



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

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN



FOR THE PROPOSED CONSTRUCTION OF BOARDWALKS IN SEMULIKI NATIONAL PARK

September 2024

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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
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
SNP:	Semuliki National Park
UWA:	Uganda Wildlife Authority
VAC:	Violence Against Children
VMGP:	Vulnerable and Marginalized Groups 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

Kirumia trail is a 14km tourism trail traversing the forest East to West. It starts from Kirumia trading centre along the Bundibugyo - Fort-Portal highway to River Semuliki. The tourism trail is famous and internationally known for birding in Semuliki National Park (SNP). It traverses various forest habitats ranging from forest age, secondary forest, primary forest, swamp land or oxbow lakes such as Ngoyo and Kibura. These areas are known for rare and restricted range bird species such as the Capuchin Babbler, Spot breasted Ibis, white tailed blue swallow, forest francolin, Grey throated rail, African Piculet, Black dwarf and red billed dwarf hornbills, Black throated Coucal, Zenkers honey guide, lyre tailed honey guide and red rumped tinkerbird among others. Kirumia trail also provides access to key primate species such as the rare Semuliki Red colobus monkeys earmarked for a new tourism product.

The undulating terrain in SNP lowland forest poses great challenges to the birdwatching tourists using this trail. The trail is almost entirely flooded during the rainy season making it impassable. The need for boardwalks comes in handy to provide visitor access to the tourism sites.

The boardwalks (700m) are proposed to be constructed on boggy section along the famous Kirumia bird watching trail which traverses the tropical forest along a 4km trail from the Bundibugyo-Fort-Portal high way to River Semuliki (the DRC-Uganda border). The site is located 3-4km from the main road. The boggy section is also crossed by Kirumia River which currently comprise temporary foot bridges. The trail sections and site are seasonally flooded and muddy and only accessed on foot.

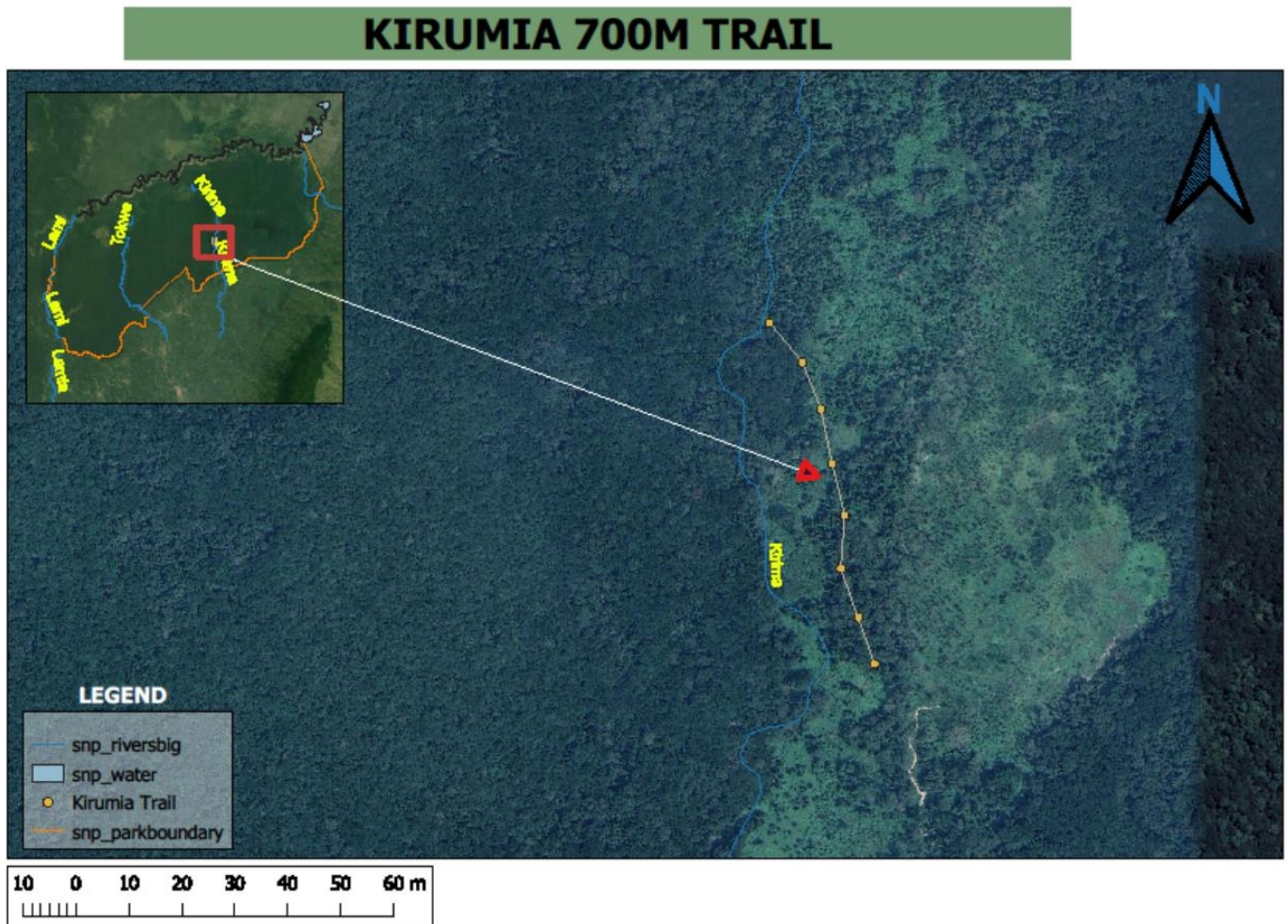
The boardwalk design shall comprise a one-meter-wide walkway suspended from the ground with hand/guard rails provided. The required and appropriate materials shall be HDP plastic pipes of about one meter (01m) diameter with a treated timber decking of one meter (01m) wide. The timber decking is expected to be fastened onto the HDP plastic pipes using bolts of specified size for the standard boardwalks. The site preparation requires use of pangas, hoes and /or spades.

