Emergency Locust Response Program (ELRP) (P173702)
Uganda ANNEX

Environmental and Social Review Summary
Appraisal Stage
(ESRS Appraisal Stage)
April 21, 2020

D. Environmental and Social Overview

D.1. Project location(s)and salient characteristics relevant to the ES assessment [geographic, environmental, social]

Since the first sightings of the locusts in North Eastern Uganda, multiple new swarms have entered the country from Turkana County in Kenya. Though there are currently 40 Districts at risk, infestations have been sighted in 24 districts in the regions of Karamoja, Teso, Sebei, Acholi, Lango and Bugisu, including some of the most affected areas of Amudat, Moroto, Abim, Nakapiripirit, Kaabong, Nabilatuk, Napak, Kotido, Katakwi, Kumi, Soroti, Kaberamaido, Kalaki, Ngora, Bukedea, Amuria, Kapelebyong, Serere, Kapchorwa, Bukwo, Kween, Kitgum, Pader, Agago, Amuru, Lamwo, Gulu, Nwoya, Omoro, Alebtong, Otuke, Lira, Dokolo, Apac, Oyam, Bulambuli, Sironko, Mbale, Manafwa, and Bududa. The project will be implemented in the North Eastern and Sebei Region in districts where locust has been sighted and it will also cover the high-risk districts. The new areas will be defined as the migratory routes and infestation areas are informed by Ministry of Agriculture Animal Industry and Fisheries (MAAIF) surveillance and response team. The swarms have invaded some of the most economically and socially fragile regions of the country. The communities in the affected communities derive their livelihoods from agriculture, while Karamoja – livelihood is mostly from pastoralism and agriculture. Karamoja has the IK who meet the ESS 7 requirements.

Desert Locusts are expected to continue to breed and spread during the coming months, with severe food and livelihood security implications for the poor and most vulnerable during the period 2020 and beyond. The swarms have invaded some of the most economically and socially fragile regions of the country (Karamoja and Teso). FAO has predicted that the Desert Locust Lifecycle is likely to coincide with the regeneration of rangelands and the start of the planting activities in Karamoja and Teso, which will likely affect the main staple crop production. This will have devasting consequences for food access and availability, especially if control measures in place are not fully effective. FAO assessments indicate that in addition to 291,000 people already considered severely food insecure in Karamoja and Teso Regions (Integrated Food Security Phase Classification (IPC) Phase 3 and above), the DL crisis poses a significant threat to the food security of another 1.32 million people (IPC Phase 2). Thus, majority of Districts suffering the impacts from the desert locust infestation in Northern and Eastern parts of Uganda are largely along the Cattle Corridor along the Cattle Corridor of Arid and Semi-Arid Areas (ASALs) with the Karamoja Region practicing nomadic pastoralism as way of livelihood. The Karamoja and Sebei regions host some of the vulnerable and marginalized communities in Uganda and may further become vulnerable due to the locust infestation. Karamoja region has one of the major pristine National parks in Uganda - Kidepo, Pian-Upe Wildlife Reserve, Mt. Elgon National Park, and a number of small conservancies. The region has mostly plantation forests (modified habitats). The affected region hosts Lake Kyoga which is one of the freshwater lakes in Uganda, and a large number of expansive wetlands/swamps, including water streams/ seasonal rivers. Most of the communities practice small scale/ subsistence agriculture. The activities proposed in this operation include ground and aerial spraying with the use of both synthetic chemical pesticides and biopesticides. This is likely to affect the listed natural resources and thus impact on the health of the communities as well as their natural resource-based livelihoods.

Government of Uganda (GoU) has embarked on locust control activities with technical support from Food and Agricultural Organization (FAO). Previously, the Bank provided 1 Million USD support through an ongoing Agriculture Cluster Development Project (ACDP P145037) which financed the initial surveillance of desert locust control activities in Uganda. Thus, the planned MPA activities will complement the ongoing GoU and other development partners activities to control the desert locust invasion.

The objective of the program is to prevent and respond to the threat posed to livelihoods by the desert locust outbreak and to strengthen Uganda's national systems for preparedness.

Project Components

Component 1: Surveillance and Control Measures. The Objective is to limit the growth of existing and new desert locust populations and curb their spread, while mitigating the risks associated with control measures and their impacts on human health and the environment. It has three sub-components. This component will support pest surveillance for informed decision making; mounting and conduct of control activities; and risk reduction and management investments.

Sub-component 1.1: Pest surveillance. In order to improve locust and other pests surveillance, MAAIF together with the District LGs will mobilize communities and establish a locust surveillance system based at three levels: (i) community; (ii) district; and (iii) national to undertake continuous surveillance, mapping monitoring and reporting on the Desert locusts spread in invaded and locust prone districts through utilization of the existing structures in MAAIF and Local Governments. The current NUSAF III structures will be adopted at community level.

The activities will include but not limited to: (i) monitoring observed breeding and egg-laying areas to inform early action; (conducting ground surveys and other data collection to assess the locust situation and habitat conditions; and (iii) collection and analyzing data to inform planning and ensure appropriate control methods are applied. Innovative approaches to surveillance such as the use of satellite imagery and maps, drones, eLocust3, GPS enabled cameras and other disruptive technologies, as well as deployment of the communities for ground truthing would be financed. Key investments will include: (i) establishment of structures for detection, surveillance, monitoring and reporting at all levels; (ii) supporting mini diagnostic labs at the district with equipment and building the capacity of the officers to use them to enhance the capacity of the districts to make accurate differential identification of the Desert Locust from other locust species and grasshoppers at nymph stages; (iii) procurement of necessary equipment for migratory pest detection, surveillance including heavy duty drones, Geo Information System (GIS)/Remote sensing consultancy services, vehicles to support field surveillance, reporting and mapping DL spread, and provision of regular technical support to district;(iv) procurement of necessary soft-wares to support migratory pest detection, surveillance, and monitoring such as Arc GIS desktop 10.8 license, Image processing software (ENVI), and eLocust3 system; (v) the customization of the elocust3 systems to support MAAIF monitoring and surveillance of locusts and migratory insects; and (iv) training and capacity building at all levels.

Sub-component 1.2: Control measures. Appropriate control measures will be undertaken to reduce locust populations and prevent their spread to new areas. Locust control measures will be undertaken mainly through targeted ground and aerial control operations. Whenever possible and facilitated by effecting surveillance and reporting, these would be aimed at neutralizing hopper bands on the ground before they develop into adult swarms, to minimize the need for aerial spraying requiring conventional pesticides. While the focus would be on ground sprays, these would be supplemented by aerial spray operations. Working closely with FAO and other entities, the use of technology including growth regulators and bio-pesticides will be included in the ground and aerial spraying. A pest management plan will be developed under the support and guidance of the WB's environmental specialists.

