captured in the quarterly E&S reports and documented in the Aide-Memoires**
**Indicative Incidents**

<b>Environmental</b>	<b>Social</b>	<b>Occupational Health &amp; Safety</b>
Small-volume hydrocarbon or chemical spills	Small-scale crop damage or livestock deaths	Underuse of personal protective equipment (PPE) by Works Contractor
Localized dust, light, or noise pollution	Grievances due to Project use of public roads	Local increase in the occurrence of communicable disease
Illegal hunting of wildlife (non-endangered)	Project interference with locally significant practices or sites	Minor job site injuries
Small volume sediment, pesticide, or fertilizer run-off into local waterways	Vehicle damage to public or private roads caused by Works Contractors	Poor “housekeeping” at site, e.g., littering and random disposal of solid waste
Minor off-site disposal of solid waste from Project	Nuisance-level contact between employees and community	Lack of understandable warning or traffic control signage
Poor quality or delayed site restoration and revegetation	Minor instances of inappropriate behavior of security forces or other	Almost empty first aid kit at work site
Poorly functioning erosion-control measures	Overloading of local commercial services from use by Project personnel	Poorly organized or sporadic health & safety induction and training
	Minor impacts on livelihood restoration and/or access to community natural resources	Multiple “slip and trip” hazards throughout the site
	Minor impacts on cultural sites/areas	Lack of Health & Safety plan and/or training for staff
	Minor social conflict related to or affecting the Project	
	Some problems with consultation/outreach about the Project	
	Delays by GRM in handling/addressing grievances	

### Serious Incidents

<b>Environmental</b>	<b>Social</b>	<b>Occupational Health &amp; Safety</b>
Large-volume hydrocarbon or chemical spills, or other hazardous substances impacting the environment	Widespread crop damage or livestock deaths	
Over-exploitation of local natural resources	Cases of mistreatment of communities potentially, including vulnerable groups, by Project workers or security forces, including incidents such as sexual harassment	Instances of serious communicable diseases among workforce
Large-volume or long-term sediment, pesticide, or herbicide runoff into waterways	Significant impacts to protected physical cultural resources	Consistent lack of health & safety plans and training at work site
Medium to large-scale deforestation	Works have commenced without compensation and resettlement being completed	Chronic non-use of PPE at Project work site
Lack of implementation of agreed environmental restoration program	Significant and repeated community impacts from Project vehicles and construction activities	Repeated non-compliance or failure to remedy non-compliance
Disturbance to wildlife habitat, breeding areas or wildlife itself	Lack of clarity about consultations with Indigenous Peoples and broad community support for the Project	
	GRM not functioning	
	Inadequate consultation and engagement of stakeholders in the Project leading to significant conflict and/or delays	
	Non-violent community protests against the Project, or mild community unrest	

### 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 vapours 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 MWE 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 MWE, 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 West. 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 5,735.3km<sup>2</sup> with a land area of 3,612.17km<sup>2</sup>. The western border is completely covered by Lake Albert amounting to 2,123.13km<sup>2</sup> 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 Kigorobyia 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, Kigorobyia 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 HCIIs 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 Northeast, Apac in the East, Masindi in the South and Southwest and Buliisa in the Northwest. The District has a land area of 3,624.1 km<sup>2</sup> of which 1,747km<sup>2</sup> 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/km<sup>2</sup>. UBOS 2014, reveals that Kigumba sub-county in Kiryandongo District had the highest number of households (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 households 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 km<sup>2</sup> 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 households 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 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 the 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%. The 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,

leaving school and never attending 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 underage 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/km<sup>2</sup>. 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 km<sup>2</sup>. 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 3128km<sup>2</sup> of which land area is 3081.2km<sup>2</sup>.

#### ***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 3,128km<sup>2</sup> and its population density was 74persons/km<sup>2</sup> per km<sup>2</sup> of land in 2014. It is believed; the population density has increased from 16 persons/km<sup>2</sup> 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 the 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 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 facilities 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 given 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.) compared 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% compared 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 in 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 Northwest; Yumbe in the Northeast; Democratic Republic of Congo in the West; Nebbi in the South; Zombo in the Southeast; and Amuru district in the East. In total the

district covers an area of 4,274.13km<sup>2</sup>, 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 are 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 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 the 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 a 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 wholesale, 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 km<sup>2</sup>, of which 192km<sup>2</sup> is rivers and swamps, 172km<sup>2</sup> 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 km<sup>2</sup>. 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 under 18 years constitute 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 school are still in school at the age of 18 compared to half of the boys.

At the 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. The 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 exists 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 are 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 extent 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. 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 the dry season and decreases during the 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.

## **The Batwa Community**

### **The Background:**

The Batwa are an indigenous group in Uganda who historically lived as hunters and gatherers in the forests of Bwindi and Mgahinga in South-Western Uganda. In the 1990s, the Batwa communities were evicted from the forests to create national parks for gorilla protection and tourism activities. The protected areas that were created after the Batwa eviction from the forests include Mgahinga NP, Bwindi INP, Semuliki NP and Echuya CFR. Since then, the Batwa have not yet been able to cope with the new lifestyles; have remained marginalised and face poverty and several other challenges.

**Distribution and Population:** Currently, the Batwa are majorly situated in the four districts of Kisoro, Rubanda, Kanungu and Bundibugyo. They stay in the peripheries of the four aforementioned protected areas. According to the 2014 National Population & Housing Census report, the Batwa population was 6,200 people. The census report for 2024 indicates that this population has fallen to 3,857 persons; this represents a population decline of approx. 37.8% over a period of 10 years.

**The Culture:** Traditionally, the Batwa lifestyle was dwelling in the forest, hunting wild animals and gathering fruits and honey. The Batwa used traditional knowledge to advance traditional medicine that were sourced from the forests. The Batwa have traditional dances, songs, and deep spiritual connections to the forests, land and wildlife which defined their identity. The Batwa have continued to offer their cultural practices to the visiting tourists (traditional dances and music, art and crafts and the unique Batwa Trails); these have provided them with some income.

**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 <sup>th</sup> November 2019 Place: Uganda Wildlife Authority	<ul style="list-style-type: none"> <li>• Access to resources tend to be regulated more especially where there are boundary disputes</li> <li>• There is a tendency not to comply and adhere to agreements. Some members of the community turn resources into commercial exploitation for income. This results in enforcement by the park authority. However, there is a need for: (i) transparency; (ii) engagement of communities and park offices.</li> </ul>
2.	Environment and Social Safeguard Specialist Date: 4 <sup>th</sup> November 2019 Place: Ministry of Water and Environment	<ul style="list-style-type: none"> <li>• There is a need for community consultations. This is important for ownership and addressing specific conditions rather than generalizing.</li> <li>• 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.</li> </ul>
3.	Partnership Officer National Date: 4 <sup>th</sup> November 2019 Place: Forestry Authority	<ul style="list-style-type: none"> <li>• Boundary surveys- the involvement of DLG political and civil leaderships is very important.</li> <li>• 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.</li> <li>• Funding- There are community development driven funds which are obtainable in the districts. These funds do boost CFM activities.</li> <li>• 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 Ex-NFA (now Division of Natural Forests) capacity is also low.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Gender relations among the Batwa, Benet, Tepeth and IiK are therefore constituted through the patriarchal and patrilineal systems where the male is dominant, and the female is subordinate.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Land tenure and governance; Support governments in developing land tenure frameworks that officially recognize women's rights to forest products and carbon from forests.</li> <li>• 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.</li> </ul>

5.	<p>Local Government District Officials, UWA, Ex-NFA, WMZO Officials and Refugee Camps Commandants</p> <p>Date: 12-17 June 2019</p> <p>Places:</p> <p>Rubanda District Headquarters Echuya Central Forest Reserve Kisoro District Hqtr.</p> <p>UWA (Kisoro Meeting/Mgahinga NP)</p> <p>Ex-NFA Forest Station/ Community Tourism Camp – Karengyere</p> <p>Karinju Forest Station</p> <p>Rubirizi District Hqtr</p> <p>QENP Hqtr</p> <p>Albert WMZO Fort Portal</p> <p>Kibale NP Hqtr</p> <p>Rwamwanja Refugee Scheme</p> <p>Kamwengye District Hqtr</p> <p>Kagombe CFR</p> <p>Nyabyeya FC</p> <p>Budongo CFR</p> <p>Hoima District Hqtr</p> <p>Kyangwari Refugee Scheme</p>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Forest revenue (from timber) increasing, but still low due to weak revenue management</li> <li>• Increasing risk of dominance of Eucalyptus and Pine, including the concern about effect of eucalyptus on water resources</li> <li>• Ongoing community initiatives supported through UWA's Revenue sharing scheme. Initiative focuses on livelihoods at household level, Problem Animal management, boundary management and Community goods e.g., health facilities, access roads, water and sanitation facilities, etc</li> <li>• Human Wildlife Conflicts due to problem animals/vermin especially with regards to Kyambura Wildlife Reserve (elephants, chimpanzees, hippos) and disease transmission to livestock</li> <li>• 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</li> <li>• High incidences of Problem animal attacks on human beings (elephants, crocodiles, hippos, and lions)</li> <li>• Increasing coverage of invasive plant species limiting pasture and limiting tourism activity</li> <li>• Emergence of new forms of poaching (armed poaching) and resultant illicit trade of wildlife products</li> <li>• Wildfires specially in the grassland portions of KNP</li> <li>• 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)</li> <li>• Access to adequate wood for firewood and construction by the refugees</li> <li>• Increasing pressures on forest and fragile ecosystems due to high population (natural growth, immigrants, refugees)</li> </ul>
6.	<p>Communities of Nyabaremure and Batwa</p> <p>Date:2/March /2019</p> <p>Place: Nkuringo Cultural Centre, Kisoro</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Batwa thinks 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.</li> </ul>
7.	<p>52 Participants from Government MDAs, CSOs MPs, LG Officials.</p> <p>Date: 17<sup>th</sup> – 18<sup>th</sup> May 2017</p> <p>Place: Hotel Africana, Kampala</p>	<ul style="list-style-type: none"> <li>• <b>Gender strategies;</b> It was expressed at the workshop that gender should be mainstreamed in the REDD+ strategy</li> <li>• <b>Refugees:</b> Since the influx of refugees is high, REDD+ should consider including the concentration areas with the planning perspectives.</li> </ul>
8.	<p>Local Government (District) officials. Field Staff of Ex-NFA (now Division of Natural Forests), UWA, DWRM. CSO/NGOs, Media and Private Sector representatives.</p> <p>Date: March and May 2018 Places: Kabale, Kasese, Hoima, Arua, Lira and Mbale</p>	<ul style="list-style-type: none"> <li>• The role of District/Local governments in FIP implementation and mechanism for accessing FIP budget and for integration in departmental activity plans and budgets.</li> <li>• Capacity for implementing FIP at Local Government level, protected areas level and across the landscape.</li> <li>• Forest governance and capacity for law enforcement, regulation and compliance monitoring.</li> <li>• Relationship between FIP and other forestry programmes of GoU (FIEFOC, REDD+, etc.) and NGOs such as IUCN, WWF, WCS, Nature Uganda, ECOTRUST, etc.</li> <li>• Other incentives (in addition to PES+ payments for carbon trees)</li> <li>• Forestry data and information and utilization technology</li> <li>• Access to quality seed and planting materials</li> <li>• Safeguards in relation to evictions, access/use of cultural assets, conflicts</li> </ul>
9.	<p>Stakeholders on BSA, RSO, FGRM &amp; SESA</p> <p>Date: November 2016-May 2017</p>	<ul style="list-style-type: none"> <li>• Some of the Batwa do not own land since they used to live the forest and were evicted from there over the time until around the 1990s</li> </ul>