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 construction activities of the proposed boardwalks. Uganda Wildlife Authority (UWA) will require the Contractor undertaking the construction of the boardwalks to implement this ESMP, which will be included in the bidding documents and in the works contract.

1.4 Project Location and Map



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 Waters Resources Policy, 1999

The policy caters for safeguarding water sources.

Relevance to the sub-project: No pollutants from the operations at the sub-project should be released to the nearby water sources.

2.1.4 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.

2.1.5 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.

2.1.6 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 excavation works to areas that will be required for construction of the sub-project so as to minimize on the impacts on wildlife.

2.1.7 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 the construction 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 during construction adheres to the provisions of this Act.

2.2.4 The Water Act, Cap 152

The Water Act, Cap 152 of 1995 provides for the management of water in Uganda under the mandate of the Directorate of Water Resources Management (DWRM) in the Ministry of Water and Environment. Section 31, subsection (1) of the Water Act deals with prohibition of pollution to water.

Relevance to the sub-project: UWA should ensure that appropriate measures to prevent pollution of underground and surface water sources in the site neighbourhood are implemented.

2.2.5 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 construction 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.

2.2.6 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).

2.2.7 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.

2.3.3 The National Environment (Wetlands, Riverbanks and Lakeshore) Management Regulations, 2000

The regulations aim at facilitating the sustainable utilization and conservation of resources on river banks and lake shores by and for the benefit of the people and community living in the area and promoting the integration of wise use of resources in river and lakes into the local and national management of natural resources for socio-economic development; among others.

Relevance to the sub-project: UWA should undertake an assessment to ensure that the sub-project is developed in a sustainable manner.

2.4 World Bank Environmental and Social Standards (ESSs) relevant to the subproject

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 construction of the boardwalks 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 construction of the boardwalks 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.
ESS6: Biodiversity Conservation and Sustainable	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

Environmental and Social Standard	Provision
Management of Living Natural Resources	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.
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 proposed for construction of boardwalks, a Chance Find Procedure has been included as the implementation of the sub-project will involve some form of excavations.
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 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 construction of the boardwalks will be publicly disclosed in conformity with ESS10.

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 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. VMGP for SNP

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 because of the sub-project implementation. The site visits also assisted in establishing benchmarks that will be used in monitoring compliance of the sub-project to mitigation measures.

It was observed during the site visit that the proposed site for boardwalk construction is boggy and waterlogged coupled with lengthened walking entry distance to the site and access to the site for boardwalk construction is entirely on foot through the existing birding trail.

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 inform the process of developing appropriate mitigation and management options.

