



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

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN



FOR THE PROPOSED ERADICATION OF INVASIVE SPECIES IN MGAHINGA GORILLA NATIONAL PARK

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ACRONYMS

CFR:	Central Forest Reserve
CoC:	Code of Conduct
DWRM:	Directorate of Water Resources Management
ESHS:	Environment, Social, Health and Safety
ESIA:	Environmental and Social Impact Assessment
ESIRT:	Environmental and Social Incident Reporting Toolkit
ESMF:	Environmental and Social Management Framework
ESMP:	Environmental and Social Management Plan
ESSs:	Environmental and Social Standards
GBV:	Gender Based Violence
GHG:	Green Houde Gas
GRM:	Grievance Redress Mechanism
MGNP:	Mgahinga Gorilla National Park
MTWA:	Ministry of Tourism, Wildlife and Antiquities
MWE:	Ministry of Water and Environment
NP:	National Park
OPM:	Office of the Prime Minister
OSH:	Occupational Safety and Health
PPE:	Personal Protective Equipment
PWDs:	Persons with Disabilities
SEA:	Sexual Exploitation and Abuse
UWA:	Uganda Wildlife Authority
VAC:	Violence Against Children
VGMP:	Vulnerable Groups Management Plan
WR:	Wildlife Reserve

1.0 INTRODUCTION

1.1 Background

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

The development objective of IFPA-CD is to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes. The project supports Government of Uganda agenda of increasing forest cover through afforestation and reforestation and slowing down the loss and degradation of the nation's forests.

The project is implemented under 4 components, namely:

- *Component 1: Improved management of forest protected areas.* This focusses on improving management of government-managed forest and wildlife protected areas (PAs) to ensure they can continue to generate revenues and provide important environmental services.
- *Component 2: Increased revenues and jobs from forests and wildlife protected areas.* This focusses on increasing revenues and jobs from forest and wildlife protected areas (PAs) through targeted investments in tourism and productive forests.
- *Component 3: Improved landscape management in refugee hosting areas.* This encourages establishment of greater tree cover in refugee-hosting landscapes on host community land outside PAs, supporting sustainable forest management and landscape resilience on private and customary land.
- *Component 4: Project Management and Monitoring.*

The project is being implemented in selected sites in the Albertine Rift and the refugee hosting areas of West Nile region and Lamwo District with focus on targeted PAs including 7 National Parks (NP), 4 Wildlife Reserves (WR), 27 Central Forest Reserves (CFR) and 18 refugee host districts.

1.2 Project Description

Mgahinga Gorilla National Park had been invaded by invasive exotic plant species. These include alnus acuminata (mountain alder/green alder, black wattle (acacia mearnsii), cypress (t. ascendens) and eucalyptus. These have mainly invaded the North Eastern parts of the park, currently occupying an estimated area of about 500 hectares. Alnus acuminata has the biggest impact on the park, occupying over 85% of the areas already invaded, where 140 hectares have been assessed to have alnus acuminata.

The other invasive species of black wattle, cypress and eucalyptus are widely spreading over various parts of the park. These invasive plants are reducing the gorilla food. The eradication of invasives will be done mainly through uprooting and de-barking the invasives.

It is believed that invasive species spread at a rate of about 12% per annum and if no intervention is made, they will colonize the entire park. It is proposed that local community members will be hired to clear the invasive species.