Key activities and investment will include: (i) decentralizing ground control activities to the locust control regions and districts supported by communities; and equipping ground control teams with rapid response capability; (ii) procurement of FAO recommended pesticides and spray equipment including manual and motorized pumps, vehicle mounted spray equipment; adapted spray vehicles, hire and leasing of required aircrafts to supplement aircraft to be accessed through a revamped Desert Locust Control Organization for eastern Africa (DLCO-EA), and personal protective gear; and (iii) training and capacity building of response teams.

Sub-component 1.3: Early Warning Systems. The proposed project will support the establishment and operation of early warning systems will entail investment in the following areas: (i) strengthening of the capacity of the early warning unit of MAAIF; and (ii) development of Early Warning Management Information System The proposed project will support the capacity enhancement of MAAIF's early warning unit to undertake tasks envisioned in the early warning systems by facilitating acquisitions of needed equipment, software, human resources, and capacity training of the core technical staff in the early warning unit of the MAAIF. Specifically, the project will support investments in: (a) procurement of necessary soft-wares to support migratory pest detection, surveillance, and monitoring such as Arc GIS desktop 10.8 license, image processing software (ENVI), and eLocust3 system; (b) the development of a pest monitoring android tools for monitoring locusts and migratory insects; (c) subscription to identified data source especially climates and satellite data sources such as NASA and Planet; (d) access to regional and global materials and services from organizations like NASA Earth Observatory, Planet Lab, and DLCO-EA; and (e) short-term and long-term training from specialized organizations such as NASA to strengthen capacities in the use of modern technologies including remote sensing and drones.

Sub-component 1.4: Risk reduction and management. Monitoring and assessing environmental and human health risks associated with locust control will be undertaken to inform implementation of health, environmental and safety measures to reduce risks to an acceptable minimum. Monitoring of control operations is necessary to assess whether adverse effects occur and under what circumstances so that they can be mitigated. Activities will include: i) testing of human health and soil and water for contamination from use of insecticides; ii) estimating the cost and the effects of the locust control on crop, pastures and livestock production; iii)optimizing the selection of control strategies, protection measures, and insecticides based on situational and environmental assessments; and providing safety and awareness training for spraying teams and other locust control personnel. Public awareness campaigns and a robust communication strategy will keep the public informed about possible environmental and health effects of insecticides, before, during and after locust control operations.

Component 2: Livelihoods Protection and Restoration – This component will strengthen the coping mechanisms and livelihoods support for affected communities and vulnerable households; and, develop coping mechanisms to increase production and productivity to mitigate reduction of incomes and revenues in agriculture. The overall objective of this component is to protect lives and human capital and to restore livelihoods of affected households, communities (including small holder, agro-pastoral and pastoral farmers) and vulnerable groups (including women and youth).

Sub-Component 2.1: Safeguarding Food Security and protecting Human Capital: This will involve Labor-Intensive Public Works (LIPW). This sub-component will involve provision of seasonal income transfers to poor and vulnerable households in return for their participation in labor-based works purposely to avail cash and smoothen their consumption during the lean period. The activity also results in the creation of physical assets of value to the local communities. The LIPW implementation and the LRS complement each other. The LIPW will provide temporary employment to the most vulnerable households for a period of 54 days with daily wages of UGX: 5,500. Key areas of interventions will be in physical water and soil conservation activities, agro-forestry technologies and practices, agribusiness technologies and to a smaller extent access and market infrastructure. A 10% direct transfer shall be provided for poor and vulnerable households and groups such as women and youth without labor to participate in public works and when they do not have enough and reliable support in the village. The beneficiary households will be required to form smaller savings groups at village to utilize their savings as revolving capital as well as to qualify to benefit from the VRF.

Sub-Component 2.2: Livelihoods Restoration Support (LRS). Through this sub-component, Government will: 1) implement the Village Revolving Fund (VRF) that involves strengthening existing savings and investment groups at village level by provision of grants to boost their capital base. Under the VRF, a total of US$ 10,000 will be availed to support initial cluster of four groups (each with average of 30 members) per village. 2) Implement the Household Income Support Project (HISP)

that involves providing grants to invest in livelihood activities for household income earnings in targeted communities. This includes boosting commercial production such as in crops, livestock, beekeeping and fisheries. Under the HISP, the active poor are targeted through the Participatory Rural Appraisal methodology and are organized to work in groups. Each group is supported with a grant of $5,000 to $10,000 to invest in selected market-driven enterprises.

- ***Livelihoods Targeting*** The targeting under the Livelihoods component shall follow a two-phased process beginning with geographical targeting to identify and demarcate "watershed/catchment" upon which the component's planning model hinges. A typical Watershed boundary may fall within a sub-county (one or more parishes) or even across boundaries to adjacent sub-counties. The selection of watersheds will be based on five critical requirements that include; ***a)*** Severity of impact of Locusts invasion, b) Levels of environmental degradation, c) Spatial distribution of population (critical mass), d) Absence of other players in the watershed management, e) Feasibility of success, f) Potential for productivity (regeneration and improved agricultural production and g) Micro catchment areas for potential investments.

- The second phase shall involve community mobilization and sensitization in the target watershed and Household targeting using Participatory Community/wealth ranking for both Livelihood Restoration Support (LRS) and Labor-Intensive Public Works (LIPW) sub-components. The community will categorize households into 'poorest of poor', 'poor' and 'non-poor' and use the ranking to select the neediest persons to benefit from the project intervention. The identified persons will represent their households and become LIPW participants or recipients of household grants for Household Income Support (HISP) sub-components.

- The Village Revolving Fund (VRF) on the other hand will target existing savings and investment groups with majority poor households (90% of households). The most vulnerable households under LIPW shall be categorized into a**) Able-bodied households:** Households with able bodied poor and vulnerable adult men and women who will work in LIPW projects and in turn earn a daily transfer and **b) Non-able bodied households (10%):** Households without able bodied adults men and women who will earn a transfer without participating in Labor intensive activities and they will include; child-headed households, households of elderly persons too old to qualify for public works, pregnant and lactating mothers, households of Persons with Disabilities (PWDs) among others.