The proposed development of a tourism board walk along Kirumia Trail within Semuliki NP was consulted upon during a stakeholder consultation meeting with the Ntororo Subcounty held on 18th July, 2024 at Kirumia East Village. The meeting was attended by a total of 127 local community members (of which 38 female) and chaired by the Chairperson LC I Kirumia East and Chairperson LC II Nyansoro parish. The overall feedback was positive, as the proposed development would provide employment opportunities; increase visitation and hence increase the revenue and government income; ease movement for visitors, rangers, and communities along the trail; ease conducting park operations especially patrols and guiding; and provide for a local market for local products. The potential identified negative impacts include possible noise during construction; minimal destruction of vegetation during board walk construction; and temporary interference of animal movements.

In a nutshell, all community members and leaders in attendance embraced and supported the proposed construction of boardwalks along the Kirumia trail by the project, since the positive impacts outweigh the negative impacts.

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 for example as porters or non-skilled labourers thus the subproject will act as a source of income for local community members.	<p>The contractor should hire local workers whenever possible. External labor should be hired only if specific skills are not available locally.</p> <p>Workforce recruitment should be undertaken with involvement of local leaders who can identify local community members.</p>	Construction
Provision of market for local raw materials	The local community members will be able to supply raw materials for example timber, thus the construction of the boardwalk will provide market opportunities for local raw materials.	<p>The Contractor should procure locally available supplies and construction materials whenever their quality is up to standard.</p> <p>The Contractor should provide fair prices for locally procured supplies.</p>	Construction
Improved tourist experience and satisfaction	The construction of boardwalks will improve visitor experience and satisfaction.	The design of the boardwalks should be according to the current international standards but taking into account site conditions.	Planning
Increased revenue	The construction of boardwalks will lead to increased visitor numbers thus increased revenue.	Ensure visitor fees and other charges are collected from the tourists before they access the site.	Operation

4.2 Key Adverse Impacts/Risks

KEY ADVERSE IMPACT/RISK	PROPOSED MITIGATION MEASURES
The boardwalks will be constructed in highly sensitive ecosystems thus affecting the integrity of ecosystems and/or endanger rare or endangered species.	<p>Boardwalks should be located in less sensitive areas and away from endangered vegetation and wildlife.</p> <p>In areas where there are wetlands, care should be taken to maintain the natural hydrology including fluctuations of water levels important to wildlife.</p> <p>Natural materials should be used e.g., wood for boardwalks to avoid contamination of the ecosystems.</p>

KEY ADVERSE IMPACT/RISK	PROPOSED MITIGATION MEASURES
Water levels in many wetlands typically fluctuate and boardwalks may be destroyed during flooding especially for those constructed in wetland areas and low-lying areas.	The deck of the boardwalks shall be raised above anticipated flood elevations during construction, as designed.
Solid and liquid waste generation	<p>Provision of adequate waste bins.</p> <p>Remove all waste generated and dispose to an authorized landfill site.</p> <p>The contractor will provide mobile toilets for the construction workers on site.</p>
As with any construction project, there is potential for impacts on health and safety likely to occur as a result of accidents and unplanned events that may occur during the construction process.	The Contractor shall implement the provisions of the project OSH measures that have been developed for the project.
Additionally, workers may contract water borne diseases.	<p>Among others:</p> <p>All construction 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 construction works.</p> <p>Continuous safety training will be carried out in form of toolbox safety talks.</p> <p>A fully equipped first aid kit will be available on site.</p> <p>Orient the contractor on the project incident reporting procedures especially in case of major/serious incidents that may occur at the project site.</p>

4.2 Environment and Social Management Plan (ESMP)

Proposed mitigation measures will be implemented by UWA and the contractor as per the plan below.

During construction, UWA staff will accompany the contractor at all times while on site (this is as per UWA's standard operating procedures) – each patrol will be composed of two rangers. Budget below is based on the estimated duration of works of 3 (three) months.