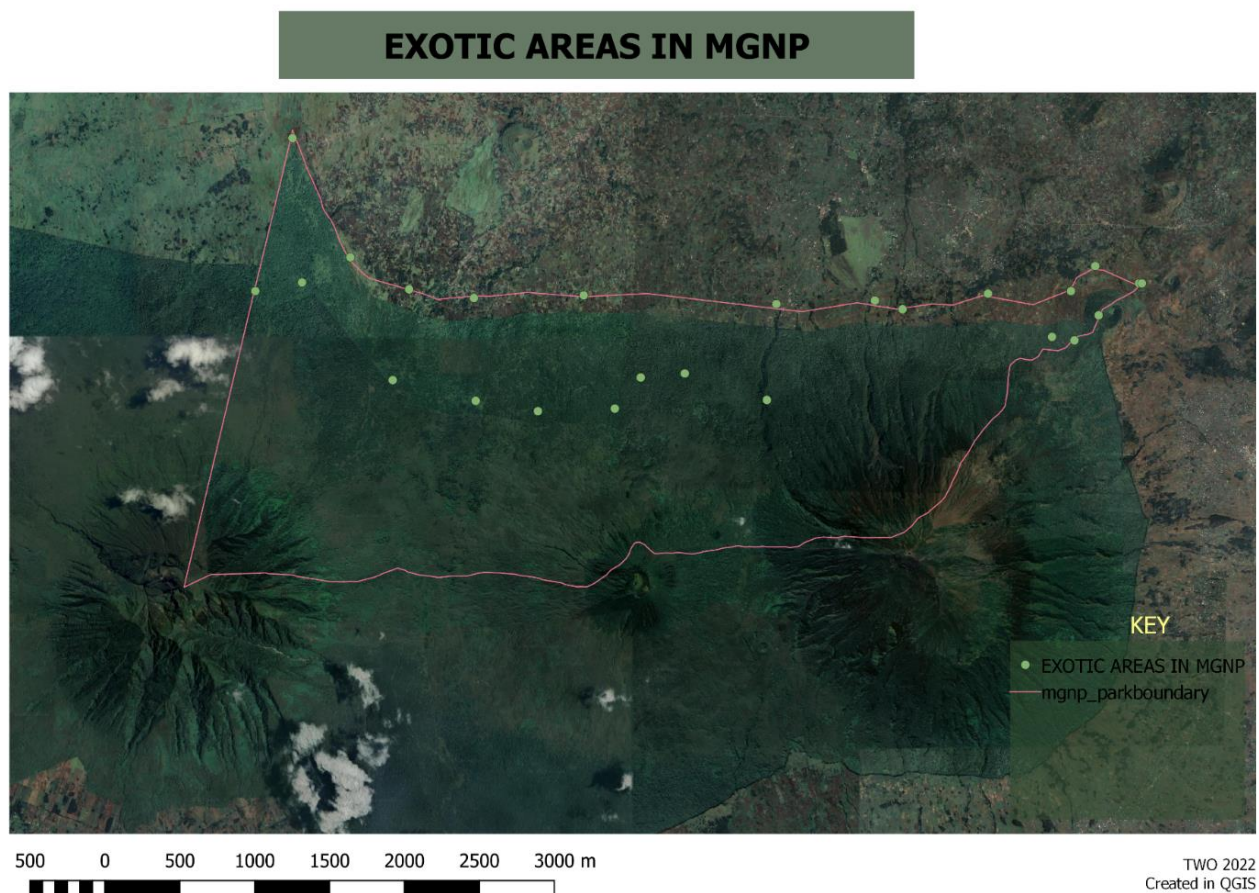
1.3 Objective of the ESMP

This ESMP has been prepared in compliance with the World Bank Environmental and Social Standards (ESSs) as well as applicable national legislation.

This Environmental and Social Management Plan (ESMP) provides adequate measures and controls that shall be used to minimise and mitigate the environmental and social risks and impacts resulting from activities of the proposed eradication of invasive species. Uganda Wildlife Authority (UWA) will require the Contractor undertaking the eradication of the invasive species to implement this ESMP, which will be included in the bidding documents and in the works contract.

1.4 Project Location and Map

This is the secondary forest of the Park that was once settled by communities up to 1992 when they were evicted and left most of the exotics/invasive plants in this zone and these exotic species are still undergoing regeneration.



2.0 POLICY, LEGAL AND REGULATORY FRAMEWORK

This section provides a brief overview of the policy, legal and regulatory framework for environmental and social impacts and risks management in Uganda relevant to the proposed sub-project.

2.1 National Policies

2.1.1 The National Environment Management Policy, 1994

The overall goal of this policy is the promotion of sustainable economic and social development that enhances environmental quality without compromising the ability of future generation to meet their needs.