Component 3: Coordination, and Preparedness. The objective of this component is to strengthen national capacities for surveillance, response mechanisms, and ongoing preparedness for preventing future locust infestations by supporting improved coordination strategies for effective surveillance, and prevention. Therefore, this component will finance activities related to the regional and national coordination for surveillance, and prevention measures countering the recurrence of locust crises.

Subcomponent 3.1. Regional level coordination. The regional dimension of the locust problem requires commitment from nations to manage a joint problem. Under this subcomponent, the proposed project will support activities aimed at strengthening the regional coordination capacity, strategies, method, and funding contributions to the regional level surveillance and control of desert locust. The main elements and activities of the subcomponent will include: (i) funding and participation in regional initiatives such as coordination of regional monitoring led by specialized organizations; (ii) technical support for regional coordination under Food and Agricultural Organization and the Commission for Desert Locust Control in East Africa (DLCO-EA) including subscription to DLCO; (iii) procurement of necessary equipment for migratory pest detection, surveillance, monitoring and preparedness at the regional level plane(s) for desert control to be based at the DLCO-EA; (iv) inter-country knowledge exchanges; (v) participatory identification of alternative technologies; and (vi) support for and participation in regional training on surveillance, conferences, and use of modern technologies.

Subcomponent 3.2. National Level Coordination. Under this subcomponent, the proposed project will support activities aimed at building and strengthening the national and sub-national coordination capacity of government agencies to execute locust management activities. At the national level, the proposed project will support: (a) the development and updating of national contingency plans for desert locust and migratory pest crises; (b) the development of country risk management plans; (c) strengthening national committees that coordinate inputs from development partners and oversee the execution of national campaign against the locust invasion; (e) development of targeted locust campaigns based on accurate data, prioritized by potential impacts; and (f) establishment of dissemination mechanisms at both district and national level through print media, SMSs and radio/television talk shows, and mass sensitization workshops.

Subcomponent 3.3. Preparedness to counter the recurrence of locust crisis. The successful prevention of desert locust plagues relies on regular monitoring, accurate analysis of risks, detection, and prediction. This subcomponent will finance activities related to maintaining preparedness, including capacity building and training, and research to improve the knowledge of the DL insect biology and behavior. The key activities under this subcomponent are: (1) procurement and use of historic satellite imageries and spatial layers (soil, topography, water) to support preventative monitoring, risk analysis, detection and prediction; (2) Training and capacity building in remote sensing application and use of remote sensing data; and research on biological control, efficacy of the pesticides mixing and time; and the research on locust behavioral modeling.

Component 4: Project Management: This component will have four sub-components: (i) Project Administration; (ii) Enhancing Transparency, Accountability and Anti-Corruption; (iii) Management Information System, Monitoring and Evaluation; and (iv) Communication and Stakeholder Engagement.

Sub-component 4.1: Project Administration and Coordination. This will include; (i) facilitating the operations of the inter-ministerial technical committee and the national taskforce; (ii) support to field operations by the coordination unit; (iii) technical training and support from DLCO-EA (regional organization responsible for desert locust control); (iv) facilitate data collection, information sharing and early warning systems and hiring of DL Control experts to support national efforts; (v) procurement of transport equipment to support national coordination; and (vi) facilitate district political and technical teams to create continuous awareness and information dissemination. The component will meet the operational costs of the Project Coordination Unit.

Sub-component 4.2 Enhancing Transparency, Accountability and Anti-corruption. will cover activities implemented by the Inspectorate of Government (IG) to improve transparency, accountability, and anti-corruption efforts in the operation. In Uganda, the IG's office has the constitutional mandate for oversight of good governance in the use of public resources, and to ensure the prevention, elimination and/or prosecution of corruption and mismanagement in public projects. In line with its legal mandate, the IG shall independently implement activities aimed at strengthening transparency and accountability within the project. The component therefore aims to ensure that project is executed as planned, wastage of project resources minimized, and project performance and service delivery improved.

Sub-component 4.3: Management information System. The sub-component will support activities related to: (1) monitoring inputs, outputs and processes; (2) impact evaluation of project interventions on target outcomes as well as environmental and social impact assessments; and (3) generation of learning outcomes. The project will have one management information System based at MAAIF. However, the inspectorate of government and Livelihood Restoration Support will take advantage of the NUSAF3 Management Information System but will be linked to MAAIF MIS developed under NFASS through Application Programming Interface (API). The project shall support the integration of the NUSAF3 and MAAIF MIS systems.

Sub-component 4.4: Communications and Stakeholder Engagement: The objective of this sub-component is to enhance Communications about the desert locust and their debilitating impact on affected communities, with a special focus on Stakeholder Engagement and Social Accountability. It will support the dissemination of information generated by the early warning systems; aid in the post swarm recovery and promote the resilience of communities as they rebound from the crisis. It will also support community awareness programs about the effects and risks of the locust swarms such as the right types of pesticides to be used and the appropriate mechanisms for their application in a sustainable manner. To ensure counterpart leadership of the communications process, communications capacity will be built within PIU for the effective implementation of a Communications Strategy, impact assessment and sharing of results achieved through this intervention.

D.2. Borrower's Institutional Capacity

The Project will be implemented by the Ministry of Agriculture, Animal Industry and Fisheries (MAAIF) and Office of the Prime Minister (NUSAF Secretariat) which both have long experience of implementing World Bank financed projects under Agricultural and Social Protection programs respectively, for over 20 years. The implementation of this MPA operation will be coordinated by MAAIF and supported by the Project Implementation Unit (PIU) which is executing current desert locust control operations. In terms, of Environmental and Social Risks Management, MAAIF is being supported by Project social safeguards Specialists under Agriculture Cluster Development Project ACDP (P145037) and Regional Pastoral Livelihoods Resilience Project RPLRP (P129408), and the Livelihood Protection and Restoration Component will be implemented with support from Social Safeguards Specialist under Northern Uganda Social Action Fund Project Phase 3 (P149965) and Development Response to Displacement Impacts Project DRDIP (PP152822). The community driven development (CDD) methodologies used in these projects will provide important lessons, provide capacity through experienced staff and make use of existing community infrastructure to quickly respond to the locust invasion and address medium term effects. The Project is working with FAO on the desert locust operations who are providing technical support to the Ministry through the Multi-Institutional Technical Team on the pesticide selection, applications and management. The Ministry has adopted FAO Desert Locust Guidelines, section 6. Safety and environmental Precautions issued 2003 which are aligned to GIIP in managing the environment, health and safety risks for this operation. The District Local Governments shall also be involved in the operations and will have key participation of their technical officers including District Environment Officers and District Community Development Officers. It is recommended that all Safeguards Staff be taken through Refresher Training on the application and implementation of Safeguards Instruments that are being developed for the project. Specifically, on desert locusts control activities, FAO shall provide the required technical training, working closely with the Bank.