	<p>Places:          Kampala, Fairway Hotel          Bundibugyo District          Kisoro          Mbarara/Fortportal          Mbarara, Lake View Hotel          Kampala, Hotel Africana          Kampala, Ex-NFA Meeting Room</p>	<ul style="list-style-type: none"> <li>• They are very poor and vulnerable to socioeconomic and environmental threats and risks.</li> <li>• Their livelihood is extremely dependent on the forest resources (i.e. located 200 m away from the forest or national park boundaries)</li> <li>• 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.</li> <li>• 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</li> <li>• There is need to expand the district FGRM team to include all relevant stakeholders in the FGRM, including MWE's Division of Natural Forests (Ex-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</li> <li>• Boundaries of protected areas need be clearly and permanently marked in the terrain</li> <li>• Clear roles and responsibilities need be defined and well understood for all implementing units</li> </ul>
10.	<p>49 Civil Society Organizations          Date: 20th January 2017          Place: Colline Hotel, Mukono</p>	<ul style="list-style-type: none"> <li>• Is there a possibility of further prioritization of the investment options under the FIP? Thus, the focus could be on 1 or 2 options, especially those where not many engagements have been made. Hence, the focus should be on forestry-based industry investments and the others could be Uganda's contribution.</li> <li>• 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?</li> <li>• The proposed FIP investments will be implemented in selected water management zones in the country. What about the mountain ecosystems?</li> <li>• What is the role of CSOs during the implementation of the FIP?</li> <li>• 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.</li> <li>• 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.</li> </ul>
11.	<p>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</p>	<ul style="list-style-type: none"> <li>• FIP preparation ends with a national FIP document, and issue of preparation of FIP at district level was discussed</li> <li>• Need to promote other energy sources like Biogas, briquettes</li> <li>• Preparation of this plan (FIP) best supported with provision of funds to DFS through conditional grant</li> <li>• Population is ever rising, yet the forest lands are constant so FIP development should look into aspects of SLM working with the agriculture sector</li> <li>• FIP should address issues of quality planting materials</li> </ul>
12.	<p>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</p>	<ul style="list-style-type: none"> <li>• Among the activities there is still a gap between 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 to eliminate Eucalyptus trees.</li> <li>• 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</li> <li>• 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</li> </ul>

		<p>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 resources. Some areas can be degazetted but not rich in natural biodiversity; Migera is rich in biodiversity. There is a mineral wetlands action plan but I'm not sure how far.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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 of some of the forest reserves shared by districts, we can't look at one side of the forest and ignore the other?</li> <li>• 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.</li> </ul>
13.	<p>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</p>	<ul style="list-style-type: none"> <li>• There is a need to talk about the practicability but not the theory of the management of forests. Therefore, how the villages and parishes are going to be alert putting forestry in their plans.</li> <li>• Trans-border is it an issue of concern; as the insecurity is fueling it.</li> <li>• Need to advise on the status of forest regulations 2014.</li> <li>• Wood land /savannah forests, are they priority areas in National parks and Wetland reserves?</li> <li>• River line forests, how do they come into the equation of REDD+ and storing carbon in trees?</li> <li>• Incentive measures for community engagement on efficient utilization of forest products. Look into management plans of respective FRs and find out which are beneficial.</li> <li>• NFTP-2003 objectives to have in place a fund supporting tree planting, but it has not performed well.</li> <li>• 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 district's work should be different instead of it being lump sum.</li> <li>• 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.</li> <li>• Confirm status of management responses to; Mpanga management planning and implementation. (it is there) we have to think about supporting the implementation</li> <li>• Hot spot areas in Port Fortal- Kyenjojo have been destroyed by deforestation, established nursery beds, 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.</li> <li>• Uganda's system for MRV. Some countries have indicators for measuring their footprints. The system for designing that tool is getting ready; hopefully it will be ready next year. We should thus give specific examples.</li> </ul>
14.	<p>National workshop had around 30 participants          Date: March 2017          Place: Kampala (City Royale)</p>	<ul style="list-style-type: none"> <li>• 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 Ex-NFA and the local people should be improved even to the point where locals manage the central forest reserves on behalf of Ex-NFA (now Division of Natural Forests).</li> <li>• 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 as it is with the agriculture sector.</li> </ul>

		<ul style="list-style-type: none"> <li>• Policy and law enforcement is needed, especially on private lands and regulations (licenses &amp; certifications) for commercial charcoal production from exotics only were considered needed and to be included into the Land Act.</li> <li>• 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 works and technical support to them was highlighted, including a need for quality seeds and seedlings.</li> <li>• A common concern was also that the rural households are currently not benefiting much from the rural electrification programme due to high tariffs and that the 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.</li> </ul>
15.	<p>Lower East: Benet at Mount Elgon; IPs and local Communities from Karamoja and Mt. Elgon</p> <p>Bukwo, Kapchorwa, Kween, Mbale, Manafwa, Sironko, Bulambuli, Bududa, Moroto, Kotido, Kaabong, Abim, Amudat, Nakapiripirit, Napaak</p> <p>Date: 31st January – 2nd February 2017</p> <p>Place: Wash and Wills hotel, Mbale</p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
16.	<p>Northern region</p> <p>West Nile and Northern region</p> <p>Agago, Amuru, Gulu, Pader, Kitgum, Lamwo, Nwoya, Apac, Amolatar, Alebtong, Lira, Otuke, Oyam, Kole, Dokolo, Arua, Adjumani, Moyo, Nebbi, Yumbe, Koboko, Maracha, Zombo</p> <p>Date: 3rd – 7th February 2017</p> <p>Place: Dove's nest hotel, Gulu town</p>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• 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 the Northern region.</li> <li>• 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</li> </ul>
17.	<p>Kampala Central</p> <p>Buikwe, Bukomansimbi, Butambala, Buvuma, Gomba, Kalangala, Kalungu, Kampala, Kayunga, Kiboga, Kyankwanzi, Luweero, Mityana, Mpigi, Mukono, Nakaseke, Nakasongola, Rakai, Ssembabule, Wakiso</p> <p>Date: 9th January 2017</p> <p>Place: City Royale Hotel Kampala</p>	<ul style="list-style-type: none"> <li>• In the Central Region (Kampala) participants were concerned about the role of local governments giving away forestlands to commercial enterprises and this concern is consequently causing conflicts with the central government.</li> <li>• Furthermore, there are some conflicts between cattle rangers and tree growers, which might have a negative impact on strategy options implementation.</li> <li>• 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.</li> <li>• In addition, stakeholders noted that in central region where Mailo land tenure is predominant, there seems to be two landowners 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.</li> </ul>
18.	<p>Western</p> <p>Masindi, Hoima, Kibaale, Buliisa, Kabarole, Kyenjojo, Kamwenge, Kyegegwa, Kasese, Bundibugyo, Ntoroko, Mubende</p> <p>Date: 14th -16th February 2017</p> <p>Place: Fort portal town</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>

		<p>temperatures. Both cocoa and coffee provide a great opportunity for agroforestry, and as a strategic option.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
19.	<p>Western          Bushenyi, Ibanda, Mbarara, Ntungamo, Lyantonde, Kiruhura, Isingiro, Buhweju, Rubirizi, Ruhinda, Sheema, Kabale, Kisoro, Kanungu, Rukungiri          Date: 2 -17<sup>th</sup> Feb 2017          Place: Mbarara town</p>	<ul style="list-style-type: none"> <li>• In the Southern Region (Mbarara) cattle thefts were a major concern and taxation on charcoal production was proposed.</li> <li>• Further, the need 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).</li> <li>• 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.</li> </ul>
20.	<p>Indeginous communities and Protected areas adjacent communities:          Benet; Ik at Kaabong District; Acholi at Lamwo District; Kalangala at Ssesse Islands; Baswa at Bundibugyo District and Batwa at Kisoro District          Date: 1st -16th February 2017</p>	<ul style="list-style-type: none"> <li>• These communities visited were found to be quite 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 the laws themselves and are ineffective - evicted people several decades ago are for instance not compensated.</li> <li>• There are 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.</li> <li>• The consulted 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.</li> <li>• 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 communities who cause the deforestation and forest degradation.</li> </ul>