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
PRE-CONSTRUCTION PHASE					
Misunderstandings and conflicts	Misunderstandings and conflicts may develop between UWA, local community members and other stakeholders especially if adequate engagements are not carried out about the proposed sub-project.	Adequate engagements should be undertaken.	UWA	to be integrated into operating costs budget	Before commencement and throughout the construction process as needed.
Exclusion of the vulnerable groups such as women, Batwa, PWDs etc.	The Contractor may recruit sub-project workers without giving due attention to women and Persons with Disabilities (PWDs).	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. The Contractor should employ willingly the disadvantaged persons and give them appropriate jobs/tasks.	Contractor	No additional cost	Before commencement of works
Hiring of underage workers	Workers under the age of 18 may wish to seek employment for the project activities	Screening and age verification during the employment process, checking national IDs or other relevant documents, to ensure that only persons over the age of 18 are employed	Contractor	No additional cost	Throughout project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
CONSTRUCTION PHASE					
Impacts on sensitive ecosystems	The boardwalks may be constructed in highly sensitive ecosystems thus affecting the integrity of ecosystems and/or endanger rare or endangered species.	Boardwalks should be located in less sensitive areas and away from endangered vegetation and wildlife. In areas where there are wetlands, care should be taken to maintain the natural hydrology including fluctuations of water levels important to wildlife. Natural materials should be used e.g., wood for boardwalks to avoid contamination of the ecosystems.	UWA Contractor	No additional cost	Throughout project implementation
Soil erosion and geological disturbances	Since the boardwalk construction will involve excavations in some sections, soil disturbance and soil erosion may take place.	Hand tools will be used to undertake the required excavations. Unnecessary vegetation clearance along the line of the boardwalk should be avoided.	UWA Contractor Supervising engineer	No additional cost	Throughout project implementation
Vegetation clearance and subsequent disturbance of micro habitats	There may be some need to clear vegetation along the line for the boardwalk in some sections. Additionally, vegetation clearance may be undertaken to create areas for material stockpiles.	The boardwalk should be routed in less vegetated areas and should also be routed around large trees so that there is no need to cut trees. In order to do away with the need for material stockpiles in the protected area, boardwalks should be assembled outside the protected area.	Contractor Supervising engineer	No additional cost	Throughout project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
Trampling of vegetation	Project workers especially porters, may trample on vegetation during transportation of boardwalk construction materials. Additionally, porters may use various routes and in the process trample on vegetation.	<p>Close supervision and enforcement by UWA rangers.</p> <p>Orientation of porters and other project workers prior to construction.</p> <p>Construction workers will be required to keep on the designated routes/existing walkways.</p>	<p>Contractor</p> <p>Supervising engineer</p> <p>UWA</p>	<p>No additional cost</p> <p>(UWA rangers will accompany workers at all times as per regular practice)</p>	During Construction
Aesthetic impacts	The materials used for the boardwalks may not blend in with the rest of the natural surrounding areas thus producing unsightly surroundings.	The designs and colors that blend in with the natural scenery e.g., natural wood colours should be used.	<p>UWA</p> <p>Contractor</p> <p>Supervising engineer</p>	No additional cost	During construction
Potential destruction from flooding	Water levels in many wetlands typically fluctuate and boardwalks may be destroyed during flooding especially for those constructed in wetland areas and low-lying areas.	The deck of the boardwalks should be raised above anticipated flood elevations during construction.	<p>UWA</p> <p>Contractor</p> <p>Supervising engineer</p>	No additional cost	Throughout project implementation
Disturbance in the movement of wildlife	Wildlife movements and migratory patterns may be disturbed by the constructed boardwalks especially in the swampy and wetland areas.	The height of the structures should allow migrating animals to pass unhindered below the structures.	<p>UWA</p> <p>Contractor</p> <p>Supervising engineer</p>	No additional cost	Throughout project implementation
Spread of HIV and other STIs	Sub-project workers may engage in risky social behaviours with the local women and men. Some of the people may be infected with HIV/AIDS hence increasing incidences of the disease and other communicable diseases.	<p>Sensitise workers on HIV/AIDS.</p> <p>Provision of condoms to construction workers.</p> <p>Every project worker will be required to sign and abide by a workers Code of Conduct (CoC); compliance will be monitored by the Contractor.</p>	<p>Contractor</p> <p>Supervising engineer</p> <p>UWA</p>	4,000,000	Throughout project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
Noise	<p>Since the construction will take place on the edge of the park and inside the park, sub-project workers may produce noise thus becoming a nuisance and upsetting animals.</p> <p>Additionally, construction noise may consist of sounds from hammers, from battery-powered hand drills etc</p>	<p>Supervision and enforcement to be undertaken by UWA Rangers to make sure project workers do not make unnecessary noise.</p> <p>All construction work, must be carried out during day time to minimize nuisance and disturbances caused to nocturnal fauna that uses auditory communication.</p> <p>Thus, construction will be limited to day time between 7:00 Hours to 17:00 Hours.</p>	<p>UWA Contractor Supervising engineer</p>	No additional cost (UWA rangers will accompany workers at all times as per regular practice)	During Construction
Solid and liquid waste generation	<p>Project workers may carry out indiscriminate waste disposal along the line of the boardwalk construction.</p> <p>Additionally, inadequate provision of sanitary facilities for use by construction workers can lead to ad hoc defecation in secluded areas around the park, thus creating of unsanitary conditions and sources of fly infestation.</p>	<p>Provision of adequate waste bins.</p> <p>Remove all waste generated on a daily basis and disposal to an authorized landfill site.</p> <p>The contractor will provide mobile toilets for the construction workers on site.</p>	<p>Contractor Supervising engineer</p>	30,000,000	During Construction and 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 in the park.	<p>Sensitization and supervision of workers by UWA rangers.</p> <p>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.</p>	<p>UWA Contractor Supervising engineer</p>	<p>2,000,000 contractor sensitization activities</p> <p>No additional cost to UWA</p> <p>(UWA rangers will accompany workers at all</p>	forThroughout project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
				times as per regular practice)	
Domestic violence	The Project may induce domestic violence as a result of empowering women through employment as some men don't like their wives to work. Additionally, increased liquidity among local male project workers who may resort to alcohol abuse and get involved in extramarital activities including marrying second wives; and abandoning their families etc.	Sensitization of both women and men. Prioritizing employment to women where they qualify. Balancing gender when employing community members.	Contractor Supervising engineer	2,000,000	Prior to start of works and throughout project implementation
Labour influx risks and impacts	Like any other project with works, the construction of the boardwalk may attract different people both from within and outside the local community for employment opportunities. Although this is expected to be minimal (this number is estimated to be about 20 external people), labour influx comes with its own negative impacts such as crime, conflicts with the local people; which the community should be made aware of.	Every project worker will be required to sign and abide by a workers Code of Conduct (CoC) and will be adhered to by the Contractor. There will be zero tolerance to SEA by the Contractor.	Contractor Supervising engineer	No additional cost	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	1,500,000 cost to UWA for additional patrol cost: (UWA rangers will accompany workers at all	Throughout project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
				times as per regular practice)	
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>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	No additional cost	Throughout project implementation
Occupational, health and safety risks and impacts/ Accidents and injuries of workers	<p>As with any construction project, there is potential for impacts on health and safety likely to occur as a result of accidents and unplanned events that may occur during the construction process.</p> <p>Additionally, workers may contract water borne diseases.</p>	<p>The Contractor shall implement the provisions of the project OSH measures that have been developed for the project.</p> <p>Among others:</p> <p>All construction 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</p>	<p>UWA</p> <p>Contractor</p> <p>Supervising engineer</p>	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
		<p>before commencement of construction works.</p> <p>Continuous safety training will be carried out in form of toolbox safety talks.</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> <p>The contractor shall provide wholesome water to the employees.</p>			
Dust emissions	Dust is mainly expected to be as a result of vehicles moving on dusty roads in trading centres / communities next to the park.	<p>A speed limit for all vehicles will be introduced and enforced to reduce dust generated by over speeding vehicles on dusty roads.</p> <p>Sprinkling of water on dusty roads in trading centres at least twice a day during the days when materials are being delivered to the closest road point.</p>	<p>Contractor</p> <p>Supervising engineer</p>	10,000,000	Construction phase
Construction traffic related impacts	The construction activities are anticipated to result in a slight increase in the number of vehicles notably those supplying boardwalk construction materials and this might lead to risk of traffic-related accidents to other road users and/or communities around.	<p>Toolbox safety talks shall be conducted for drivers of construction vehicles.</p> <p>Safe traffic control measures shall be employed, including humps, road signs and flag persons to warn of dangerous</p>	<p>Contractor</p> <p>Supervising engineer</p>	10,000,000	Construction phase