Borrower capacity for Social Risk Management: As noted above, the Government of Uganda has implemented several initiatives in the affected area, For Component 1: The MAAIF is currently undertaking spraying of locusts in Northern Uganda with assistance from the FAO and Ugandan Military. Due to the tight timeframes however, it was not possible to assess the performance of existing operations and social risk management procedures. For Component 2 on livelihood protection and Restoration and 1.1 on pest surveillance existing implementation arrangement and community networks of NUSUF 3 can be leveraged and scaled up. The third Northern Uganda Social Action Fund (NUSAF 3) project have provided effective livelihood support interventions in the project area. NUSAF has over time developed a model CDD approach that is very participatory in its targeting approach which has been adopted for this project.

Capacity for Stakeholder engagement: For component 1: In response to concerns over ACDP, MAAIF has recently strengthened its capacity for stakeholder engagement, however the capacity to implement this project has not been assessed. For component 2 and 1.1, the NUSAF PIU has strong community linkages and robust stakeholder engagement

built into its operations and refined over the last 10 years of operations. These community linkages and processes are expected to provide a solid foundation for stakeholder engagement for component 2.

GRM Structure: this will be based on the NUSAF model which has been in operation in the project area for many years. The GRM makes use of an online system used for both project monitoring and reporting and addressing grievances. The system is functioning well and will be readily adapted to both component 1 and 2 of this project.

For Component 2: NUSAF has a well-established system for targeting selected beneficiaries which will be adapted to target people affected by locusts and the impacts of this targeting regime assessed for potential exclusion. There are robust and tried structures in place under NUSAF which will assist with targeting under this operation.

Despite this knowledge and experience it should be noted that both NUSAF 3 is being implemented under the old Operations Policies meaning the team at MAAIF and projects through which some components will be implemented lack experience in ESF project implementation. Currently, ACDP has no Environmental Specialist. With the increase of project portfolio, the PIU the safeguards capacity needs strengthening, by hiring an additional Environmental Specialist to complement the existing resources.

The safeguards project instruments (ESMF, VMPP) for NUSAF 3 through which component 2 of the project will be implemented shall be updated to include all aspects of the ESF and disclosed by Government.

The NUSAF PIU has undergone ESF training and taken part in ESF organized clinics. Therefore, investments in GoU's capacity through trainings to implement the project using the ESF will go a long way in enhancing the effectiveness and efficiency in safeguards implementation using ESF. MAAIF through its PIU will engage a GBV specialist for the project before disbursement of component1. This GBV specialist will also support component 2. The existing Social safeguards specialist under ACDP will continue to support safeguards aspects of the project and coordinate with the safeguard's specialist from OPM – NUSAF 3 implementing agency. This safeguards specialist will also be responsible for ensuring that any social requirements are considered when developing early warning and response systems under component 3.

II. SUMMARY of ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

High

Environmental Risk Rating – Substantial

The project will finance the procurement of both synthetic pesticides and biopesticides and equipment's. The application of the pesticides will cover almost a third of the Country impacted by the desert locust invasion that will potentially impact local populations dependent on natural resources for their livelihoods such as pasture and crop fields. Given the large area to be covered, the amount of pesticides to be used is large. The use and application of pesticides through ground and aerial spraying is likely to impact sensitive ecological areas such as water bodies, wetlands, national parks and reserves, forests, soils, pasture grasslands, standing crops, etc. This will easily be mitigated by mapping spray areas, establishing strict operational procedures and a judicious choice of pesticides (i.e. Biopesticides could be used in/near potentially sensitive areas). Also, use and application of the pesticides may pose adverse effects on the health of the workers on task teams and on local communities where both ground and aerial spraying may take place. This will be mitigated by testing and monitoring personnel involved in the locust control campaign for acetylcholinesterase before, during and after the campaign under Component 1.4. The testing helps to monitor exposure to chemicals and

put in place a rotation of applicators to avoid/limit overexposure and potential health impacts. The Capacity to effectively manage the whole program, including involvement of the Army, and inherent security aspects in the Karamoja region, may however pose contextual and operational challenges, which are largely social. Technically, given availability of proven mitigation measures, adherence to Standard Operating Procedures (SOP), trained personnel, and close involvement of FAO for technical support should lower the potential risks associated risks with chemical pesticide. Thus, the environmental risk for this project is considered **SUBSTANTIAL**.

Social Risk Rating - High

Under component 1: **Surveillance and Control Measures**. The key risk anticipated is that Surveillance and control measures can exacerbate exposure of women/girls to GBV and SEA as household stresses and forced changes in livelihood strategies exacerbate existing high rates of GBV. Moreover, with the deployment of external personnel including the Ugandan Military, to implement control measures women and girls may face growing levels of SEA, and also as a negative coping strategy. Other risks associated with Surveillance and control measures are (i) the risks posed to human health by spraying locusts; (ii) risks to livelihoods in particular if there is an accident in the use of pesticides which could damage crops, pasture and livestock; (iii) Lack of community support due to poor communication and challenges in stakeholder engagement and grievance redress with all affected communities coupled with the COVID - 19 restrictions; (iv) due to the emergency nature of the project and the speed at which the first component will be implemented to control the locust, this might leave little room for effective and efficient consultation and engagement of the IK and in Elgon; the presence of this IK community in Karamoja meets the criteria of Sub-Saharan African historically underserved traditional local communities under ESS7,

The social risk management for the project will depend on, (i) adhering to the GBV action Plan developed by MMAIF in consultation with Military, (ii) adhering to the requirements of safe pesticide use and management international good practices, national guidelines and World Bank Environment and Social Standard requirements detailed in the IPMP/ ESMF, (iii) ensure a non-discriminatory, decent work environment; including by ensuring that all direct and contracted workers adhere to the professional code of conduct and establish a grievance mechanism within MMAIF developed as part of the LMP. (iii) Implementation of Stakeholder Engagement Plan that ensures systematic communication and community outreach to create awareness and understand community concerns and resolve them in an effective and efficient manner using the existing GRM related to (a) the potential benefits and risks, (b) awareness and prior information about pesticide spraying; (c) ensure tailored approach for locust infestation management in the communities(d) Ensure participation of Vulnerable and marginal communities as per ESF standards.