Relevance to the sub-project: This ESMP has been prepared to ensure sustainable development, as the sub-project is likely to result in environmental impacts and risks.

2.1.2 The Child Labour Policy, 2006

This policy prohibits employment of children.

Relevance to the sub-project: UWA should ensure strictly no employment of children at the sub-project in accordance with this policy.

2.1.3 The National Employment Policy, 2010

Employment creation is central to the national socio-economic development process. It is at the core of the transformation of Uganda from a poor agrarian economy to the modern, prosperous and skilled society.

Relevance to the sub-project: UWA shall ensure the provisions of this policy are adhered to as far as the sub-project is concerned.

2.1.4 The National Culture Policy, 2006

Uganda is endowed with a rich and diverse cultural heritage, which includes sixty-five indigenous communities with unique characteristics. The National Culture Policy provides strategies to enhance the integration of culture into development.

Relevance to the sub-project: UWA shall ensure that there is an enabling environment created for social protection and social transformation of the community around the sub-project site.

2.1.5 The Wildlife Policy, 1999

Ownership of wildlife (plant and animal) existing in its wild habitat is vested in Government on behalf of, and for the benefit of, the people of Uganda (Sec. 3(1) - this is consistent with the constitutional position in article 237(2b)).

Relevance to the sub-project: UWA should restrict works to areas that will be required for the sub-project so as to minimize on the impacts on wildlife.

2.1.6 The Uganda Gender Policy, 2007

The policy provides a legitimate point of reference for addressing gender inequalities at all levels and by all stakeholders.

Relevance to the sub-project: Based on this policy, UWA and/or the contractor is expected to take gender issues into account during sub-project implementation and most particularly, through equitable access to the job opportunities available.

2.2 Legal Framework

2.2.1 The Constitution of Uganda, 1995

The constitution of the republic of Uganda is the cardinal law in Uganda upon which all environmental and social laws and regulations are founded. The constitution provides for, among others:

- The right of every Ugandan to a clean and healthy environment (Article 39);
- The responsibility of Government to enact laws that protect and preserve the environment from degradation and to hold in trust for the people of Uganda such natural assets as lakes, rivers, wetlands, game reserves and national parks (Article 237,2);
- The right of every Ugandan to fair and adequate compensation in instances of land acquisition.

Relevance to the sub-project: UWA should ensure that the sub-project is implemented in a way that aligns with the constitution.

2.2.2 The National Environment Act No.5 of 2019

This act provides for various strategies and tools for environment management, which also includes the Environmental and Social Impact Assessment (ESIA) (Section 113) for projects likely to have significant environmental impacts, and audit (Section 126) for ongoing projects/activities which may significantly affect the environment.

Relevance to the sub-project: The sub-project does not fall under projects that require a project brief or a mandatory ESIA. However, an ESMP has been developed to identify, assess and manage environmental and social risks and impacts as the implementation of the sub-project is likely to have associated negative environmental and social impacts and risks.

2.2.3 The Children's Act, Cap 59

The Act puts into effect the Constitutional provisions on children and emphasizes the protection of the child by upholding the rights, protection, duties and responsibilities as contained in the Convention on

Rights of the Child and the Organization for African Unity Charter on the Rights and Welfare of the African Child, with appropriate modification to suit the circumstances in Uganda and other International and regional instruments. For example, Section 8 prohibits employment of children.

Relevance to the sub-project: UWA should ensure the sub-project adheres to the provisions of this Act.

2.2.4 The Occupational Safety and Health Act, 2006

The Occupational Safety and Health Act of 2006 consolidates, harmonises and updates the law relating to occupational safety and health and repeals the Factories Act of 1964. It makes provisions for the health, safety, welfare and appropriate training of persons employed in work places. The Act provides for safe access to the workplaces and safe work practices which applies to this project as well.

Relevance to the sub-project: The Act is applicable in relation to protection of the workers against secondary injuries and hazards during execution of their duties or work. UWA and the Contractor should provide for the protection of workers from adverse weather, provision of a clean and healthy work environment, sanitary conveniences, washing facilities, first Aid and facilities for safe drinking water and meals. In summary, this act should be used as a guideline to ensure health and safety of workers is guaranteed. UWA and Contractor should provide PPE to its entire staff.

2.2.5 The Employment Act, 2006

The Employment Act 2006 is the governing legal statutory instrument for the recruitment, contracting, deployment, remuneration, management and compensation of workers.

Relevance to the sub-project: The Act will govern labour type and conditions under which the people hired by the sub-project work. It prohibits child labour (a condition the contractor must also comply with).

2.2.6 The Workers Compensation Act, Cap 225

The Act emphasizes the provision of personal protective equipment (PPE) to employees to minimize accidents and injuries.

Relevance to the sub-project: All workers at the sub-project should be provided with adequate PPE that is appropriate to the task they are involved in. A workers' compensation policy should be implemented as stipulated.

2.3 Regulatory Framework

2.3.1 The National Environment (Environmental and Social Impact Assessment) Regulations, 2020

The regulations state in Part II, Section 6 (1) A developer of a project in section 112 of the Act and set out in Schedule 4 of the Act shall assess the likely environmental, health and socio-economic impacts of the project.

Relevance to the sub-project: This ESMP has been prepared in consideration of the above requirement.

2.3.2 The National Environment (Waste Management) Regulations, 2020

These regulations provide for sustainable management of wastes and that the waste does not cause harm to human health or the environment.

Relevance to the sub-project: The sub-project should ensure that wastes are managed in a way to avoid environmental pollution and public health impact and that wastes are managed and disposed off in an environmentally friendly manner.

2.4 World Bank Environmental and Social Standards (ESSs)

Environmental and Social Standard	Provision
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	ESS1 provides for carrying out an environmental and social assessment of the project to assess the environmental and social risks and impacts of the project throughout the project life cycle. ESS1 is applicable to the project and the preparation of this ESMP for the eradication of invasive species is in conformity with ESS1 and also conforms with the ESMF and LMP.
ESS2: Labor and Working Conditions	ESS2 promotes the fair treatment, non-discrimination, provision of equal opportunities and safe working conditions for workers engaged on projects. It strongly encourages protection of all project workers, including vulnerable groups such as women, persons with disabilities, children (of working age) and migrant workers, contracted workers and primary supply workers, as appropriate. It provides certain requirements that the project must meet in terms of working conditions, protection of the work force (especially the prevention of all forms of forced and child labour), and provision of a grievance mechanism that addresses concerns on the project promptly and uses a transparent process that provides timely feedback to those concerned. ESS2 is applicable to the project and the project prepared the Labour Management Procedures and Occupational Health and Safety Measures which shall be used to guide the eradication of invasive species in accordance with ESS2.
ESS3: Resource Efficiency and Pollution Prevention and Management	The ESS3 provides requirements for projects to achieve the sustainable use of resources, including energy, water and raw materials, as well as implement measures that avoid or reduce pollution resulting from project activities. The standard places specific consideration on hazardous wastes or materials and air emissions (climate pollutants) given that the current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of present and future lives. ESS3 is applicable to the project and the sub-project will implement measures to avoid pollution and a waste management plan will be prepared.
ESS4: Community Health and Safety	This standard recognizes that project activities, project equipment and infrastructure increase the exposure of project stakeholder communities to various health, safety and security risks and impacts and thus recommends that projects implement measures that avoid or limit the occurrence of such risks. It provides further requirements or guidelines on managing safety, including the need for projects to undertake safety assessment for each phase of the project, monitor incidents and accidents and preparing regular reports on such monitoring. ESS4 also provides guidance on emergency preparedness and response. ESS4 is applicable to the project and the Occupation Safety and Health Protocols prepared under the project will guide in addressing the issues related to community health and safety in accordance with ESS4.
ESS5: Land Acquisition, Restrictions on Land Use and	This standard seeks to avoid involuntary resettlement. ESS5 promotes consideration of feasible alternative project designs to avoid or minimize land acquisition or restrictions on land use, especially where this would result in physical or economic displacement, while balancing environmental, social, and financial costs and benefits, and paying particular attention to gender impacts and impacts on the poor and vulnerable.

Environmental and Social Standard	Provision
Involuntary Resettlement	ESS5 promotes engagement with affected communities, including host communities, through the process of stakeholder engagement described in ESS10. ESS5 is applicable to the project as the project may lead to restrictions on land use. However, for this particular sub-project, ESS5 does not apply since the land where eradication of invasive species is to take place is within the National Park.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 promotes the conservation of biodiversity or natural habitats and supports the protection and maintenance of the core ecological functions of natural habitats and the biodiversity they support. It also encourages projects to incorporate into their development, environmental and social strategies that address any major natural habitat issues, including identification of important natural habitat sites, the ecological functions they perform, the degree of threat to the sites, and priorities for conservation. ESS6 is applicable to the project and some of the mitigation measures mentioned in this ESMP are aimed at addressing issues under ESS6.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	<p>This standard seeks 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.</p> <p>ESS7 promotes sustainable development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate and inclusive. ESS7 is applicable to the project and a Vulnerable and Marginalized Groups Plan (VMGP) for MGNP has been prepared under the project and will guide in addressing issues related with indigenous peoples (Batwa) including during the implementation of this sub-project.</p>
ESS8: Cultural Heritage	This standard sets out general provisions on cultural heritage preservation and recommends protecting cultural heritage from the adverse impacts of project activities. ESS8 is applicable to the project and although there are no known cultural heritage sites in the area to be eradicated of invasive species, a Chance Find Procedure has been included as the implementation of the sub-project will involve some form of excavations.
ESS9: Financial Intermediaries	ESS9 sets out how Financial Intermediaries (FIs) must assess and manage environmental and social risks and impacts associated with the sub-projects it finances. ESS9 requires an FI to promote good environmental and social management practices in the subprojects the FI finances and promote good environmental and sound human resources management within the FI. ESS9 is not applicable to the project as there are no financial intermediaries involved in project implementation.
ESS10: Stakeholder Engagement and Information Disclosure	ESS10 seeks to encourage open and transparent engagement with project-affected parties throughout the project life cycle. The standard establishes a systematic approach to stakeholder engagement and helps to identify stakeholders and build and maintain a constructive relationship with them, as well as disclose information on the environmental and social risks and impacts to stakeholders in a timely, understandable, accessible and appropriate manner and format. It recommends that stakeholder engagements are commenced as early as possible in the project development process and continued throughout the lifecycle of the Project. This allows

Environmental and Social Standard	Provision
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	<p>for stakeholders' views to be considered in the project design and environmental and social performance. ESS10 also provides for establishment and implementation of a grievance mechanism to receive and facilitate resolution of concerns and grievances. ESS10 is applicable to the project and various stakeholders were consulted as part of the overall project and the project has established a Grievance Redress Mechanism (GRM). Additionally, the ESMP for the eradication of invasive species will be publically disclosed in conformity with ESS10.</p>
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3.0 METHODOLOGY

This section highlights the methods that were used in the development of this ESMP.

3.1 Environmental & Social Screening

This is the stage at which it was determined that an ESMP would be adequate to mitigate the likely environmental and social impacts and risks. The sub-project was subjected to the project screening checklist and it was determined that the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. The 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.

3.2 Document Review

Documents readily available relating to the sub-project and the project as a whole were reviewed. The following project related documents were reviewed during the development of the ESMP:

- i. The project Environmental and Social Management Framework (ESMF)
- ii. Labour Management Procedures (LMP)
- iii. Occupational Health and Safety Measures
- iv. VGMP for MGNP

3.3 Site visit

The area of the proposed sub-project was examined during a site visit. During the site visit, the observation and assessment of the physical characteristics of the proposed sub-project site, the immediate surrounding areas and other environmental and social attributes likely to affect or be affected by the implementation of the sub-project was undertaken.

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

3.4 Stakeholder Consultations

Consultations were carried out with key staff of Uganda Wildlife Authority (UWA) and local community members to obtain their comments on the proposed sub-project with respect to the potential environmental and socio-economic issues and impacts. These consultations were mainly aimed at identifying environmental, social and health impacts and also inform the process of developing appropriate mitigation and management options.

4.0 IMPACT IDENTIFICATION AND MITIGATION

4.1 Expected Positive Benefits/Impacts

IMPACT	DESCRIPTION OF IMPACT	ENHANCEMENT MEASURES	PHASE
Provision of employment	Local community members will be employed by the sub-project thus the subproject will act as a source of income for local community members.	The contractor should hire local workers. External labor should be hired only if specific skills are not available locally. Workforce recruitment should be undertaken with involvement of local leaders who can identify local community members.	Activity
Safeguarding biodiversity and ecosystem health	The ecosystem health of MGNP will be enhanced thus safeguarding biodiversity.	The methods preferred for eradication of invasives should be effective.	Operational

4.2 Key Adverse Impacts/Risks

KEY ADVERSE IMPACTS/RISKS	PROPOSED MITIGATION MEASURE
As with any project, there is potential for impacts on health and safety likely to occur as a result of accidents and unplanned events. There are also other risks such as attacks from venomous creatures such as snakes, insects etc.	The Contractor shall implement the provisions of the project OSH measures that have been developed for the project. Among others: 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. The PPE shall be inspected regularly and maintained or replaced as necessary. There shall be a safety awareness/induction training for workers before commencement of works. A fully equipped first aid kit will be available on site. 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.
Project workers may carry out indiscriminate waste disposal during species eradication.	Provision of adequate waste bins.
Additionally, inadequate provision of sanitary facilities for use by workers can lead to ad hoc defecation in secluded areas around	The contractor will provide mobile toilets for the workers on site.

KEY ADVERSE IMPACTS/RISKS	PROPOSED MITIGATION MEASURE
the park, thus creating of unsanitary conditions and sources of fly infestation.	
The general project area is inhabited by the Batwa people. The Contractor may overlook the Batwa for employment opportunities thus further marginalizing them.	Recruitment of able bodied Batwa as sub-project workers.
Project workers may be attacked by animals causing injuries or even death.	Ensure Ranger presence all the time.

4.2 Environment and Social Management Plan (ESMP)

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
PRE-ACTIVITY PHASE					
Misunderstandings and conflicts	Misunderstandings and conflicts are likely to develop between UWA, local community members and other stakeholders especially if adequate consultations are not carried out about the proposed sub-project.	Adequate consultations should be undertaken. UWA		10,000,000	Before commencement of works
Exclusion of disadvantaged groups such as women, PWDs etc.	The Contractor may recruit sub-project workers without giving due attention to women and Persons with Disabilities (PWDs).	<p>The Contractor should hold sensitization meetings with local community leaders before recruitment of project workers to let the community know what sort of work is available for women and PWDs so that they can be considered.</p> <p>The Contractor should employ willing disadvantaged persons and give them light jobs/tasks e.g., fetching water for women</p>	Contractor	2,000,000	Before commencement of works
ACTIVITY PHASE					
Soil erosion and geological disturbances	The eradication of invasive species will involve uprooting which will inevitably lead to soil disturbance. This may lead soil erosion if proper back filling is not done.	Proper back filling will be undertaken to avoid soil erosion.	Contractor	No additional cost	Throughout project implementation
Occupational, health and safety risks and impacts/ Accidents	As with any project, there is potential for impacts on health and safety likely to occur as a result of accidents and unplanned events. There	The Contractor shall implement the provisions of the project OSH measures that have been developed for the project.	UWA Contractor	20,000,000 ¹	Throughout project implementation

¹ Some items for example PPE will be included as preliminaries in the bid document

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
and injuries of workers	are also other risks such as attacks from venomous creatures such as snakes, insects etc.	<p>Among others:</p> <p>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.</p> <p>The PPE shall be inspected regularly and maintained or replaced as necessary.</p> <p>There shall be a safety awareness/induction training for workers before commencement of works.</p> <p>A fully equipped first aid kit will be available on site.</p> <p>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.</p>			
Trampling of vegetation	Sub-project workers may trample on vegetation by using various routes to the sub-project sites.	<p>Close supervision and enforcement by UWA rangers.</p> <p>Orientation of sub-project workers prior to commencement of works.</p> <p>Sub-project workers will be required to keep on the designated routes/existing walkways.</p>	Contractor UWA	4,000,000	During project implementation
Noise from sub-project workers	Since sub-projects activities will take place inside the park, sub-project workers may	Supervision and enforcement to be undertaken by UWA Rangers to make sure	UWA Contractor	4,000,000	During project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
	produce noise thus becoming a nuisance and upsetting animals.	sub-project workers do not make unnecessary noise. All sub-project activities must be carried out during day time to minimize nuisance and disturbances caused to nocturnal fauna that uses auditory communication. Thus, works will be limited to day time between 7:00 Hours to 17:00 Hours.			
Solid and liquid waste generation	Project workers may carry out indiscriminate waste disposal during species eradication. Additionally, inadequate provision of sanitary facilities for use by workers can lead to ad hoc defecation in secluded areas around the park, thus creating of unsanitary conditions and sources of fly infestation.	Provision of adequate waste bins. The contractor will provide mobile toilets for the workers on site.	Contractor	30,000,000	Throughout implementation.
Poaching	Poaching may take place due to the fact that project workers may have easy access to animals as they will be working inside the park.	Sensitization and supervision of workers by UWA rangers. Ensure that an ESHS code of conduct (CoC) is in place for Contractor and site workers, who should be sensitized on the contents of the CoC and agree to abide by the requirements there in.	UWA Contractor	2,000,000	Throughout project implementation
Attacks from animals	Project workers may be attacked by animals causing injuries or even death.	Ensure Ranger presence all the time.	Contractor UWA	4,000,000	Throughout project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
Non-payment of workers or unreasonable delays in payment	The Contractor may fail and/or delay to pay the workers thus causing agitation among the workers.	<p>Provide and establish a Project GRM and advise workers on where to report grievances.</p> <p>Develop and implement a Grievance Redress Mechanism for project workers before engaging them and maintained throughout project implementation.</p> <p>All workers must sign contracts that indicate payment conditions and enforce to ensure contractors adhere to this.</p> <p>Verification should first be undertaken to confirm that workers have been paid by the Contractor before payment is made to the contractor.</p>	Contractor	3,000,000	During project implementation
Exclusion of the Batwa	The general project area is inhabited by the Batwa people. The Contractor may overlook the Batwa for employment opportunities thus further marginalizing them.	Recruitment of able bodied Batwa as sub-project workers.	PCU, UWA Contractor	Included in Contractor's contract	Throughout project implementation

5.0 ENVIRONMENTAL AND SOCIAL MONITORING PLAN

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility	Cost Estimate ²³
Pre-Activity Phase							
Misunderstandings and conflicts	Adequate consultations should be undertaken.	Project area	Records of consultative meetings	Review of records	Before commencement of works and throughout project implementation.	UWA	4,000,000
Exclusion of disadvantaged groups such as women, PWDs etc.	The Contractor should hold sensitization meetings with local community leaders before recruitment of project workers to let the community know what sort of work is available for women and PWDs so that they can be considered for employment.	Project area	Documentation/records of sensitization meetings	Review of records/documentation	Before start of civil works	UWA/PCU	4,000,000
Activity Phase							
Soil erosion and geological disturbances	Proper back filling will be undertaken to avoid soil erosion.	Project working areas site	Erosion gullies, loose soil on the ground	Visual observation during field monitoring	Monthly	UWA	4,000,000
Occupational health and safety risks and impacts	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. The	Project working areas	Presence and use of PPE Health and safety incidents	Visual observation during field visits Review of incident and accident logs	Continuous	UWA Contractor	10,000,000

² Part of regular monitoring activities

³ Costs of monitoring overlap as during one field monitoring, several parameters of different mitigation measures can be monitored

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility	Cost Estimate ²³
	PPE shall be inspected regularly and maintained or replaced as necessary.						
	There shall be a safety awareness/induction training for workers before commencement of works.	Project working areas	Records of trainings	Review of training records	Quarterly	UWA/PCU	
	Fully equipped first aid kits will be provided on site.	Project working areas	Presence and number of first aid kits	Visual observation during field visits	Continuous	UWA	
	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.	Project working areas	Records/documentation of the orientation	Review of documentation Review of logs of incidents/accidents	Quarterly	UWA/PCU	
Trampling of vegetation	Orientation of sub-project workers.	Project working areas	Records of orientation meetings	Review of documentation	Before start of civil works	UWA	4,000,000
	Sub-project workers will be required to keep on the designated routes/existing walkways.	Project working areas	No newly created walkways	Visual observation during field monitoring	Monthly	UWA	
Noise from workers	Supervision and enforcement to be undertaken by UWA Rangers to make sure project workers do not make unnecessary noise.	Project working areas	Noise levels	Noise level measurements Observation during field monitoring	Weekly	UWA	7,000,000
	All work must be carried out during day time to minimize nuisance and disturbances caused to nocturnal fauna that uses auditory communication.	Project working areas	Log of daily work hours	Review of logs	Weekly	UWA	

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility	Cost Estimate ²³
	Thus, activities will be limited to day time between 7:00 Hours to 17:00 Hours.						
Solid and liquid waste generation	Provision of adequate waste bins.	Project working areas	Number of waste bins on site	Observation during field monitoring	Monthly	UWA/PCU	4,000,000
			Littering of waste on site				
	The contractor will provide mobile toilets for the workers on site.	Project working area	Presence of mobile toilets	Visual observation	Monthly	UWA	
Poaching	Sensitization and supervision of workers by UWA rangers.	Project working areas	Number of incidents related to poaching	Review of incident logs	Monthly	UWA	4,000,000
	Ensure that an ESHS code of conduct (CoC) is in place for Contractor and site workers, who should be sensitized on the contents of the CoC and agree to abide by the requirements there in.	Project working areas	Signed ESHS codes	Review of codes	Quarterly	UWA/PCU	
Attacks from animals	UWA Rangers will be used for escorting and guarding Project workers.	Project working areas	Presence of UWA Rangers on site	Visual observation during field monitoring	Monthly	PCU	4,000,000
Non-payment of workers	Provide and establish a Project GRM and advise workers on where to report grievances.	Project working areas	Presence of a functional GRM on site	Review of grievance logs and payment records	Monthly	UWA	6,000,000
			Records of grievances				
	Develop and implement a Grievance Redress Mechanism for project workers before engaging them and maintained throughout project implementation.		Payment records				
Exclusion of the Batwa	Recruitment of able bodied Batwa as workers.	Project working areas	Number of Batwa employed by the project	Review of records/documentation	Quarterly	UWA/PCU	4,000,000

ANNEX 1: CODES OF CONDUCT

CONTRACTOR CODE OF CONDUCT

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

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

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

General

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

Health and Safety

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

Gender Based Violence and Violence Against Children

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

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

Implementation

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

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

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

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

Contractor Name: _____

Signature: _____

Name: _____

Title: _____

Date: _____

INDIVIDUAL CODE OF CONDUCT
IMPLEMENTING ESHS AND OHS STANDARDS, PREVENTING GENDER BASED VIOLENCE AND VIOLENCE
AGAINST CHILDREN

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

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

I agree that while working on the project I will:

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

- Not participate in sexual contact or activity with children under the age of 18—including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.
- Unless there is the full consent by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered “non-consensual” within the scope of this Code.
- Consider reporting through the GRM or to my manager any suspected or actual GBV/VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

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

Sanctions

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

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.

6. Termination of employment.

7. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety measures. That I will avoid actions or behaviours that could be construed as GBV/VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Name: _____

Title: _____

Date: _____

ANNEX 2: CHANCE FIND PROCEDURE

Chance find procedures will be used as follows:

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

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