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
		conditions, children and/or community members crossings.			
OPERATION AND MAINTENANCE PHASE					
Likelihood of destruction or collapse of the boardwalks	There is a possibility that the boardwalk may collapse during the operational phase as a result of poor workman ship or use of sub-standard materials.	As practically possible, use of standard quality materials should be ensured during construction phase. UWA shall employ services of credible Contractor.	UWA Contractor Supervising engineer	Included in Contractor's contract and Supervising engineer tasks	Construction Phase
		Regular supervision of works will be undertaken during the construction period to ensure that the contractor adheres to work specifications.			
Damage to the boardwalks	The boardwalks may be damaged during the operational phase as a result of overload and/or overuse.	Anticipated load bearing capacities should be incorporated in the designs and enforced during the operational phase. Limitations should be put in place on the hours of usage of the boardwalks to minimize strain and overuse of the boardwalks.	UWA Contractor Supervising engineer	No additional cost	Operational Phase
Solid waste management impacts	Visitors using the boardwalks may litter the route along the boardwalks with waste. Considerable amount of waste will be generated at decommissioning as the boardwalks are being demolished.	Animal-proofed litter containers (with locked lids, etc.) should be provided at convenient locations to reduce littering. All waste generated shall be collected and disposed off in an authorized landfill site.	UWA	20,000,000	Operational and Decommissioning Phases

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
Occupational health and safety risks during decommissioning	Workers may suffer from occupational, health and safety risks and impacts during the demolition of the boardwalks at decommissioning	<p>Workers should be provided with adequate PPE like helmets, gumboots, gloves, masks, overalls etc.</p> <p>There should be a safety awareness/induction training for workers before demolition works.</p> <p>A fully equipped first aid kit should be available on site.</p>	<p>UWA</p> <p>Demolition Contractor</p>	20,000,000	Decommissioning Phase

5.0 ENVIRONMENTAL AND SOCIAL MONITORING PLAN

Regular monitoring will be undertaken by the UWA rangers that accompany contractor on a daily basis (cost included in the Management Plan above).

In addition, one monitoring visit by the EIA unit (from headquarters) is planned during the construction phase; this frequency is determined by the planned duration of 3 (three) months. Cost of this monitoring visit is estimated at 1,500,000 Uganda Shillings.

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility
Misunderstandings and conflicts	Adequate engagements should be undertaken.	Project area	Records of consultative meetings	Review of records	Before commencement of works and throughout project implementation.	UWA
Exclusion of disadvantaged groups such as women, Batwa 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, Batwa, 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
			Review of employment records	Review of employment records	Monthly (to be reported in monthly contractor reports)	UWA
Impacts on sensitive ecosystems	In areas where there are wetlands, care should be taken to maintain the natural hydrology including	Project area	Location of the boardwalks	Observation during field monitoring	Monthly	UWA

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility
	fluctuations of water levels important to wildlife.					
Soil erosion and geological disturbances	Hand tools will be used to undertake the required excavations.	Construction site	Presence and use of handheld tools	Visual observation during field monitoring	Monthly	UWA
	Unnecessary vegetation clearance along the line of the boardwalks will be avoided.	Construction site	Extent of vegetation clearance	Visual observation during field visits	Monthly	UWA
Vegetation clearance and subsequent disturbance of micro habitats	The boardwalk will be routed in less vegetated areas and routed around large trees so that there is no need to cut trees.	Project working area	Routing of the boardwalks	Observation during field monitoring	Monthly	UWA
	In order to do away with the need for material stockpiles in the protected area, boardwalks should be assembled outside the protected area.	Construction site	Presence of assembly points outside the protected area	Observation during field monitoring	Monthly	UWA
Trampling of vegetation	Orientation of porters and other project workers prior to construction.	Project working areas	Records of orientation meetings	Review of documentation	Before start of civil works	UWA
	Construction 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
	Designation of specific areas to deliver materials.	Construction area	Presence of designated areas	Observation during field monitoring	Weekly	UWA

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility
Aesthetic impacts	The designs and colors that blend in with the natural scenery e.g., natural wood colours should be used.	Construction area	Colors of construction materials	Observation during field monitoring	Quarterly	UWA
Potential destruction from flooding	The deck of the boardwalks will be raised above anticipated flood elevations during construction.	Construction area	The height of the boardwalk deck	Observation during field monitoring	Quarterly	contractor to include in regular reports to UWA
Disturbance in the movement of wildlife	The height of the structures should allow migrating animals to pass unhindered below the structures.	Project area	Height of the boardwalks	Observation during field monitoring	Quarterly	contractor to include in regular reports to UWA
Spread of HIV and other STIs	Sensitise workers on HIV/AIDS.	Project area	Records of sensitization meetings	Review of records	Monthly	UWA
	Provision of Condoms to construction workers.	Construction area	Presence of condom booths or records of distribution	Visual observation Review of records	Monthly	contractor
	Every project worker will be required to sign and abide by a workers Code of Conduct (CoC) and will be adhered to by the Contractor.	Construction area	Signed codes	Review of codes	Quarterly	UWA
Noise from construction 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

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility
	All construction work must be carried out during day time to minimize nuisance and disturbances caused to nocturnal fauna that uses auditory communication. Thus, construction will be limited to day time between 7:00 Hours to 17:00 Hours.	Project working areas	Log of daily work hours	Review of logs	Weekly	UWA
Solid and liquid waste generation	Provision of adequate waste bins.	Project working areas	Number of waste bins on site Littering of waste on site	Observation during field monitoring	Monthly	UWA
	Remove all waste generated from the park on a weekly basis or as will be determined by amounts generated and disposal to an authorized landfill site.	Project working areas	Removal Logs Contract with a registered waste handler	Review of logs Review of contract	Weekly	UWA
	The contractor will provide mobile toilets for the construction 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
	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	Project working areas	Signed ESHS codes	Review of codes	Quarterly	UWA

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility
	agree to abide by the requirements therein.					
Domestic violence	Sensitization of both women and men on the project.	project workers	Documentation that sensitizations have been undertaken	Review of documentation	Quarterly	UWA
	Prioritizing employment to women where they qualify.	Project working areas	Number of women employed	Review of employee records	Quarterly	UWA
	Balancing gender, in a culturally sensitive manner, when employing community members.	Project working areas	Ratio of men to women employed on site	Review of employee records	Monthly	UWA
Labour influx risks and impacts	Every project worker will be required to sign and abide by a workers Code of Conduct (CoC) and will be adhered to by the Contractor.	Project working areas	Signed codes of conduct	Review of codes of conduct	Quarterly	UWA
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	UWA PA mgt
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
	Develop and implement a Grievance Redress Mechanism for project workers before engaging them and maintained throughout project implementation.		Records of grievances Payment records			

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility
Occupational health and safety risks and impacts	All construction workers will be provided with adequate PPE areas 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.	Project working areas	Presence and use of PPE	Visual observation during field visits	Continuous	UWA
	There shall be a safety awareness/induction training for workers before commencement of construction works.	Project working areas	Records of trainings	Review of training records	Quarterly	UWA contractor
	Continuous safety training will be carried out in form of toolbox safety talks.	Project working areas	Records of toolbox meetings	Review of records	Weekly	UWA
	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	Contractor
	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	At the start of assignment / Quarterly	UWA

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility
Construction traffic related impacts	Toolbox safety talks shall be conducted for drivers of construction vehicles.	Project working areas	Records of toolbox safety talks	Review of records	Monthly	UWA
	Safe traffic control measures shall be employed, including temporary road signs and flag persons to warn of dangerous conditions, children and/or community members crossings.	Routes leading to the project area	Number of related complaints from the community and other road users	Review of records Visual observation during field visits	Quarterly	UWA/
Exclusion of the Batwa	Recruitment of able bodied Batwa as workers during the construction phase	Project working areas	Number of Batwa employed by the project	Review of records/documentation	Quarterly	UWA/
Likelihood of destruction or collapse of the boardwalks	As practically possible, use of quality materials should be ensured during construction phase.	Construction site	Certification of materials used for construction	Review of records	Monthly	Supervising engineer
	Regular supervision of works will be undertaken during the construction period to ensure that the contractor adheres to work specifications.	Construction site	Supervision records	Review of records	Monthly	Supervising engineer
Damage to the boardwalks	Anticipated load bearing capacities should be incorporated in the designs and enforced during the operational phase.	Project area	Designs	Review of designs	Yearly	Supervising engineer

Potential Impact	Proposed Mitigation Measure	Location	Parameters to be Monitored	Measurements	Frequency of Measurement	Responsibility
	Limitations should be put in place on the hours of usage of the boardwalks to minimize strain and overuse of the boardwalks.	Project area	Documentation	Review of documentation	Quarterly	UWA
Solid waste management impacts	Litter containers should be provided at convenient locations to reduce littering.	Project area	Presence of litter bins	Observation during field monitoring	Monthly	UWA
	All waste generated shall be collected and disposed off in an authorized landfill site.	Designated landfill	disposal register	signed register	Monthly	UWA
	A fully equipped first aid kit should be available on site.	Demolition site	Presence and number of first aid kits	Visual observation	Monthly	UWA

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.