Under component 2: **Livelihoods Protection and Restoration.** The primary social considerations for Component 2 are (i) avoiding inadvertent exclusion of vulnerable or marginalized people and communities through inappropriate targeting of livelihood support or elite capture, (ii) labor management including sexual harassment; (iii) community health and safety issues from cash transfers including GBV/SEA; and (iv) community health and safety during cash for work operations (LIPW). (iii) issues around access to land for some LRS and LIPW activities and associated environmental and social impacts. *These activities shall be selected by the respective communities' groups for support as appropriate and as per the procedure outlined in the Project Operational Manual. The selected activities* shall be subjected to environmental and social screening following the set criteria in the project ESMF, and where necessary ESMPs developed before commencement of their implementation. The environmental and social risks will be managed through the development of an ESMF which includes a GBV action plan, labor management procedure and appropriate targeting measures to ensure equitable sharing of project benefits. A VMPP will also be prepared.

The management of social risks, in particular stakeholder engagement and targeting activities, will be made more challenging due to the Covid-19 pandemic restriction in movements. The Social risk for the project is considered **HIGH** because of the high GBV/SEA/H risks anticipated in the project that includes use and involvement of the military in component 1, for locust control activities.

B. Assessment of Environmental and Social Risks and Impacts

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

The project is financing activities that will have positive impacts and benefits to the areas currently infested with the desert locust. The proposed locust control activities will eliminate swarms of locust that have destroyed vegetation, crops and restore livelihoods in the affected areas. Through the project livelihood restoration and recovery component, the project could positively and negatively affect pastoralists and farmers communities that have seen their livelihood destroyed by large swarms of locust. Particularly disadvantaged and vulnerable groups of pastoral communities in Karamoja and women and girls across these groups.

Component 1 Surveillance and Control Measures: The potential negative environmental risks and impacts associated with these desert locust control activities include: (i) Potential spillage or leakage of pesticides (considered hazardous materials) during transportation, handling, storage of the pesticides, dosage during treatment and disposal of used pesticide containers/drums; this will likely lead to the contamination of the environment and potential health hazards to the pesticides applicators and communities. MAAIF will manage these risks by adopting and complying with FAO Desert Locust Control Guidelines on safety and environmental precautions and other FAO technical guidelines on Ground Application of Pesticides, Aerial Application of Pesticides, personal protection when handling and applying pesticides, the use of WBG General EHS Guidelines and National legislations and regulation on use of Pest Control Products. Also, the Ministry will prepare and operationalize emergency preparedness and response procedures to manage any contamination or poisoning that may occur; (ii) Potential risks of polluting ecologically sensitive habitats such as wetlands, national parks, reserves and water bodies. The Ministry will carry out inventory of ecologically and agronomically sensitive areas and administer alternative treatment such as use biopesticides, and undertake awareness-raising and provide relevant information to local communities on pesticide treatment schedules and potential negative impacts on them and their livelihoods; (iii) The application of the pesticides is likely to contaminate community water sources such as shallow wells, boreholes, pasture and browse for livestock and wildlife and affect agronomically sensitive areas where crops may be grown for export. To manage these risks MAAIF will carry out awareness-raising and provide relevant information to local communities on pesticide treatment schedules and potential impacts; the Ministry will prepare and operationalize emergency preparedness and response procedures in event of contamination for applicators or communities members, and further, will carry out regular environmental monitoring of field pesticide treatment activities; and (iv) The use and application of pesticides is likely to contaminate and lead to poisoning of the pesticides application teams. To manage this risk the project will provide appropriate and adequate Personal Protective Equipment (PPEs), train the field control teams and conduct regular analysis and monitoring of the levels of cholinesterase for the field control teams and rotate operators involved in Organophosphate pesticide applications to avoid overexposure to pesticides.

MAAIF with technical support from FAO have selected use an organophosphate (Fenitrothion 96% ULV) for use on desert locust control activities under this project, as well as Deltamethrin ULV; Malathion ULV; and Chloropyrifos 480g/l

i.a. EC. It is also proposed to procure *Metarlizium aminospliae,* a bio-pesticide for research purpose to be used targeting locust nymphs. These are all listed under the FAO guidelines.

The key potential social risks and impacts related to the operation include:

(a) Surveillance and control measures can exacerbate exposure of women/girls to GBV and SEA as household stresses and forced changes in livelihood strategies exacerbate existing high rates of GBV. Moreover, with the deployment of external personnel including the Ugandan Military, to implement control measures women and girls may face growing levels of SEA, and also as a negative coping strategy. This component will involve the use of the military mostly in the control of the locust in the invaded area. They are currently already engaged by government to conduct this exercise. However military engagement in a civilian community pose a risk to the community; such risk would include Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Harassment of the civilian community. To mitigate this a rapid risk assessment will be conducted and a GBV action plan developed, this will form part of the ESMF and ESCP. A gender-based violence specialist will be recruited by the project to manage this issue.

The exact nature of the military deployment to support this project is not known at present. The Ugandan Military codes of conduct will be assessed for adequacy on addressing SEA/H and key messages on avoiding SEA/H and any kind of violence against the community and between staff will be reinforced as part of technical training for the military. An operational GBV action plan will be prepared before project disbursement for component 1 in consultation with the military. The GBV Action plan will provide details on appropriate means for preventing and responding to violations including reporting, response institutions and ways of resolving the issues.

(b) Human health risks due to exposure to pesticides in circumstances when the community is not fully informed about the spraying activities eg locations and timings, the need to avoid entering the area for a period after spraying, use of crops sprayed etc. This is particularly important for subsistence farmers who may access crop fields daily. The Project will develop a clear communication strategy guided by the SEP to keep communities aware and informed early on spraying plans.

(c) Misuse of pesticides, during transportation storage or disposal, may result in agricultural crop damage, damage to pasture lands, fodder, natural resources and harm to livestock within and beyond buffer zones. The nature and extent of the damage will depend a variety of factors including the pesticide (type, concentration etc), the geographical area impacted and potentially the nature of the crop or pastureland. This is a concern where populations are vulnerable including those who rely on subsistence farming, pastoralists and the poorest of the poor. Under normal operating circumstances such impacts should not occur, and the Project is expected to follow FAO guidelines on the application and use of pesticides to minimize the risk of misuse. Those negatively impacted persons would be compensated by being made part of the project beneficiaries in a way to offset any damages and losses. Such misuse can also result in harm to human health and in many areas where spraying will be undertaken access to health care services is limited. As such, the ESMF/IPMF will present details of how such issues and concerns would be addressed.