## Annex 7. List of Persons consulted

Date	Type of stakeholder	Organization and affiliation	Location of meeting /consultation	Number of attendees			Purpose of the Consultation
				M	F	T	
28 Oct 2025	Government staff and Indigenous People	UWA and Batwa Leadership	Mgaha Visitor Centre, Semuliki			54	Review of VMGPs
28 Oct 2025	CSO Staff	Cross Cultural Foundation for Uganda (CCFU)	Nkombwe - Bundibugyo			08	Review of VMGPs
27 Oct 2025	Government & WB staff	Bundibugyo Local Government Officers (CAO, DFO, DCDO, DPO); MWE staff and World Bank team	Bundibugyo Local Government Offices			10	Review of VMGPs
27 Oct 2025	CSO Staff	Fight for the Forgotten - Karambi	Karambi Settlement			30	Review of VMGPs
27 Oct 2025	Government staff	Uganda Wildlife Authority (UWA) Officials - Semuliki	UWA Offices			15	Review of VMGPs
16 July 2025	Government & CSO staff	UWA and Batwa NGOs	Buhooma UWA offices			07	Review of VMGPs
16 July 2025	CSO staff	Meeting with 04 Batwa CSOs	ABEG offices			04	Review of VMGPs
15 July 2025	Government staff	Kanungu District Local Government Officials (CAO & DCDO)	CAO's office			02	Review of VMGPs
15 July 2025	CSOs	Batwa Civil Society Stakeholders – Kanungu	Kanungu District headquarters			5	Review of VMGPs
15 July 2025	Indigenous People	Kihembe Batwa Community members	Kihembe Batwa hall			26	Review of VMGPs
15 July 2025	Indigenous People	Buhamba, Kitaro Batwa communities	Kitarion Batwa hall			18	Review of VMGPs
14 July 2025	Indigenous People	Kashasha Batwa Community	Kashasha T/Council offices			24	Review of VMGPs
14 July 2025	Indigenous People	Kachereere Batwa Community	Kachereere Town Council offices			40	Review of VMGPs
13 July 2025	Indigenous People	Rushaga Batwa Community	Rushaga Batwa settlement	15	15	30	Review of VMGPs
13 July 2025	CSO staff	Batwa Indigenous Empowerment Organisation (BIEO)	BIEO offices			04	Review of VMGPs
13 July 2025	Indigenous People	Nyabaremura Batwa Community	Nyabaremura Batwa settlement	04	12	16	Review of VMGPs
12 July 2025	CSO staff	Nkuringo Conservation and Development Foundation (NCDF)	NCDF Offices			06	Review of VMGPs
12 July, 2025	Indigenous People	Buniga Forest Trail/ Sanuriro Batwa Community	NCDF grounds	09	13	22	Review of VMGPs
11 July 2025	Government staff	Uganda Wildlife Authority (UWA) staff	Visitor centre, Kisoro			05	Review of VMGPs

Date	Type of stakeholder	Organization and affiliation	Location of meeting /consultation	Number of attendees			Purpose of the Consultation
				M	F	T	
11 July 2025	Indigenous People	Nyacancece Batwa community	Nyacancece settlement area			50	Review of VMGPs
10 July 2025	Government & CSO	District Technical staff and CSOs working with Batwa in Kisoro	Kisoro district council hall			27	Review of VMGPs
10 July 2025	Indigenous People	Abadasigana Batwa Group, Birara - Bukimbiri	Kabimbiri S/C HQs			37	Review of VMGPs
9 July 2025	Government staff	NFA Staff (Echuya CFR)	NFA offices			05	Review of VMGPs
9 July 2025	Indigenous People	The Kalenjeni Batwa Community at Echuya Batwa Camp	Echuya camp site			29	Review of VMGPs
9 July 2025	Indigenous People	The Rwamahano Batwa Community.	Rwaburindi Primary School			30	Review of VMGPs
24 April 2025	CSO	United Organization for Batwa Development in Uganda [OUBDU] Consultation	OUBDU Offices			05	Consultations on issues raised by the Batwa led organisations
24 April 2025	Government staff	Uganda Wildlife Authority (UWA)	UWA Visitor center, Kisoro			03	Consultations on issues raised by the Batwa led organisations
23 April 2025	CSOs and Community	Staff of 03 Batwa organisations (BDO BIEO, & BIDO) BioVision Africa & community members	BIDO Offices			20	Consultations on issues raised by the Batwa led organisations
22 April 2025	Government staff	National Forestry Authority	NFA Headquarters			05	Consultations on issues raised by the Batwa led organisations
November 2019	Government staff	UWA, Ex-NFA & MWE	--	02	01	03	Preparation of the ESMF and PF
July 2019	Indigenous People	Benet Community	Benet Church of Uganda Kween district	10	56	66	Mainstreaming Gender into REDD+ processes and strengthening capacity of Forest Dependent Indigenous People to actively engage in REDD+ Strategy Implementation
July 2019	Indigenous People	Batwa Community	Bukimbiri Church, Bukimbiri Sub-County, Kisoro District.	30	25	55	
July 2019	Indigenous People	Batwa Community	King Nzito premises in Bundibugyo district.	32	29	61	
July 2019	Indigenous People	Batwa Community	NFA Offices at Rubanda District	40	46	86	
July 2019	Indigenous People	Tepeth Community	Tapac Sub County Hall in Moroto District	30	32	62	
June 2019	Government & WB Staff	MWE, UWA, Ex-NFA, WB	Rubanda District Headquarters	16	03	19	World Bank Mission
June 2019	Government & WB Staff	MWE, UWA, WB, Ex-NFA, DLG	Echuya Central Forest Reserve	24	02	26	
June 2019	Government & WB Staff	MWE, UWA, Ex-NFA, DLG	Kisoro District Hqtr	14	02	16	
June 2019	Government & WB Staff	MWE, UWA, Ex-NFA, DLG	Mgahinga NP	15	03	18	
March 2019	Indigenous People	Batwa Community	Nkuringo Cultural Centre, Kisoro	Details missing			Building the capacity of Indigenous Peoples to actively participate in

Date	Type of stakeholder	Organization and affiliation	Location of meeting /consultation	Number of attendees			Purpose of the Consultation
				M	F	T	
							Redd+ processes in Uganda.
17 <sup>th</sup> – 18 <sup>th</sup> May 2017	GoU, Private Sector and CSOs	MDAs, Private Sector, CSOs & Multinational Agencies	Hotel Africana, Kampala	39	15	54	Second Consultation for the National REDD+ Strategy for Uganda
Feb 2017	Local communities	Several Villages	Kagano Village Muko Sub-County			17	Consultations on Priorities & Projects; Opportunities and Challenges for community participation in Forest Investment Plan Program (FIP) design and implementation
			Bitegyengyere Murubindi			25	
			Rwamahano Village			20	
			Giyebe Village Murora			20	
			Biizi and Rugeshi Villages			16	
			Birara Kanaba			20	
			Kitahurira Village			08	
			Kayonza Village			11	
			Bikuto Village			22	
Karehe Village			11				
20th January 2017	CSOs	IP127 = 12 CSOs IP228= 03 CSOs IP329 = 33 CSOs	Colline Hotel, Mukono	29	19	48	Consultations on Priorities & Projects; Opportunities and Challenges for Implementing Partners (IPs) participation in Forest Investment Plan Program (FIP) design and implementation
31 <sup>st</sup> Jan – 2 <sup>nd</sup> Feb 2017	Government, Private Sector CSOs and	DLGs, Private Sector, UWA & CSOs	Wash and Wills hotel, Mbale	38	13	51	IPs and local Communities from Karamoja and Mt. Elgon Region
3 <sup>rd</sup> – 7 <sup>th</sup> February 2017	Government, Private Sector CSOs and	DLGs, Private Sector & CSOs	Dove's Nest Hotel, Gulu Town	29	06	35	IPs and local Communities from West Nile and Northern region districts
9 <sup>th</sup> Jan 2017	Government, Private Sector & CSOs	DLGs, MDAs, Private Sector & CSOs	City Royale Hotel Kampala	33	14	47	IPs from Central region districts
14 <sup>th</sup> -16 <sup>th</sup> Feb 2017	Government, Private Sector & CSOs	DLGs, Private Sector & CSOs	Fort Portal Town.	22	14	36	IPs from western region districts
2 -17 <sup>th</sup> Feb 2017	Government, Private Sector & CSOs	IPs	Mbarara Town	32	14	46	IPs from western region districts
March 2017	MDAs, Private Sector & CSOs	IPs	City Royale Hotel, Kampala	19	16	35	National workshop

<sup>27</sup> IP1- Strengthening policy implementation, institutional capacity and delivery of forest services

<sup>28</sup> IP2 - Supporting the development of an efficient and sustainable forest-based industry for continued investments into production forests

<sup>29</sup> IP3 = Integrated and sustainable catchment and landscape management for improved livelihoods and community resilience

Date	Type of stakeholder	Organization and affiliation	Location of meeting /consultation	Number of attendees			Purpose of the Consultation
				M	F	T	
29.08.2016	Government, Private Sector & CSOs	IPs	White Horse Inn, Kabale	41	05	46	Regional Stakeholder Consultations for South-Western Uganda
29th August 2016	Government, Private Sector & CSOs	IPs	Desert Breeze Hotel, Arua Town	49	07	56	Regional Stakeholder Consultations for West-Nile Region
31.08.2016	Government, Private Sector & CSOs	IPs	Sandton Hotel Kasese	42	04	46	Regional Stakeholder Consultations for Western Uganda

Further consultations with the Batwa communities and other relevant stakeholders have been conducted in 2024 and 2025 around Echuya central forest reserve (CFR), as well as in Bwindi, Mgahinga, and Semuliki National Parks. These are outlined below

S/N	Dates	Groups Engaged	Venue	No. of Pax
1	22 April 2025	National Forestry Authority Meeting	NFA	05
2	23 April 2025	Batwa Stakeholder Engagement Meeting (Three Batwa organisations (BIEO, BDO, and BIDO), their staff, community members and BioVision Africa	BIDO Offices	20
3	24 April 2025	Uganda Wildlife Authority (UWA)	UWA Visitor center, Kisoro	3
4	24 April 2025	United Organization for Batwa Development in Uganda [OUBDU] Consultation	OUBDU Offices	05
5	9 July 2025	NFA Staff (Echuya CFR)	NFA offices	05
6	9 July 2025	The Kalenjeni Batwa Community at Echuya Batwa Camp	Echuya camp site	29
7	9 July 2025	The Rwamahano Batwa Community.	Rwaburindi Primary School	30
8	10 July 2025	District Technical staff and CSOs working with Batwa in Kisoro	Kisoro district council hall	27
9	10 July 2025	Abadasigana Batwa Group, Birara - Bukimbiri	Kabimbiri S/C HQs	37
10	11 July 2025	Uganda Wildlife Authority (UWA) staff	Visitor centre, Kisoro	05
11	11 July 2025	Nyacance Batwa community (Nyacance Batwa Settlement)	settlement area	50
12	12 July 2025	Nkuringo Conservation and Development Foundation (NCDF) staff	NCDF Offices	06
13	12 July, 2025	Buniga Forest Trail/ Sanuriro Batwa Community	NCDF grounds	22 (13w)
14	13 July 2025	Rushaga Batwa Community members,	Rushaga Batwa settlement	30 (15w)
15	13 July 2025	The Batwa Indigenous Empowerment Organisation (BIEO)	BIEO offices	04
16	13 July 2025	Nyabaremura Batwa Community	Nyabaremura Batwa settlement	16 (12w)
17	14 July 2025	Kashasha Batwa Community	Kashasha Touncil offices	24
18	14 July 2025	Kachereere Batwa Community	Kacherere Town Council offices	40
19	15 July 2025	Kanungu District Local Government Officials (CAO and DCDO)	CAO's office	02
20	15 July 2025	Batwa Civil Society Stakeholders – Kanungu	Kanungu district headquarters	5

21	15 July 2025	Kihembe Batwa Community members	Kihembe Batwa hall	26
22	15 July 2025	Buhamba, Kitario Batwa communities	Kitarion Batwa hall	18
23	16 <sup>th</sup> July 2025	UWA and Batwa NGOs Engagement	Buhooma UWA offices	7 Members
24	16 <sup>th</sup> July 2025	Meeting with 04 Batwa CSOs	ABEG offices	4 Members
25	27 <sup>th</sup> October 2025	Bundibugyo Local Government Officers Chief Administrative Officer (CAO), District Forest Officer (DFO), District Community Development Officer (CDO), District Production Officer (DPO) MWE - Ministry of Water and Environment And the World Bank team	Bundibugyo Local Government Offices	10 members
26	27 <sup>th</sup> October 2025	Fight for the Forgotten - Karambi	Karambi Settlement	30 members
27	27 <sup>th</sup> October 2025	Uganda Wildlife Authority (UWA) Officials - Semuliki	UWA Offices	15 members
28	28 <sup>th</sup> October 2025	Community Meeting with UWA and Batwa Leadership	Mgaha Visitor Centre, Semuliki	54 members
29	28 <sup>th</sup> October 2025	Cross Cultural Foundation for Uganda (CCFU)	Nkombwe - Bundibugyo	8 members

## Annex 8. Occupation Health and Safety Measures (OHS)

### 1.0 Introduction

The IFPA-CD Project Occupational Health and Safety Measures (**OHSM**) aim to provide a comprehensive framework on how work will be executed during implementation of IFPA-CD Project to ensure that health and safety of the workers are adequately managed to prevent injuries and loss of lives during the course of employment. Occupational Health and Safety Measures has been developed in a manner consistent with the World Bank's Environmental and Social Standard (ESS) 2 on Labour and working conditions in addition to relevant GoU legal and regulatory framework, World Bank Group General Environmental Health and Safety Guidelines (WBG EHS Guidelines), International Labour Organisation Conventions and other Good International Industry Practices. By integrating national laws, international standards, and best practices, the project aims for zero incidents, robust risk management, and continuous improvement in health and safety performance. The Occupational Health and Safety Measures (OHSM) outlined in this document are designed to ensure the health and safety of all workers, contractors, and stakeholders involved in the project. The measures incorporate Ugandan legal frameworks, World Bank Environmental and Social Standards (ESS), International Labour Organization (ILO) conventions, and Good International Industry Practices.

### 2.0 Health and Safety Management Structure

#### Policy Statement

The Ministry of Water and Environment, in collaboration with NFA and UWA, is committed to executing the project with zero incidents of injury or ill health. The Project Coordination Unit (PCU) leads the implementation, ensuring continuous monitoring, training, and improvement of health and safety performance.

### 3.0 Roles and Responsibilities

- **MWE, UWA:** Oversee project accountability, worker recruitment, compliance with labor laws, daily monitoring, and grievance management.
- **District Local Government:** Ensures compliance, offers guidance, and identifies areas for improvement.
- **PCU:** Implements safety measures, monitors contractors, ensures risk assessments, and chairs the health and safety committee.
- **Health Safety and Environment Manager:** Coordinates health and safety reports, incident investigations, and monthly reporting.
- **Technical Service Providers (TSPs):** Directly hired contractors, including NGOs and CBOs, responsible for compliance.
- **Community Workers:** Must comply with safety measures and report incidents promptly.

### 4.0 Legal and Policy Framework

The OHSM is grounded in a robust legal and policy framework, including:

- **National Policies:** Child labor, gender, disability, HIV/AIDS, employment, industrial policy, and environmental management.

- **National Laws:** Constitution, Occupational Safety and Health Act, Employment Act, National Environment Act, Public Health Act, Workers' Compensation Act, Building Control Act, Refugee Act, Children Act, Mental Health Act, and others.
- **International Standards:** World Bank EHS Guidelines, ILO conventions on labor, child protection, discrimination, forced labor, and UN conventions on human rights and refugees. UG IFPA-CD Project OHSS FINAL

### 5.0 General Health and Safety Rules

All personnel must undergo health and safety induction before accessing project sites. Key rules include:

- Mandatory use of PPE (helmets, vests, boots).
- Drug and alcohol-free workplace.
- Smoking only in designated zones.
- No entry for persons under 18 years.
- Prohibition of weapons, pornography, and sexual activity on site.
- Respectful conduct and prohibition of discrimination.
- Strict housekeeping and clear access routes.
- Mobile phone use only in safe, stationary areas.
- Manual handling only when mechanical options are unavailable.
- Training and certification required for specialized tasks.
- Emergency procedures must be known and followed by all.

### 6.0. Training, Awareness, and Promotion

- **Induction Training**

All workers and visitors receive induction covering project location, safety policies, hazards, PPE use, emergency procedures, and workplace conduct. Attendance is documented.

- **Toolbox Talks**

Short, focused safety meetings are held before work shifts, covering accident prevention, equipment safety, hazard awareness, and more.

- **Specialized and Statutory Training**

Specific groups (drivers, operators, electricians, scaffolders, chemical handlers) receive targeted training as required by law.

- **Health and Safety Committee**

Workplaces with 20+ employees must establish a committee to investigate hazards, handle complaints, conduct inspections, and liaise with grievance mechanisms.

- **Promotion and Awards**

Health and safety awareness programs, events (e.g., World Day for Safety and Health), and incentive schemes encourage proactive participation.

### 7.0 Welfare Facilities

Contractors must provide and maintain:

- **Drinking Water:** Safe, tested, and clearly marked.
- **Washing Facilities:** Adequate for chemical handlers, with proper signage.
- **Sanitary Facilities:** Gender-sensitive toilets, sanitary bins, and handwashing stations.
- **Rest Areas and Canteens:** Clean, well-maintained, with clear signage.
- **First Aid:** Competent personnel, first aid rooms or boxes, and ambulances or health facility contacts.
- **Changing Rooms:** Gender-separated, well-lit, and secure.

## 8.0 Operational Controls

- **Hazard Identification and Risk Management**

Hazards are classified as biological, chemical, physical, ergonomic, and psychosocial. Contractors must conduct risk assessments, maintain risk registers, and use the hierarchy of controls (elimination, substitution, engineering, administrative, PPE).

- **Job Hazard Analysis**

Pre-task safety analysis is required for high-risk activities, ensuring hazards are controlled before work begins.

- **Permit to Work**

A permit system governs high-risk activities (hot works, excavation, electrical, confined spaces, scaffolding, chemical handling).

- **LOTOTO Procedure**

Lock Out Tag Out Try Out procedures prevent accidental energization during equipment maintenance.

## 9.0 Safe Working Procedures

Detailed procedures should be provided for:

- **Earthworks, Compaction, Dewatering, Steel Fixing, Formwork, Concreting:** Method statements, risk assessments, medical exams, PPE, training, and equipment inspections are mandatory.
- **Working at Height, Ladder and Scaffold Safety:** Training, competent personnel, inspections, barricading, and use of harnesses.
- **Rigging and Lifting:** Safe plans, competent operators, equipment inspections, and clear signages.
- **Housekeeping:** Daily cleaning, designated storage, and waste segregation.
- **Environment Protection and Waste Management:** Compliance with regulations, hazardous waste handling, and licensed disposal.
- **Hot Works, Gas Cylinder Safety, Chemical Handling:** Permits, PPE, training, & safe storage.
- **Fire and Electrical Safety:** Hazard identification, fire detection, firefighting equipment, emergency procedures, and competent electrical work.
- **Compressed Air and Hand Tool Safety:** Safe use, PPE, inspections, and prohibition of unsafe practices.

- **Personal Protective Equipment:** BS EN certified PPE, training, replacement of damaged gear.
- **Traffic Management:** Safe routes, separation of vehicles and pedestrians, competent drivers, and regular inspections.

## 10. Emergency Response and Incident Management

- **Emergency Response Plan (ERP)**

Annual drills, evacuation routes, assembly points, and special provisions for workers with disabilities are required. Emergency contacts must be up to date and posted.

- **Incident Reporting and Investigation**

All incidents (ill health, injuries, property damage, environmental events) must be reported immediately. Procedures include securing the scene, attending to the injured, equipment inspection, environmental containment, and witness interviews.

- **Corrective Actions and Communication**

Root cause analysis, corrective action plans, and lessons learned are shared with all stakeholders. Reports are submitted to the PCU and World Bank according to specified timelines.

- **Record Keeping**

Contractors must maintain detailed incident reports and make them available upon request.

## 11. Consultation, Communication, and Monitoring

- **Stakeholder Engagement**

Contractors must consult with NFA, UWA, PCU, and workers' organizations on health and safety arrangements.

- **Awareness Tools**

Posters, banners, signages, and observation cards are used to communicate hazards, rules, and emergency information.

- **Regular Meetings**

Monthly health and safety review meetings are held to assess performance, audits, corrective actions, and rewards.

- **Monitoring and Auditing**

Daily inspections, quarterly audits, and statutory inspections are conducted. Key performance indicators include manhours, injuries, audits, training sessions, and compliance rates.

- **Non-Conformance and Penalties**

Non-compliance results in reports, penalties, and disciplinary actions, ranging from warnings to dismissal.

## 12. Contractor Management and Recruitment

Contractors must:

- Comply with all legal and project-specific health and safety requirements.
- Conduct transparent, non-discriminatory recruitment.
- Provide written contracts and interpretation services.
- Prioritize local communities for unskilled labor.
- Ensure no hiring fees or exploitation.
- Adhere to maximum working hours and provide notice before termination.

## 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 18<sup>th</sup> 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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 Kampala, Uganda

ALD 141/259/01 TC

21<sup>st</sup> 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 30<sup>th</sup> 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 18<sup>th</sup> 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.
- Implementating 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 18<sup>th</sup> 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.
- Implementating entities should strengthen grievance redress mechanisms, including an independent hotline and third-party monitoring systems where necessary.



Ramathan Ggoobi

**PERMANENT SECRETARY/SECRETARY TO THE TREASURY**

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

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender, Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

The Solicitor General, Ministry of Justice and Constitutional Affairs

The Permanent Secretary, Ministry of Health

The Permanent Secretary, Ministry of Education and Sports

The Permanent Secretary, Ministry of Gender, Labour and Social Development

The Director of Public Prosecutions

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BPD 86/179/01

10<sup>th</sup> July, 2023

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

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

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

### A. INTRODUCTION

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

Minister

"To formulate sound economic policies, ensure 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 (11) (e) (i-ii) of the Public Finance Management Act, 2015 (Amended). This emphasizes equality of all persons in access to all opportunities and benefits presented by the above projects, without prejudice and discrimination on the ground of sex, race,

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

*Advertising by Ministries, Agencies and Local Governments*

11. In his letter of Ref. No. PO/3 dated 6<sup>th</sup> 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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Website: [www.health.go.ug](http://www.health.go.ug)

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

5<sup>th</sup> 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

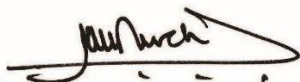
### PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

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  
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 Website: [www.education.go.ug](http://www.education.go.ug)  
 Kampala, Uganda

18<sup>th</sup> 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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[www.dpp.go.ug](http://www.dpp.go.ug)

Our Ref: ADM 12/01  
 Your Ref:

Date: 25<sup>th</sup> 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 30<sup>th</sup> 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**

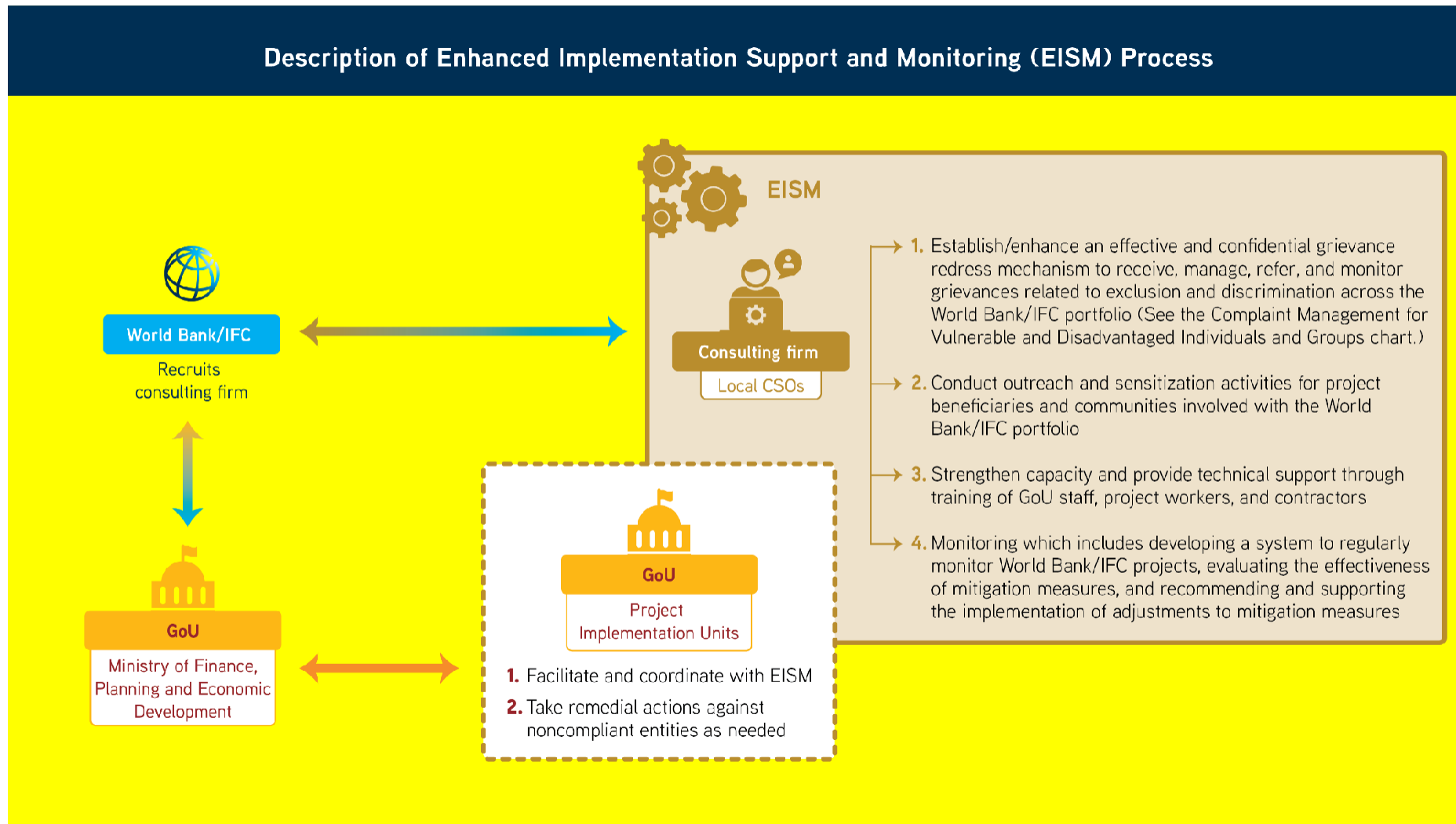
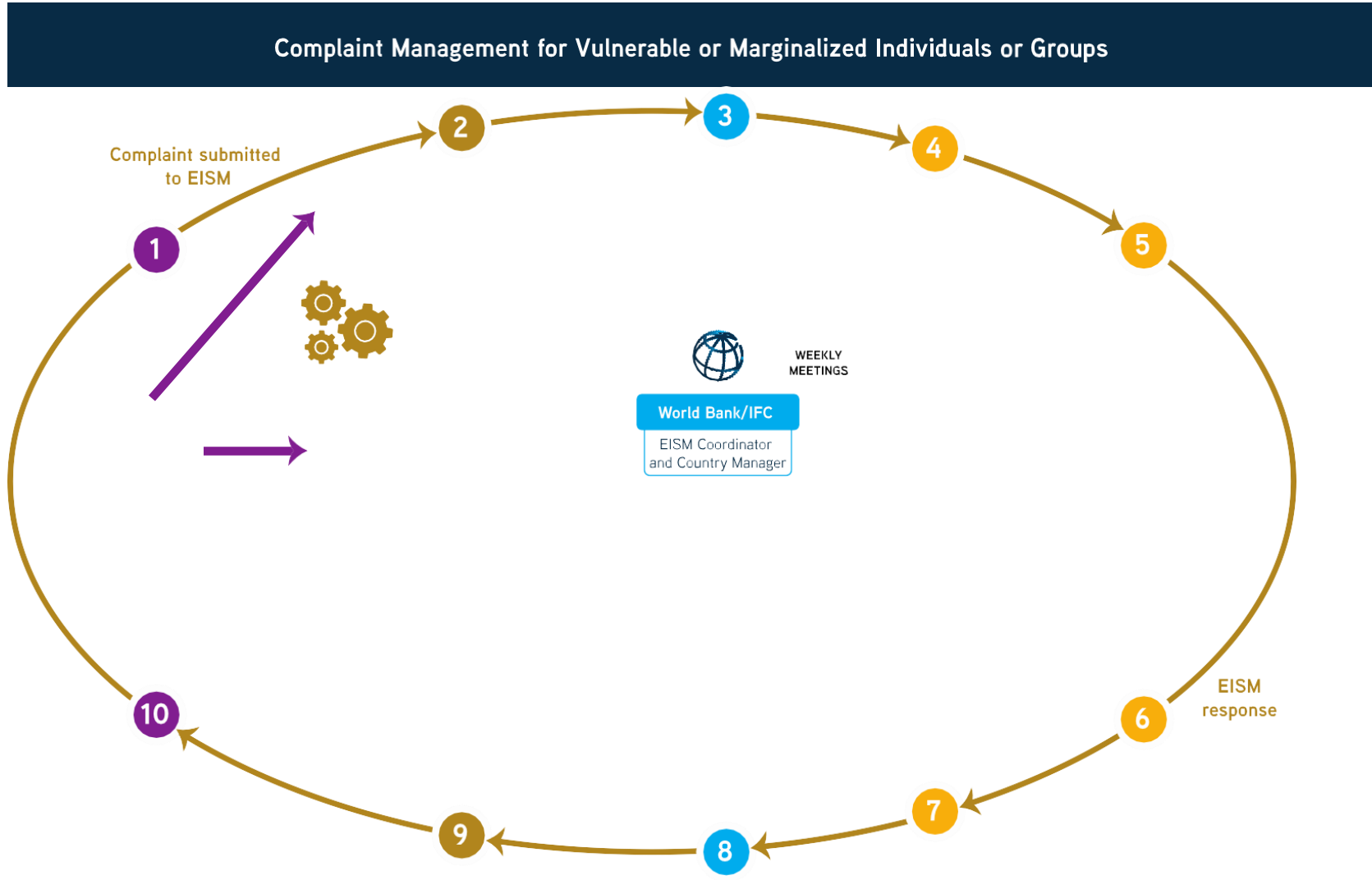


Figure 4: Complaint Management for Vulnerable or Marginalized Individuals or Groups



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.

### **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.

**Annex 12: Analysis Highlighting Discrepancies Between World Bank ESF and Uganda'S Environmental and Social Risk Management Framework**

Good International Practice	Uganda aligned?	Comments
<b>VISION AND OVERALL GOALS</b>		
Environmental sustainability, including action to support climate change mitigation and adaptation	YES	<ul style="list-style-type: none"> <li>- Constitution (1995) requires GOU to ensure environmental protection &amp; provides Ugandans a right to clean &amp; healthy environment.</li> <li>- Vision 2040 outlines goals: political, economic, social, environmental, and cultural. Aspires to sustainable socio-economic development that ensures environmental quality and ecosystem resilience.</li> <li>- National Environment Management Policy (1994) calls for sustainable development that maintains and enhances environmental quality &amp; resources to meet the needs of present &amp; future generations.</li> <li>- 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.</li> <li>- 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.</li> <li>- 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.</li> </ul>
Social development and inclusion, equality, and non-discrimination	<p>YES (in theory)</p> <p>PARTIAL<sup>32</sup> (in practice)</p>	<p><i>IN THEORY:</i></p> <ul style="list-style-type: none"> <li>- 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;</li> <li>- 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"</li> <li>- 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.</li> </ul> <p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- There is still discrimination in labour, especially regarding gender and disability, in large projects, recruitment, and social stigma against persons with HIV/AIDS.<sup>30</sup></li> <li>- There are still a number of interventions required at every level in the country to better ensure that gender, HIV and AIDS are properly mainstreamed<sup>31</sup>.</li> </ul>
Avoid or mitigate adverse environmental and social impacts, but also maximise benefits	<p>YES (in theory)</p> <p>PARTIAL (in practice)</p>	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- 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).</li> </ul> <p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- In practice, ESIA's are stronger regarding environmental issues, weaker on social issues, and even weaker on health and gender.</li> <li>- 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.</li> </ul>
<b>Standard 1: Assessment and Management of Environmental and Social Risks and Impacts</b>		

<sup>30</sup> From UGANDA SRM technical report. Peter Cohen, 2019.

<sup>31</sup> Conclusion from EIA barometer workshop conducted by SAIEA in 2011.

<sup>32</sup> "partial" in this context means alignment is incomplete as there are aspects of practice that are inconsistent with policies and laws

i. ESIA required for high-risk projects	YES	<ul style="list-style-type: none"> <li>- 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</li> <li>- Mining Act, 2003 requires EIAs for exploration and mining (in accordance with the NEA)</li> <li>- 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.</li> </ul>
ii. ESIA must include all standard contents (as specified)	YES	<ul style="list-style-type: none"> <li>- 1999 EIA Regs outline the requirements, which are standard</li> <li>- 1997 EIA guidelines establish three major phases for the EIA; Screening impact study phase and decision making. The process is standard and straightforward.</li> </ul>
iii. Country must properly implement ESIA/ESCP/ESMP throughout the project life cycle – following the mitigation hierarchy	YES (in theory)	<i>IN THEORY</i> <ul style="list-style-type: none"> <li>- The NEA (2019) (section 5.2(j) explicitly requires the application of the mitigation hierarchy in ESIA's (avoid, minimize, restore, offsets),</li> <li>- 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.</li> </ul>
	PARTIAL (in practice)	<i>IN PRACTICE</i> <ul style="list-style-type: none"> <li>- implementation is variable – good in the case of donor or Bank funded projects, but modest to poor otherwise.</li> </ul>
iv. ESIA's must include consideration of alternatives and good stakeholder engagement	YES (in theory)	<i>IN THEORY:</i> <ul style="list-style-type: none"> <li>- 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.</li> </ul>
	PARTIAL (in practice)	<i>IN PRACTICE</i> <ul style="list-style-type: none"> <li>- See ESS10 for discussion on stakeholder consideration</li> <li>- 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.</li> </ul>
v. ESIA's must especially consider risks to human security, escalation of conflict, violence and crime; esp. for vulnerable people	NO	<ul style="list-style-type: none"> <li>- 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.</li> </ul>
ESIA must also consider risks and impacts associated with the project's primary suppliers	NO	<ul style="list-style-type: none"> <li>- Not covered by the NEA nor regulations</li> </ul>
ESCP and ESMP must allow for adaptive management if a project changes or there are unforeseen circumstances.	PARTIAL	<ul style="list-style-type: none"> <li>- 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.</li> <li>- Adaptive management has been evident in World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.</li> </ul>
ESCP and ESMP must be monitored for compliance and effectiveness	YES (in theory)	<i>IN THEORY</i> <p>Section 28 of NEA Regs allow for cancellation of approved ESIA at any time where -</p> <ul style="list-style-type: none"> <li>- there is non-compliance with conditions in the certificate;</li> <li>- where there is a substantial modification of the project</li> <li>- where there is a substantive undesirable effect not contemplated in the approval.</li> <li>- A revocation under sub-regulation (1) shall lead to the automatic cancellation of the certificate issued under paragraph (c) of regulation 26.</li> <li>- (3) Where a certificate of approval is cancelled under sub-regulation (2) the developer shall stop further development pending rectification of adverse impact.</li> </ul>
	PARTIAL (in practice)	<i>IN PRACTICE</i> <ul style="list-style-type: none"> <li>- 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.</li> </ul>

		- Monitoring takes place for World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.
External/3 <sup>rd</sup> party experts should be used to verify above	NO	Independent review is not specifically required under the existing EIA Regulations <sup>33</sup> 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.
<b>Standard 2: Labour and Working Conditions</b>		
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. <sup>34</sup>
	PARTIAL (in practice)	<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. <sup>35</sup> - 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 accidents <sup>36</sup> . - HS practices are in place for World Bank and other donor funded projects, but less so for government, parastatals or some private sector projects.
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. - 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.
	PARTIAL (in practice)	<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. <sup>37</sup>

<sup>33</sup> Though this is partially rectified in the proposed draft 2018 ESIA regulations

<sup>34</sup> From Uganda Social Risk Management (SRM) Technical Paper (2019).

<sup>35</sup> Ibid.

<sup>36</sup> Ibid.

<sup>37</sup> Ibid.

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).
	NO (in practice)	<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. <sup>38</sup>
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).
	PARTIAL (in practice)	<i>IN PRACTICE</i> - Inadequate political space/bargaining power for ethnic minorities and vulnerable and marginalized groups <sup>39</sup> - 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 workers <sup>40</sup> .
v. Project workers must have accessible means to raise workplace concerns.	PARTIAL (in practice)	See below
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.
	PARTIAL (in practice)	- 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.

<sup>38</sup> Ibid.<sup>39</sup> Ibid.<sup>40</sup> Ibid.

		<p>Having a more permanent workforce across the project cycle also reduces the risk of labour influx.<sup>41</sup></p> <p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.<sup>41</sup></li> <li>- In practice, adherence is inconsistent – depending on the project, proponent, and funder.</li> </ul>
vii. Written, clear and understandable contracts in place for project workers	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- 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.</li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- Adherence is inconsistent – depending on the project, proponent, and funder.</li> </ul>
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)	
<b>Standard 3: Resource Efficiency and Pollution Prevention and Management</b>		
i. Promote the sustainable use of resources, e.g. energy, water and raw materials.	YES	<ul style="list-style-type: none"> <li>- NEA 2019, Section 5 (d) includes the principle that there shall be “optimum sustainable yield in the use of renewable natural resources”</li> <li>- 2011 EIA Guidelines for water resources related projects assist planners, developers, practitioners safeguarding water resources through EIAs.</li> <li>- 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.</li> </ul>
ii. Avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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).</li> <li>- Public Health Act Cap 281 requires every local authority to take measures to prevent any pollution dangerous to public health.</li> </ul>
	PARTIAL (in practice)	<i>IN PRACTICE</i>

<sup>41</sup> Ibid.

		- 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.
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.
	PARTIAL (in practice)	<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 relationship <sup>42</sup> . - 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 environment <sup>43</sup> . - It is estimated that only 20-30% of the solid waste generated in Kampala is collected and disposed of properly.
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)	<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 pesticides <sup>44</sup> .
<b>Standard 4: Community Health and Safety</b>		

<sup>42</sup> <https://www.nape.or.ug/publications/chemical-management/7-chemical-management-booklet-2014/file>.

<sup>43</sup> Wasswa and Schluep 2008.

<sup>44</sup> 2015 safeguards diagnostic report.

<p>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.</p>	<p>YES (in theory)</p>	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- 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;             <ul style="list-style-type: none"> <li>- 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).</li> <li>- 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.</li> <li>- EIA regs specifically require EIAs to consider health issues</li> <li>- 2008 Guidelines for OHS, Including HIV provide a framework for workplace health &amp; safety for all workers within the health sector.</li> <li>- 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.</li> <li>- 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.</li> <li>- MoGLSD has a Directorate of Labour, Employment, Occupational Safety and Health, and is responsible for implementation of Labour policies and laws.</li> </ul> </li> </ul> <p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- Health and safety issues are generally taken care of in World Bank and donor funded projects, but less so otherwise</li> <li>- Most EIAs conducted focus mostly on environmental issues, with social and health issues receiving considerably less attention.</li> <li>- 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</li> </ul>
<p>ii. Promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams.</p>	<p>PARTIAL</p>	<ul style="list-style-type: none"> <li>- 2019 NEA provides for emerging environmental issues including climate change</li> <li>- 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.</li> <li>- 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 m<sup>3</sup> or more.</li> <li>- 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)</li> <li>- The NEA establishes NEMA, whose functions include advising on the formulation and implementation environmental and climate change PPPs;</li> <li>- 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, human rights observance, social, environment and economic costs, climate change, partnership and coordination and regional and international partnerships.</li> <li>- 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.</li> <li>- 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</li> </ul>

		implementation of dam safety measures through the project cycle. There is also no strong institution to regulate the safety of dams in Uganda. <sup>45</sup>
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.		<p>See 4i and 4ii</p> <p>Furthermore, security risks related to law enforcement where armed personnel shall be involved is an issue for Bank funded projects. The country under the UWA have armed personnel involved in ensuring security of the tourists and dealing with illicit activities perpetuated by poachers. Furthermore, the country has established a unit for the Vital Assets and Strategic Installations under the UPDF the government intends to protect all its vital assets and strategic installations. This unit will have coordination with both the government and private sector entities. The unit shall focus on key assets including Oil and Gas installations, Protected Areas (NPs, WRs and CFRs), water bodies, bridges &amp; dams among others. This unit is fully functional. The Uganda Police have a mandate to ensure law and order in the country; this responsibility extends up to the PAs.</p> <p>The operations of these armed forces are clearly stipulated in the respective laws; the applicable laws include the Uganda Peoples' Defence Forces (Amendment) Act 2025; the Police Act Cap 303 of 1994; and the Uganda Wildlife (Amendment) Act, 2024. These laws also give provisions where the members of one force can be called in to complement the other depending on the circumstances.</p> <p>The operations that involve the use of force and the standard operating procedures which should be implemented when it comes to the interventions in the communities are areas for further improvements. The institutional assessments and the subsequent support that shall be required – including trainings and inductions are areas for consideration.</p>
vi. Ecosystem services (provisioning and regulating) not compromised	<p>YES (in theory)</p> <p>PARTIAL (in practice)</p>	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- The Constitution (1995) requires GOU to ensure environmental protection &amp; provides Ugandans a right to a clean &amp; healthy environment.</li> <li>- Section 4(1) of the NEA (2019) proclaims the “nature has the right to exist, persist, maintain and regenerate its vital cycles, structure, 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</li> <li>- The NEA (Art 44) empowers the Minister of the Ministry of Water and Environment (MoW&amp;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.</li> <li>- In 2011, the MoW&amp;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.</li> <li>- 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 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</li> </ul>

<sup>45</sup> 2016 safeguards diagnostic report.

		<p>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.</p> <ul style="list-style-type: none"> <li>- 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</li> <li>- Art 67 of NEA 2019 (payment of ecosystem services) empowers NEMA to issue guidelines and prescribe measures and mechanisms for (<i>inter alia</i>):             <ul style="list-style-type: none"> <li>- identifying and valuing ecosystem services that are critical for the environment and human well-being;</li> <li>- 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</li> <li>- the criteria for the design of payment for ecosystem schemes that ensure ecosystem sustainability.</li> </ul> </li> </ul> <p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- Wetland cover decreased from 13 per cent in 1990 to 8.6 per cent in 2015. It is estimated that Uganda loses 846 km<sup>2</sup> of its wetlands annually.</li> <li>- Fish production is depleted due to overfishing, illegal fishing gear and invasive species.</li> <li>- Most rural water samples do not comply with national drinking water quality standards.</li> <li>- Soil fertility is compromised because of nutrient mining, loss of soil cover and organic matter, low rainfall infiltration and soil compaction.</li> <li>- 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.</li> <li>- Cultural sites are threatened by quarrying, agriculture, and erosion.</li> <li>- Natural forest cover has been declining because of agriculture, charcoal and wood fuel demand, infrastructure development, and excessive harvesting.</li> <li>- Rangelands are under pressure from crop production, overgrazing, privatization of the communal rangelands and invasive species.<sup>46</sup></li> </ul>
vii. Safety of dams must be ensured		See 4ii
<b>Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>		
i. Avoid involuntary resettlement & forced eviction: When unavoidable, minimize by exploring project design alternatives	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- Article 237(3) establishes four distinct land tenure systems, but these multiple regimes require multiple approaches to compensation for land.</li> <li>- The IFPA-CD Process Framework (2019) provides for criteria and measures to be applied in scenarios where there are potential restrictions of community access to resources from the PAs. The PF establishes a process by which potentially affected communities can participate in identifying and redefining mitigation measures to be addressed in the project, determine measures for achieving amicable co-existence, restrictions, and implementation and monitoring of relevant project activities. The PF also stipulates modalities for</li> </ul>

<sup>46</sup> National State of Environment Report 2016-7.

		<p>stakeholder consultations and guides on dispute settlement in relation to access restrictions.</p> <p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- The law does not, however, define any corresponding tenure-specific approaches to land acquisition or compensation, which has resulted in contested compensation processes in practice<sup>47</sup>.</li> <li>- Affirmative action for the implementation of the PF is an aspect that requires attention; the PF needs to be adequately disclosed to the potentially affected communities and for all the project implementing actors to be aware of its provisions.</li> </ul>
	<p>PARTIAL (in practice)</p>	
<p>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.</p>	<p>YES (in theory)</p>	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> </ul>
	<p>PARTIAL (in practice)</p>	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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 process<sup>48</sup>.</li> <li>- 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 to<sup>49</sup></li> <li>- The 2016 Safeguard Diagnostic Report listed (<i>inter alia</i>) the following as gaps between WB requirements and Ugandan laws: <ul style="list-style-type: none"> <li>- Ugandan laws do not appear to make provisions for avoidance or minimizing of involuntary resettlement</li> <li>- 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.</li> <li>- In Uganda law those without formal legal rights or claims to such lands (e.g. tenants) are not entitled to be resettled or compensated.</li> <li>- Those without formal legal rights or claims to such lands and/or semi-permanent structures are not entitled to resettlement assistance or compensation.</li> </ul> </li> <li>- The the following weaknesses are identified: <ul style="list-style-type: none"> <li>- Outdated, incomplete and/or overlapping laws and regulations, and lack of a clear and comprehensive national policy and guidelines;</li> <li>- Weak institutional arrangements and unclear mandates, roles, and responsibilities;</li> <li>- Multiple tenure regimes with no corresponding specific acquisition procedures;</li> <li>- Lack of provisions for avoiding or minimizing involuntary resettlement or ensuring that it occurs prior to displacement or restriction of access;</li> <li>- Lack of clear eligibility criteria for compensation and social support;</li> </ul> </li> </ul>

<sup>47</sup> See UGANDA SRM technical report. Peter Cohen, 2019.

<sup>48</sup> Ibid.

<sup>49</sup> 2016 Diagnostic Assessment Report of Uganda's Environmental and Social Safeguards Management Systems.

		<ul style="list-style-type: none"> <li>- Prevalence of cash compensation, with no clear provisions for other forms of compensation (relocation assistance, transitional support or civic infrastructure...);</li> <li>- Failure to pay compensation at full replacement cost;</li> <li>- Budget shortfalls, leading to delays, negative social impacts, and non-payment of compensation</li> <li>- Inadequate and ineffective stakeholder engagement, community participation, and social accountability, GRM, and monitoring and evaluation;</li> <li>- Lack of systematic engagement with civil society or private sector actors (thereby foregoing the benefits of third-party monitoring and guidance); and</li> <li>- Inadequate inclusion of women and vulnerable groups.</li> </ul>
<b>Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>		
i. To protect and conserve biodiversity and habitats.	YES	<ul style="list-style-type: none"> <li>- The Constitution (1995) requires GOU to ensure environmental protection &amp; provides Ugandans a right to a clean &amp; healthy environment.</li> <li>- Section 4(1) of the NEA (2019) proclaims the “nature has the right to exist, persist, maintain and regenerate its vital cycles, <del>and</del> 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</li> <li>- 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</li> <li>- Wildlife Policy, 2014 aims at conserving wildlife in a manner that contributes to SD and wellbeing of people. Includes management of wildlife protected areas.</li> <li>- 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</li> <li>- 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.</li> </ul>
Where biodiversity impacts likely, apply mitigation hierarchy and precautionary approach in project design & implementation	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- 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).</li> </ul> <p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- implementation is variable – good in the case of donor or Bank funded projects, but modest to poor otherwise.</li> <li>- 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.<sup>50</sup></li> <li>- 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 laws<sup>51</sup>.</li> </ul>
	PARTIAL (in practice)	
Promote sustainable management of living natural resources.	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- See 6 i</li> <li>- Policy for the Conservation &amp; 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.</li> </ul>
	PARTIAL (in practice)	<ul style="list-style-type: none"> <li>- Fisheries Policy, 2004 aims at developing cooperation with neighbours on management of shared water bodies, and stocking to improve fisheries diversity and productivity.</li> </ul> <p><i>IN PRACTICE</i></p> <p>See 4 vi</p>

<sup>50</sup> 2017 ESSA unpublished report (compiled for the World Bank by Cutler and Srivastava).

<sup>51</sup> Ibid.

Support livelihoods of local communities, including Indigenous Peoples	YES (in theory)	<i>IN THEORY</i> - See 7 regarding IPs
	PARTIAL (in practice)	- 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. <i>IN PRACTICE</i> See 4 vi
v. Seek inclusive economic development that integrates conservation needs and development priorities.	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.
<b>Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</b>		
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	YES (in theory)	<i>IN THEORY</i> - The Uganda Constitution (1995) provides that: The State shall endeavour to fulfill the fundamental rights of all Ugandans to social justice and economic development and shall, in particular, ensure that all developmental efforts are directed at ensuring the maximum social and cultural well-being of the people. There is no explicit legal protection for IP in Uganda
	PARTIAL (in practice)	<i>IN PRACTICE</i> - Although national legislation reflects some elements of ESS7, several challenges remain in implementation and monitoring of indigenous peoples rights - There have been antagonisms and unclear line between the need for conservation and sustainable use vis-à-vis the need for community access to natural resources which often comes with pressure due to the ever-increasing populations, These tend to jeopardise most conservation projects.
To avoid adverse impacts of projects on Indigenous Peoples; when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts	YES (in theory)	<i>IN THEORY</i> - The Uganda Constitution states that: The State shall take affirmative action in favour of groups marginalised on the basis of gender, age, disability or any other reason created by history, tradition or custom, for the purpose of redressing imbalances which exist against them. - MWE's Environment & Social Safeguards Policy (2018) – stipulates that “Projects and programmes undertaken by the ministry shall avoid adverse impacts on indigenous peoples, and when avoidance is not possible, will minimize, mitigate and/or compensate appropriately in a consistent way; promote benefits and opportunities; and respect and preserve indigenous culture, including the indigenous peoples’ rights to lands, territories, resources, knowledge systems, and traditional livelihoods and practices”.
	PARTIAL (in practice)	<i>IN PRACTICE</i> - The mapping and participation of the marginalised groups may have limitations due to the limitations that confer marginalisation on such communities. - The avoidance measures may mean abandoning some of the planned interventions especially where government may not have finances for the compensation of the affected communities; this leaves the communities marginalised. - There could be scenarios of lack of collective priorities by the marginalised groups thereby making it difficult to achieve consensus and in such cases, planned interventions fail to take off.
To promote sustainable development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate and inclusive.	YES (in theory)	<i>IN THEORY</i> - The Uganda Constitution provides that: (i) There shall be balanced and equitable development; (ii) The State to take special measures in favour of the development of the least developed areas; - The National Culture Policy (2006) provides a framework for promotion of culture for development and this framework complies with international instruments on culture.

	<b>PARTIAL</b> (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- The participation of Indigenous Peoples in the planning for project activities may not be all-inclusive as regards coverage due to the intrinsic practices and beliefs that may limit the Indigenous Peoples.</li> <li>- The resources available for implementing development interventions in the communities (including for Indigenous Peoples) may be limiting; thus not enabling the aspirations of equitable development</li> <li>- Articulating culture into the development process in some scenarios may be unachievable due to the project designs and scopes which may not align with the cultural practices.</li> </ul>
To improve project design & promote local support by establishing & maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples affected by a project throughout the project's life cycle	<b>YES</b> (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- The Uganda Constitution provides that: The State shall take affirmative action in favour of groups marginalised on the basis of gender, age, disability or any other reason created by history, tradition or custom, for the purpose of redressing imbalances which exist against them.</li> <li>- MWE's Environment &amp; Social Safeguards Policy (2018) – stipulates that “all Ministry projects and programmes shall support the full and effective participation of indigenous peoples and the design and implementation of activities will be guided by the rights and responsibilities set forth in the United Nations Declaration on the Rights of Indigenous Peoples.</li> </ul>
	<b>PARTIAL</b> (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- The political pressures that come during the appropriation of development resources may not be directed towards addressing imbalances as the actors involved tend to often want to pull resources to their constituencies.</li> <li>- Full and effective participation in the project planning and subsequent engagements is not be achievable in practice.</li> <li>- As project implementation goes on, the different actors often tend to develop other ideologies that may be contrary to the project principles and this in most cases kills the spirit of meaningful consultation throughout the project's life cycle</li> </ul>
To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples	<b>YES</b> (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- The Uganda Constitution states that: Minorities have a right to participate in decision-making processes, and their views and interests shall be taken into account in the making of national plans;</li> <li>- The National Culture Policy (2006) provides for respect of one's and the others' Culture.</li> <li>- The NEA provides for the consultation of the communities during the ESIA process such that their views and aspirations are captured and incorporated in the project designs.</li> </ul>
	<b>PARTIAL</b> (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- Some project proponents do not seek for the Prior, and Informed Consent of the affected communities.</li> <li>- The decision making processes need every actor to have a good understanding of the planned projects; this in most cases doesn't occur</li> <li>- Some ESIA processes leave a lot to be desired especially as regards the details of stakeholder engagements done.</li> <li>- Some ESIA processes come at a later time after project designs have progressed and thereby incorporating the views from the community doesn't occur; these become formality ESIA's.</li> </ul>
To recognize, respect and preserve the culture, knowledge, & practices of Indigenous Peoples and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.	<b>YES</b> (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- The Uganda Constitution provides that:             <ol style="list-style-type: none"> <li>The State shall promote and preserve the cultural values and practices which enhance the dignity and well-being of Ugandans;</li> <li>Cultural &amp; customary values which are consistent with fundamental rights &amp; freedoms, human dignity, democracy and with the Constitution may be developed and incorporated in aspects of Ugandan life;</li> <li>Right to culture and similar rights - every person has a right to belong to, enjoy, practise, profess, maintain and promote any culture, cultural institution, language, tradition, creed or religion in community with others.</li> </ol> </li> </ul>

		<ul style="list-style-type: none"> <li>- The National Culture Policy (2006) states that / provides for:           <ol style="list-style-type: none"> <li>Communities look up to the traditional/cultural institutions for their identity</li> <li>Promotion of Cultural Change - encourages adapting and adopting new ideas and approaches within the laws of Uganda.</li> </ol> </li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- The desire to adapt and adopt new ideas and approaches in life is a process that needs affirmative stakeholder engagements so as to instil the new ideas; this is always not given utmost priority.</li> <li>- Most of the cultural values, practices and beliefs are not documented but have been carried down from generation to generation my word of mouth and practice; these are gradually getting eroded.</li> <li>- With modernisation (academically, in worship and technology etc.), the influence of cultural leaders is losing a grip on the subjects and this is endangering most cultures and beliefs.</li> </ul>
<b>Standard 8: Cultural Heritage</b>		
(i) To protect cultural heritage from the adverse impacts of project activities and support its preservation.	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- The Uganda Constitution (1995) - <u>Objective XXIV - Cultural objectives</u>; provides that: The State shall promote &amp; preserve cultural values &amp; practices which enhance the dignity &amp; well-being of Ugandans</li> <li>- <u>Section 114 of the NEA, 2019</u> requires a developer to undertake an environmental risk assessment as part of the ESIA process if the activity is likely to impact on cultural or natural heritage;</li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- The provisions of the NEA been implemented especially where the cultural heritages involved are very sensitive and have strong community attachments.</li> <li>- In some instances, the cultural heritage resources may not be observable at the time of planning and designing; this therefore means that effort to protect these become reactionary and not proactive</li> </ul>
(ii) To address cultural heritage as an integral aspect of sustainable development	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- (i) above</li> <li>- The Museums and Monuments Act, 2023 empowers the Department of Museums and Monuments to protect (a) cultural and natural heritage resources; (b) a specified place, site or immovable structure or building declared a national heritage; or (c) an object with historical, cultural, artistic or scientific importance.</li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- (i) above</li> <li>- The concept of sustainable development is not holistically understood by all actors; and in so doing little or no consideration is accorded to cultural heritage resources.</li> </ul>
(iii) To promote meaningful consultation with stakeholders regarding cultural heritage	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- The Museums and Monuments Act, 2023 provides for the engagement of the communities; documentation, surveys and research for cultural and natural heritage resources.</li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- Meaningful consultations for cultural heritages is an area that is still less understood by the several stakeholders; though it is provided for in the legislation, little attention is paid to it.</li> <li>- The costs involved in stakeholder engagements may not be readily available to the Department of Museums and Monuments.</li> </ul>
(iv) To promote equitable sharing of benefits from the use of cultural heritage	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- The Museums &amp; Monuments Act, 2023 grants a community within in the location of a cultural heritage to get first priority in the protection, conservation and development of</li> </ul>

	PARTIAL (in practice)	<p>the heritage resource; and an entitlement to share from the revenue collected from the heritage</p> <p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- The understanding of the benefits attached to the cultural heritage is an issue that has evaded the current generation where cultural values have been gradually eroded. Such communities may not make any effort to pursue any benefits associated with the cultural heritage.</li> <li>- Documentation of benefits and valuation of the same is another grey area which will make it difficult for value to be attached to cultural heritage</li> </ul>
<b>Standard 10: Stakeholder Engagement and Information Disclosure</b>		
(i) To establish a systematic approach to stakeholder engagement that helps Borrowers to identify stakeholders and build & maintain a constructive relationship with them, in particular project-affected parties.	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- The Local Governments Act, 1997 provides for the decentralisation and devolution of functions, powers and services at all levels of local governments to ensure good governance, democratic participation and <b><i>decision making by the people</i></b>.</li> <li>- <u>Article 176 – 2 (b)</u> of the 1995 Constitution states that decentralisation shall be a principle applying to all levels of local government and, in particular, from higher to lower local government units to <b>ensure peoples’ participation</b> and democratic control in <b>decision making</b></li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- Local governments and communities have been empowered in decision making; however, most often the resources required for implementing of the LG plans become limiting and these aspirations remain in paper</li> <li>- In some instances, partnerships are established at the design and onset of the projects but these fail to be sustained throughout the project phase.</li> </ul>
(ii) To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- (i) above</li> <li>- The 1995 Constitution of Uganda in Objectives X – provides for role of the people in development: The State shall take all necessary steps to involve the people in the formulation and implementation of development plans and programmes which affect them.</li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- (i) above</li> <li>- Achieving harmony between project proponents and some members of the public has been a complicated issue in most project areas – especially if the project has negatively impacted on the population.</li> <li>- The views from the stakeholders may not be incorporated into project designs which jeopardises the spirit of ownership by the communities.</li> </ul>
(iii) To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- (i) above</li> <li>- The National Environment (Environmental and Social Assessment) Regulations, 2020 provide for stakeholder engagement throughout the proposed project or activity development, including details on how to address potential related grievances or requests for information, and evidence of stakeholder consultation; and</li> <li>- Section 16 of the National Environment (Environmental and Social Assessment) Regulations, 2020 provides for stakeholder consultation during the environmental and social impact study: The developer shall, in undertaking the environmental and social impact study, carry out <b>consultations</b> with relevant stakeholders, communities likely to be affected by the project and the public.</li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- (i) above</li> <li>- The establishment of grievance redress structures which are supposed to be at the forefront of handling project-related grievances is a voluntary role which doesn’t attract any financial benefits. This in most cases makes the grievance redress systems less effective.</li> </ul>

		<ul style="list-style-type: none"> <li>- Engagements with project affected parties have been complicated by issues such as absentee landlords; parents – thereby living the subordinates with no mandate to make meaningful decisions.</li> </ul>
(iv) To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- Section 16 of the National Environment (Environmental and Social Assessment) Regulations, 2020 provides for stakeholder consultation during the environmental and social impact study. The developer shall carry out <i>consultations</i> with relevant stakeholders, communities likely to be affected by the project and the public. In these consultations, the potential risks from the project are communicated to the community.</li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- The level of understanding of the project risks and the openness to discuss these with the public has always had some setbacks.</li> <li>- Though the risks may be explicitly articulated and communicated to the stakeholders, there have always been shortfalls in providing the mitigation measures – arising from limited funding or less concern from the implementing teams (especially Contractors).</li> </ul>
(v) To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances	YES (in theory)	<p><i>IN THEORY</i></p> <ul style="list-style-type: none"> <li>- (iii) above</li> </ul>
	PARTIAL (in practice)	<p><i>IN PRACTICE</i></p> <ul style="list-style-type: none"> <li>- The commitment by the Borrowers to respond to grievances and concerns arising from project-affected parties has been an issue with gaps that have left several issues reverberating to the detriment of the projects.</li> </ul>