(d) There is the potential for a lack of support from local communities and hence lack of support/ input into key community led initiatives if all elements of the project are not clearly communicated to people including the benefits, risks and mitigations measures that will be put in place. This will need to be addressed through clear communication guided by the SEP and the demonstration of an effective grievance redress mechanism.

(e) Presence of Vulnerable and marginalized communities: Due to the emergency nature of the project and the speed at which the first component will be implemented to control the locust, this might leave little room for effective and efficient consultation and engagement of vulnerable and marginalized communities, potential exclusion and elite capture of project benefits. There is a very vulnerable community in Elgon region. Also, communities in Karamoja meets the requirements of Sub-Saharan African historically underserved traditional local communities under ESS7 and would require additional efforts to ensure their participation and inclusion. This will be addressed through targeting strategy of beneficiaries detailed out in Project Implementation Manual and VMPP and SEP. The project will ensure that the IK are appropriately informed and can share in the benefits of the project in an inclusive and culturally appropriate manner

Component 2-Livelihoods Protection and Rehabilitation: *Sub-Component 2.1: Livelihoods Restoration Support (LRS) activities shall be selected by the respective communities' groups for support as appropriate. The selected activities for* Village Revolving Fund (VRF) support shall be subjected to environmental and social screening following the set criteria in the project ESMF, and where necessary ESMPs developed before commencement of their implementation. The key activities under Sub-component 2.2. Labor Intensive Public Works include interventions in physical water and soil conservation activities, agro-forestry technologies and practices, agribusiness technologies and to a smaller extent access and market infrastructure. The potential negative environmental impacts associated with the activities on this component include, potential soil erosion, dust emissions, generation of solid waste, occupational health and safety risks related to minor construction activities for the proposed construction of grain and seed storage facilities. The proposed activities related to supporting pastoralist communities undertake re-stocking of livestock may result to outbreak of animal diseases and potential degradation of the rangelands. These activities shall be subjected to environmental and social screening as per the criteria that will be set in the ESMF. ESMPs shall be developed where applicable.

Social Risks: Ineffective targeting of beneficiaries may result in a number of risks including social tensions between community members especially if certain groups are considered to be excluded or unfairly benefitting. Moreover, incorrect targeting has the potential for elite capture of project benefits. These issues will need to be addressed through a clearly defined targeting process which is documented, consulted upon and disclosed as part of the project documentation. Where the IK are present this will also need to be addressed through the development of a VMPP. Any compulsory land acquisition and involuntary resettlement is not anticipated under the project. Some activities under component 2 may require access to land which will be managed in accordance with the requirements of ESS5 and outlined in the project operations manuals as appropriate.

In addition, component 2 could inadvertently exacerbate already high levels of gender-based violence in the project area. The project will seek to mitigate risks of intrahousehold conflict due to women having access to additional cash, savings or economic opportunities as well as sexual exploitation and abuse of community members who are extorted for sexual favors in exchange for access to livelihood protection and restoration opportunities. These issues will be addressed through the development and implementation of a GBV Action Plan which will include grievance mechanism that is responsive to GBV and access to services by survivors.

As the community will be involved in LIPW a Labor Management Procedure will be developed and implemented which will outline the approach to community workers and minimize exposure to risks associated with project activities.

MAAIF is preparing an Environmental and Social Management Framework (ESMF) to cover Component 1 Control activities, Component 2 Livelihoods Protection and Restoration and Component 3 Coordination and Early Warning Preparedness activities, including Sub-component 4.3 Management information System, Monitoring & Evaluation; to guide assessment and management of environmental and social risks associated with the said components; before any

environmental or social adverse impacts can arise from activities supported by the project. The ESMF will include environmental and social screening procedures for potential sub-projects.

Component 3 will specifically involve the development of plans and procedures for future response which will need to consider the requirements of the ESF. This requirement will be presented in the ESCP. Such considerations could be linked to stakeholder engagement, community inputs, labor and working conditions and livelihood protection.

ESS10 Stakeholder Engagement and Information Disclosure

A Stakeholder Engagement Plan has been prepared and disclosed already. The project will establish a structured approach to engagement with stakeholders (which would include Key relevant government institutions, districts, affected communities, Civil Society Organizations and relevant development partners working in the same field)that is based upon meaningful consultation and disclosure of appropriate information, considering the specific challenges associated with the locust emergency response.

The project community consultation for component 1 will focus on awareness raising regarding timing of the spraying, potential impact of the spraying on human health, livestock and fodder, water wells for humans and livestock, agricultural crops, spraying mechanism (hand held, vehicle and aircraft), roles and responsibilities including that of the communities. The updated SEP will include an assessment of the potential impacts on IK and culturally appropriate communication and consultation requirements for Sub-Saharan African Historically Underserved Traditional Local Communities.

For component 2, the consultation with the communities will inform targeting for livelihoods protection and restoration. The Uganda Locust Response Project will include adequate resource for the implementation of the Stakeholder Engagement Plan. These activities will inform an update to the project approach to stakeholder engagement. These outreach mechanisms is defined as part of the SEP (will be updated to define the operational steps prior to disbursement for each component) based on the local context, language, preferred media and cultural norms and values.

The financing will be used for producing communication materials, including local radio content, and traditional information sharing channels for effectively sharing information with communities during operation of spraying and documentation. These will cover affected communities and village leaders' sensitization and training of experts of all infested areas to approach country-wide awareness creation as a key activity for the SEP. The stakeholder engagement plan takes into consideration the COVID-19 guidelines on social distancing and current ban on gatherings to limit the spread of the disease and use appropriate means for engagement such as radios, newspapers to spread information.

The project will ensure the establishment of a Grievance Redress Mechanism is outlined in the SEP. The updated SEP will further detail the GRM mechanism.

The approaches taken will thereby ensure that information is meaningful, timely, and accessible to all affected stakeholders, including use of different languages, addressing cultural sensitivities, as well as challenges deriving from illiteracy or disabilities, tailored to the differences in geography, livelihoods and way of life.

The project has also disclosed Environmental and Social Commitment Plan. The other E&S instruments such as ESMF VMPP etc. will also be disclosed subsequently.

B.2. Specific Risks and Impacts

Assessment of the relevance of the project's risks and impacts, given its context at the time of Appraisal.

ESS2 Labor and Working Conditions

The Project will develop Labor Management Procedures (LMPs) to manage risks to occupational health and safety and working conditions in line with the requirements of ESS2. Due to the nature and timing of works LMPs may be prepared separately for Components 1 and 2 and will be part of ESMF.

The Project will involve the use of the following types of labor – direct employees including civil servants (all components), contracted employees (component 1) and community workers (component 2); coordinated by the Ministry of Agriculture Animal Industry and Fisheries (MAAIF).

The MAAIF will be responsible for overall project implementation across all components as existing civil servants they will remain subject to their existing terms and conditions of employment. If needed, they will be trained on any Occupational Health and Safety requirements associated with locust control measures in line with FAO guidelines. However, this is considered to be unlikely as civil servants will not be directly involved in spraying. Such measures would be captured in the LMP for component 1.

Component 1 will involve the MAAIF and district officials who as outlined above will remain subject to their existing terms of employment. Consultants may be recruited to work directly on the project to provide technical support to the MAAIF any such contracts will need to be drafted in line with the requirements of ESS2 and Ugandan law. As will any civil servants whose contracts are legally transferred to the project.

Ground spraying under Component 1 will be implemented by the Military who will do pest control activity through operating handheld pest management sprayers.

Contracted staff may also be hired to implement elements of component 1. Contracted labor includes, vehicle mounted sprayer drivers, technicians, aircraft operators, flag men/women and scouts. In addition, NGOs will be hired to undertake monitoring activities. Details of this contracts are not known; however, this will have to be in line with ESS2 and Uganda law and will involve due diligence during contracting to ensure they don't have a record of abuses of labor and working conditions.

In order to protect the Occupational Health and Safety of workers the LMP will refer to the fact that, MAAIF will follow the FAO Desert Locust Guidelines, Section 6. Safety and Environmental Precautions issued in 2003 for the locust response as applicable for safety and environment procedure and training manual and other international good practice on observing occupational health and safety of staff involved in the pesticide transport, management, use, disposal of residue and spraying. The project safeguards team will ensure the application of Occupational Health and Safety measures (e.g. inclusion in the site-specific ESMPs, contracts and monitoring systems) as outlined in the ESMF noted under ESS1 as well as FAO guidelines, including Guidelines for personal protection when handling and applying pesticide (2020).

Component 2, of the project involves Livelihood Restoration Support (LRS) and Labor-Intensive Public Works (LIPW) to provide income support to vulnerable households. Labor issues associated with the LRS component are expected to be limited as the workforce will be limited to direct employees who will be responsible for the implementation and oversight of the project at the national and district level.

The LIPW will involve the provision of seasonal income transfers to poor and vulnerable households in return for their direct participation in labor-based works. The LIPW will provide temporary employment to the most vulnerable households for a period of 54 days with daily wages of UGX: 5,500. Women's inclusion in LIPW will take a minimum of 50%. Key areas of interventions will be in physical water and soil conservation activities, agro-forestry technologies and practices, agribusiness technologies and to a smaller extent access and market infrastructure. Those involved in LIPW will be classified as Community Workers and the LMP for Component 2 will need to detail the terms and conditions under which labor will be provided including pay, working hours, occupational health and safety requirements and training and grievance management. The LMP will also need to cover non-discrimination and equal opportunities as well as child labor restrictions for these workers considering the required targeting. LIPW activities will be stopped or significantly reduced when spraying is being undertaken to minimize the risk to human health.

The recruitment of child labor is forbidden in accordance with ESS2 and Ugandan law, due to the hazardous nature of the work involving use and management of pesticides which is forbidden for any person under the age of 18. Similarly, inclusion in LIPW will be limited to those over 18. These restrictions including measures to determine the age of employees will be outlined in the relevant LMPs.

In line with ESS2 the use of forced labor or conscripted labor in the project, both for pesticide spraying and the cash for work activities is not allowed. The MAAIF will ensure consistent application and adherence to the requirements related to the applicable Environmental and Social Standards.

The labor grievance redress mechanism will be detailed in the relevant LMPs and will allow workers to report any labor issues including lack of PPE, unreasonable overtime, issues with pay etc.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project will finance procurement of large quantities synthetic chemical pesticides and biopesticides and equipment to support the application of the pesticides. The project will prepare IPMP for this operation before commencement of implementation of project activities.

MAAIF with technical support from FAO have selected an organophosphate (Fenitrothion 96% ULV) for use on desert locust control activities under this project, as well as Deltamethrin ULV; Malathion ULV; and Chloropyrifos 480g/l i.a. EC. It is also proposed to procure *Metarlizium aminospliae,* a bio-pesticide for research purpose to be used targeting locust nymphs. The selected chemical pesticide is categorized as Class II of the WHO and FAO recommended pesticides and it is moderately hazardous. Both pesticides are registered and allowed for use in Uganda. To minimize and mitigate potential risks the project and the IPMP adopts to use FAO guidelines on Safety and environmental precautions, the World Bank Group General EHS Guidelines and applicable national legislation and regulations on pesticide control products.

The Ministry will work with FAO to procure the pesticides and they will be tested to ensure that they are manufactured, formulated, packaged and labelled as per the FAO guidelines and WBG General EHS guidelines. The Ministry will put in place measures to ensure the transportation and handling of the pesticides from the port of entry is carried out as

standard FAO procedures and guidelines and the drivers are sensitized on accident prevention and with dealing with potential emergencies such as spillage or fire during transportation. MAAIF will provide safe storage for the pesticides in all the proposed ground base stations and will put in place control procedures on the release of the pesticides for the application. The location of the pesticide storage will include proper siting and design of the storage facilities and providing equipment and facilities for containing possible spillage, protecting the pesticides from direct sunlight/rains, and having checklist/form to manage stock movement in and out of the stores.

In addition, MAAIF will adopt WHO/FAO guidelines on management options for empty pesticides containers. The project will ensure that empty pesticides containers/drums are disposed safely through systematic rinsing and crushing on site and are not given to members of the community for their use. The Project IPMP will incorporate an Emergency Preparedness and Response Plan for the pesticide application activities.

Most of the Districts in Northern and Eastern part of the Country infested with the desert locust have areas that are designated as ecologically sensitive that include national parks, reserves, lakes, wetlands/swamps and agronomically sensitive areas for the use of pesticides use. The Ministry will identify and map out these areas and evaluate locust management options, based on the type of organisms at risk and the likely locust targets that may appear in the area. This will be carried with specialist lead agencies in charge of managing the ecological sensitive areas i.e. the Uganda Wildlife Authority, National Forest Management Authority, Ministry of Water and Environment (Wetlands Management Department, Directorate of Water Resources Management), National Environment Management Authority, Ministry of Gender Labour and Social Development and the Districts Local Governments. MAAIF and NEMA will carry out environmental monitoring of the areas that have received the treatment of the pesticides to ascertain any potential negative impacts on the flora and fauna and communities.

ESS4Community Health and Safety

In line with safety provisions in ESS2 as they relate to workers, it is equally important to ensure the safety of communities from the potential impacts and risks of pesticide use and other measures intended to mitigate the locust infestation.

Before undertaking spraying operations, the program shall be communicated to local communities through local Leaders and media (FM radios) in the local language and people shall be warned to stay indoors during, and for a specified period after spraying, and to avoid eating crops or animal products in sprayed areas for a certain period (depending on the pesticides used). Management and control of pesticides shall be undertaken by the extension workers at the grassroots (Agricultural Officers, Veterinary Officers, Community Development Officers, Water Officers, and District Natural Resources Officers) in order to avoid people getting poisoned in the process. Recruitment of Community Labour shall be discouraged. However, in circumstances where traditional approaches are used such as drumming, application of pesticides shall be delayed or controlled by extension workers. Extension workers shall be deployed to technically supervise on-ground the process of applying pesticides to ensure use of Personal Protective Equipment (PPE) by all workers engaged and/or communities exposed to the spraying operations, making sure that equipment is used correctly, and pesticides are not diverted for other purposes, etc.).

The use of pesticide for managing locust infestation may require regular community interaction and awareness creation about the benefits, potential side effects of pesticide use on humans, agricultural crops, livestock and livestock feed, on water wells for humans and livestock, and the environment. The management and disposal of residual pesticide including the overuse and misuse may have potential impacts and associated risks on community health and safety. The project will use drum crushers to ensure that empty pesticides containers/drums are disposed safely through

systematic rinsing and crushing on site and are not given to members of the community for their use. Any unintended risks of pesticide spraying should be communicated to communities in appropriate language, form and via media to avoid adverse health effects on the community. This should include:

- How project activities will be carried out in a safe manner with (low) incidences of accidents and incidents in line with Good International Industry Practice (FAO guideline).
- Measures in place to prevent or minimize the unintended and out of control effects of pesticide use.
- Emergency preparedness and response measures including for poisoning of humans.

The transportation, storage, management of pesticide should follow the 2003 FAO guideline on Desert Locust Guidelines, section six Safety and environmental precautions. Further, the project will follow the provisions outlined in the ESMF with specific guidance under each environmental and social standard. The MAAIF is in the process of developing an Integrated Pesticide Management Plan.

The project may increase the risk of Gender Based Violence and Sexual Exploitation and Abuse in communities particularly towards the most vulnerable women and girls due to the presence of project personnel including the military and as a result of livelihood protection and restoration activities. The project will mitigate this by putting in place a GBV action plan and recruiting a project gender-based violence specialist.

As noted, the use of the military to support component 1 poses particular risks to community health and safety which need to be mitigated While the military has established working guidelines with MAAIF, these guidelines will be reviewed and strengthened where necessary, to ensure that the use of the military in project activities will not result in adverse consequences to community health and safety, including SEA and SH. Therefore, the Component 1 ESMF will include a GBV Action Plan to ensure appropriate standards of behavior are followed by the military and other mitigation measures are in place. It is also worth noting that the Military has already been deployed to the project area to support Government Locust control activities for a number of weeks and some 2000 personnel have been trained in on the ground control techniques. These personnel will require additional training in community engagement and SEA/SH prevention and before the commencement of Bank supported activities. Equally, it will be necessary to have SEA/SH reporting mechanisms in place before the start. The FAO Guidance Code of Ethics and Professional conduct, Ugandan Law, the World Bank Good Practice note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel and the applicable Environmental and Social standards and the Bank Good Practice Note on Use of Security Forces shall be used to guide agreed operating procedures for the military implementing project activities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

It is not anticipated that the project will involve any land acquisition or involuntary resettlement. Some activities under component 2 may require land use which will be managed in accordance with the requirements of ESS5 and outlined in the project operations manuals as appropriate.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The application of pesticides through both ground and aerial spraying will likely impacts sensitive ecological areas that are located within the desert locust infested areas. The MAAIF will identify and map out the sensitive ecological areas that include national parks, reserves, wetlands and agronomically sensitive areas. The sensitive ecological and agronomically will not be sprayed with chemical pesticides but will be evaluated and given treatment of the biopesticides that are less harmful. In addition, traditional integrated pest management approaches shall be used, especially in

ecologically sensitive areas.

The MAAIF will adopt the FAO guidelines in the treatment of ecologically and agronomically sensitive areas and this will be incorporated in the IPMP. The project will institute environmental monitoring after treatment of pesticides has been carried out to monitor the impact on sensitive areas.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The project will be implemented in Karamoja where the IK are present who meet the criteria of ESS7.

Component 1: Potential risks and impacts to the IK as a result of component 1 are likely to be like those described above for all communities. The SEP will contain special provisions to guide meaningful engagement and grievance management with the IK.

Component 2: Under the livelihood restoration, the project will prepare a VMPP to ensure the impacts in the Ik are identified and managed. The project will ensure that the IK are appropriately informed and can share in the benefits of the project in an inclusive and culturally appropriate manner.

The proposed project does not involve aspects which would require FPIC.

ESS8 Cultural Heritage

Minor construction works have been proposed under Component 2, there is the potential for chance find of cultural or archeological significance during construction. The ESMF will cover risks associated with intangible cultural heritage (such as disruption to religious/cultural festivity in the community by civil work). Subproject specific ESMPs will address these issues through the inclusion of chance find procedures and site-specific mitigation measures.

ESS9 Financial Intermediaries

Not currently relevant.

B.3. Other Relevant Project Risks

The Karamoja Region is sometimes prone to inter-clan raids among the pastoral ethnic communities requiring involvement of the Army and the National Police Forces. Also given the use of Security forces to undertake locusts spraying, likely interface with the communities where they will be operating in, a security Management Plan shall be drawn to handle security issues.

C. Common Approach

No

Provide outline of Common Approach, identifying key substantive and procedural aspects.

D. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No

Describe steps taken to comply with the Bank Operational Policy:

OP 7.60 Projects in Disputed Areas	No

Describe steps taken to comply with the Bank Operational Policy: