



Republic of Uganda

OFFICE OF THE PRIME MINISTER

Northern Uganda Business Advisory Support Project



Environmental and Social Management Framework

(ESMF)

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ACRONYMS

CAO	Chief Administrative Officer
CBO	Community Based Organization
CDD	Community Driven Development
CDO	Community Development Officer
CIR	Community Infrastructure Rehabilitation
CPC	Community Procurement Committee
CPMC	Community Project Management Committee
CSO	Civil Society Organization
DEC	District Executive Committee
DFID	Department for International Development (United Kingdom)
DTPC	District Technical Planning Committee
DLG	District Local Government
ESMF	Environmental and Social Management Framework
GoU	Government of Uganda
GPN	General Procurement Notice
MSNUR	Minister of State for Northern Uganda Reconstruction
NUMU	NUSAF Project Management Unit
NHS	National Household Survey
NUREP	Northern Uganda Rehabilitation Program
NURP	Northern Uganda Reconstruction Project
NUSAF	Northern Uganda Social Action Fund
OPM	Office of the Prime Minister
PC	Parish Chief
PDC	Parish Development Committee
PRDP	Peace, Recovery and Development Plan
HISP	Household Income Support Program
IDP	Internally Displaced Person
IEC	Information, Education and Communication
IG	Inspectorate of Government
IGG	Inspector General of Government
LRA	Lord's Resistance Army
M&E	Monitoring and Evaluation
MIS	Management Information System
MoES	Ministry of Education and Sports
MoFPED	Ministry of Finance Planning and Economic Development
MoLG	Ministry of Local Government
MoU	Memorandum of Understanding
RPF	Resettlement Policy Framework
SAC	Social Accountability Committee
SCC	Sub-County Chief
SCEC	Sub-County Executive Committee
SMC	School Management Committee
STPC	Sub-County Technical Planning Committee
TAAC	Transparency, Accountability and Anti-Corruption
ToRs	Terms of Reference
TPC	Technical Planning Committee
TST	Technical Support Team
TWG	Technical Working Group
	Uganda Bureau of Statistics
UBOS	

Background

Government of Uganda has implemented successive development projects and programmes in the Northern and North Eastern part of the country over the past two decades to address development gaps created by the effects of civil strife, insurgencies and cattle rustling perpetuated for long in the region. The recent interventions included the first Northern Uganda Social Action Fund (NUSAF 1) Project implemented with IDA support from February 5, 2003 to March 31, 2009. The NUSAF 1 was succeeded by the Second Northern Uganda Social Action Fund (NUSAF 2) Project that became effective on November 25, 2009 and closed on February 29 2016. Other key interventions to enhance the livelihood of persons in the Northern and North-Eastern region include Karamoja Livelihood Program (KALIP), Northern Uganda Agricultural Livelihoods Recovery Programme (ALREP) and National Agriculture Advisory Services (NAADS) amongst other undertakings by Government, development Agencies, and international NGOs.

The Northern Uganda Business Advisory Support Project (NUBSP)

The Northern Uganda Business Advisory Support Project(NUBSP) is a pilot project to complement the NUSAF 3Project, which is well aligned with the Bank’s Country Assistance Strategy (CAS) and the Government’s National Development Plan (NDP), and Peace, Recovery, and Development Plan (PRDP) in its poverty alleviation and growth efforts. The proposed project will complement the Improved Household Support Program (IHISP) of NUSAF3 by integrating the provision of business management training and follow-up business advisory services through extension of support to the CIGs and other very poor individuals in the four districts of Kitgum, Gulu, Nebbi, and Soroti, in Northern Uganda to help them increase their income in a sustainable manner. The NUBSP project will be funded through a US\$ 2.857 million equivalent grant of the Japan Social Development Fund (JSDF) and will operate over a period of three years.

Project Development Objective

The development objective of NUBSP project is to improve and sustain the incomes of poor households belonging to existing and new community interest groups (CIGs) in the four pilot districts (Kitgum, Gulu, Nebbi, and Soroti) by providing business training, small start-up grants, and follow-up business advisory services to existing and new CIGs.

Project Beneficiaries

The main beneficiaries will be the existing and new CIGs formed by poor and vulnerable households located in Kitgum, Gulu, Nebbi, and Soroti districts. The existing CIGs were formed under the HISP of the NUSAF 2 Project, and the new CIGs will be formed under NUBSP project. The members of the new CIGs will belong to poor and vulnerable groups such as female-headed households, people with disabilities, and vulnerable youths, among others and will be selected through a participatory process that was used in NUSAF2.

The grant will benefit 120 existing and 240 new CIGs.¹ Each CIG will comprise of 10-15 members. The members of the CIGs will complete training in business management and technical skills development and will produce business plans. The existing CIGs to benefit from this pilot initiative will be selected from those supported by the NUSAF 2 Project, while the new CIGs will be formed through a participatory process that was previously used by NUSAF 2 same as for the NUSAF3 in the formation of the existing CIGs. There will be 4,680 direct beneficiaries within the 360 CIGs, and the project will strive to ensure that at least 50 percent of the members of the new CIGs are women (the existing CIGs consist of more than 50 percent women).

Project Components

This project will support the formation of 240 new CIGs and the provision of training, small grants, and business follow-up services to them. It will also provide training and business follow-up services to 120 existing CIGs but will not provide them with small grants because they will have already received similar grants from NUSAF 2 or NUSAF 3. The NUSAF3 participatory process will be used to form the new CIGs for NUBSP, which will consist of individuals from poor households (10 to 15 individuals per CIG). The project will be implemented in three years in two project cycles. Each project cycle will be implemented in one and half years, which will include one year of providing follow-up business advisory support services to new and existing CIGs.

“Each CIG will receive small grants not exceeding \$2,000 to start their income-generating activities. These can be any activities that have the potential to yield short-term cash flow, such as the production of groundnut paste or fruit juices, the processing of sesame oil or sun-dried fruit, baking, milk processing, the production of smoked fish, maize flour, or cassava flour, starting a salon, tailoring, dress making, handicrafts, keeping poultry or pigs, or vegetable farming.”

Lessons Learned and Reflected in the Project Design

Lessons from NUSAF 2

Since the NUBSP is going to be implemented through NUSAF3, and lessons from NUSAF2 have informed the design of NUSAF3, the following observations from the review of ESMF for NUSAF2 as well as field visits to the beneficiary areas coupled with field consultations should provide good lessons for ESMF for NUBSP:

Good lessons

- a. The project made a deliberate provision for an Environmental Specialist to be responsible for mainstreaming environmental mitigations measures into its plans and activities;
- b. Deliberate effort to mainstream gender across all project components of NUSAF2 which is evident in the management and implementation structures, allocations of the completed structures on community infrastructure rehabilitation (CIR) as well as in the public works projects road works though these varied across all components. In addition, it was observed, the requirement of having at least 30% of women in each of the committees was adhered to in the sub-project composition;
- c. Gender and disability sensitivity informed the design of NUSAF 2 infrastructures. For instance, CIR component took into account both gender, accessibility and equality considerations. The institutional VIP latrines designs ensured there were separate toilets for men, women, boys and

¹ The average number of members in a CIG is 13, with most CIG having between 10 to 15 members.

girls. There are also provisions for separate shower rooms, access ramp as well as grip bars to cater for teachers, health workers and pupils with disabilities. These were all good safeguards mainstreaming measures in the project;

- d. NUSAF 2 exercised the obligation of ensuring that, development process should ensure broader universal social inclusion of sections of society in that; vulnerable categories such as People Living With Aids (PLWA), widows/widowers, orphans, child mothers, ex-combatants, youth, the elderly, IDP returnees, disarmed Karimojong, and female headed households as well as maimed land mine victims amongst others, are equally and equitably brought on board in line with the project targeting goals. These groups were part of the beneficiary categories in the project;
- e. Targeted involvement of the line district technical staff namely the DEOs, CDO, DVOs and DAOs in the management of the safeguards aspects in projects ensures their proper mainstreaming which is reflected in the manner such concerns are reported and integrated into the components operations. For its success, this process ought to start early enough in the project cycle;
- f. Beneficiary communities and groups were asked to plant trees before receipt of the funding for the subprojects which had climate change mitigation measures;
- g. Screening of sub-projects was a pre-requisite before release of funds; and
- h. The project prepared appropriate environmental management tools for mainstreaming environmental management into its operations;

Challenges

- a. Though trees were planted by the communities and in schools, there were inadequate measures to ensure their protection and care;
- b. Inadequate articulation of institutional framework for the implementation of the ESMF during project implementation;
- c. Lack of an assessment of the capacity of implementing institutions to implement safeguards provisions in the project. NUSAF2 has a number of institutions which play a role in implementation of its sub-projects such as MAAIF, MLGSD, MoWT, MoES, and MoH among others. It was therefore important that, the different institutions should have been assessed in terms of their capacity to effectively implement safeguards provisions in the subproject entities they were implementing;
- d. Lack of indicative cost for ESMF implementation in the document;
- e. Inadequate coverage of Physical Cultural Resources in ESMF
- f. Lack of Grievance Redress Mechanism in the ESMF document.
- g. There was no environmental and social baseline data in the ESMF document.

Purpose and Scope of ESMF for NUBSP

This ESMF provides guidance on how environmental and social aspects shall be identified, assessed and managed in the NUBSP. Specific locations have not been clearly identified at this stage, hence it provides a general impact identification framework to assist project implementers to screen the projects and institute measures to address adverse environmental and social impacts.

Approach and Study Methodology in NUBSP ESMF Preparation

The ESMF has been prepared in accordance with applicable World Bank safeguard policies and Uganda environmental and social impact assessment guidelines, and involved data literature reviews; field reconnaissance studies, public consultations and discussions with relevant sector institutions, including districts, private sector, statutory agencies and local communities.

Key laws and regulatory frameworks

National Policy Framework

- The National Environment Management Policy 1994;
- The National Cultural Policy, 2006;
- The National Water Policy, 1999;
- The National Land Use Policy, 2011;
- Forestry Policy, 2001
- Public Health Policy 1964
- The National Gender Policy, 1997;
- The National HIV/AIDS Policy, 2004;
- The National Policy for the Conservation and Management of Wetland Resources, 1995

The Ugandan legal framework

- The Constitution of the Republic of Uganda, 1995;
- The National Environment Act, Cap 153;
- The Public Health Act, 1964
- The Land Act, Cap 227;
- The Water Act, Cap 152;
- The Occupational Safety and Health Act, 2006;
- Historical Monument Act, 1967;
- The National Forestry and Tree Planting Act, 2003;
- The National Environment (Impact Assessment) Regulations, 1998
- The National Environment (Waste Management) Regulations, 1999;
- The National Environment Regulations (Noise Standards and Control), 2003
- The National Environment Regulations (Hilly and Mountainous areas Management), 2000
- The National Environment (Audit) Regulations, 2006 (12/2006);and
- The National Environment (Wetlands, Riverbanks and Lakeshores Management) Regulations (SI 153-5).

International and Regional Environmental instruments/obligations for Uganda

- The African Convention on the Conservation of Nature (1968)
- The Ramsar Convention (1971) on wetlands of International Importance
- The Protection of World and Cultural Heritage convention (1972)
- Convention on Biological Diversity- (CBD 1992)
- Basel Convention
- Stockholm Convention
- Montreal Protocol
- Rotterdam Convention
- United Nations Framework Convention on Climate Change (UNFCCC, 1992)

World Bank Safeguard Policies

The safeguards policies triggered are:

- OP 4.01 Environmental Assessment
- OP 4.09 Pest Management
- OP 4.12 Involuntary Resettlement

Key Stakeholder Issues Raised in NUSAF2 project to inform NUBSP project

ISSUE RAISED	CONSULTANT'S REMARKS/PROPOSED MEASURES
<p>Ms. Ali Munira – Head, Public and International Relations/Principal Relations Officer Inspectorate of Government (IG)</p> <p>Under Transparency Accountability and Anti Corruption, IG has undertaken a number of initiatives to sensitize and empower the communities to report corruption and maladministration tendencies through media channels and seminars;</p> <p>The Inspectorate has instituted avenues such as e-mails, Report to IG using Short Message System (SMS), telephone calls on 0414347387 (hot line) and other general lines, physical reporting to any of the 16 IG Regional Offices spread throughout the country.</p> <p>Report to IG uses a short code 6009. This short code is the number to which all complaints or reports are sent. It is TOLL FREE for all mobile networks.</p> <p>With your mobile phone, simply type the keyword “CORRUPT” and SMS to 6009 and follow the prompts. You will receive a Complaint reference number which will be used to follow-up the complaint.</p> <p>Complaints can also be filed online at http://www.igg.go.ug/complaints/</p>	<p>A systematic way for capturing information and data on appeals and complaints has not been generally operational in NUSAF2. Yet, the latter would be an important mechanisms to ascertaining transparency and accountability in terms of whether project beneficiaries who have grievances are able to register them, and if the registered, whether concerned committees and/or authorizes take necessary action and on time. This intervention will foster a sense of responsibility and ownership among the citizenry by introducing a mechanism for the community level committees to become the first level of instance for grievances handling and referral to the IG if no resolutions will have been reached.</p>
<p>Eng. Charles Ngeye – Senior Engineer, Dept. of Construction Standards and Quality Management, MoWT</p> <ul style="list-style-type: none"> • NUBSP needs to integrate cross-cutting issues into the project designs early enough and they should be integrated even in the BoQs for works; • The Environmental Management Specialist for NUBSP should be in place right from the beginning of the project not as was the case under NUSAF 2 to assist in NUBSP project safeguards Implementation • NUBSP should not assume the districts will monitor and enforce compliance on safeguards 	<ul style="list-style-type: none"> • Cross-cutting issues including environment, gender, HIV/Aids, waste management to be included in the budgets. • NUSAF Secretariat has an Environment and Social Safeguards Specialist to provide guidance on safeguards implementation for NUBSP • The ESMF recommends facilitation of DEOs and CDOs to enforce safeguards; this item has been included in the budget for ESMF implementation.

<p>without allocating facilitation. The DEOs have challenges of resources and any additional load should be matched with resources; and</p> <ul style="list-style-type: none"> • If the DEOs are to follow up works, they should be brought on board in the project early enough not much later in the project. 	<ul style="list-style-type: none"> • The design of the NUBSP projects is in such, way that DEOs of pilot districts are involved in subprojects right from screening through monitoring.
<p>Munguleni Alfred, NUSAF Desk Officer, Maracha District</p> <p>Screening is done by the environmental officer for all projects and issues of concern are identified and recommendations suggested before an environmental certificate is issued. This is done for all projects before implementation.</p> <p>The district lacks adequate capacity to provide technical advisory services to the benefiting communities. Line ministries such as MAAIF have not harmonized their activities with NUSAF2. The NUBSP project need to strengthen in this area an ensure there is harmonization of their sub project with MAAIF as most of the activities are agricultural related</p> <p>OPM should involve the office of the RDC and GISO in monitoring of NUBSP projects other than the IG's office which is under staffed and overwhelmed by work, for example West Nile has 3 Officers under IG's department to monitor all government activities in the region.</p>	<p>This is a good practice that has to be strengthened further in NUBSP.</p> <p>OPM will have to closely work with MAAIF to strengthen the Afforestation, crop production and veterinary extension services systems to address the beneficiaries' demands of extension services.</p> <p>OPM will have to work with MAAIF to fill the human resource gaps in these regions by training more Community Animal Health Workers (CAHWs).The above is critical because of the need for training of the beneficiary groups on animal management practices to ensure sustainability. Equipping and strengthening the veterinary extension service system at district and sub county level is critical and should be prioritized.</p>
<p>Atto Francisca, District Environment Officer, Gulu District</p> <p>Most projects were screened especially the road works HISP and CIRs. A budget of UGX 600,000 was set aside, for the environmental issues on each CIR and 300,000 for HISP project.</p> <p>Improve on the budget for environmental related issues in the design of NUBSP and there should be a provision for monitoring under NUBSP</p>	<p>It is important to appreciate that the mitigations required vary from subproject to subproject and therefore the budgets for mitigations should be based on the required mitigations based on the screening results. This needs to be considered under NUBSP. This is catered for in the budget for this ESMF. OPM should ensure that monitoring is duly undertaken.</p>
<p>Mr. Ojok Brian, NUSAF Desk Officer, Yumbe District</p> <p>The selection criterion for group members depends on the level of discrepancy of community members. There are communities in Yumbe where everyone is too vulnerable hence every community member is eligible for selection. But in some instances, verbal and assertive members end up being beneficiaries even</p>	<p>There is a need for defining clear criteria in the selection of beneficiaries while also allowing flexibility to the community to identify poor in a participatory manner keeping community situation and ground realities in mind. Under NUBSP, at the community-level, beneficiaries will be selected for inclusion in the Project through a community-based targeting process that will be facilitated by the CDO and other key actors based on eligibility criteria that are established at the national level.</p>

<p>when they do not qualify.</p>	<p>The selection of beneficiaries for Component 1 will be carried out through a two-step process including geographic identification of the poorest districts and community based targeting to reach the poorest and most vulnerable. To facilitate this process, the NUBSP project will focus on few geographic areas with higher level of poverty, exposure to climatic hazards such as drought and flood.</p>
<p>Ms. Teopista, NUSAF Trainer, NUSAF Desk Office, Nebbi District.</p> <p>Training of communities in NUSAF2 projects was inadequate and some of them are ill prepared to implement the subprojects. Training is supposed to be continuous but there are no budgetary provisions for this. There should be a component of continuous training but this is not provided for in the budget, therefore this should be considered when designing NUBSP.</p>	<p>During the implementation of NUSAF2, the TST and Districts mainly focused on generation and approval of sub-projects. There wasn't much support for beneficiaries during and post implementation of sub-project. Under NUBSP program, in order to provide implementation support and follow up mentoring to community and beneficiaries, an implementation support team at Sub-County, Parish and Community level will be put in place.</p>
<p>Gadilaya Tree Planting Group, Jupuyik Village, Nebbi</p> <p>Training was inadequate because the trainer only appeared for 3 days. There is need for more training in nursery management and production of quality seedlings. Seedlings are often attacked by pests and diseases which cause great losses to the group. There is also inadequate information about where to obtain quality seeds and other inputs such as pesticides.</p>	<p>This is an indication of lack of adequate extension services to the beneficiaries. OPM will have to closely work with MAAIF to strengthen the Afforestation, crop production and veterinary extension services systems to address the beneficiaries' demands of extension services.</p>
<p>Amilobo Women Group, Gulu district</p> <p>Subproject: Banana plantation</p> <ul style="list-style-type: none"> • The plants wilt during prolonged dry season • It also becomes hard to maintain the garden during the rainy season due to the vigorous growth of weeds. • The yields from the plantation are very low especially last year no sales were made because wind brought down all plants that had fruited <p>The initial training was not adequate as the group was trained for two days only.</p>	<p>Such groups require adequate extension services on crop production to minimize losses. This echoes the need for OPM/NUBSP to closely work with MAAIF to strengthen extension services to the beneficiaries.</p>
<p>Ms. Kyalisiima Lydia, Treasurer, Buliisa Health Centre IV, NUSAF Group</p>	<p>Provision of additional infrastructure to health centers should be accompanied with provision of more waste management facilities. It is recommended that a specific budget for</p>

<p>For medical waste, there is an incinerator which is partially functional and another alternative is a shallow pit where waste is dumped openly.</p>	<p>environmental mitigations is put in place to cater for waste management issues.</p>
<p>Ayesiga Mukama NUSAF Group, Kigwera sub county Headquarters, Buliisa District</p> <p>Most NUSAF decisions are taken at district level without directly involving the targeted beneficiary communities. District leaders often waste a lot of resources on workshops and seminars yet these do not directly benefit the community.</p>	<p>One of the components NUBSP will adopt from NUSAF 3 is Transparency, Accountability and Anti-Corruption Programme (TAAC). The TAAC program is intended to promote good governance at all levels of Project implementation. The program is implemented independently by the Office of the IG.</p> <p>As part of the TAAC program, the Inspectorate of Government will continue to use both enforcement and preventive/proactive measures. Enforcement measures will include investigation of complaints against corruption, as well as enforcement of the Leadership Code. The IG will be one of the first ports of call for the social accountability committees (SACs) in the communities.</p>
<p>Lamoki Village community – Beneficiary of Onyomtil – Adimola 8km Community Access Road</p> <p>Every able bodied member of the community was given a chance to participate in road construction. The women contributed the large number since they dominate the community in terms of population.</p>	<p>Gender mainstreaming has been observed across all project components of NUSAF2 and the practice should continue in NUBSP to ensure that women continue to benefit from the project.</p>

NUBSP Project Categorization

Overall, the environmental and social impacts of the NUBSP program are expected to be positive as it is geared towards alleviating pressures on the livelihoods of the poor that lead to unsustainable exploitation of natural resources leading to environmental degradation. Despite these, its community sub-projects may involve limited degree of land take and displacement of land-uses and/or livelihoods forms. Such impacts will be managed through the Resettlement Policy Framework prepared alongside this ESMF. By their nature, NUBSP program component 1 may have limited and localized negative environmental and social impacts which may be of short term nature, reversible and through incorporation of appropriate mitigation measures, such impacts will be addressed. Therefore, on the basis of these, the categorization of its subprojects will be based on the provisions of the World Bank Operational Policy on Environmental Assessment (OP 4.01).

On the basis of these considerations, **NUBSP Project has preliminarily been assigned Environmental Category B type and its sub-projects are not expected to fall under EA Category A.** Furthermore, the NUBSP ties in the twin goals of the World Bank group of alleviating poverty and promoting shared prosperity. The potential environmental and social impacts can be adequately managed by integrating environmental and social due diligence into its sub-project cycle.

Subprojects Screening and Assessment

Screening of Sub-Project Activities and Sites: The Sub-county Technical Planning Committee (STPC) with guidance from the CDO and the DEO will constitute subproject appraisal teams, comprised of members of relevant line departments with knowledge in the subproject proposals received. After the

desk appraisal, the Sub-county appraisal teams will undertake a field appraisal of each subproject at the respective sites to verify the magnitude of the environmental and social issues, the adequacy of mitigation measures provided; the cost of implementing mitigation measures, suggest modifications to be incorporated in the environmental and social components of the subproject (if any) and finalize the appraisal report. The report will be reviewed by the STPC, endorsed by the Sub County Executive Committee (SEC) for onward submission to the District Technical Planning Committee (DTPC).

Review and Approval of the Screening Activities: After the desk and field appraisals, the Sub-county Chief will forward all the subprojects to the Sub-county Executive Committee for endorsement, after which the Sub-county Chief will forward all the recommended and endorsed subproject proposals to the District. The District Technical Planning Committees and District Environment Committee will review the results and recommendations presented in the environmental and social screening forms and the proposed mitigation measures presented in the environmental and social checklists as a basis for making recommendations for subproject approval.

Recommendation for Subproject Approval: After analyzing the data contained in the environmental and social screening forms and after having identified the right environmental category and thus the scope of the environmental work required, the Environment Focal Person/DEO will make a recommendation to the District Technical Planning Committee whether: (a) no environmental work is required; (b) the implementation of simple mitigation measures will be enough; (c) a project brief will be required, or (d) a full ESIA will be required.

Based on the results of the above review process, and consultations with the relevant stakeholders and potentially affected persons, the DTPC will proceed to approve or reject a subproject, in case of projects that don't require EIA or Resettlement Action Plan. The approval will be based on the submission of the District Environment Officer on behalf of the District Environment Committee. In case of subprojects that require EIAs, the recommendation for approval will be given by NEMA.

Project Implementation Framework

Institution	Responsibility and Safeguards Capacity for ESMF Implementation
OPM	<p>Responsibility – The institutional arrangement which will be used to implement the NUSAF 3 project will be used to implement the NUBSP. The Office of the Prime Minister (OPM) will be the implementing agency of the project and will work with a wide range of institutions at central, district and sub-county levels to deliver the project. The OPM will continue to be supported by a Technical Support Team headed by a Project Coordinator and staffed by relevant technical experts. The exact composition and number of staff will be reviewed following further elaboration of the design but it is expected that the team will have a cost effective structure and more practical presence. The Permanent Secretary, Office of the Prime Minister will have overall responsibility for the coordination, accounting for the project resources and ensuring successful implementation of the Project.</p> <p>Safeguards Capacity – NUSAF3 has a qualified Environment and Social Specialist to handle safeguards issues in NUBSP</p>
IG	<p>The Inspectorate of Government (IG) will conduct NUBSP specific IEC, oversight, grievance response and, where necessary, investigations. The IG under the TAAC will undertake grievance handling especially in regard to corruption. The IG will liaise with the PS-OPM, Chief Administrative Officers and Sub-county Chiefs to ensure effective implementation of the TAAC Program at national, district and sub-county levels</p>

	respectively. Under this arrangement, the IG will submit six-monthly reports to OPM, MFPED, Parliament and the World Bank.
MoGLSD	Responsibility – While the OPM will be responsible for the overall resources management and implementation of the project, the Ministry of Gender, Labor, and Social Development (MGLSD) mandate as the government agency responsible for Social Protection sector policymaking and overall coordination of SP interventions. As a result, the MGLSD is leading the preparation of a national framework to build the foundation for the direct income support program.
DLG	<p>The following institutions under the District Local Government (DLG) will be involved in screening and implementation of mitigation measures, monitoring and evaluation of subprojects within the District:</p> <ul style="list-style-type: none"> • District Executive Council (DEC) • District Technical Planning Committee (DTPC) • The Sub County Technical Planning Committee (STPC) • Parish Development Committee (PDC) • Community Project Management Committee (CPMC) • IG Regional Office <p>Implementation - At District level, the Chief Administrative Officers will be in charge, as the Accounting Officers and overall Coordinators of the project. Building on the positive experience from NUSAF 2 project implementation, the districts will assign an officer (civil servant) who will be a full-time focal person for the NUBSP and will be supported by the District Community Development Officer, District Engineer, and District Environmental officer, among others. Multi-sectoral Technical Planning Committees (TPC) at the district and sub-county levels and the Parish Development Committee will ensure that the project’s activities are: appropriately planned, approved and integrated into the budgets and work programs of the respective local governments and line ministry’s technical agencies. The role of districts and sub-counties will be outlined in a Memorandum of Understanding between the OPM and Districts. The livelihoods component will be further supported by the creation of an implementation support team at sub-county level to support implementation at sub-county, parish and community level. This team will be led by the CDO and comprises of Parish Chiefs, Parish Development Committee members, LC1, Extension staff and community facilitators. Key partnerships will include those with SACCOs, MFIs and banks, business entities that promote the marketing of agricultural produce and other organizations and programs providing financial literacy or business development services.</p> <p>The Role of the DEOs and CDOs in the implementing districts will also be to ensure that NUBSP subprojects are implemented in accordance with NEMA conditions of approval. They will also attend the monthly site inspection meetings for the project and be able to point out issues of concerns. Specifically the CDOs will oversee implementation of compensation aspects and other social issues such as complaints.</p> <p>Safeguards Capacity – Every district has a designated District Environment Officer whose responsibility is to monitor all environmental affairs of the district including compliance of activities with their jurisdiction. In addition, every district has a Community Development Officer who is responsible for mobilizing communities to participate in projects as well as coordinating and reporting on the impact of projects (positive and negative) on the communities. District Land Tribunals are also in place for some of the project districts to handle land related issues of the NUBSP. However, the districts (specifically the DEOs and</p>

	CDOs) will require facilitation to monitor project implementation as provided for in the ESMF budget.
MAAIF	<p>Mandate and Responsibility – MAAIF is responsible for policy formulation, planning, setting standards on irrigation, aquaculture and water for livestock. OPM/NUBSP will have to closely work with MAAIF to strengthen the Afforestation, crop production and veterinary extension services systems to address the beneficiaries’ demands of extension services.</p> <p>Capacity – Lack of capacity in some NUBSP districts more on veterinary professionals and services both at local government level and the private sector. This has greatly affected the delivery of the much needed veterinary services and inputs to the pastoralist communities. OPM/NUBSP will have to work with MAAIF to fill the human resource gaps in these districts by training more Community Animal Health Workers (CAHWs).The above is critical because of the need for training of the beneficiary groups on animal management practices to ensure sustainability. Equipping and strengthening the veterinary extension service system at district and sub county level is critical and should be prioritized.</p>
MoH	<p>Mandate and Responsibility - Health governance in Uganda is spearheaded by the MoH and shared with other ministries, health development partners, district leadership, providers (public and private), and representatives of civil society organizations (CSOs). The MoH is tasked with the role and responsibility of delivering on the health goals and objectives of government.</p> <p>Under decentralization law in Uganda, power, authority and resources are decentralized from the central government directly to the districts. Health services in Uganda are delivered within the framework of decentralization. The local governments are empowered to appoint and deploy public servants, including health workers, within the districts, through the District Service Committees. The local governments also plan for and oversee service delivery within the districts. The MoLG steers the local governments, which govern the District Health Offices. District Health Officers are responsible for performing the policy, planning, and supervision functions required of monitoring health services and products in the districts.</p> <p>Under NUBSP, CIGs in NUBSP will receive grants to finance activities that have the potential to yield short-term cash flow, such as the production of groundnut paste or fruit juices, the processing of sesame oil or sun-dried fruit, baking, milk processing, the production of smoked fish, maize flour, or cassava flour, starting a salon, tailoring, dress making, handicrafts, keeping poultry or pigs, or vegetable farming.”</p> <p>Quality of products and health and safety of the groups will be monitored by health staff</p>
NEMA	<p>Mandate and Responsibility - NEMA is specifically mandated under the National Environment Act (NEA) Cap. 153 as the principal agency in Uganda charged with the responsibility of coordinating, monitoring, supervising, and regulating all environmental management matters in the country. One of the key institutional mandates of NEMA include among others ensuring the observance of proper safeguards in the planning and execution of all development projects including those already in existence that have or are likely to have significant impact on the environment. The role of NEMA in NUBSP will be to review and approve environmental impact assessments and Project Briefs as well as monitoring project implementation in accordance with the National Environment Act and the respective regulations.</p> <p>Safeguards Capacity – NEMA has adequate technical capacity to monitor the NUBSP</p>

	through its Department of Environment Compliance and Monitoring in addition to the District Environment Officers in the respective project areas that will be able to report any cases of non-compliance. NEMA Environmental Inspectors do capture social issues/complaints during their inspections where feasible. However, NEMA is constrained by the small number of staff it has and in most cases does not monitor projects they deem of low-moderate environmental and social impacts. In addition, NEMA is also resource constrained since it does not have enough funds to take care of projects monitoring and compliance follow up. Overall, NEMA captures both environmental and social issues either through the mandatory annual compliance audits or through monitoring reports by the respective District Environment Officers who are gazetted Environment Inspectors. Therefore, there is need for close coordination between the DEOs and CDOs in order to fully integrate social issues into the monitoring reports prepared by the DEOs.
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Grievance Redress Mechanism (GRM)

TAAC under NUSAF includes a grievance handling arrangement which will be used in the NUBSP. Grievance handling will, at grassroots level, be anchored in Social Accountability Committees (SACs), and ultimately linked to the Inspectorate of Government (IG) headed by the IG at national level. The SAC will be focal points and will initiate a response to such grievances that shall be based on prevention, detection, and consequence. The SAC shall meet at least once every month and shall submit its reports to the Sub-county CDO and their respective beneficiary communities on monthly basis.

The grievance handling system will, depending on the severity and potential criminal liability of grievance, invoke referrals by the NUBSP grievance handling function to:

- refer the matter to the District Land Tribunal for land-related issues;
- The disciplinary regulatory system of the Ministry of Local Government (for Local Government employees at district level and below);
- The Inspector of Government (IG) for all levels of civil servants and elected government officials in accordance with the constitutional roles;
- The Police, Director of Public Prosecution (DPP), and the Judiciary as ultimately is the case with all Ugandan citizens in cases of criminal liability for collusion and corruption.

Under NUSAF2, the TAAC implemented a GRM through SMS and other convenient media of communication like mobile phone calls. **A toll free SMS Corruption reporting system called “Report 2 IG” will be used to report grievances as well in NUBSP.** The hotline **0414-347387** will allow citizens to report grievances to the IGG at no cost and at any time. The IG also has regional offices in Arua (**0476-420317**), Gulu (**0471-432569**), and Soroti (**0454-463201**)

Proposed 3 Year ESMF Implementation Budget for NUBSP

ITEM	,000 UG SHS		
	Year 1	Year 2	Year 3
Training of CDOs, DEOs, and NDOs in safeguards management (environment, social, vulnerability issues, GRM issues, monitoring and reporting etc.)	50,000		
Facilitation of CDOs, NDOs and DEOs to screen sub-projects	40,000		
Facilitation for extension workers (DVOs, DFOs, Community Animal Health Workers, agricultural extension staff etc.) to train beneficiaries and monitor implementation of	50,000	50,000	

safeguards (IPM and pesticide use, soil conservation, animal husbandry, etc.)			
Capacity building of Technical Staff	50,000		
Technical Back stopping and Compliance assessment	20,000	20,000	20,000
Sub-totals	210,000	70,000	20,000
Total Budget Estimates			300,000

Disclosure

This ESMF will be disclosed both in-country in one or two of the local dailies, on OPM's website and in the World Bank's info-shop in compliance with relevant Ugandan environmental regulations as well as in the World Bank Operational Policies. OPM will also provide copies of the respective environmental screening reports and RAPs (where applicable) for disclosure at the World Bank Info-shop for public access.

Conclusions

The overall environmental and social impacts of the NUBSP program are expected to be positive through alleviating pressures on the poor that lead to unsustainable exploitation of natural resources and environmental degradation. The community subprojects may involve limited degree of land take and displacement of land-uses and/or livelihoods. Therefore, by their nature, the project components 1 have localized negative environmental and social impacts. For this reason, the project is rated as EA category B. The project ties in the twin goals of the World Bank group of alleviating poverty and promoting shared prosperity. The potential environmental and social impacts can be adequately managed by integrating environmental and social due diligence into the subproject cycle. This ESMF provides a step-by-step guidance on how to identify potential adverse environmental and social impacts from project activities, and how to plan, implement and monitor measures to mitigate them.

Recommendations

The following recommendations need to be put in place in order to achieve better safeguards implementation under NUBSP:

1. **Extension services:** Extension services to the project beneficiaries especially in regard with veterinary extension services as many of the business investments may be in the areas of livestock and crop farming
2. **Training of beneficiaries:** Community trainings will require adequate budget and the training package will include husbandry measures, health and safety and as well handling, application and management of pesticides and accaricides during sub projects implementation to ensure that environmental issues are well managed and project sustainability.
3. **Waste Management:** OPM/NUBSP needs to consider providing a budget for waste management especially for biodegradable and non biodegradable waste generated in the facilities such as food processing and others so that CIGs ensure they are well managed.
4. **Consultation and inclusion of PWDs:** Consultation and mobilization of communities should take into consideration PWDs. The approach should take care on not only the lame but also the

deaf and the visually impaired. This will ensure that all categories of PWDs are systematically consulted and included in the planning and implementation of the project.

5. **Content of Operations Manual:** It was noted that most DEOs, NDO, and CDOs didn't have a copy of the NUSAF Environment Handbook and rely entirely on the Operations Manual which had gaps. It may be more useful if the NUBSP Operations Manual would contain more guidance on management of environmental and social issues and availed to district technical staff early enough to enable proper implementation of safeguards issues in the project.

1 INTRODUCTION

1.1 BACKGROUND

Government of Uganda has implemented successive development projects and programmes in the Northern and North-Eastern part of the country over the past two decades, to address development gaps created by the effects of civil strifes, insurgencies and cattle rustling perpetuated for long in the region. The recent interventions included the first *Northern Uganda Social Action Fund (NUSAF 1)* Project implemented with IDA support from February 5, 2003 to March 31, 2009. The NUSAF 1 was succeeded by the *Second Northern Uganda Social Action Fund (NUSAF 2)* Project that became effective on November 25, 2009 and will close on August 31, 2015. Other key interventions to enhance the livelihood of persons in the Northern and North-Eastern region include Karamoja Livelihood Program (KALIP), Northern Uganda Agricultural Livelihoods Recovery Programme (ALREP) and National Agriculture Advisory Services (NAADS); amongst other undertakings by Government, Agencies, and International NGOs.

1.2 NORTHERN UGANDA BUSINESS ADVISORY SUPPORT PROJECT

The Northern Uganda Business Advisory Support Program (NUBSP) is a pilot project to complement the NUSAF 3 Project, which is well aligned with the Bank's Country Assistance Strategy (CAS) and the government's National Development Plan (NDP), and Peace, Recovery, and Development Plan (PRDP) in its poverty alleviation and growth efforts. The proposed program will complement the IHISP of NUSAF3 by integrating the provision of business management training and follow-up business advisory services through extension of support to the Community Interest Groups (CIGs) and other very poor individuals in Northern Uganda to help them increase their income in a sustainable manner. NUBSP Project will be funded through a US\$ 2.857 million equivalent grant of the Japan Social Development Fund (JSDF) and will operate over a period of three years. The programme will be piloted in the four districts of Kitgum, Gulu, Nebbi, and Soroti. The criteria for selection of the pilot districts are based on the poverty map and variety of sub-projects implemented under NUSAF 2 and 3. Besides Karamoja sub-region and some parts of North-Eastern Uganda which have exceptionally high incidence of poverty, with 74 percent of the population living below the national poverty line, the poverty map depicts the second highest concentration of poverty in Kitgum and Gulu districts; while Nebbi and Soroti have a wide variety of sub-projects, including farm and non-farm activities, being implemented by the Community Interest Groups under NUSAF2. In addition, the completion of subprojects and accountability of funds disbursed under NUSAF2 for the four districts were 100 percent by the end of the project period.

1.3 THE PROJECT DEVELOPMENT OBJECTIVE (PDO)

The development objective of this project is to improve and sustain the incomes of poor households belonging to existing and new Community Interest Groups (CIGs) in the four pilot districts (Kitgum, Gulu, Nebbi, and Soroti) in northern Uganda. The project development objective will be achieved by providing business skills training, small grants, and follow-up business advisory services to existing and new CIGs.

1.4 PROJECT FINANCING AND DURATION

The NUBSP project will be funded through a US\$ 2.857 million equivalent grant and will operate over a period of 3 years.

1.5 PROJECT COMPONENTS

1.5.1 COMPONENT 1: BUSINESS TRAINING, SMALL GRANTS AND FOLLOW-UP BUSINESS ADVISORY SERVICES TO CIG COMPONENT

This component will support the formation of 240 new CIGs and also support the provision of training, small grants, and follow-up business advisory support services to the new CIGs, as well as the provision of business skills training and follow-up business advisory support services to 120 existing NUSAF2/ 3 CIGs in the pilot districts of Gulu, Kitgum, Nebbi, and Soroti.

1. **Component 1** will support five activities: (i) the formation of new CIGs and the identification of possible income-generating activities based on an assessment of the local market; (ii) the provision of business management training both to new and existing CIGs and help with the production of their business plans; (iii) the provision of small start-up grants to new CIGs to enable them to start their income-generating activities; (iv) the establishment of a mentor support system; and (v) the provision of follow-up business advisory services. The details of the activities are presented below.

(i) **Subcomponent 1.1: Identification and Supporting the formation of New CIGs.** This will involve mobilizing and raising awareness of the new project in the relevant communities. This effort will be coordinated with local community leaders and sub-county technical staff. The poorest households will be chosen using NUSAF3 selection procedures.² The new CIGs will be trained to undertake value-added and/or service-based activities that have been proven to be the most viable in their particular environments. The activities will be chosen based on the interest expressed by the CIGs and on local demand based on a local market assessment.

(ii) **Subcomponent 1.2: Providing Business Management Training to CIGs.** Basic leadership and business management training will be provided to 240 new CIGs to enhance their capacity to formulate business plans of their income-generating activities complete with projections of expected revenues and expenses. This training will last for five days and will be provided by consulting firms or NGOs procured locally on a competitive basis. The first three days of the training will be focused on business planning including financial, marketing, and operations planning, while the last two days will be focused on group dynamics (for example, the leadership skills needed to solve group problems) and the formulation of a group business plan (including how to support individual member entrepreneurs with collaborative marketing and economies of scale). There will be two trainers running sessions for the members of two CIGs at the same time. The same trainers will be responsible for providing the follow-up business advisory services to the same CIG members. Each CIG has between 10 and 15 people, each of whom is representing their own household. The five days of training will be spread over a period of time (about two to three weeks) to allow the trainees to reflect on what they are learning and put it into practice, while at the same time allowing them time to continue attending to their businesses. The trainees will also need time during the training period to collect data for their business plans. The implementing partner will use and leverage existing infrastructure in the communities like nearby schools, churches, and community centers for training so that the trainees do not have to travel far from their homes.

(iii) **Subcomponent 1.3: Providing Small Grants to the New CIGs.** The existing CIGs will not receive any business training or small grants because they have already received similar training and grants under the NUSAF 2 project. However, the project will provide follow-up business advisory services to the existing 120 CIGs. The new CIGs will be formed by individuals from poor households (10 to 15 individuals per CIG) following the NUSAF 2 participatory process. The rationale for the formation of new CIGs stems from the fact

² NUSAF 3 selection is based on the knowledge that neighbours have of each other and of who are the poorest households in the community. Self-reported poverty may not be accurate, but the neighbours know who the vulnerable poor are.

that the majority (over 85 percent) of the existing CIGs are focused on traditional income-generating activities, such as cattle and goat rearing, which take a relatively long time to generate income. It is envisaged that the project will guide the new CIGs towards value-added and service-based activities that have the potential to generate higher incomes in a relatively short time. This will also help to widen the choice of income-generating activities for the poor communities.

Upon completing the business training and submitting a business plan, each CIG will receive small grants not exceeding \$2,000 to start their income-generating activities. These can be any activities that have the potential to yield short-term cash flow, such as the production of groundnut paste or fruit juices, the processing of sesame oil or sun-dried fruit, baking, milk processing, the production of smoked fish, maize flour, or cassava flour, starting a salon, tailoring, dress making, handicrafts, keeping poultry or pigs, or vegetable farming. If their business is successful for the first six months,³the CIG may be able to apply for an additional grant of a maximum of \$2,000 per group on the basis of an updated business plan. The requirement associated with this additional grant will be that the group must use it to establish a revolving fund that will provide members with small loans to expand their businesses as per their revised plan. The revolving fund will be managed by a community council will make rules and regulations relating to the administration of the revolving fund, including deciding the interest rate to be paid by members, reviewing and approving requests from members, and setting the repayment terms. To strengthen provision of small grants, following selection criteria will be followed to ensure sustainability. Selection criteria -

The pilot will be implemented in only a specific number of villages in four pilot districts, and the community mobilization and sensitization will be conducted in only those target villages. Once target villages have been identified, a joint team, comprised of parish chiefs, Local Council 1 members (LC 1) and community facilitators engaged by the service provider will conduct social mobilization in target villages. This team will work under the leadership of the Community Development Officer (CDO). The aim of this social mobilization will be to ensure that all households (including elderly and disabled household members) in target villages are aware of this project, the activities supported, who is eligible and how to access support. Following the mobilization a community targeting exercise will be conducted to identify those households that are eligible for the pilot. The targeting process in target villages will take 6 days, and will comprise of following steps: i) sensitization and awareness; ii) Community profiling; iii) Identification of target beneficiaries; iv) Verification and validation; v) Display the final list of beneficiaries in the village; vi) Approval of the final list by village community. Households eligible for and interested in the IHISP will be able to nominate one representative to be a member of the Community Interest Group. The recommended size of a Community Interest Group is 10-15 members of which at least 50 percent will be women. Repayment mechanism - The revolving fund will be managed by a community council elected by the general assembly of the village. The council will be composed of respected community members who are not members or representatives of the CIG (in other words, any potential beneficiaries of the revolving fund). The community council will make rules and regulations relating to the administration of the revolving fund, including deciding the interest rate to be paid by members, reviewing and approving requests from members, and setting the repayment terms. Overall, the community council will do following to ensure sustainability: review and approve the livelihood business plans and loan request from the groups with the support from the Sub-County/District Technical task team; ii) sign the financing agreement and disburse loans to the groups whose livelihood business plans have been approved; iii)monitor the loans provided to the groups to ensure that they are being used for the desired

³ Because six months may be too short a time to gauge performance on the basis of any income or profit generated from the activity, other processes may be used to gauge the performance of a group. These may include the group's record keeping, its sales revenue realized as a percentage of forecasted sales revenue, or the extent to which a group work together as depicted by the number of meetings attended by all members, the number of joint tasks performed, whether a group has a bank account, whether a group has a code or internal rules to govern its members, the existence and organization of minutes of group meetings, and the extent to which the business plan is being implemented. The details will be in the operations manual.

purpose in accordance with their livelihoods business plans; manage recovery of loans from the groups and payment of agreed interest rates/ service charges; keep records of funds and support CIGs to maintain records; prepare financial and progress reports and share with CDO and NDO and all the groups on a monthly basis; convene quarterly general meetings with CIGs; ensure all the groups are registered at village level; ensure CIGs develop and follow by-laws and are adhering to agreed principles (regular meetings, regular savings, regular repayment, inter loaning, regular repayment); periodically assess and grade CIGs; link and support CIGs in opening their group accounts in banks or any other reliable and properly regulated financial institutions; monitor quality of functioning of CIGs; and provide support for maintenance of accounts and auditing of CIGs.

(iv) Subcomponent 1.4: Providing Support to mentors and Facilitating Learning Workshops. The mentors will be members of CIGs who have already put their business plan into action and are running profitable and sustainable income-generating activities. These mentors must have demonstrated a sound grasp of business management skills and must be willing to become local business advisors to mentor other CIGs within their locality. A database of all such income-generating CIGs will be prepared in each district. Based on this, the 10 most successful entrepreneurs will be selected using criteria that will be set out in the operations manual. These people will then be chosen to be mentors and business development advisors for other CIGs. They will work under the supervision of the training service providers, sharing their experiences in managing their own businesses and helping the CIG members to address some of their challenges.

In addition to this, the project will organize learning workshops for 10 mentors in each district to share experiences, lessons, challenges, and needs related to providing follow-up business advisory services to CIGs. These workshops will be organized by the training service providers on a regular basis in liaison with the District NUSAF Officer and the Community Development Officer(CDO). Another objective of these learning workshops will be to ensure that the mentors are motivated and are given the help that they need to continue to act as mentors even after the project has ended.

(v) Subcomponent 1.5: Providing Follow-up Business Advisory Services to CIGs. The follow-up business development advisory services will be provided to improve the income-generating activities of new and existing CIGs by increasing their productivity and improving the quality of their products or services and their collaborative marketing efforts. The follow-up business advisory services will be provided to each CIG for a maximum of one year. The proposed services will be provided by the service provider staff as well as mentors. The service provider will hire their staff locally, and will be trained in business skills and most importantly have years of experience within the environment of small enterprises in the target districts. The service provider will also recruit mentors from the community to provide business advisory support services to the CIGs in the second stage of the project. Since providing follow-up business advisory services is a new and innovative way to support the poor in the northern region, the pilot will test the most effective way to do this. Therefore, these services will be provided to CIGs for different lengths of time up to a maximum of one year to determine how long poor entrepreneurs are likely to need follow-up support after completing business skills training. The Project Operations Manual will specify the details how long follow-up services will be provided to different groups of CIGs. With the baseline and end survey data, it will be possible to estimate the medium-term impact of different combinations and lengths of the business management training and follow-up business advisory services on beneficiaries' income-generating activities. If the project is successful, then it can be integrated into any future programs related to the income-generating activities of the poor.

COMPONENT 2: PROGRAM MANAGEMENT AND ADMINISTRATION, MONITORING AND EVALUATION AND KNOWLEDGE DISSEMINATION COMPONENT

This component will support the operational expenditures related to the management and the monitoring and evaluation of the project. Its support will strengthen the project's planning and coordination of activities, as well as the monitoring of its implementation. The coordination of the project and the accountability for project resources are both the responsibility of the Permanent Secretary in the Office of the Prime Minister with the support of the established NUSAF technical support team (TST) and the project manager. This component will finance three activities: (i) program management and administration; (ii) monitoring and evaluation (M&E); and (iii) knowledge dissemination. In order to ensure good program management, governance, and accountability, including financial management, within the TST, the implementing districts, and associated partners, this component will provide financing for basic grant administration and monitoring and evaluation. Through its knowledge dissemination subcomponent, it will also help to ensure that lessons learned from the project are widely shared.

(i) Subcomponent 2.1: Program Management and Administration. This sub-component will cover the overall program management and administration of the project including: (i) hiring a project manager; (ii) auditing; (iii) carrying out an environmental assessment if any new CIG activities seem likely to have an impact on environment; and (iv) supporting the other operational costs incurred at the national, district, and sub-county level during the administration of the project. This budget will also be used for the planning, implementing, and technical oversight of Component 1.

(ii) Subcomponent 2.2: Monitoring and Evaluation. This subcomponent will cover M&E and all reporting related to the project. This will include regular reports on the program's progress, financial reporting, and the participatory monitoring of outputs and outcomes that will involve the beneficiaries. It will also include the production of impact evaluation and implementation completion reports at the end of the three years of the project. The requirement to produce an impact evaluation is justified by the fact that provision of business management training coupled with business advisory services to poor communities is an innovation in Uganda, and little is known about how it might affect on household income or the growth and sustainability of businesses. Therefore, the impact evaluation will measure: (i) the effect of business management skills training without follow-up business advisory services on the beneficiaries' income generation and the growth and sustainability of their businesses; (ii) the effect of different times and lengths of follow-up advisory services on the beneficiaries' income generation and on the growth, and sustainability of their businesses; and (iii) the effect of the project on the generation of income by different categories of activities. This will require the establishment of a comparison group in order to have an indication of what would have happened to the project participants if the project did not exist. To provide this information, the project will support the costs involved in carrying out an initial survey to collect baseline data and an end survey to collect impact evaluation data.

In addition, an online management information system (MIS) will be developed to continuously capture routine data on a set of input, process, and output indicators to enable service providers, and district and sub-county officials to track and report on the progress of the program. The details of which input, process, and output indicators will be captured by the MIS will be given in the Project Operations Manual.

(iii) Subcomponent 2.3: Knowledge Dissemination. This sub-component will support efforts that will ensure that lessons learned from the project are fully shared with all stakeholders. Disseminating this knowledge will ensure that the weaknesses and strengths of this pilot project are available to inform the development of similar income-generation projects. Furthermore, lessons learned about any synergies between this project and existing social protection and rural enterprise projects targeted to the poorest of the poor will help the government and its development partners to consolidate good governance practices in the management of their projects. This knowledge dissemination component will support: (i) the development of a documentary promotion video; (ii) workshops at the national level to share the lessons learned from the project with policymakers, development partners, and other relevant stakeholders; and (iii) a series of learning notes to disseminate lessons from the pilot with a wider range of stakeholders.

1.6 PROJECT LOCATION

The program will be implemented in selected NUSAF-2 and 3 districts of Kitgum, Gulu, Nebbi and Soroti concentrated in northern and eastern Uganda. The distribution of poverty and vulnerability in the country demonstrates the need for a national program, which is not feasible given the available financing. Therefore, the criteria for selecting the districts to participate in the Japan Social Development Fund operation was determined by the capacity built in the NUSAF 2 areas.

1.7 CORE BENEFICIARIES

The main beneficiaries will be the existing and new CIGs formed by poor and vulnerable households located in Kitgum, Gulu, Nebbi, and Soroti districts. The existing CIGs were formed under the HISP of the NUSAF 2 Project, and the new CIGs will be formed under this proposed project. The members of the new CIGs will belong to poor and vulnerable groups such as female-headed households, people with disabilities, and vulnerable youths, among others.

The grant will benefit 120 existing and 240 new CIGs.⁴ The members of the CIGs will complete training in management and technical skills development and will produce business plans. The existing CIGs to benefit from this pilot initiative will be selected from those supported by the NUSAF 2 Project, while the new CIGs will be formed through a participatory process that was previously used by NUSAF 2 as well for NUSAF3 in the formation of the existing CIGs. There will be 4,680 direct beneficiaries within the 360 CIGs, and the project will strive to ensure that at least 50 percent of the members of the new CIGs are women (the existing CIGs consist of more than 50 percent women).

2 SAFEGUARD LESSONS ON PREVIOUS NUSAF2 PROJECT ESMF

NUSAF2 Safeguards Implementation has been guided by Environment and Social Management Framework (ESMF), the NUSAF Environment Handbook, the NUSAF2 Operations Manual and as well as the Resettlement Policy Framework (RPF) that were developed for the project. These four reference documents have been used to give guidance to ensure that the NUBSP project is implemented in an environmentally and socially sound manner in line with the relevant World Bank policies and Ugandan laws.

2.1 GAPS IN THE ESMF FOR NUSAF2

A review of the ESMF for NUSAF2 was undertaken as one of the key tasks in preparation of NUBSP as well as implementation of the safeguards in the project areas and amongst issues noted included:

2.1.1 LACK OF CHANCE FINDS PROCEDURES

The NUSAF2 ESMF articulated the need for careful planning prior to undertaking subproject activities to avoid irrevocable damage to cultural resources and these were observed to be amongst the key assets that deserved attention and to be keenly preserved. However, no mechanism for Chance Finds Procedures was provided to guide management of such assets in case of accidental encounters.

However, in this ESMF for the NUBSP, a Chance Finds Procedure has been outlined (Annex 8) for management of accidentally encountered Cultural resources in the project as well as in the management of

⁴ The average number of members in a CIG is 13, with most CIG having between 10 to 15 members.

known PCRs including avoiding such sites, relocation or translocation and where unavoidable, compensation. The procedures include useful contact information.

2.1.2 LIMITED COVERAGE OF BASELINE DATA

The ESMF for NUSAF2 provided generic baseline environment for Uganda and very little project area specific baseline information. In view of these limitations in the NUSAF2 ESMF, **the ESMF for NUBSP is fairly explicit and broad in its coverage. Chapter 3 presents environmental and social baseline information that includes the following among others:**

- a. Climate
- b. Topography
- c. Land tenure
- d. Social organization
- e. Economic and livelihood data
- f. Gender issues
- g. Literacy levels

The above information will enable the NUBSP'S implementing agencies to have a better idea of the characteristics of the project areas, the challenges to be expected and the strategies to enhance the project benefits as well as community ownership of the project among other critical issues.

2.1.3 LIMITED INFORMATION ON LAND TENURE SYSTEMS

The NUSAF2 ESMF simply stated that “Land in northern Uganda is predominantly owned under customary land tenure” yet the NUSAF2 areas cover more regions apart from Northern Uganda. It is worth noting that different regions of Uganda have different land ownership and use arrangements. This means it is important to understand how projects implemented on community land are supposed to be owned in order to avoid conflicts.

This ESMF for NUBSP provides a detailed description of land tenure and use systems for the different NUSAF project areas. This will guide the implementing institutions to understand the land ownership issues for the different regions to guide acquisition and compensation where applicable.

2.1.4 LACK OF ASSESSMENT OF SAFEGUARDS CAPACITY IN INSTITUTIONS

NUSAF2 has a number of institutions that play a role in its implementation such as Ministry of Agriculture, Animal Industry and Fisheries (MAAIF), Ministry of Gender, Labour and Social Development (MoLGSD), Ministry of Works and Transport (MoWT), Ministry of Education and Sports (MoES), and Ministry of Health (MoH) among others. It was important that, the different institutions are assessed in terms of their capacity to effectively implement safeguards provisions in the subproject entities they were implementing. For example, every line ministry would be expected to have an Environmental Specialist and Social Development Specialist to guide on safeguards implementation. This capacity assessment was not provided in the NUSAF2 ESMF yet it is critical to ensure that there is an adequate budget for capacity building and training for safeguards management.

In the NUBSP ESMF, attempts have made to assess the capacity needs of its partner implementing institutions and proposals made on how they can address those needs proposed in terms of recruitment or training of the technical support staff on safeguards issues.

2.2 LESSONS LEARNT IN THE IMPLEMENTATION OF SAFEGUARDS IN NUSAF2 PROJECT

2.2.1 LACK OF ADEQUATE TRAINING IN SAFEGUARDS ISSUES

In the NUSAF2 ESMF, it was observed that in most projects under NUSAF1, environmental issues were considered in subproject design and funds budgeted for mitigation measures out of community contribution; however mitigation measures were largely not implemented.

According to the NUSAF2 ESMF, training programs were to be coordinated and anchored within the Technical Support Team (TST) at both national and at districts and local government level. Short term consultants were to be called upon through competitive recruitment process to develop and conduct such short term trainings on various aspects of implementing the ESMF guidelines. The training modules were clearly stated in the ESMF and a budget highlighted. However, that was not implemented reportedly due to a number of reasons.

Therefore, the issue of lack of adequate training has been encountered for both NUSAF1 and NUSAF2 projects and it is a critical issue that needs to be finally addressed in NUBSP. A clear budget for ESMF implementation has been proposed in this ESMF and OPM has committed to it.

It is worth noting that, the structure for the management of safeguards is well designed in NUSAF2. There is a designated Environment and Social Safeguards Specialist at NUSAF Secretariat to manage safeguards issues in NUBSP. At district level, there are District Community Development Officers, District Environment Officers, and Environment Focal Persons at the sub-counties charged with the management of safeguards (NUSAF2, 2015).

2.2.2 CAPACITY TO IMPLEMENT SAFEGUARDS

District, Sub-County and Parish level staff were not given sufficient orientation and training on the project. The District political and technical leadership lacked understanding of the project especially during its initial phase. The project also did not reach out to inform communities in all the villages. One of the important lessons from NUSAF 2 implementation is that the District with well-informed political and technical leadership performs better. ***Therefore orientation and capacity building of District, Sub-County and Parish level officials will be critical in NUBSP.***

2.2.3 SUBPROJECT SCREENING AND APPROVAL

According to district cumulative reports, five main critical issues have been identified across projects that were thought to be critical to be safeguarded in NUSAF2 projects and these included de-vegetation (tree cutting and over grazing), soil erosion, run offs, solid waste issues, pollution and health hazards (OPM, 2015). In addition these issues were also site-specific and by component and districts endeavored to utilize the Environment and Social Checklist to identify mitigations to address the identified issues which were then included in the respective Environment and Social Management Plans for Costing (OPM, 2015).

In summary to date, all the NUSAF2 approved sub projects have all been screened for their likely environment and social negative impacts. Districts according to their filed subproject documents endeavored to utilize the Environment and Social screening forms, gender Matrix, and as well Environment Checklists that outlined

guidance on specific activity and its possible mitigation measures applicable to all identified NUSAF2 Menu for all components (OPM, 2015). *The same need to be replicated in NUBSP program*

2.2.4 WASTE MANAGEMENT

Types of waste and waste management measures in HISP vary from districts and also from the type of technology or enterprises implemented by farmers (OPM, 2015). Waste type across NUSAF2 HISP subprojects range from kitchen waste (catering facilities), livestock waste (from piggery, dairy, cattle and goats), crop waste, poultry waste, used oil (from weldings, carpentry, millers, rice hullers etc.), and chemical wastes (acaricides, pesticides, fertilizers and saloon chemicals). Most of these wastes are biodegradable and only chemical waste as outlined above are inorganic and are not easily degraded which called for their proper management by the beneficiaries through targeted capacity building for their proper handling. According to field assessments made by the safeguards unit to districts, two main waste management measures have been commonly implemented by the farmers that include collection and safe disposal of waste in garbage pits (kitchen waste, rice hullers, carpentry etc.) and re-use of waste mainly from livestock, poultry, and crops(OPM, 2015).

It is recommended that a specific budget item under NUBSP environmental mitigations is included to cater for waste management issues in all its CIG Business support investments rather than leaving to the owners to do it on voluntary basis as some of the waste can be recycled.



Figure 1: Some of the Agricultural Waste handling by Bududa HISP beneficiaries

Budgets for Mitigation

Field consultations revealed that a uniform budget was allocated to put in place mitigations for subprojects. For example, in Gulu District, a budget of UGX 600,000 was set aside for the environmental issues on each Community Infrastructure Rehabilitation (CIR and Public Works Projects (PWP) subproject and 300,000 for all HISP agriculture and non agricultural projects.

However, it is important to appreciate that, mitigations measures required vary from sub-project to sub-project and therefore the budgets for mitigations should be based on the required mitigations based on the screening results. This needs to be considered under NUBSP.

2.2.5 PUBLIC CONSULTATION DURING MOBILIZATION

In NUSAF 2, OPM noticed that, not all Household Heads (HHs) attended the meetings and therefore, were not involved in the mobilization process in the target villages. Also, only few villages were targeted and covered. *Therefore, in order to ensure increased coverage and participation of community in the mobilization process, the mobilization in NUBSP will involve the following:*

- *Mobilization to be carried out by a joint team comprising the Parish Chief, LC1 and Community Facilitators in all the villages in the Parish;*
- *All HHs in the village shall be informed and involved in the process. The team shall ensure all elderly and disabled persons are informed;*
- *The mobilization team shall use community radio, community notice boards and places of workshops like Churches and mosques to mobilize the community.*

2.2.6 INCLUSION OF WOMEN

Gender mainstreaming has been observed across all project components of NUSAF2. This is evident in the management and implementation structures, allocations of the completed structures on CIR and as well in the PWP and HISP projects. This will vary across all components. For instance, in HISP sub projects, women beneficiaries dominated this component than in PWP road projects (OPM, 2015).

For instance communities in districts visited like Kitgum and others during the study confirmed the low female participation due to the above-mentioned. Females cannot fully participate in PWP because of their other family roles and during the rainy seasons, they are fully engaged in farming activities. *This therefore necessitates that, the NUBSP project menu needs to have projects favoring women participation just like in HISP in NUSAF2. Adequate sensitization is also critical in this case in regards to women selection of enterprises to be financed as women tend to be busy during farming period.*

The sharing of sub project benefits so far delivered is in line with the gender provisions of NUSAF2. The 50/50 sharing of project benefits has so far been observed, with benefits being distributed equally between female and male beneficiaries especially under HISP. Indicative Planning Figures (IPFS) as well are distributed equally according to the number of sub counties in districts and also disparities within regions has been addressed (OPM, 2015).

2.2.7 SUBPROJECTS AND ACTIVITIES FOR VULNERABLE GROUPS

Under NUSAF2, broader universal social inclusion has also been pursued to ensure that all vulnerable categories including; PWDs, PLWA, Widows/Widowers, Orphans, Child mothers, Ex- combatants, IDP

Returnees, Dis-harmed Karamojong, and Female headed households, Land mine victims and others are equally and equitably brought on board in line with the Project targeting goals (OPM, 2015).

The project has endeavored to address regional and sub-regional economic and social disparities in terms of coverage. All population sub groups in the communities have been meaningfully engaged in the subprojects including youth, young and older women and persons with disabilities among others. The male have particularly benefited from employment in PWPs, while women have benefitted from HISPs (OPM, 2015).

Based on the experience from implementation of NUSAF 2 HISP Component, a menu of successful and productive livelihood activities will be prepared to enable poor and vulnerable households to make an informed selection of their livelihoods activities for stable and sustainable income earning and graduation out of poverty. ***There is a need in NUBSP to create diversified menu of possible and viable livelihoods to allow more diverse income generating options.***

2.2.8 CONSULTATION AND INCLUSION OF PWDS

CIR of NUSAF2 component promoted universal designs that enable both gender access and equality. The institutional VIP Latrine designs separate toilets for men and women and boys and girls. Also provisions are made for a shower room, a ramp and as well grip bars to cater for teachers, health workers and pupils with disabilities (NUSAF2, 2015).

However, gaps in consultation strategy were noted during NUSAF2 implementation. During NUSAF2, PWDs were consulted, particularly those in leadership positions. However, the consultation was inadequate because it did not take care of the information needs of the deaf and the visually impaired. To be effective there is a need for sign language interpretations services and information in Braille as may be applicable.

The consultation process targeting every community member in NUBSP should fully recognize the different needs of community members such as PWDs who might need sign language interpretations services and information on NUBSP in accessible formats. PWDs also need to be involved in leadership (subproject committees) in order for them to influence issues on disability.

2.2.9 LACK OF SUPPORT TO BENEFICIARIES

The NUSAF2 Implementation Manual states that, “Communities are expected to implement subprojects that are affordable and within their capacity to manage and maintain.” During the implementation of NUSAF2, the TST and Districts mainly focused on generation and approval of sub-projects. There wasn’t much support for beneficiaries during and post implementation of sub-project. A number of NUSAF2 Desk Officers raised the issue of lack of training of beneficiaries to sustainably manage their subprojects and where training has been done, it has been for a very short period and inadequate.

Under NUBSP, in order to provide implementation support and follow up mentoring to community and beneficiaries, an implementation support team at Sub-County, Parish and Community level will be put in place.

The Core Technical Group at the Sub-County level will be responsible for supporting the implementation of Livelihoods Component at Sub-County, Parish and Community level. This team will be led by CDO and comprises Parish Chiefs, Parish Development Committee (PDC), LC1, Extension staff and community facilitators. In the successor project, Sub-Counties will act as the nerve centers for monitoring and supporting

the implementation of Livelihoods Component and CDOs will coordinate all activities at this level. Two persons from PDCs will support implementation in their respective Parishes. The persons to be designated from PDC will be decided by Sub-County Technical Planning Committee (STPC), based on a TOR. The PDC members would concentrate on supporting Community Mobilization, Targeting, Community Institution building, Generation and implementation of sub-projects.

In this NUBSP program, Community facilitators will be selected from the community and trained by the project and would be engaged for the longer duration. These facilitators will work closely with Sub-County Core Technical Team led by CDO and comprising of Parish Chiefs, PDC, LC1 and extension staff to provide support during implementation as well as provide follow up mentoring support after implementation. Tools used for EPRA process would also be simplified, shortened and translated in local languages.

2.2.10 GRIEVANCE REDRESS MECHANISMS

Under NUSAF2, the Transparency Accountability and Anticorruption (TAAC) implemented a GRM through SMS and other convenient media of communication like mobile phone calls. A toll free SMS Corruption reporting system called “Report 2 IG” with the slogan, “Expose Corruption” was launched in 2013. The hotline allows citizens to report grievances to the IGG at no cost and at any time.

However, a systematic way for capturing information and data on appeals and complaints has not been generally operational. Yet, the latter would be an important mechanism to ascertaining transparency and accountability in terms of whether project beneficiaries who have grievances are able to register them, and if the registered, whether concerned committees and/or authorizes take necessary action and on time. This intervention will foster a sense of responsibility and ownership among the citizenry by introducing a mechanism for the community level committees to become the first level of instance for grievances handling and referral to the IG if no resolutions will have been reached.

During field consultations, some NUSAF2 Desk Officers raised a concern of the limited human resource capacity of the IG. An example of West Nile where the IG has only 3 Officers to monitor all government activities in the region was cited. ***They recommend that OPM should involve the office of the RDC and GISO in monitoring of NUBSP projects together with the IG’s office.***

2.2.11 LAND ACQUISITION ISSUES

A Resettlement Policy Framework (RPF) for the NUSAF2 project has enabled extensive guidance on all issues related to land acquisitions. NUSAF2 safeguards unit as well developed a uniform voluntary land consent form which community beneficiaries have successfully used to consent on all the lands they voluntarily gave to support their projects (OPM, 2015). This was also made easier for investments particularly of CIR and PWP such as constructions, water, and roads which would otherwise cause conflicts, but as an access condition before approval of any project for funding, communities had to consent on availability of land.

Districts had to ensure such investments were in their respective District and sub county development plans to avoid duplication and to ensure constructions projects done in the existing structures such schools, Health Centers, etc. Meanwhile, in the case of roads, each community member that lived adjacent on either sides of the road and had contributed land had to consent on community minutes for meetings held by CPMCs regarding voluntary land giving. For HISP, a representative of a group would consent on behalf of other group members and all these documents are filed on respective community sub project files (OPM, 2015).

2.2.12 MONITORING AND REPORTING

Clarity of projects Key Performance Indicators (KPIs) is important as it enables demonstration of results achieved by the project. NUSAF2 KPIs developed do not adequately capture all safeguards outputs (OPM, 2015). *NUBSP monitoring, evaluation and reporting system should look critically on identifying clear KPIs that can support the project to demonstrate well safeguards results.*

2.3 NORTHERN UGANDA BUSINESS SUPPORT PROGRAM ESMF

2.3.1 PURPOSE AND JUSTIFICATION

The World Bank Safeguards Policies for Investment projects requires proper preparation of an ESMF and an RPF to guide assessment and management of potential Environmental and Social safeguards issues.

2.3.2 APPROACH AND METHODOLOGY IN ESMF PREPARATION

2.3.2.1 REVIEW OF EXISTING LITERATURE/DOCUMENTATION

Some of the key documents that were reviewed include:

- ❖ ESMF for NUSAF2
- ❖ NUSAF2 Safeguards Summary Implementation Status Report January 2015
- ❖ NUSAF2 Operational Manual
- ❖ NUSAF2 Environment Hand Book
- ❖ Uganda Environment policy documents
- ❖ World Bank Safeguards Policy Documents
- ❖ Uganda Resettlement Policy Documents
- ❖ Pest Management Plan of Agriculture Cluster Development Project (ACDP)
- ❖ Social Protection Policy Documents
- ❖ Environment Impact Assessments Regulations and others

2.3.2.2 FIELD VISITS AND IMPACTS IDENTIFICATION

All the NUBSP proposed project implementation areas (Kitgum, Gulu, Nebbi and Soroti) were among the 22 districts sampled that were visited through deliberate inspection of their respective characteristic features i.e. the environmental and social setup to initiate a baseline before project implementation. This was done with a view of assessing the values that are likely to be affected and identifying the potential impacts of the project components. An interaction with the respective persons in these locations was carried out to capture their input.

2.3.2.3 STAKEHOLDER CONSULTATIONS

Stakeholder consultative meetings were conducted with the key agencies (local and national levels) to document their input and experience in the use of environmental and social tools in NUSAF1 and NUSAF2 projects and what they would expect to be incorporated in the ESMF for the new Project. Key findings of stakeholder consultations are mentioned in the ESMF and details presented as an Annex. Among others, the following were consulted and their views recorded, analyzed and appropriate measures recommended as part of the EMSF where necessary: OPM-NUSAF Secretariat, MoWT, MoES, MoWE, MoH, MoGLSD, MAAIF, District Local Governments, and possible project host communities, among others.

3 BASELINE ENVIRONMENTAL AND SOCIAL INFORMATION

An attempt has been made to document the key baseline environmental and social settings relevant to the NUBSP program districts have been summarized herein.

3.1 NEBBI DISTRICT

This covers the planned NUBSP district of Nebbi and its baseline information is summarized as follows:

3.1.1 PHYSICAL AND BIOLOGICAL ENVIRONMENT

3.1.1.1 CLIMATE

Nebbi district experiences tropical climate and receives a bi-modal annual rainfall of about 1,267mm with distinct dry periods that begin from December to February. November and March have moderate rainfall. The two major peaks in rainfall occur in April (short rainy season) and between August and October (major rainy season). Areas along the Nile receive less rain (860mm) than the rest of the district areas. Temperature is generally high except in parts of Padyere County including Erussi Sub-county and Nebbi Sub-county (Goli area)

3.1.1.2 LAND DEGRADATION

The typical size of an individual family land holding varies from half to three acres on average in the district. Land fragmentation has led to over cultivation without soil conservation measures and the traditional fallow periods (at least 3 years) eliminated in most parts. This situation has led to severe loss of soil through erosion and declines in soil productivity.

3.1.2 SOCIO-ECONOMICS

3.1.2.1 LAND

Typical land holdings vary generally from half to about three acres per household on average and more than half of the farmers would like to cultivate more land. This situation varies significantly; farmers in the less populated areas have bigger plots than farmers elsewhere in the region.

Land in the region is held under four tenure systems as described below: -

- ❖ Customary land tenure; means a system of land tenure regulated by customary rules which are linked in their operation to a particular description or class of persons. Land acquisition under this system is usually through inheritance. Land is allocated by a father to his sons who in turn assign it to their wives to cultivate. According to the law, women can inherit property (and thus land), although in the patriarchate societies in the district, this is virtually never the case, so women tend to be excluded from having control over this basic resource.
- ❖ Leasehold land tenure; means the holding of land for a given period from a specified date of commencement, on such terms and conditions as may be agreed upon by the lessor and the lessee. Land

can be leased (to a maximum of 500 acres) from the state and this currently is done by very few farmers. In case land to be leased is held under customary land tenure system by some individuals, these previous owners with customary claims are compensated before leasing it to the new owner.

- ❖ Communal land tenure system; this system is gradually disappearing due to increase in population size. Communal land is used for grazing livestock. It is common in all sub counties.
- ❖ Mailo land tenure system.

3.1.2.2 SAFE WATER COVERAGE

Total number of safe water sources is 3,830. Functional water sources are 3095. The number of boreholes in the District stands at 968. Functional boreholes stand at 76% and safe water coverage is at 76%. Running water is available in Pakwach Town Council, Nebbi Town Council and at a small scale in Erussi Sub-county.



Figure 2: A man collecting water from a borehole constructed by NUSAF in Andhak Community Borehole in Udhure Village Kalowang Parish Nebbi District

3.1.2.3 HOUSING AND SETTLEMENT PATTERN

The Districts have a spatial population, which is unevenly distributed. Settlement in Nebbi and other West Nile areas is determined by natural resources and availability of infrastructure. The district has two main patterns of settlements. These include: dispersed rural homesteads and nucleated urban centers. The NUBSP program district area has a mixture of household structures and the quality of buildings differs in rural and urban centers. The urban areas are dominated by permanent structures and semi-permanent structures in some

instances. In rural areas, the dwelling units are dominated by semi-permanent and temporary structures made of mud and wattle with grass thatching.

3.1.2.4 HEALTH FACILITIES IN NEBBI DISTRICT

There are 40 Health Centers comprising 20HCII, 17HCIII, 1HCIV and 2 Hospitals. Life expectancy is at an average of 45 years; i. e 43 years among males and 47females. Infant mortality rate is at 88/10,000 while maternal mortality rate is 505/100,000.Total fertility rate stands at 6.7.

Population per doctor and nurse stands at 32,392:1 and 995:1 respectively. Population per health staff housed within facilities is at 60%. This has increased considerably given the current intervention in the Health Sector with specific attention to health staff houses under the NUSAF2 DFID funding.

The district has immunization coverage of 99% as per 2015 report. Latrine coverage stands at **78.6%**. On the other hand antenatal attendance and deliveries in Health Units is at 58%. This means that almost 50% of mothers still deliver at home. Finally Out Patient Dispensary (OPD) utilization stands at 1.2.

3.1.2.5 HIV AND AIDS

HIV/AIDS/STIs and Tuberculosis together pose increasing threat to the survival of the people of not only Nebbi district but the country at large. A recent survey by MoH indicates that HIV/AIDS prevalence rate in Nebbi District is 4.3%

The effects of this scourge have impacts that cut across all the sectors and categories of people including effects on social, economic, political, and cultural dimensions. The end impact of the epidemics rests on the households where both the affected and the infected live.

The promoting factors of this situation include the cultural practices that hinder open discussions on sexuality, the parents' shyness and inadequate knowledge of current scientific facts on sexuality and HIV/AIDS, powerful negative influence on the youth by the electronic media.

There is a serious problem of drug abuse among the youth. This makes them vulnerable to crime and HIV/AIDS/STI infections hence need to develop support mechanism for especially the youth. These could be through peer-to-peer strategy and adherence to the ABC strategy that the country is advocating for as the best way in the struggle to avoid and reduce the prevalence of the disease.

3.1.2.6 POPULATION

Table 1: Population for NUBSP Nebbi District in West Nile Region

DISTRICT	2002 CENSUS			Population projections					
				2012			2014		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
NEBBI	126,832	139,480	266,312	164,700	181,500	346,200	184,507	200,713	385,220

(Source: UBOS 2014 Population Projections)

3.1.2.7 POVERTY ESTIMATES

Most communities in Nebbi like in other West Nile districts are engaged in subsistence farming using simple tools like hoes, pangas and axes. They grow food crops like maize, cassava, beans, ground nuts and simsim among others. Some of the farm produce is sold to purchase other items like salt, soap and school fees. Some households rear goats, sheep, cows, birds, rabbits and in some non-mMuslim families they also rear pigs. Major cash crops in the district include tobacco and cotton which is grown by few people.

Table 2: Poverty Estimates in the UNHS IV (2009/10) by Sub-region

Sub-region	Pop. Share	Mean CPAE
Kampala	5.0	155,260
Central 1	11.2	101,418
Central 2	10.2	72,213
East central	13.1	53,733
Eastern	16.5	46,499
Mid-northern	9.8	41,541
North-east	3.4	31,323
West Nile	6.9	39,127
Mid-western	11.7	48,737
South-western	12.3	63,389

Notes: West Nile includes Moyo, Adjumani, Yumbe, Arua, Koboko, Nyadri, and Nebbi

3.1.2.8 GENDER ISSUES

Gender imbalance is evidenced through the disparity and access to education, productive resources and benefits, development opportunities, decision-making and participation in development activities. In all the above aspects women are less privileged than their male counterparts. This imbalance is observed in the various economic, social, cultural and political activities in the respective districts. The intake at lower classes is good for girls but they progressively drop out in higher classes. Earlier studies attribute this to shared sanitary facilities in schools, early marriages, and increased demand for domestic labour on the girl child.

In the health sector, gender imbalances are evidenced in decision making over reproductive health choices that is reflected in increased fertility level in the district. Women bare the greatest burden in child upbringing, caring for the sick and general domestic chores, which have little, or sometimes no economic values. The current insecurity has affected health service delivery generally but in particular maternity care services that limit supervised deliveries, hence increased maternal mortality and subsequent infant mortality. Therefore decision making for childbearing is still critical in gender relation.

Women as compared to their male counterparts in terms of participation and engagement indicate that much of their time is taken up in production of domestic goods and services for the welfare of their household members, yet they don't have control and ownership of the productive resources such as land, household assets, and proceeds from land. Quite often the men produce for sales but do not declare proceeds to their female counter parts. This is also a source of irresponsibility on the part of the man and conflict in the households.

There are skewed employment opportunities for women compared to that of men. Relatively across the district, the literate and illiterate woman has less employment opportunities both in formal and informal enterprises.

Labour-based road works have attracted more labour force from men than from the female workforce yet women are more dedicated workers than men and their proceeds go further to improve on the house hold incomes.

3.2 TESO REGION

This is comprised of the NUBSP pilot district of Soroti and its baseline information is presented below:

3.2.1 PHYSICAL AND BIOLOGICAL ENVIRONMENT

3.2.1.1 GEOLOGY AND SOILS

The stratum of the Soroti district and other Teso areas is an extension from a section of Karamoja region to the greater Teso areas and is comprised mainly of pre-Cambrian system. The other groups of rocks include the Mesozoic and Cenozoic eras; they are associated with volcanic eruptions in the eastern parts of the region represented by mountains of Tororo. The altitude in the areas ranges between 100-2500m above sea level.

3.2.1.2 VEGETATION

The vegetation of the region is mainly savannah grassland with dotted trees and shrubs. Other areas have savannah woodland composed of different tree species; the most notable include *Combretum collinum*, *Vitellaria paradoxa* and *Piliostima thonningii* widely spread in the district. Some areas bordering Karamoja have semi-arid conditions and are characterized by thorny trees such as *Balanites spp*, *Acacia sieberiana*, and *Acacia Senegal*.

3.2.2 SOCIO-ECONOMIC

3.2.2.1 HOUSING SITUATION

The housing situation in the area is generally poor with most dwelling units constructed of mud and wattle. The commonest roofing material is grass that is easily destroyed by fires and rots after a few years; some have iron sheet roofed houses although the floors are of mud and wattle. The floors of the houses are just rammed earth with no cement making their condition unfavorable to human health, bearing in mind that most households sleep on the floor with local materials like mats for bedding. The permanent buildings are mostly found in the urban towns of Soroti and in rural growth centers that are mushrooming in most parts of the district.

3.2.2.2 GENDER DIMENSION

Overall the level of gender mainstreaming in development Projects is low despite the efforts made previously. Therefore, the participation of women in developmental process is low. The communities in the district are largely patriarchal in nature. In Soroti area (like most parts of Uganda), the place of women and men in terms of their roles in the community can be largely categorized into two; reproduction and production respectively. It is a practice that in more than 90% of the households and communities in the district, men hold sway in matters relating to control of resources and access to them. These resources mainly include productive assets

like land, capital and finances. The males are by tradition the heads of households under the traditional clan systems.

3.2.2.3 SOCIO- ECONOMIC AND ASPECTS OF LIVELIHOODS

Generally the Iteso are agro-pastoralist community. The Teso sub-region inclusive Soroti have suffered from floods, drought and famine, conflicts and cattle raiding. This vulnerability to floods, compounded by unpredictable weather patterns and Karamojong cattle raiding, continues to negatively impact the livelihood security of people at community and household levels in the rural areas of Soroti and other Teso region. While internal displacement has ended in Teso, several factors are undermining sustainable resettlement and recovery. Gaps in social service provision and limited livelihood opportunities continue to hamper the quest for durable solutions.

Table 3: Average Monthly Income by Region and Residence (UGX)

Region	2005/06			2009/10		
	Urban	Rural	Total	Urban	Rural	Total
Kampala	347,900	-	347,900	959,400	-	959,400
Central	320,200	192,600	209,300	603,800	336,800	389,600
Eastern	261,700	144,100	155,500	361,000	151,400	171,500
Northern	209,000	76,200	93,400	361,200	117,200	141,400
Western	313,100	144,200	159,100	479,000	282,300	303,200
Uganda	306,200	142,700	170,800	660,000	222,600	303,700

(Source:

UBOS

UNHS

<http://www.ubos.org/UNHS0910/chapter7.Average%20Monthly%20Household%20Income.html>)

Table 4: Poverty Estimates in the UNHS IV (2009/10) by Sub-region

Sub-region	Pop. Share	Mean CPAE
Kampala	5.0	155,260
Central 1	11.2	101,418
Central 2	10.2	72,213
East central	13.1	53,733
Eastern	16.5	46,499
Mid-northern	9.8	41,541
North-east	3.4	31,323
West Nile	6.9	39,127
Mid-western	11.7	48,737
South-western	12.3	63,389

Notes: Sub-region of North east includes the districts of Kotido, Abim, Moroto, Kaabong, Nakapiripiriti, Katakwi, Amuria, Bukedea, Soroti, Kumi and Kaberamaido

3.2.2.4 GENDER IN PRODUCTION IN SOROTI

As in most districts in Teso, crop farming for consumption and sale is the predominant economic activity of both women and men in the communities in the areas of Soroti and those of NUBSP. A part from farm-based

income, women are also engaged in brewing (beer and spirits), except for a relatively small percentage who are successful traders or owners and managers of service enterprises, such as bars and restaurants. On the other hand, men are engaged in a broader range of income activities most of which are physically demanding activities, such as collection and sale of forest products especially charcoal burning, and higher income gender-prescribed manufacturing activities, such as brick making and carpentry which rely on both physical strength and skills acquired through training or passed down informally. Such trainings traditionally favor men more than women. Farm labor is also a common form of employment though often practiced periodically according to opportunity and need and is one of the sources of cash and in-kind income for poor and medium-income households. Generally, enterprises or activities falling into the lowest income bracket are performed by both men and women.

3.2.2.5 LAND TENURE IN SOROTI

In Soroti like other parts of Teso region most common mode of land ownership is customary system, which is almost the same as customary law in other parts of northern Uganda. Under this customary tenure arrangement, the clan elders have the responsibility for administering land, but this includes the right to say who can sell land and to whom. This is because, they have the responsibility to protect the land for the whole clan, and to make sure that everyone in the clan is given rights to land. The family head manages the land on behalf of the family as the steward of the land. His rights to manage the land go together with the responsibility to look after the rights of others to use the land, and to make sure that the next generation will also be able to enjoy the land. Other people in the family also have rights over the land. Security of tenure over land always comes with land allocation, on condition only that a household is able to use the land. The family head is responsible for ensuring security of tenure, with clan authorities as the overall guarantor.

The clan on its part has therefore the responsibility for overseeing the administration of all the land. This means making sure that there are heirs appointed at household levels to manage the land and to oversee and authorize any land sales. The clan also owns land which is communally used, such as for hunting and grazing. It is responsible for ensuring proper use of the land and that, there are no trespassers. A son becomes head of household after marriage and is allocated land to hold and to manage for the good of his family. He is the steward of that land and his wives, children and other family members also have rights to that land, but he is the overall ‘manager’.

3.2.3 NATURAL RESOURCE USE AND ACCESS

The existing communal natural resources include; grazing land (pasture), water, and firewood (Social Assessment, 2013). These resources are all shared within the communities without much disturbance from the outside communities save for the dry season when the neighboring communities from Karamoja and Sebei come in search of water and pasture. According to the results of the social assessment in Bukedea District, grazing land is still used communally but due to land scarcity some people have started fencing off their land hence denying communities the right to use their land.

3.2.3.1 POPULATION

The population details of the three districts of Serere, Soroti and Kumi where NUBSP projects will be implemented in the region are summarized as follows:

Table 7: Population for NUBSP Soroti District in Teso Region

DISTRICT	2002 CENSUS			Projections					
	2002 Census			2012			2014		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
SOROTI	94,222	99,088	193,310	159,800	162,200	322,000	144,408	152,746	297,154

(Source: UBOS 2014 Population Projections)

3.3 ACHOLI REGION

These comprise NUBSP areas of Gulu and Kitgum Districts

3.3.1 PHYSICAL AND BIOLOGICAL ENVIRONMENT

3.3.1.1 TOPOGRAPHY

The relief of Gulu and other Acholi consist of complex low landscape with relatively uniform topography marked by few sharp contrasts like Oroko and Ajulu hills, Ayamo, Awere and Omoro. Generally, the altitude ranges between 1,000-1,200 meters above sea level. The relief of Gulu consists of complex low landscape with relatively uniform topography marked by few sharp contrasts like Kilak hills in the north-eastern part of the district. Generally, the altitude ranges between 1,000-1,200 meters above sea level.

3.3.1.2 GEOLOGY

The major rock types that form the geology of Gulu and other Acholi districts are composed of remnants of low land surfaces and scarps related to rift or Aswa, sediments of western rift valley, zone of Tors and inselbergs areas of infill, remnants of upland and hot springs. No other formations have been mapped, although there may be recent sediments comprising silts, alluvium and lake deposits adjacent to Lake Kwania and along the base of some of the larger river valleys.

3.3.1.3 SOILS

According to Langlands (1974) classifications, the soil of Gulu and other districts consists of ferruginous soil with a high percentage of sandy soils and therefore susceptible to erosion. Due to its sandy nature, the soil has low water retention capacity and high rate of water infiltration. The soils are usually deep with little differentiation into clearly defined zones and possess fine granular structure, others molded into large, weak coherent clods that are very porous. Gulu district is endowed with vast fertile soils like in Orapwoyo in Odek and Adak in Lalogi and this has resulted to very high crop yield. Kitgum areas are endowed with mainly sandy loam soils of ferralitic type. Its bottomland is constituted mainly of deposits of alluvium. Generally, the soils all over the district are well drained, fertile and suitable for production.

3.3.1.4 CLIMATE

The type of climate experienced in Gulu and Kigum consists of dry and wet seasons. The average total rainfall received is 1,500 mm per annum with the monthly average rainfall varying between 14 mm in January and 230 mm in August. Normally the wet season extends from April to November with the highest peaks during May, August and October, while the dry season begins in November and extends up to March.

3.3.1.5 DEFORESTATION

There has been indiscriminate cutting of trees in the Acholi areas since the LRA conflict times during which, deforestation took place as trees were cut down by people living within the camps to provide fuel. The practice has continued encouraged by land owners who lease their land to businessmen who then cut the trees for charcoal burning before transporting them to Kampala and other Districts.

A number of initiatives including NUSAF2 have been undertaken to plant trees aimed to create jobs for the local population, increase household income of the beneficiaries and create environmental and tree planting awareness among the local communities and crucially restore tree cover. The project has established some nurseries in which a range of tree species are grown which can be used by beneficiaries as a source of income (for example by selling fruits or other sustainable tree-based products). These are then distributed amongst project beneficiaries.

3.3.2 SOCIO-ECONOMIC

3.3.2.1 LAND TENURE

Land tenure system in the regions is largely customary land tenure type with the exception of church missions, hospitals and schools a number of which hold Freehold land tenure titles. Inheritance of land is usually passed on to a male heir and negotiations affecting land acquisition is always geared to the male head of the household after the clan head has given the go ahead.

3.3.2.2 LAND USE AND AGRICULTURE

The Districts have spatial populations, which are unevenly distributed. Accessibility to socio-economic infrastructures has largely determined population distribution in the districts while natural resource endowments largely determined and greatly influenced the settlement pattern. It is worthwhile to mention that in the past two decades or so the population settlement pattern in the districts has had a departure from natural resource endowment potentials and existence of socio-economic activity determinants to security concerns. People predominantly live in grass thatched houses.

According to the Comprehensive Food Security and Vulnerability analysis (CSFVA) conducted by the World Food Programme (WFP) Uganda and the Uganda Bureau of Statistics (UBOS), on average Ugandan agricultural households have 1.34 hectares (3.3 acres) and 61% cultivate less than a hectare. Those in the north have more land available, but often it takes them longer to reach it (WFP and UBOS, 2013).

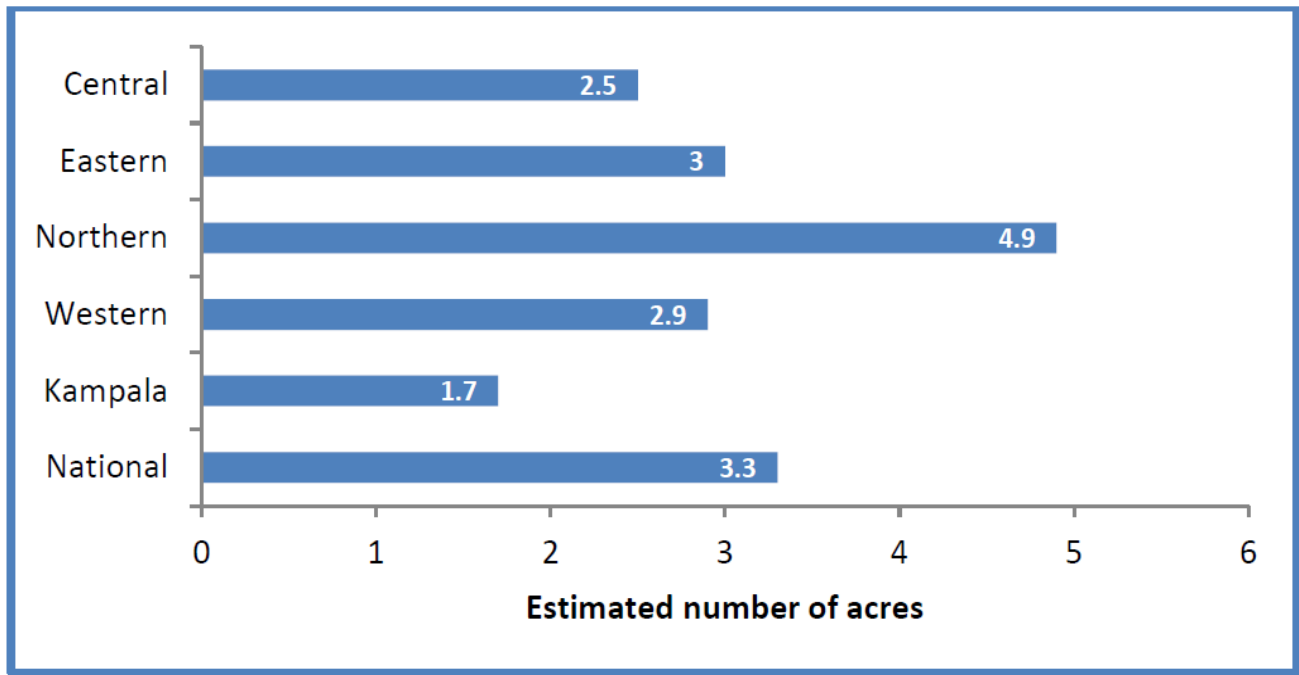


Figure 3: Acreage available per household

(Source: WFP and UBOS, 2013)

While it takes the majority less than 15 minutes to access their land, 13% have to walk between half an hour and an hour to tend to their land. In the north, almost a fifth (19%) of farmers take two hours or more to access some of their land, which could be a factor that prevents them from cultivating well or frequently, thereby limiting food availability (WFP and UBOS, 2013). Central households are generally better connected to markets (to buy inputs and sell outputs) than those elsewhere.

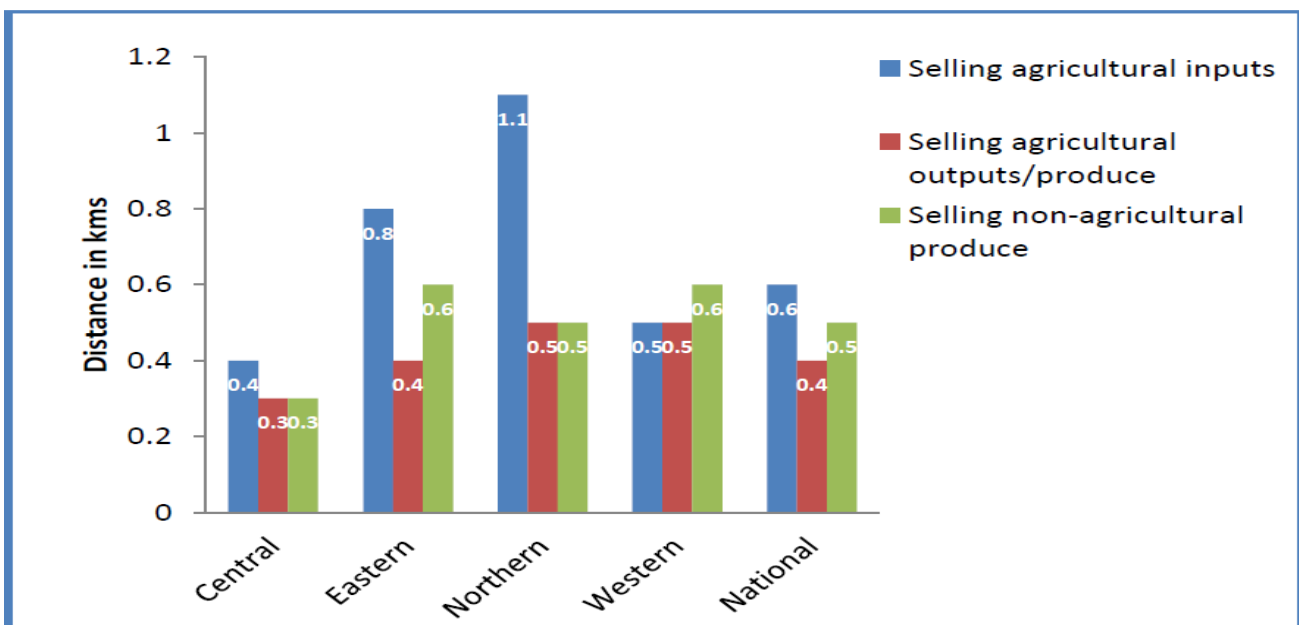


Figure 4: Average distance of household to nearest market by region

(Source: WFP and UBOS, 2013)

3.3.2.3 POPULATION

Population estimates of the Districts are summarized in the Table below:

Table 5: UBOS Population Estimate for NUBSP areas Gulu and Kitgum Districts

DISTRICT	2002 CENSUS			Project Populations					
				2012			2014		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
GULU	146,750	151,777	298,527	196,300	200,200	396,500	233,007	245,742	478,749
KITGUM	139,557	142,818	282,375	223,467	229,937	453,584	98,438	105,574	204,012

(Source: UBOS 2014 Population Summaries)

3.3.2.4 HOUSING AND SANITATION

According to the comprehensive food security and vulnerability analysis (CSFVA) conducted by the World Food Programme (WFP) Uganda and the Uganda Bureau of Statistics (UBOS), Housing is much more rudimentary in the north with more than half living in huts with thatched roofs and earth floors. 13% have more than five people sharing a room, almost double the national average. Sanitation is much poorer than elsewhere in the country with almost a quarter of households devoid of toilet facilities and forced to defecate in the bush. Of course both factors are an indicator of poverty but poor quality housing and sanitation can also lead to disease, a leading cause of malnutrition (WFP and UBOS, 2013).

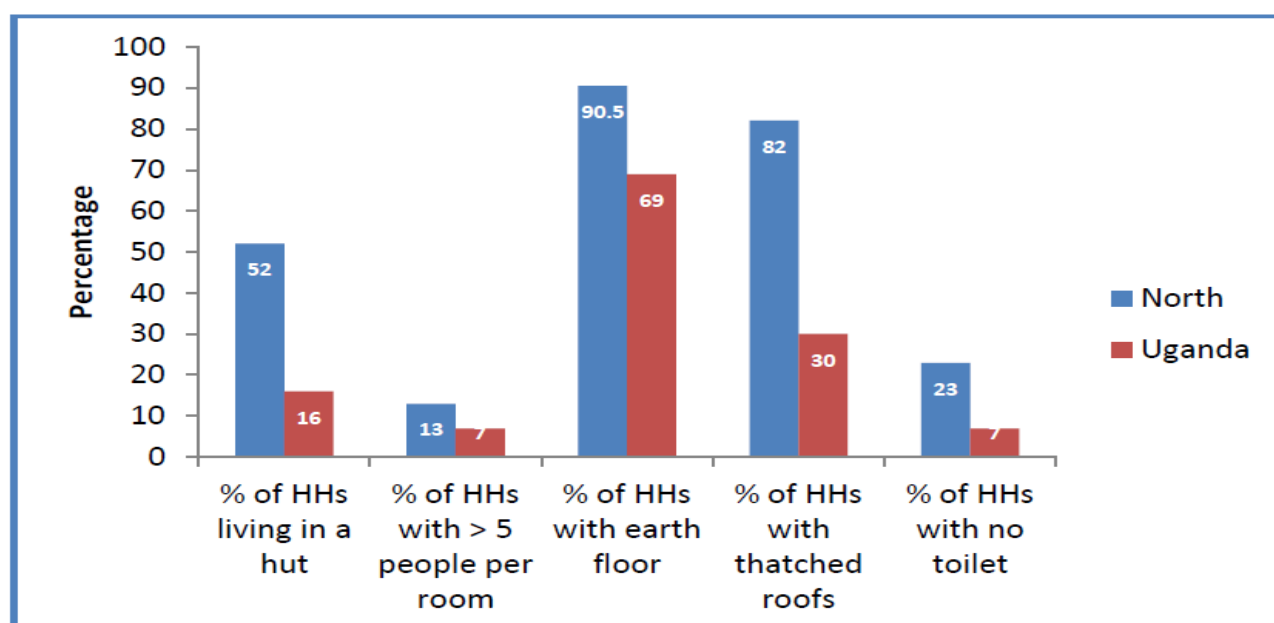


Figure 5: Housing, sanitation and crowding: northern Uganda vs. national average

(Source: WFP and UBOS, 2013)

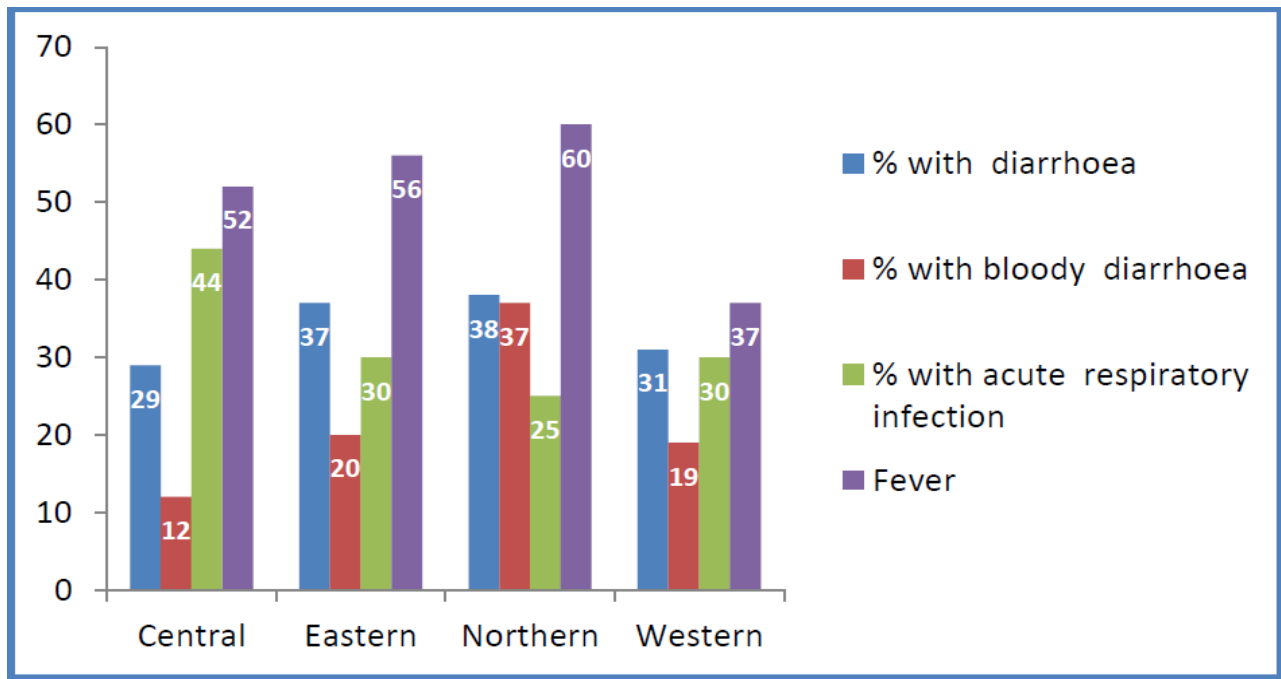


Figure 6: Child illness by region in the two weeks preceding the survey

With the exception of acute respiratory infection, child illness rates (diarrhea, bloody diarrhea and fever) are the highest in the country. Furthermore, vaccination rates for children (for Tuberculosis, Diphtheria, whooping cough (Pertuasis), Tetanus, Hepatitis B, Haemophilus Influenza, Polio and Measles) are the lowest in the country (WFP and UBOS, 2013). A fifth of communities have experienced epidemic outbreaks since 2008, the highest in the country.

3.3.2.5 ECONOMIC SITUATION IN ACHOLI AND LANGO REGIONS

On the basis of a multi-dimensional index of poverty (MPI), Northern Uganda has the highest proportion of poor people, estimated at 86% compared to a national average of 72%. It also has a significantly lower HDI score than the rest of the country.

After decades of conflict, the return of the IDPs to the land is seen as a major opportunity for significant and rapid progress in poverty reduction, as agricultural livelihoods are reconstructed, trade is restored and the local economy rebuilt. According to the United Nations Security Council (UN Security Council Report of the Secretary-General on the Lord’s Resistance Army-affected areas, November 2011), most of the 1.8 million people formerly displaced in northern Uganda have returned to their villages of origin or integrated locally elsewhere.

Although there are clear signs of economic regeneration, hopes for the possibility of poverty eradication in northern Uganda have relied on the assumption that the major factors constraining progress have disappeared with the end of the active conflict in the north; freedom of movement has removed constraints to trade and also, with a few exceptions, the exploitation of agricultural land. However other constraints remain, many relating to the massive asset depletion which took place during the period of conflict, in particular relating to the loss of cattle (formerly used for ploughing), and this has an on-going impact on people’s livelihoods in several ways, limiting the area that can be farmed, and contributing to the lack of capital available at household level. Significant numbers of people continue to be affected by the legacy of the war, including those who have suffered physical or mental injuries and those who lost household members. Acholi in particular has a high rate

of widows, and over half of all households have at least one member who has suffered some serious crime.⁶ Such households have been found to have higher rates of food insecurity due to both direct economic effects, such as the reduction of labour capacity and also indirect effects resulting from social isolation, which increases their vulnerability to land grabbing (Gelsdorf et al 2012).

House Income Support programme (HISP) and public works programmes (PWPs) have become a popular instrument for addressing both livelihoods and poverty challenges, with NUSAF 2 being the largest programme in the region including these components, alongside a number of other smaller programmes. In Acholi alone House Hold Support programme that aim to enhance income generating capacity of the communities are implemented by ACTED, CESVI, Goal, Mercy Corps, as well as the GoU NUSAF 2 programme **and the same is going to be implemented under the NUBSP through providing grants to support CIGs in Acholi districts of Gulu and Kitgum to improve their livelihoods through implementing of House Income Support through business enhancement activities.**



Figure 7: Amilobo Women’s Group one of the NUSAF2 beneficiaries in Gulu district in their banana plantation

Table 6: Average Monthly Income by Region and Residence (UGX)

Region	2005/06			2009/10		
	Urban	Rural	Total	Urban	Rural	Total
Kampala	347,900	-	347,900	959,400	-	959,400
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Uganda	306,200	142,700	170,800	660,000	222,600	303,700

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North-east	3.4	31,323
West Nile	6.9	39,127
Mid-western	11.7	48,737
South-western	12.3	63,389

Notes:Mid-Northern included Gulu, Amuru, Kitgum, Pader, Apac, Oyam, Lira, Amolatar and Dokolo

3.3.2.6 KEY ECONOMIC ACTIVITIES

The Acholi are traditionally agro-pastoral communities. Most people (80% of households) report that crop production is their main economic activity, though most people depend on several complementary activities. Many aspire to return to the situation where livestock keeping was a significant secondary livelihood source (McCord et al., 2013). There is very little formal employment in rural areas. Apart from crop production, the most common sources of income include; casual labour, both agricultural and non-agricultural, petty trading, alcohol brewing especially for women and seasonal exploitation of natural resources, such as charcoal burning, collecting firewood, making bricks A few people, especially younger men, have motorcycles (*bodaboda*) and work in bicycle repair, etc., though very few of households identify any such small business activities as a main income source. Participation in Cash for Work (CFW) is also mentioned by villagers as a livelihood source.

3.3.2.7 FOOD SECURITY

According to the comprehensive food security and vulnerability analysis (CSFVA) conducted by the World Food Programme (WFP) Uganda and the Uganda Bureau of Statistics (UBOS), Northerners are far more likely to be lacking in food energy than Ugandans elsewhere in the country: some 54% are food energy deficient compared with an average of 48% nationally (WFP and UBOS, 2013). They are more likely to have poor food consumption (6.2% vs. 4.6% national average), which, as discussed above, suggests they have an extremely limited and one sided diet. And some 12% of northern households are surviving on one meal a day compared with 6.3% at the national level.

According to the same report, Households in this part of the country spend a higher share of their overall expenditure on food than other regions (56% vs. 51% average). In fact some 45% spend more than 65% of their overall income on food (nationally 30% of households spend more than this portion of their income on food) (WFP and UBOS, 2013).

In the survey, households were asked whether they had faced a situation when they did not have enough food to feed the household members in the year before the survey (Sept 2008 – 2009). Nationally some 44% of households responded that they had –rising to 74% in northern Uganda.

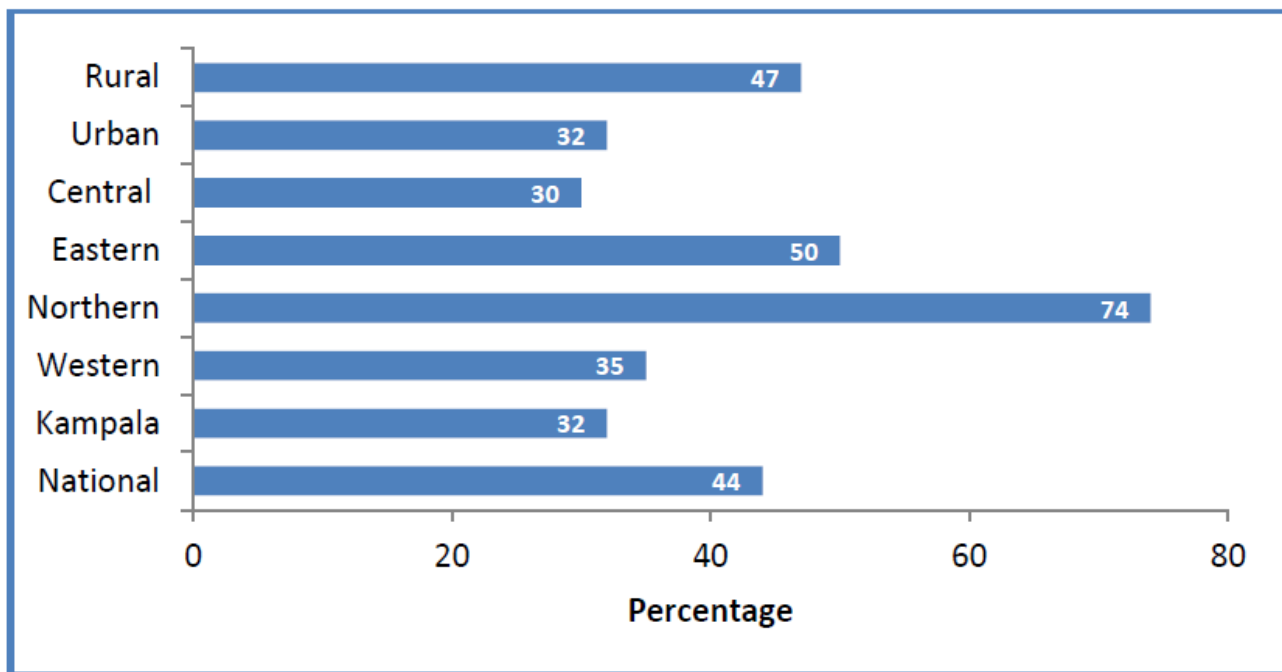


Figure 8: Households that reported they did not have enough to eat by region Sept 08-09 (%)

(Source: WFP and UBOS, 2013)

Many of these food security and malnutrition indicators may be linked to the conflict that has blighted the lives of hundreds of thousands of people in the north for 20 years, particularly the Acholi people in the districts of Gulu and Kitgum (WFP and UBOS, 2013).

However, it is worth to note that Northern Uganda has experienced significant transformation since 2007 when communities started their return process from IDP camps. The food security of many households has steadily improved, primarily because of the return of peace which has enabled the displaced to return home and to open up land for cultivation. Although communities report that this has been supported by training provided by Non-Governmental Organizations (NGOs) which boosted skills in technical areas such as planting methods, weed and pest control, and support provided under NAADS and NUSAF I (including the provision of animal traction, and support in initiating small scale livestock projects such as poultry, piggery), in fact the extent and impact of such programmes is marginal (McCord et al., 2013).

The available evidence suggests that generalized food insecurity in Acholi is unlikely to persist for many years, if climatic conditions are not too unfavorable. Hence, there is an opportunity to support households to move beyond basic food security and towards broader improvements in livelihoods. The main constraints to achieving an acceptable standard of living are identified as low production due to the low acreage cultivated (on average 3 acres per household), poor production technology and market infrastructure, and the lack of profitable alternatives (McCord et al., 2013).

A disaggregated analysis of poverty however suggests that there is risk of persistent and significant food insecurity among particular vulnerable population groups, resulting from factors including the ongoing effects of the war, the loss of land rights (affecting widows, and divorced and separated women), and high dependency ratios (with household labour constraints resulting from factors such as chronic illness, old age, and the absence of adult males) (McCord et al., 2013).

3.3.2.8 ACCESS TO SOCIAL SERVICES

There is a low penetration of services in the Acholi and Lango regions, which is particularly severe in terms of access to health centres. For example, in Lagoro sub-county (Kigum District), one health centre serves all five parishes within the sub county, and in Omiya anyima sub-county, some communities travel for more than 30km to access the nearest health centre. Access to primary schools is less problematic in terms of physical distance, although not all villages have their own schools. However, in discussion, community members noted that the main constraint to accessing health and education services was cost. While health services and primary education are nominally free, a number of additional fees (for uniforms, PTA, etc.) were reported as hindering access.

The main physical (non-financial) constraint to school participation was reported to be not distance to school, but accessibility and security in terms of the safety of paths and provision of bridges. In Alebtong, in the past two years, three children were reported to have lost their lives trying to cross the Agiya stream on their way to school. The construction of Lamit central community access road in Kitgum under NUSAF 2 was motivated by the need to ensure safety of children particularly at spots where they have to cross streams and as well accessibility of products to town. Similarly Kitgum Guu B tong pur community access road has boosted business in the area.



Figure 9: Sections of Guu B tong pur Community access road, Kitgum district, on the right is the uncompleted bridge and on the left is Onyi Village one the benefiting communities

4 POLICY AND LEGAL FRAMEWORK

4.1 THE POLICY FRAMEWORK

4.1.1 UGANDA'S VISION 2040

Uganda has envisaged a development perspective termed “Uganda Vision 2040” with the aspiration to transform the country from a predominantly peasant and low income to a competitive, middle income country with a per capita income of approximately USD 9,500 by the year 2040 . To this effect, the country’s current development interventions are guided by the National Development Plan (NDP1) which ends in June 2015 and will be succeeded by the NDP2 starting in the FY 2016/17. The NDP2 will be the second of the six NDPs structured under the Comprehensive National Development Planning Framework (CNDPF) towards implementation of the Uganda Vision 2040. The NDP1 that runs from 2010/11 to 2014/15 was instrumental in instilling the culture and discipline for development planning and financing while the NDP2 prioritizes key development opportunities and fundamentals with the aims to increase overall competitiveness, create additional wealth and employment while emphasizing inclusive and sustainable growth.

4.1.2 PEACE, RECOVERY, AND DEVELOPMENT PLAN (PRDP2)

The development interventions in Northern and North Eastern Uganda are aligned to the Peace, Recovery, and Development Plan (PRDP2) that provides strategic planning framework at the regional level. The PRDP2 will be succeeded by PRDP3 expected effectively in the FY 2015/2016. The PRDP3 prioritizes improvement of household income in line with the NDP2 to address the socio-economic imbalances. In the same vein, Government provided guidance to the proposed successor project that will be implemented under the PRDP3 framework to focus on improving incomes and livelihoods of the poor and vulnerable communities and contribute to the revitalization of the local economy.

4.1.3 THE NATIONAL ENVIRONMENT MANAGEMENT POLICY, 1994

The key policy objectives include the enhancement of the health and quality of life of Ugandans and promotion of long-term, sustainable socio-economic development through sound environmental and natural resource management and use; and optimizing resource use and achieving a sustainable level of resource consumption. ***With regard to NUBSP, aspects of Environmental Assessment have been integrated into the project with the objective of ensuring sustainability in the project***

4.1.4 THE NATIONAL CULTURAL POLICY, 2006

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

4.1.5 THE NATIONAL WATER POLICY, 1999

The overall water resources policy objective is to sustainably manage and develop the water resources in a coordinated and integrated manner to secure/provide water of an acceptable quantity and quality for all social and economic needs. ***This ESMF outlines measures to control erosion, siltation as well as potential for pollution from oil spills, creosote and waste in areas of project implementation.***

4.1.6 THE NATIONAL LAND USE POLICY

The overall policy goal is to achieve sustainable and equitable socio-economic development through optimal land management and utilization in Uganda. ***The policy recognizes amongst others, the need for the protection and sustainable use of land resources through conducting environmental assessments and implementation of measures outlined in such assessment studies.***

4.1.7 THE NATIONAL GENDER POLICY, 1997

The government adopted a National Gender Policy of 1997, a tool to guide and direct the planning, resource allocation and implementation of development programs with a gender perspective. The adoption of the gender policy has facilitated Uganda's gender mainstreaming programs in all sectors of the economy (implying, the planned works project should equally integrate gender into the implementation of works. ***OPM as an agency implementing the NUBSP program has mainstreamed gender dimensions into its activities, plans and policies.***

4.1.8 THE NATIONAL HIV/AIDS POLICY, 2004

The policy provides the principles and a framework for a multi-sectoral response to HIV/AIDS in Ugandan's world of work. The policy applies to all current and prospective employees and workers, including applicants for work, within the public and private sectors. It also applies to all aspects of work, both formal and informal. ***NUBSP will have to mainstream HIV/AIDS interventions into its plan, Projects and activities.***

4.1.9 NATIONAL POLICY FOR THE CONSERVATION AND MANAGEMENT OF WETLAND RESOURCES, 1995

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

4.2 THE LEGAL FRAMEWORK

4.2.1 THE CONSTITUTION OF THE REPUBLIC OF UGANDA, 1995

The right to a clean and healthy environment is enshrined in Article 39 of the Constitution of Uganda, 1995 as well as integration of people in the development process. ***To ensure NUBSP compliance with the Constitutional obligations on sustainability, this ESMF has been prepared which outlines mechanisms for environment assessment and mitigation measures included therein.***

4.2.2 THE NATIONAL ENVIRONMENT ACT, CAP 153

Section 20 of the Act makes it a legal requirement for every developer to undertake an environmental assessment for projects listed in the Third Schedule of the Act. In this case, agriculture amongst others, including large scale agriculture, use of new pesticides are some of the projects in the Third Schedule to the Act that require an ESIA to be conducted before they are implemented. ***This ESMF outlines some of the salient impacts in NUBSP as well as mechanisms for conducting further assessments on the project sub-components.***

4.2.3 THE LAND ACT, CAP 227

The Land Act vests land ownership in Uganda in the hands of Ugandans and that, whoever owns or occupies land shall manage and utilize the land in accordance with the Forest Act, Mining Act, National Environment Act, the Water Act, the Uganda Wildlife Act and any other law [section 43, Land Act]. ***The planned NUBSP has integrated Environmental Assessments in its ESMF in compliance with the Act provisions.***

4.2.4 LAND ACQUISITION ACT, 1965

This Act makes provision for the procedures and methods of compulsory acquisition of land for public purposes whether for temporary or permanent use. The Act requires that adequate, fair and prompt compensation is paid before taking possession of land and property. Dispute arising from the compensation to be paid should be referred to the court for decision if the Land Tribunal cannot handle. ***These provisions are meant to ensure that the process of land acquisition is in compliance with existing laws and that the affected persons receive fair, timely, adequate compensation. Therefore, where land need for land take is anticipated, these provisions will guide the process of compensation amongst others in the NUBSP.***

4.2.5 NATIONAL FORESTRY AND TREE PLANTING ACT, 2003

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

4.2.6 THE OCCUPATIONAL SAFETY AND HEALTH ACT, 2006

The Act provides for the prevention and protection of persons at all workplaces from injuries, diseases, death and damage to property. ***The ESMF provides for provision of safety gear for workers during implementation of NUBSP activities especially for value addition and processing facilities among other projects.***

4.2.7 HISTORICAL MONUMENT ACT, 1967

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

4.2.8 ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 1998

The procedures for conducting EIAs are stipulated in the Regulations. The Regulations require environmental assessments to be conducted to determine possible environmental impacts, and measures to mitigate such impacts. At the end of the study, the environmental assessment report is submitted to NEMA to take a decision as to whether to approve or reject the project. ***The Guidelines also stipulate that the ESIA process will be participatory, that is the public will be consulted widely to inform them and get their views about the proposed project which in this case, has been undertaken to capture views of stakeholders for inclusion in the ESMF.***

4.2.9 THE NATIONAL ENVIRONMENT (AUDIT) REGULATIONS, 2006 (12/2006)

The Audit Regulations apply to environmental audits under the Environment Act, environmental audits under the ESIA regulations, voluntary environmental audits by the owner and any other audits as may be required or prescribed [Regulation 3]. ***The ESMF provides for the need for compliance Audits of the NUBSP Program.***

4.2.10 NATIONAL ENVIRONMENT (WASTE MANAGEMENT) REGULATIONS, 1999

The National Environment (Waste Management) Regulations, 1999 apply to all categories of hazardous and non-hazardous waste and to the storage and disposal of hazardous waste and its movement into and out of Uganda. The regulations promote cleaner production methods and require a facility to minimize waste generation by eliminating use of toxic raw materials; reducing toxic emissions and wastes; and recovering and reuse of waste wherever possible. ***The Regulations oblige the Developer to put in place measures for proper management of waste.***

4.2.11 THE NATIONAL ENVIRONMENT (WETLANDS, RIVER BANKS AND LAKESHORES MANAGEMENT) REGULATIONS, 2000

This law, consisting of 4 Parts, describes management policy and directions for important wetlands, riverbank and lakeshore areas that exist in Uganda. Any development projects, within those registered areas need ESIA studies and permission to be granted by NEMA in accordance with Regulation 34 of this law.

4.2.12 THE NATIONAL ENVIRONMENT REGULATIONS (NOISE STANDARDS AND CONTROL), 2003

The National Environment (Noise Standards and Control) Regulations, 2003 Section 7 of these regulations requires that no person shall emit noise in excess of permissible noise levels, unless permitted by a license issued under these Regulations. Section 8 imparts responsibility onto the owner of a facility to use the best practicable means to ensure that noise do not exceed permissible noise levels. ***The project is obliged to observe these Regulations by instituting measures for minimizing noise in the project such measures include proper maintenance of equipment and providing workers with PPEs.***

4.2.13 THE NATIONAL ENVIRONMENT (STANDARDS FOR DISCHARGE OF EFFLUENT INTO WATER OR ON LAND) REGULATIONS 1999

The National Environment (Standards for Discharge of Effluent into Water or on Land) Regulations 1999, together with National Environment (Waste Management) Regulations of 1999 were put in place to ensure sustainable use of environment and natural resources across the country. Amongst others, under these Regulations, the standards for effluent or waste before it is discharged into water or on land shall be as prescribed in the Schedule of the Regulations.

4.3 INTERNATIONAL ENVIRONMENTAL INSTRUMENTS/OBLIGATIONS FOR UGANDA

Uganda is a signatory to several international instruments on environmental management. These are summarized in Table 1 below.

Table 8: International Environment Instruments/Obligations applicable to Uganda

Convention	Objective
The MDG 7	to ensure environmental sustainability
The African Convention on the Conservation of Nature (1968)	to encourage individual and joint action for the conservation, utilization and development of soil, water, flora and fauna for the present and future welfare of mankind, from an economic, nutritional, scientific, educational, cultural and aesthetic point of view.
The Ramsar Convention (1971) on wetlands of International Importance	to stop the progressive encroachment on and loss of wetland now and in the future, recognizing the fundamental ecological functions of wetlands and their economic, cultural, scientific and recreational values
The Protection of World and Cultural Heritage convention (1972)	to establish an effective system of collective protection of the cultural and natural heritage of outstanding universal values
The Convention on the International Trade in Endangered Species of Wild Flora and Fauna (CITES, 1973)	to protect certain endangered species from overexploitation by means of a system of import/export permits
The Convention on the conservation of migratory species of wild animals (1979).	to protect those species that migrate across or outside national boundaries
The Vienna Convention for the protection of the Ozone Layer (1985)	to protect human health and the environment against adverse effects resulting from modification of the ozone layer
Montreal Protocol on Substances that deplete the Ozone layer (1987)	to protect the ozone layer by taking precautionary measures to control global emissions of substances that deplete it.
The Basel Convention on the	to reduce trans-boundary movements of waste subject to a

trans-boundary Movement of Hazardous Wastes and their disposal	minimum consistent to the environmentally sound and different effects of such wastes and to minimizing the amount and toxicity of hazardous wastes generated and ensuring their environmentally sound management
Convention on Biological Diversity- (CBD 1992)	to promote diversity and sustainable use and encourage equitable sharing of benefits arising out of the utilization of genetic resources
United Nations Framework Convention on Climate Change (UNFCCC, 1992)	to regulate the levels of greenhouse gases concentration in the atmosphere so as to avoid the occurrence of climate change on a level that would impede sustainable economic development, or compromise initiative in food production
United Nations Convention to combat Desertification (UNCCD, 1994)	to combat desertification and mitigate the effects of drought in countries experiencing serious drought and or desertification

4.4 WORLD BANK SAFEGUARD POLICIES AND EHS GUIDELINES

4.4.1 WORLD BANK POLICIES

NUBSP activities may have limited and localized adverse environmental and social impacts, and the project is, therefore, rated as EA category B. It triggers OP 4.01 on Environmental Assessment, OP 4.09 on Pest Management, and OP 4.12 on Involuntary Resettlement. Pest Management has been triggered because there is likely to be small scale use of pesticides that may be applied for veterinary care of animals under the Household Investment Support component.

Table 9: Summary of World Bank Safeguards in relation to NUBSP

OP N°.	Summary of Safeguard Policy	Safeguard Policy Triggered/Not Triggered	Remarks
OP 4.01	<p>Environmental Assessment: The Bank requires environmental assessment (EA) of projects proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making. Projects are screened to determine the appropriate extent and type of EA. The Bank classifies the proposed project into one of four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts.</p>	√	<p>Component 1 involves production of groundnut paste or fruit juices, the processing of sesame oil or sun-dried fruit, baking, milk processing, the production of smoked fish, maize flour, or cassava flour, starting a salon, tailoring, dress making, handicrafts, keeping poultry or pigs, or vegetable farming. Because details and specific locations of the sub-components activities are not known, a framework for conducting Environment Assessments on such activities have been provided in this ESMF.</p> <p>The project is under Environmental Assessment Category B because the likely impacts are anticipated to be of small-scale, localized, of short-term in nature and can easily be mitigated and managed.</p> <p>The results of Environmental Screening will help outline appropriate mitigation measures for sub-project based investments at community levels.</p>
OP 4.04	<p>Natural Habitat: The Bank supports the protection, maintenance, and rehabilitation of natural habitats and their functions. The conservation of natural habitats is essential for long term sustainable development.</p>	X	<p>NUBSP Projects/activities does not trigger O.P 4.04</p>
OP 4.09	<p>Pest Management: The objective of this policy is to promote the use of biological or environmental control methods and reduce reliance on synthetic chemical pesticides. In Bank-financed agricultural operations, pest populations are normally controlled through Integrated Pest Management (IPM) approaches. In Bank-financed public health projects, the Bank supports controlling pests primarily through environmental methods. The policy further ensures that health and environmental hazards associated with pesticides are minimized.</p> <p>The procurement of pesticides in a Bank-financed project is</p>	√	<p>A Pest Management Plan (PMP) has been developed as part of the ESMF. The PMP is meant for Component 1, which may involve use of pesticides and other veterinary chemicals or result in their increased usage through Livelihoods Investments support.</p>

OP N°.	Summary of Safeguard Policy	Safeguard Policy Triggered/Not Triggered	Remarks
	contingent on an assessment of the nature and degree of associated risk, taking into account the proposed use and the intended user.		
OP 4.10	Indigenous peoples: These are defined to be a distinct, vulnerable, social and cultural group possessing a number of characteristics including collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories.	X	Indigenous people (OP 4.10) policy is not triggered as the targeted districts of Nebbi, Kitgum, Gulu and Soroti do not have such people.
OP 4.11	OP 4.11 Physical Cultural Properties: This policy addresses physical cultural resources, which are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. The Bank supports the preservation of cultural properties which includes sites with archaeological, paleontological, historical, religious or unique natural values. It seeks to avoid impacts on such sites.	X	The project activities shall not be undertaken in areas with PCRs nor will it involve major civil/earth works.
OP 4.12	Involuntary Resettlement: This policy includes safeguards to address and mitigate these risks and recommends involuntary resettlement instruments which include a resettlement plan, a resettlement policy framework and a resettlement process framework.	√	Though this is likely to be a small scale impact, a Resettlement Policy Framework has been prepared for NUBSP alongside this ESMF which defines measures and modalities of handling resettlement aspects in the project.
OP 4.36	Forests: The objective of this policy is to assist borrowers to harness the potential of forests to reduce poverty in a sustainable manner, integrate forests effectively into sustainable economic development, and protect the vital local and global environmental services and values of forests.	X	The project shall not support activities that will negatively affect any forest ecosystem.
OP 4.37	Safety of Dams: The Bank distinguishes between small and large dams where large dams are 15 m or more in height. Dams that are between 10 and 15 m in height are treated as	X	The Safety of Dams (OP 4.37) policy is not triggered. The project does not include construction of dams.

OP N°.	Summary of Safeguard Policy	Safeguard Policy Triggered/Not Triggered	Remarks
	large dams if they present special design complexities. Dams less than 10 m in height are treated as large dams if they are expected to become large dams during the operation of the facility. Such large dams require amongst others, that preparation and implementation of detailed plans ensure safety aspects. The ESIA is one of the tools that can therefore formulate some of the safety aspects in large dams.		
OP 7.50	Projects on International Waterways: This policy applies to the following types of international waterways: (a) any river, canal, lake, or similar body of water that forms a boundary between, or any river or body of surface water that flows through, two or more states, whether Bank members or not; and (b) Any tributary or other body of surface water that is a component of any waterway described in (a) above.	X	The Projects on International Waters (OP 7.50) policy is not triggered. NUBSP will not be implemented on international waterways.
OP 7.60	Projects in Disputed Areas: Projects in disputed areas may raise a number of delicate problems affecting relations not only between the Bank and its member countries.	X	NUBSP program activities will not be undertaken in disputed areas. This policy is not triggered because the project will not support any activity in a disputed area.

4.4.2 WORLD BANK GROUP ENVIRONMENT, HEALTH AND SAFETY GUIDELINES

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. The General EHS Guidelines contain information on cross-cutting environmental, health, and safety issues potentially applicable to all industry sectors. It should be used together with the relevant industry sector guideline(s). The relevant General EHS Guidelines for **NUBSP** are below:

1. Environmental

- Air Emissions and Ambient Air Quality
- Energy Conservation
- Wastewater and Ambient Water Quality
- Water Conservation
- Hazardous Materials Management
- Waste Management
- Noise
- Contaminated Land

2. Occupational Health and Safety

- General Facility Design and Operation
- Communication and Training
- Physical Hazards
- Chemical Hazards
- Biological Hazards
- Radiological Hazards
- Personal Protective Equipment (PPE)
- Special Hazard Environments
- Monitoring

3. Community Health and Safety

- Water Quality and Availability
- Structural Safety of Project Infrastructure
- Life and Fire Safety (L&FS)
- Traffic Safety
- Transport of Hazardous Materials
- Disease Prevention
- Emergency Preparedness and Response

4. Construction and Decommissioning

- Environment
- Occupational Health and Safety
- Community Health and Safety

Detailed General EHS Guidelines and Industry specific EHS Guidelines can be accessed at http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/our+approach/risk+management/ehsguidelines

5 STAKEHOLDER CONSULTATIONS AND DISCLOSURE

5.1 OVERVIEW

The World Bank's Environmental Assessment Policy OP 4.01 provides that project-affected groups and stakeholders should be consulted about the project's potential environmental and social impacts during the ESA process. The consultation process gives stakeholders an opportunity to learn about the project, raise concerns, understand the potential effects, and comment on the project design as well as on the reports that are produced during each phase.

5.2 GOALS OF CONSULTATIONS

The primary goals of the consultation process are to:

- Ensure transparency and involvement of stakeholders in assessing and managing the potential environmental and socioeconomic impacts of the NUBSP;
- Help manage risks, concerns and public expectations through ongoing dialogue with stakeholders;
- Improve decision-making, and build understanding by actively involving key project stakeholders in two-way communication. Through this process, the implementing agencies will better understand the concerns and expectations of stakeholders, and the opportunities to increase project value to the local community.

5.3 OBJECTIVES OF STAKEHOLDER CONSULTATIONS

The consultations with stakeholders were carried out to specifically achieve the following objectives:

- i. To provide information about the project and to tap stakeholder information on key environmental and social baseline information in the project area;
- ii. To provide opportunities to stakeholders to discuss their opinions and concerns;
- iii. To solicit the stakeholders' views on the project and discuss their involvement in the various project activities;
- iv. To discern the attitudes of the community and their leaders towards the project so that their views and proposals are taken into consideration in the formulation of mitigation and benefit enhancement measures;
- v. To identify specific interests of and to enhance the participation of the poor and vulnerable groups; and
- vi. To inform the process of developing appropriate management measures as well as institutional arrangements for effective implementation of the NUBSP.

5.4 SOME OF THE PRELIMINARY KEY STAKEHOLDER CONCERNS AND VIEWS

ISSUE RAISED	CONSULTANT'S REMARKS/PROPOSED MEASURES
<p>Ms. Ali Munira – Head, Public and International Relations/Principal Relations Officer Inspectorate of Government (IG)</p> <p>Under Transparency Accountability and Anti Corruption, IG has undertaken a number of initiatives to sensitize and empower the communities to report corruption and maladministration tendencies through media channels and seminars;</p> <p>The Inspectorate has instituted avenues such as e-mails, Report 2 IG using Short Message System (SMS), telephone calls on 0414347387 (hot line) and other general lines, physical reporting to any of the 16 IG Regional Offices spread thought the country.</p> <p>Report2IG uses a short code 6009. This short code is the number to which all complaints or reports are sent. It is TOLL FREE for all mobile networks.</p> <p>With your mobile phone, simply type the keyword “CORRUPT” and SMS to 6009 and follow the prompts. You will receive a Complaint reference number which will be used to follow-up the complaint.</p> <p>Complaints can also be filed online at http://www.igg.go.ug/complaints/</p>	<p>A systematic way for capturing information and data on appeals and complaints has not been generally operational in NUSAF2. Yet, the latter would be an important mechanisms to ascertaining transparency and accountability in terms of whether project beneficiaries who have grievances are able to register them, and if the registered, whether concerned committees and/or authorizes take necessary action and on time. This intervention will foster a sense of responsibility and ownership among the citizenry by introducing a mechanism for the community level committees to become the first level of instance for grievances handling and referral to the IG if no resolutions will have been reached.</p>
<p>Eng. Charles Ngeye – Senior Engineer, Dept. of Construction Standards and Quality Management, MoWT</p> <ul style="list-style-type: none"> • NUBSP needs to integrate cross-cutting issues into the project designs early enough and they should be integrated even in the BoQs for works; • The Environmental Management Specialist 	<ul style="list-style-type: none"> • Cross-cutting issues including environment, gender, HIV/Aids, waste management to be included in the budgets. • NUSAF Secretariat has an Environment and Social Safeguards Specialist to provide guidance on safeguards implementation for NUBSP

<p>for NUBSP should be in place right from the beginning of the project not as was the case under NUSAF 2 to assist in NUBSP project safeguards Implementation</p> <ul style="list-style-type: none"> • NUBSP should not assume the districts will monitor and enforce compliance on safeguards without allocating facilitation. The DEOs have challenges of resources and any additional load should be matched with resources; and • If the DEOs are to follow up works, they should be brought on board in the project early enough not much later in the project. 	<ul style="list-style-type: none"> • The ESMF recommends facilitation of DEOs and CDOs to enforce safeguards; this item has been included in the budget for ESMF implementation. • The design of the NUBSP projects is in way that DEO of pilot districts are involved in subprojects right from screening through monitoring.
<p>Munguleni Alfred, NUSAF Desk Officer, Maracha District</p> <p>Screening is done by the environmental officer for all projects and issues of concern are identified and recommendations suggested before an environmental certificate is issued. This is done for all projects before implementation.</p> <p>The district lacks adequate capacity to provide technical advisory services to the benefiting communities. Line ministries such as MAAIF have not harmonized their activities with NUSAF2. The NUBSP project need to strengthen in this area an ensure there is harmonization of their sub project with MAAIF as most of the activities are agricultural related</p> <p>OPM should involve the office of the RDC and GISO in monitoring of NUBSP projects other than the IG's office which is under staffed and overwhelmed by work, for example West Nile has 3 Officers under IG's department to monitor all government activities in the region.</p>	<p>This is a good practice that has to be strengthened further in NUBSP.</p> <p>OPM will have to closely work with MAAIF to strengthen the Afforestation, crop production and veterinary extension services systems to address the beneficiaries' demands of extension services.</p> <p>OPM will have to work with MAAIF to fill the human resource gaps in these regions by training more Community Animal Health Workers (CAHWs).The above is critical because of the need for training of the beneficiary groups on animal management practices to ensure sustainability. Equipping and strengthening the veterinary extension service system at district and sub county level is critical and should be prioritized.</p>
<p>Atto Francisca, District Environment Officer, Gulu District</p> <p>Most projects were screened especially the road works HISP and CIRs. A budget of UGX 600,000 was set aside, for the environmental issues on each CIR and 300,000 for HISP project.</p>	<p>It is important to appreciate that the mitigations required vary from subproject to subproject and therefore the budgets for mitigations should be based on the required mitigations based on the screening results. This needs to be considered under NUBSP. This is catered for in the budget for this ESMF. OPM should ensure that monitoring is duly undertaken.</p>

<p>Improve on the budget for environmental related issues in the design of NUBSP and there should be a provision for monitoring under NUBSP</p>	
<p>Mr. Ojok Brian, NUSAF Desk Officer, Yumbe District</p> <p>The selection criterion for group members depends on the level of discrepancy of community members. There are communities in Yumbe where everyone is too vulnerable hence every community member is eligible for selection. But in some instances, verbal and assertive members end up being beneficiaries even when they do not qualify.</p>	<p>There is a need for defining clear criteria in the selection of beneficiaries and but also while allowing flexibility to the community to identify poor in a participatory manner keeping community situation and ground realities in mind. Under NUBSP, at the community-level, beneficiaries will be selected for inclusion in the Project through a community-based targeting process that will be facilitated by the CDO and other key actors based on eligibility criteria that are established at the national level.</p> <p>The selection of beneficiaries for Component 1 will be carried out through a two-step process including geographic identification of the poorest districts and community based targeting to reach the poorest and most vulnerable. To facilitate this process, the NUBSP project will focus on few geographic areas with higher level of poverty, exposure to climatic hazards such as drought and flood.</p>
<p>Ms. Teopista, NUSAF Trainer, NUSAF Desk Office, Nebbi District.</p> <p>Training of communities in NUSAF2 projects was inadequate and some of them are ill prepared to implement the subprojects. Training is supposed to be continuous but there are no budgetary provisions for this. There should be a component of continuous training but this is not provided for in the budget, therefore this should be considered when designing NUBSP.</p>	<p>During the implementation of NUSAF2, the TST and Districts mainly focused on generation and approval of sub-projects. There wasn't much support for beneficiaries during and post implementation of sub-project. Under NUBSP program, in order to provide implementation support and follow up mentoring to community and beneficiaries, an implementation support team at Sub-County, Parish and Community level will be put in place.</p>
<p>Gadilaya Tree Planting Group, Jupuyik Village, Nebbi</p> <p>Training was inadequate because the trainer only appeared for 3 days. There is need for more training in nursery management and production of quality seedlings. Seedlings are often attacked by pests and diseases which cause great losses to the group. There is also inadequate information about where to obtain quality seeds and other inputs such as pesticides.</p>	<p>This is an indication of lack of adequate extension services to the beneficiaries. OPM will have to closely work with MAAIF to strengthen the Afforestation, crop production and veterinary extension services systems to address the beneficiaries' demands of extension services.</p>
<p>Amilobo Women Group, Gulu district</p>	

<p>Subproject: Banana plantation</p> <ul style="list-style-type: none"> • The plants wilt during prolonged dry season • It also becomes had to maintain the garden during the rainy season due to the vigorous growth of weeds. • The yields from the plantation are very low especially last year no sales were made because wind brought down all plants that had fruited <p>The initial training was not adequate as the group was trained for two days only.</p>	<p>Such groups require adequate extension services on crop production to minimize losses. This echoes the need for OPM/NUBSP to closely work with MAAIF to strengthen extension services to the beneficiaries.</p>
<p>Ms. Kyalisiima Lydia, Treasurer, Buliisa Health Centre IV, NUSAF Group</p> <p>For medical waste, there is an incinerator which is partially functional and another alternative is a shallow pit where waste is dumped openly.</p>	<p>Provision of additional infrastructure to health centers should be accompanied with provision of more waste management facilities. It is recommended that a specific budget for environmental mitigations is put in place to cater for waste management issues.</p>
<p>Ayesiga Mukama NUSAF Group, Kigwera sub county Headquarters, Buliisa District</p> <p>Most NUSAF decisions are taken at district level without directly involving the targeted beneficiary communities. District leaders often waste a lot of resources on workshops and seminars yet these do not directly benefit the community.</p>	<p>One of the components NUBSP will adopt from NUSAF 3 is Transparency, Accountability and Anti-Corruption Programme (TAAC). The TAAC program is intended to promote good governance at all levels of Project implementation. The program is implemented independently by the Office of the IG.</p> <p>As part of the TAAC program, the Inspectorate of Government will continue to use both enforcement and preventive/proactive measures. Enforcement measures will include investigation of complaints against corruption, as well as enforcement of the Leadership Code. The IG will be one of the first ports of call for the social accountability committees (SACs) in the communities.</p>
<p>Lamoki Village community – Beneficiary of Onyomtil – Adimola 8km Community Access Road</p> <p>Every able bodied member of the community was given a chance to participate in road construction. The women contributed the large number since they dominate the community in terms of population.</p>	<p>Gender mainstreaming has been observed across all project components of NUSAF2 and the practice should continue in NUBSP to ensure that women continue to benefit from the project.</p>

5.5 FUTURE CONSULTATIONS

5.5.1 ISSUES FOR CONSULTATION

The project, its intended objectives, the location, enhancement mechanisms, its ownership as well as the need of public consultation have to be briefly discussed to the participants as well so that they can forward their views on these bases. ***The CDOs and DEOs will have to refine and clearly indicate the issues that have to be pointed out and discussed during consultations.***

5.5.2 CONSULTATION DURING MOBILIZATION AND SENSITIZATION

At this stage, OPM and Local Governments (LGs) will undertake awareness creation among the key stakeholders of the Project at national, district and sub county and community levels. This will help create a good understanding of Project objectives, access criteria, implementation modalities and inspire stakeholders to actively participate in Project implementation.

The awareness creation will be done through electronic, print and traditional media, workshops, seminars and community meetings as an ongoing undertaking. The sensitization and mobilization campaigns are expected to initially stimulate community interest in the project support as well as promote effective stakeholder participation, transparency and accountability in Project implementation throughout the subproject cycle.

The communities will express their interests in Project support in form of subproject interest forms (SPIFs) that shall be distributed free of charge. The distribution of sub-project interest forms will be the responsibility of the Sub County Chiefs, Community Development Officers or any other officers assigned the task. The SPIFs will be made available in public places e.g. sub-county headquarters, places of worship, trading centers, etc. The Sub-county Focal Person shall receive all SPIFs and register them in the SPIFs register to be opened in each the sub-county.

5.5.3 CONSULTATIONS ON TORs FOR ESIA AND RAPS

The intent of public consultation during scoping is to ensure that the ESIA takes full account of the priority concerns of project-affected people and other relevant stakeholders and identifies the full range of potential impacts. Once the ToRs for the ESIA and RAPS are available in draft form and before they are finalized, the respective implementing agency will have to obtain stakeholders' inputs on the ToRs and particularly to check that no issue of concern to stakeholders has been omitted in the scopes of assessments in the final ToRs.

The Consultant will assemble appropriate materials, (maps, graphs, drawings, simulations, models, key environmental figures) disclose them in a manner acceptable to Bank policies (timely prior to consultation, in a form and language that are understandable, in locations accessible with reasonable effort to the groups being consulted) and organize venues which will enable the affected population to participate without excessive undue efforts. Suggested venues would be near the project sites ensuring accessibility to all affected people.

After finalization of the ToRs, the respective implementing agencies will meet with representatives of the key stakeholders to review the final draft ToRs and receive feedback on any issues they feel are missing.

Terms of Reference for the follow-on ESIA and RAPs will be reviewed and adjusted depending on the outcomes of this phase and will be final after this stage.

5.5.4 CONSULTATIONS ON DRAFT ESIA AND RAP REPORTS

The second round of consultations will be held on draft environmental and social assessment documents and management plans to integrate stakeholder concerns into the final versions. Once the drafts of ESIA are available, and before they are finalized, the Consultant will have to obtain stakeholders' inputs on the reports' conclusions and particularly on the mitigations and management plans. As far as public disclosure is concerned, major initiatives to inform the public and interested parties about the NUBSP may include the following:

- Press advertisement describing the project and inviting interested parties to provide comments at a stakeholder workshop;
- Disclosure of the Draft Final ESIA Report, including the Executive Summary, locally and via the World Bank Info shop.

It is expected that the Draft Final ESIA reports, together with the respective Non-Technical Summaries will be disclosed locally for 30 days at the offices of the implementing agencies and the World Bank Info shop. In order to make people aware of the disclosure of the Draft Final ESIA Report and RAP, an advertisement will be placed in one of the national newspaper which will also draw readers' attention to the date and venue of the proposed public meeting if any.

The consultation process with affected persons (APs) will include the disclosure of the resettlement policy framework through various meetings and distribution of informative material aimed at creating awareness among PAPs regarding their potential loss, entitlements and compensation payment procedures and grievances redress mechanisms.

After this stage, the respective reports will be revised accordingly and finalized.

5.5.5 ONGOING CONSULTATIONS

The World Bank also requires that the consultation process is ongoing during the construction and operation phases of the project. To this effect, OPM will be required to maintain long term and mutually beneficial open dialogue with local authorities and the public through its Social and Environmental Safeguards Specialists and Officers during implementation. A key role of this post consultation will be to ensure that local stakeholders have an opportunity to raise questions, comments or concerns and that all issues raised are answered promptly and accurately.

Therefore, disclosure of information will also continue throughout project construction and operation. The primary emphasis here will be to assure stakeholders that the environmental and social mitigation, monitoring and management practices established in the RAP, ESIA and ESMPs are being implemented and the environmental and social standards and guidelines required by Government of Uganda and the World Bank are being met through a comprehensive monitoring and reporting process.

In that regard, the implementing agencies will have to maintain Environment and Social Registers of written records with respect to environmental and social impacts from the NUBSP. In addition, an annual report containing information relating to the monitoring program will be prepared by the implementing agencies and submitted to NEMA and the World Bank.

5.5.6 CONSULTATION OF SPECIAL GROUPS

The majority of the target beneficiaries include IDP returnees, widows, Orphans, People living with HIV/Aids, Ex-combatants, former abductees, female headed households, child mothers, unskilled and unemployed youth, youth, Elderly, Child head families, Persons with disability and Landmine victims.

Interest in the NUBSP will therefore vary among different vulnerable groups (and individuals) in the community, and they may be affected differently. It will be important to keep this in mind during the consultation process, and in some cases it may be more appropriate to consider the needs and priorities of sub-communities rather than those of a whole village. The consultative and communication strategy has to place a special emphasis to ensure the participation of vulnerable groups in decision making throughout NUBSP planning, implementation and evaluation.

Given the social setup of the Vulnerable Groups, consultation will definitely require time and an effective system of communication amongst interested parties to ensure that it adequately deal with their needs, priorities, and preference. This will be best achieved through discussions in focus groups specific to each category. Where participation of certain group of people in community meetings is difficult, due for example to geographical distance or social segregation, other methods such as door-to-door visits, structured and unstructured interview, separate community meetings or other participatory techniques will be considered. Local languages should be used and efforts should be made to include all community members.

People with disabilities are the world's poorest of the poor and vulnerable in countries even where the World Bank has invested in a number of development projects. This is because sometimes PWDs are not systematically consulted and therefore excluded in the planning and implementation of projects. Due to the LRA conflict, there are a number of PWDs in the NUBSP program areas and the consultation of PWDs will be critical to guide subproject designs to ensure their inclusion.

During NUSAF2, PWDs were consulted, particularly those in leadership positions. However, the consultation was inadequate because it did not take care of the information needs of the deaf and the visually impaired. To be effective there is a need for sign language interpretations services and information in Braille as may be applicable. The NUBSP Implementation Manual should clearly provide details on consultation of PWDs.

6 ENVIRONMENTAL AND SOCIAL ASSESSMENT PROCESS FOR NUBSP PROJECTS

6.1 ENVIRONMENTAL SCREENING UNDER OP 4.01 ENVIRONMENTAL ASSESSMENT

The classification of each subproject under the appropriate environmental category will be based on the provisions of the World Bank Operational Policy on Environmental Assessment (OP 4.01). The NUBSP Project has been assigned Environmental Category B. Therefore, no sub-project is expected to fall under EA Category A. The environmental and social screening of each proposed sub-project will result in its classification in B or C, depending on the type, location, sensitivity and scale of the subproject and the nature and the magnitude of its potential environmental and social impact:

Category B: Any project which is likely to have potential environmental and social impacts, which are less adverse than those of category A projects, on human populations or environmentally important areas including wetlands, forests, grasslands and any other natural habitat. The impacts are usually site specific, few or none of them are irreversible, and most of them are mitigated more readily than impacts from category-A sub projects. Although an ESIA is not always required, some environmental analysis is necessary. ***Such subprojects would require an ESMP. Typically, this is what shall be undertaken under NUBSP.***

Category C: Any project which is likely to have minimal or no adverse environmental and social impacts. Beyond screening no further ESA action is required. ***No assessment would be required under World Bank requirements.***

6.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT IN UGANDA

The key regulations for environmental and social assessment in Uganda include the National Environment Act, the EIA Regulations, 1998, the EIA Guidelines of 1997 and the National Environment (Audit) regulations, 2006. The *National Environment (Environmental Impact Assessment) Regulations, 1998* define the role of ESIA as a key tool in environmental management, especially in addressing potential environmental impacts at the pre-project stage. The regulations define the ESIA preparation process, required contents of an ESIA, and the review and approval process including provisions for public review and comment. The regulations are interpreted for developers and practitioners through the *Guidelines for Environmental Impact Assessment in Uganda (1997)*.

The section below illustrates the steps that will be involved during environmental and social assessment and management process as per Ugandan regulations and World Bank safeguard policies that will lead to the review and approval of subprojects under the NUBSP.

6.2.1 STEP 1: SCREENING OF SUBPROJECTS

Screening is vital and will be the first step in the sub project cycle. The objective of the screening process is to rapidly identify those subprojects which have little or no environmental or social issues so that they can move to approval and implementation immediately. Screening will provide a mechanism for ensuring that potential adverse environmental and social impacts of the sub-projects are identified, assessed and mitigated as appropriate, in a systematic way.

The Subproject approval would be streamlined to ensure that sub-projects get approved in three months. The TST shall focus on providing technical and knowledge support to Districts, and approval of livelihoods projects will be left to Districts. Screening of the projects will be done using the Environmental and Social Screening Form (ESSF) in Annex 1 that requires information that determines the characteristics of the prevailing local bio-physical and social environment with the aim of assessing the potential project impacts on it.

During environmental and social screening, due attention will be paid to the potential (adverse) environmental risks and impacts, including impacts on the natural environment (air, water and land); human health and safety; and physical cultural resources.

6.2.2 STEP 2: ASSIGNING THE APPROPRIATE ENVIRONMENTAL CATEGORIES

NEMA categorizes project applications as category I, II or III, where category III is a project likely to have many significant impacts and requiring a full, detailed ESIA; category II is similar to the Bank's Category B and may or may not require an ESIA. Category I can be approved on the basis of the Project Brief. Both Category II and Category III require environmental management plans.

The potential categories, in line with the National Environment Act and EIA Guidelines are:

- a. Activities that require a full Environmental and Social Impact Study (ESIS), either because (i) they meet the general criteria in the Third Schedule of the National Environment Act, NEA, i.e. are out of character with their surroundings, are of a scale not in keeping with surroundings, or involve major changes in land use; (ii) are types of projects listed in the Third Schedule; (iii) are located in a nature conservation area; or (iv) are identified in other laws or regulations as requiring EIA because of their location.
- b. Activities for which additional information is needed to determine what level of environmental analysis and/or management is appropriate and for which mitigation is easily identifiable. These will likely be Category B under the World Bank categorization. It is useful to note that most of the sub-components under this project will fall under this EA category B.

For NUBSP sub-project that fall within the Bank's Category B (or NEMA's Category II) an ESMP only may be required.

- c. Activities that are determined to have no significant or adverse potential impact on the environment (List A, annex 2 of the 1998 EIA Guidelines). Projects defined as List A in the EIA Guidelines will not need any further assessment as they are predicted to have little or no impact. These will likely be Category C projects under World Bank categorization. *No assessment is required for Category C subprojects, and this will be confirmed through environmental screening.*

Desk Appraisal: The Sub county Technical Planning Committee (STPC) with guidance from the CDO and the DEO will constitute subproject appraisal teams, comprised of members of relevant line departments with knowledge in the subproject proposals received. The appraisal teams will then review the received subproject proposals and appraise them for appropriateness, compliance to safeguards, sectoral standards and norms, project guidelines and budgets and fill the ESSF. The ESSF will provide useful information to enable either the Sub county appraisal teams or the designated Sub county environment focal persons and Community Development Officers to assign an environmental/social category. In instances where there is inadequate capacity to fill the ESSF form and assign the environmental category at Sub county level, the DEO and CDO will undertake the task. In addition, the Sub county appraisal teams will identify any environmental and social

issues, cross check their mitigation measures and ensure that they are planned and budgeted for. The Appraisal teams will also assess gender responsiveness and equity sensitivity of the sub project.

Field Appraisal: After the desk appraisal, the Sub county appraisal teams will undertake a field appraisal of each subproject at the respective sites to verify the magnitude of the environmental and social issues, the adequacy of mitigation measures provided; the cost of implementing mitigation measures, suggest modifications to be incorporated in the environmental and social components of the subproject (if any) and finalize the appraisal report. The report will be reviewed by the STPC, endorsed by the Sub County Executive Committee (SEC) for onward submission to the District Technical Planning Committee (DTPC).

Milestones	Objectives	Process & Responsibility	Product/Decision
Detailed Environmental Appraisal	to appraise environmental aspects of subprojects	DTPC or DEO together with STPC conducts necessary site visits to crosscheck: <ul style="list-style-type: none"> • type and magnitude of environmental issue; • adequacy of mitigation measures proposed; • cost of implementing mitigation measures; • recommend any modifications to be incorporated in environmental actions of the subproject; • appropriate changes in other activities of subproject; and • Finalize environmental component of project appraisal report. 	Sub-project Appraisal Report <ul style="list-style-type: none"> • Confirming environmental category with recommendation to either accept subproject as submitted, accept it with modifications or reject project
Detailed social Appraisal	to appraise social aspects of subprojects	CDO conducts necessary site visits to crosscheck: <ul style="list-style-type: none"> • Whether group members participated in proposal preparation • Whether beneficiaries are right target • Whether project will bring about improvements in people’s lives; • Whether project has any other negative impacts on the community • Cost of mitigating negative social impacts • Identify any modifications to be incorporated in the social aspects of the subproject; • appropriate changes in other components of subproject; • Finalize social part of project appraisal report. 	Sub-project Appraisal Report with recommendation to either accept sub project as submitted or to accept sub project with modifications, or reject it.

Disclosure of Subproject Information: The information on environmental and social issues in a subproject will be disclosed together with the other subproject information in order to comply with the Bank's Policy on Disclosure of Information. This policy requires that, before a subproject is approved, its environmental implications (filled ESSF) be made available for public review at a place accessible to local people (e.g. sub county offices or parish notice boards), and in a form, manner, and language they can understand.

Subproject approval: After the desk and field appraisals, the Sub county Chief will forward all the subprojects to the Sub county Executive Committee for endorsement, after which the Sub county Chief will forward all the recommended and endorsed subproject proposals to the District. The District Technical Planning Committees and District Environment Committee will review the results and recommendations presented in the environmental and social screening forms and the proposed mitigation measures presented in the environmental and social checklists as a basis for making recommendations for subproject approval.

After analyzing the data contained in the environmental and social screening forms and after having identified the right environmental category and thus the scope of the environmental work required, the Environment Focal Person/DEO will make a recommendation to the District Technical Planning Committee whether: (a) no environmental work is required; (b) the implementation of simple mitigation measures will be enough; (c) a project brief will be required, or (d) a full ESIA will be required.

Based on the results of the above review process, and consultations with the relevant stakeholders and potentially affected persons, the DTPC will proceed to approve or reject a subproject, in case of projects that don't require EIA or Resettlement Action Plan. The approval will be based on the submission of the District Environment Officer on behalf of the District Environment Committee. In case of subprojects that require EIAs, the recommendation for approval will be given by NEMA.

6.2.3 STEP 3: CARRYING OUT ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

The initiation of the ESIA process in Uganda is marked by the submission of the Project Brief to the Executive Director of NEMA. The Project Brief contains essential information on the project inputs and outputs and must provide sufficient information to allow the competent authority (NEMA), in consultation with lead agencies, to *screen* the project, that is, to decide whether the project may have significant environmental and social impacts and the level of environmental and social impact assessment (ESIA) that will be required.

The NEMA screening process first eliminates those projects which are exempt from ESIA (category I), then those that definitely require a full ESIA (category III). For projects deemed to fall into category II, the project may be approved on the Project Brief, if mitigation measures for adverse impacts are adequately prescribed in the Project Brief. If not, then an ESIA will be called for. It is important to note that the Bank may not require an ESIA for a Category B (category II) project but an ESMP is required.

If NEMA deems the Project Brief to be complete, a copy is forwarded to key stakeholders for review. However, in case an ESIA needs to be undertaken, the ToRs for the study will be prepared by the implementing agency and reviewed and approved by NEMA. The ESIA report will identify and assess the potential environmental and social impacts for the planned activities, assess the alternative solutions, and will design the mitigation, management and monitoring measures to be implemented. The social impact assessment component of the ESIA process typically assesses the likely impacts that a project will have on intended beneficiaries and affected stakeholders. It will therefore identify, amongst other things, the different stakeholders and their interest in the project, participation processes and how these will be adapted to different social groups and stakeholders, social diversity including gender, understanding the role of informal and

formal institutions at various levels, and the social risks beyond risks associated with social safeguards. The detailed process for conduct of the ESIA in Uganda is presented in Annex 3.

As part of the assessment, the ESIA will also assess the vulnerability of different groups in particular project contexts (in terms of potential exclusion from project benefits, negative project impacts, and the need for specific culturally compatible mechanisms for participation, e.g. for women, the widowed, permanently disabled, elderly etc.), and will incorporate adequate measures to address such vulnerability in the NUBSP design.

Where for particular project components land acquisition (temporary and/or permanent) is unavoidable, a Resettlement Action Plan will be prepared in line with the Resettlement Policy Framework (RFP) that sets out a clear framework for the assessment, mitigation and compensation and, where necessary, the settling of disputes arising out of resettlement, land acquisition, loss of assets/access to assets.

The ESIA will be conducted by the consultancy firms registered by NEMA. However, Project Briefs and RAPs maybe prepared by non-NEMA registered persons. A Project Brief doesn't require preparation of ToRs and their approval by NEMA.

According to the National Environment Act, "project brief" means a summary statement of the likely environmental effects of a proposed development referred to in section 19. Unlike the ESIA, a project brief does not require a scoping report and neither submission of terms of reference for approval by NEMA. The ESMP or Project Brief will for each potential impact include: mitigation measures, monitoring indicators, implementing and monitoring agencies, frequency of monitoring, cost of implementation, and necessary capacity-building. It is possible that after completing the Checklist, the Environmental Specialist may recommend that the subproject concerned should be subjected to a full ESIA, and submitted to NEMA for review and decision making.

According to Regulation 5 of the EIA Regulations, 2006, a Project Brief is to contain amongst others, the following:

- a. the nature of the project in accordance with the categories identified in the Third Schedule of the Act;
- b. the projected area of land, air and water that may be affected;
- c. the activities that shall be undertaken during and after the development of the project;
- d. the design of the project;
- e. the materials that the project shall use, including both construction materials and inputs;
- f. the possible products and by-products, including waste generation of the project;
- g. the number of people that the project will employ and the economic and social benefits to the local community and the nation in general;
- h. the environmental effects of the materials, methods, products and by-products of the project, and how they will be eliminated or mitigated;
- i. Any other matter which may be required by the Authority.

In addition to the above, it is currently a practice and requirement by NEMA to include details of stakeholder consultations in Project Briefs.

6.2.4 STEP 4: PUBLIC CONSULTATIONS AND DISCLOSURE

Wide-ranging consultations help to; (i) ensure that people are made aware of a project and have the opportunity to comment on it (ii) improve responsiveness, accountability and transparency on the part of project management (iii) promote better decision-making and (iv) increase cooperation of community and government partners during project implementation and local ownership after handover. Initial meetings with stakeholders provide a forum not just for dissemination of information about the project and its potential impacts, but also constitute an important opportunity to hear people's concerns and take on board their recommendations to the extent possible in project design. These meetings also will lay the foundations for systematic consultation and participation of the community in all subsequent stages of the project's development.

As a first step stakeholders will be identified. These will fall into two categories: (i) Direct stakeholders who will be directly affected by the project and (ii) Indirect stakeholders who have an interest in the project or who could influence its outcome. The implementing agencies will identify direct and indirect stakeholders and will prioritize stakeholder consultations to inform the design and decision making of the project, and thus improve the effectiveness, relevance and sustainability of all project components. A dynamic participatory approach that seeks to involve the various stakeholders in decision-making about environmental management, livelihood and community development programs will be encouraged throughout the course of the project. This approach will also be used to inform the implementation of an effective grievance redress mechanism, which would be readily accessible in the project areas.

Public consultation will be initiated during the scoping and ESIA preparation stages and views of stakeholders (general public and lead agencies) have to be included in a Project Brief as well. Public consultation will also be an integral part of the process throughout the planning and execution of the project. The implementing agencies will interact closely with PAPs/communities, project personnel, government departments, NGOs right from the early stages of the project preparation on a regular basis for developing and implementing the respective project ESIA and RAP where applicable. For this purpose, public contact drives shall be organized by the respective implementing agencies and public awareness shall also be created with NGO's and other social organizations active in the affected areas. During the public awareness drives, it will be ensured that only accurate information is given about the project and its possible environmental and social impacts.

All consultations will be documented in writing, and where culturally acceptable, with photographs and/or video of proceedings. These would then be filed in the project files. The opinion/suggestions made by the community/affected groups shall be incorporated in the respective ESIA and Resettlement Action Plans. After clearance, the assessment reports (ESIS, RAPs, PBs, etc.) shall be disclosed both in Uganda through the daily print media by PCU and at WB's Info shop by IDA.

6.2.5 STEP 5: REVIEW AND APPROVAL

The ESIA study will be undertaken by a registered ESIA Practitioner in accordance with the ToRs approved by NEMA. Following internal review of the ESIS or PB, by the respective implementing agency and the Bank the ESIS or PB will be forwarded to NEMA for final review and clearance. If the Executive Director is satisfied that the subproject will have no significant impact on the environment, or that the assessment (Project Brief or ESIS) discloses sufficient mitigation measures to cope with the anticipated impacts, he may approve the subproject. The Executive Director of NEMA or his delegated official shall then issue a Certificate of Approval for the project.

It is important to note that this review and approval process is to be carried out in parallel with the review and approval of the technical, economic, financial and other aspects of the subprojects. Implementation of subprojects cannot commence until the environmental and social aspects have been reviewed and appropriate mitigation measures have been adopted. As possibilities of social impacts regarding land acquisition, the implementation of subprojects cannot proceed until the resettlement and/or compensation plans have been prepared and implemented after clearance by the Chief Government Valuer in the Ministry of Lands, Housing and Urban Development (MoLHUD). This is detailed in the RPF for the NUBSP prepared alongside this ESMF.

6.2.6 STEP 6: SUBPROJECT IMPLEMENTATION

Management planning will be critical to ensure proper implementation of mitigation measures for the different subprojects. It will enable project beneficiaries plan and budget effectively for mitigation activities to address identified environment issues by projects. The respective management plans across components will be prepared and will include a mitigation cost to address environment and social issues as well as capacity enhancement for direct beneficiaries to duly implement the mitigations.

Implementation of environmental and social mitigation measures will be done concurrently with the other project activities and in line with sector guidelines and checklists that will be provided. In NUBSP, communities will be required to make their contribution to environmental and social mitigation measures upfront. As much as possible local communities will participate fully in sub project implementation.

6.2.7 STEP 7: ENVIRONMENTAL MONITORING

Monitoring is required to ensure that all the required environmental and social mitigation measures, set out in the Environment and Social Assessments for each project component are implemented satisfactorily. Environmental and social monitoring will be undertaken by communities themselves, the STPC, DTTC, selected councilors, DEO and CDO during all stages of the subproject implementation including operation and maintenance. The main objective of monitoring is to ascertain that the proposed mitigation measures are being implemented and that there is compliance to the terms and conditions for approval. Monitoring will be based on a set of indicators that teams will develop for specific mitigation measures. The DEO and CDO will undertake visits to project sites to provide technical support and on the spot guidance to project implementers, document progress in implementing mitigation measures, write and submit monitoring reports to the SEC/DEC on a monthly basis.

The monitoring indicators will be developed with guidance from the OPM/NUSAF Environmental Specialist charged with NUBSP safeguards management. Each subproject progress report will include monitoring of the RAP and other social issues covered by the ESMF. At the end of subproject construction phase, a Certification for Compliance integrating Environmental and social issues for the completion of works will be issued by OPM for Component 1 that involves support to income generating projects.

Overall, OPM/NUBSP will have the lead role in monitoring to ensure that various project environmental and social obligations are met, and will ensure that the requirement for an environmental and social audit is fulfilled not less than 12 nor more than 36 months after project completion or commencement of operations respectively in line with the National Environment Act and the Audit Regulations of 2006.

NEMA has its own Department of Compliance and Monitoring and a number of designated environmental inspectors, whose task is to monitor project implementation. In addition, the districts have District

Environmental Officers (DEOs) who play the role of environmental inspectors. The purpose of NEMA monitoring/ auditing is to ensure compliance with the Certificate (of Approval of ESIA) Conditions. However, for this small grant project covering only four districts, NEMA is not expected to be involved but rather the District Environment Officers and Community Development Officers. The respective Sub-county extension staff shall also be involved in monitoring project activities.

6.3 GRIEVANCE REDRESS MECHANISM

6.3.1 IMPORTANCE

Grievance redress mechanisms gives a way to provide an effective avenue for expressing concerns and achieving remedies for communities, promote a mutually constructive relationship and enhance the achievement of project development objectives. Grievance redress mechanisms are increasingly important for development projects where ongoing risks or adverse impacts are anticipated. They serve as a way to prevent and address community concerns, reduce risk, and assist larger processes that create positive social change. It has been learned from many years of experience that open dialogue and collaborative grievance resolution simply represent good business practice both in managing for social and environmental risk and in furthering project and community development objectives.

6.3.2 COMMUNITY EXPECTATIONS WHEN GRIEVANCES ARISE

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem
- An honest response to questions about project activities
- An apology
- Compensation
- Modification of the conduct that caused the grievance
- Some other fair remedy.

In voicing their concerns, they also expect to be heard and taken seriously. Therefore, the project's PCUs must convince people that they can voice grievances and the project will work to resolve them without retaliation.

6.3.3 PROCEDURES AND TIME FRAMES

There is no ideal model or one-size-fits-all approach to grievance resolution. The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs, and project conditions and scale. In its simplest form, a grievance mechanism can be broken down into the following primary components:

- a. Receive and register a complaint.
- b. Screen and validate the complaint.
- c. Formulate a response.
- d. Select a resolution approach, based on consultation with affected person/group.
- e. Implement the approach.
- f. Settle the issues.
- g. Track and evaluate results.
- h. Learn from the experience and communicate back to all parties involved.

6.3.4 GRIEVANCE PREVENTION

There are ways to proactively solve issues before they even become grievances. Implementers should be aware and accept that grievances do occur, that dealing with them is part of the work, and that they should be considered in a work plan. Implementers should do the following:

- a. ***Provide sufficient and timely information to communities.*** Many grievances arise because of misunderstandings; lack of information; or delayed, inconsistent, or insufficient information. Accurate and adequate information about a project and its activities, plus an approximate implementation schedule, should be communicated to the communities, especially PAPs, regularly. Appropriate communication channels and means of communication should be used.
- b. ***Conduct meaningful community consultations.*** OPM/NUBSP should continue the process of consultation and dialogue throughout the implementation of the project. Sharing information, reporting on project progress, providing community members with an opportunity to express their concerns, clarifying and responding to their issues, eliciting community's views, and receiving feedback on interventions will benefit the communities and the project management.
- c. ***Build capacity for project staff, particularly community facilitators and other field-level staff.*** The community-level facilitators and field-level staff of OPM/NUBSP should be provided with adequate information on the project such as project design, activities, implementing schedules, and institutional arrangements as well as enhanced skills in effective communication, understanding community dynamics and processes, negotiation and conflict resolution, and empathizing with communities and their needs. Building trust and maintaining good rapport with the communities by providing relevant information on the project and responding effectively to the needs and concerns of the community members will help solve issues before they even become grievances. It is also important that community facilitators and field-level staff provide regular feedback on their interactions with the communities to the higher levels of the implementing agencies.

6.3.5 ANTICIPATED GRIEVANCES IN NUBSP PROGRAM

The project activities will include mainly livelihood activities related to value addition, farming and capacity building to enhance business skills for the CIGs. Other sub-projects in the targeted districts will be identified during implementation. These activities are anticipated to likely cause some grievances related; a) Issues related to land, b) Location of storage facilities. The site specific land study and social assessment will provide for recommendations for the establishment of the grievance redress mechanisms that will be integrated into the relevant RAPs if any has to be done.

6.3.6 MECHANISM UNDER NUBSP PROGRAM

6.3.4.1 COMMUNITY LEVEL GRM

The NUBSP sub projects will have social structures Community Monitoring Groups (CMGs) like in NUSAF3 and Community projects beneficiaries will elect their leaders and representatives from community and not from beneficiaries to handle social accountability issues as well land issues. One of the tasks of the above committees amongst others is to, mediate in the conflicts and solve problems within the villages and as well land issues. Any grievances that cannot be resolved at that level are referred to the sub county area land committee and thereafter if it fails it is referred to the government courts of law.

The sub-project RAP team will also establish an independent grievance mechanism through Local Authorities, Land Committee and through community leaders. The Land Act creates Land Tribunals, which are intended to help resolve land related disputes at local government levels. "The Land Boards at the District level are not involved in resolving disputes but they do assist in registering land and can be called upon to give evidence on matters of land in courts of law". Issues of land conflicts do go through the Local Council system (i.e. LC I-III) in the locality and if not resolved, they are referred by LCIII to the courts of law whose decisions will be final. All PAPs will be informed about how to register grievances or complaints, including specific concerns about compensation and relocation. The PAPs shall also be

informed about the dispute resolution process, particularly on how the disputes will be resolved in an impartial and timely manner. The RAP Team will produce a Report containing a summary of all grievances.

6.3.4.2 REFERRAL OF SEVERE OR UNRESOLVED GRIEVANCES

The World Bank's Grievance Redress Service (GRS) has also been introduced to provide an easy way for project-affected communities and individuals to bring their grievances directly to the attention of Bank Management via email: grievances@worldbank.org; fax: +12026147313 or via mail: The World Bank, Grievance Redress Service, MSN MC 10-1018, 1818 H St NW, Washington, DC 20433, USA and/or via Country Office in Kampala – Rwenzori House, 1 Lumuba Avenue, P.O. Box 4463, Kampala (U); Tel: +256 414 3022 00. **MONITORING AND REPORTING OF GRIEVANCES**

The respective Sub-counties should include regular updates and analysis of the GRM in their quarterly reports and also provides regular feedback to communities and other relevant stakeholders. All submitted complaints and grievances will be added to a database/project files which will be updated regularly. Each complaint and grievance should be ranked, analyzed and monitored according to type, accessibility and degree of priority. The status of grievances submitted and grievance redress will be reported through the monthly report.

6.3.4.5. THE WORLD BANK'S GRIEVANCE REDRESS SERVICE (GRS)

GRS DEFINITION AND PURPOSE

The GRS is the World Bank's easy way to provide PAPs and communities an avenue to bring their complaints directly to the attention of Bank Management. The project-level GRM will remain the primary tool to raise and address grievances in Bank-supported operations except issues that cannot be resolved at the project level.

Thus, grievances that are brought directly to the project team or to the country office should be addressed at the project level, unless the complainants specifically refer to the GRS in their complaint, or Task Team or Bank Management considers that referring the case to the GRS adds value. Complaints that are being addressed at the project-level can always be referred to the GRS at a later stage, especially if successful resolution (perceived or actual) was not possible (escalation).

The GRS facilitates corporate review and resolution of grievances by screening and registering complaints and refereeing them to the responsible Task Teams/Managers. The GRS undertakes the follow functions within defined time frame:

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

SUBMITTING A COMPLAINT TO GRS

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

A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org;
- By fax: +12026147313
- By mail: The World Bank, Grievance Redress Service, MSN MC 10-1018, 1818 H St NW, Washington, DC 20433, USA and/or
- Through the World Bank Uganda Country Office in Kampala – Rwenzori House, 1 Lumumba Avenue, P.O. Box 4463, Kampala (U); Tel: +256 414 3022 00.

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

Issues pertaining to fraud and/or corruption will be referred to INT – the Bank’s official mechanism of handling integrity issues of transparency and accountability. These include cases of possible fraud, corruption, collusion, coercion and obstruction in World Bank-funded projects.

Freedom from Retaliation

Bank policies provide for the participation of PAPs in project preparation and implementation. Complainants who use the GRS **MUST NOT** be subject to any form of retaliation, abuse or any kind of discrimination based on the fact that they exercised their right to complain to the GRS.

GRS Review Process

Registration of Complaints

After receipt of a complaint, the GRS immediately *logs* the complaint and a notification of receipt will be sent to the complainant. Within *10 business days*: The GRS *reviews and evaluates* the complaint, determines the eligibility and type of complaint according to the categories in the table below, registers it and forwards it to the appropriate Task Team/Managers, which is noted in the online system. GRS will notify the complainant of the eligibility determination of the complaint:

- If the complaint is *eligible*, the complainant will be notified that the Task Team has been assigned the case with a case number and the expected time frame in which s/he will be contacted.
- If the complaint is *unclear*, the complainant will be requested to submit additional information or provide clarifications in order to allow a decision on registration.
- If the complainant is *not eligible*, the complainant will be notified of this decision and referred to relevant institutions where appropriate and the case will be closed.

Review of issues raised and Formulation of Proposal

Within *30 business days* after registration the Task Team will respond to the complainant. For Type I complaints (information requests) the Task Team will provide the requested information in line with the Bank’s Access to Information policy. For Type II (minor and medium impacts) and III (serious issues of corporate relevance, harm, and complex policy issues) complaints the Task Team will propose to the complainant how the issue raised in the complaint will be addressed, including a proposed time frame. The proposed time frame for Type II should not exceed 60 days and for Type III 180 days. If Task Team needs more time it will justify the additional time required. If the review by the task team reveals that the issues of concern raised in the complaint are not related to the Bank-supported project or any aspects thereof it will advise the complainant accordingly and refer the complainant to relevant government authorities to which the complaint should be addressed.

The specific proposal to address the issue or the recommendation to refer it to the borrower will be cleared by the relevant managers. The same applies to notifications that the concern is not related to the Bank project and hence the Bank has no means to address it. If the complainant accepts a specific proposal to resolve the concerns, the Task Team implements according to proposed process and proposed timeframe. The Complainant may provide input on all or parts of the initial proposal.

If the complainant rejects the proposal and/or the issue cannot be resolved through this process, the complainant will be informed by the GRS that the complaint is closed without resolution. The complainant will be referred to other options for remedy if appropriate such as responsible country authorities, relevant local/national grievance redress mechanisms or the World Bank Inspection Panel, if the complaint relates to noncompliance and harm.

Acceptance of the proposal should be reached within 30 business days after the initial proposal has been presented to the complainant. For extraneous circumstances, request for extension can be submitted if both parties agree for an additional 30 days business at a time.

Implementation of Proposal

Once the proposal is accepted, the Task Team implements the proposal. The Task Teams will update the status and progress of the implementation of the proposal in the GRS log and will keep the complainant informed of such progress until resolution of complaint. The Task Team may request support and advice through the GRS at any point. Such support and advice can be provided by other Bank Global Practices where required and as appropriate.

6.4.1 OVERALL MECHANISM

The monitoring plan will include indicators to be monitored, guidelines, responsible persons or institutions, the resources required to carry out the monitoring activities and timelines (quarterly) when the monitoring exercises will be conducted. The arrangements for quarterly monitoring of the resettlement and compensation activities would fit the overall monitoring programme of the entire NUBSP.

The arrangements for monitoring the resettlement and compensation activities will also fall under the overall responsibility of LGs. The LGs will institute an administrative reporting system that:

- a) alerts project authorities to the necessity for land acquisition in the project activities design and technical specifications;
- b) provides timely information about the assets valuation and negotiation process;
- c) reports any grievances that require resolution, and
- d) documents timely completion of project resettlement obligations (i.e. payment of the agreed-upon);
- e) Updates the database with respect to changes that occur on the ground as resettlement and compensations activities are being implemented.

Annual evaluations will be made in order to determine whether there were any PAPs affected by the sub projects and have been paid in full and before implementation of the individual sub project activities; and whether the PAPs enjoy the same or higher standards of living than before. A number of objectively verifiable indicators shall be used to monitor the impacts of with and without the compensation activities. These indicators will be targeted at quantitatively measuring the physical and socio-economic status of the PAPs, to determine and guide improvement in their social well-being. Therefore, monitoring indicators to be used for different RAPs or NUBSP will have to be developed to respond to specific site conditions.

7 PROJECT ACTIVITIES, IMPACTS AND MITIGATIONS MEASURES

7.1 PROJECT ACTIVITIES

The project will support interventions designed to improve livelihoods and access to basic socio-economic services in selected districts. The salient physical characteristics relevant to safeguard analysis relate to project Component 1: **Business Training, Small Grants, and Follow-up Business Advisory Services to CIGs Component**. Since this support will finance household income activities to help poor households build new income-generating opportunities, and also encourage the poor to mobilize themselves in livelihood-oriented groups and business organizations, the component 1 may involve use of pesticides and other veterinary chemicals or result in their increased usage through Livelihoods Investments business plans supported and would trigger OP 4.09 on pest management. The subprojects are expected to have only minor use for nationally approved pesticides; otherwise there will not be significant pesticide use in subprojects. Where pesticide use will be required, District and sub county extension staff (agricultural and veterinary officers/assistants) will train farmers on appropriate use, storage and disposal of pesticides. OP 4.09 will be used to guide the district support team on pest and pesticide management, including on allowed types of pesticides (per WHO guidelines). The pest management issues will be involved in a variety of subprojects such as:

- New land-use development or changed cultivation practices in an area;
- Expansion of agricultural activities into new areas;
- Diversification into new agricultural crops;
- Intensification of existing low-technology agriculture systems;
- Development of veterinary facilities, cattle dips, etc.,;
- Animal traction projects
- Improved goats subprojects;
- Tree nursery projects

7.2 GENERIC POTENTIAL PROJECT IMPACTS AND THEIR MITIGATIONS MEASURES

The proposed NUBSP is not likely to result in significant adverse environmental or social impacts. The project has a potential of localized, site-specific adverse environmental impacts associated with agricultural and Non agricultural projects such as production of groundnut paste or fruit juices, the processing of sesame oil or sun-dried fruit, baking, milk processing, the production of smoked fish, maize flour, or cassava flour, starting a salon, tailoring, dress making, handicrafts, keeping poultry or pigs, vegetable farming and others.

These include construction and production waste, pollution from use of pesticides, acaricides and smoke, social and health impacts due to establishment of facilities etc. Most of these impacts are well known and can be mitigated using good construction practice and agricultural practice embedded in the projects.

Impacts can be divided into environmental and social impacts associated with implementation and operation of community projects which depends specifically on the size and nature of the subproject and the environmental and social context where the subproject will be situated. The implementation of the proposed NUBSP will

result in a number of environmental and social impacts for the program as a whole. Some of these impacts may be Positive and beneficial while others are negative or adverse.

7.2.1 ANTICIPATED POSITIVE ENVIRONMENTAL AND SOCIAL IMPACTS OF NUBSP PROJECT

The objective of the NUBSP is aligned with promotion of environmental and social benefits through increased and Sustained income of the poor households in Northern Uganda by provision of; business management training, small grants, and follow-up business advisory services to existing and new CIGs.

Positive impacts expected to result from this project include the following:

- i. Increased numbers of new CIGs trained and undertaking viable and sustainable value-added and/or service-based activities in their particular environments;
- ii. Capacity of the existing and as well new CIGs built in business management skills and improved financial recording keeping by beneficiaries;
- iii. Increased number of women benefiting from the grant and implementing their business plans;
- iv. Increased sales revenues compared to forecasted sales revenues in the business plans achieved;
- v. Improved household income of existing and new CIG members who completed business management skills training, produced business plans, and received one year of follow-up management advisory services after one year of follow-up advisory services;
- vi. Increased number of CIGs reinvesting their savings in new capital assets to expand their operations;
- vii. Creation of new jobs and employment of local labour associated with specific businesses and services related to value addition projects like restaurants, saloons, simsim processing plants, farming activities etc;
- viii. Improved waste management through recycling and re-use methods;
- ix. Increased awareness in business skills and entrepreneurship skills for Northern Uganda's business entrepreneurs leading to the inclusion of the region in multi-destination itineraries with other regions in Uganda;
- x. Increased supply of trained work force capable of delivering competitive businesses, products and services;
- xi. positive economic impacts on small market suppliers for raw materials needed in enterprises implementation(i.e. farm inputs, raw materials for processing plants etc) and;
- xii. Increased number of benefiting CIGs in SACCOs and other financial institutions.

7.2.2 GENERIC NEGATIVE ENVIRONMENTAL AND SOCIAL IMPACTS OF NUBSP PROJECT

The main negative environmental and social issues of concern that were identified during the consultations for the NUBSP projects include:

- i. Generation and disposal of construction debris for facilities;
- ii. Noise affecting the immediate environment
- iii. Generation of sewage and effluent. Sewage is of significant concern with respect to the environment and particularly to water and soil. In its raw form, it is serious health hazard and emits offensive odours;
- iv. Generation of air pollutants in the form of smoke and dust particles and gas emissions (fumes) from machinery;
- v. Vegetation clearance to give way for construction of facilities;

- vi. Oil/grease spills / leaks in processing plants sites and in most areas that make use of petroleum products, which contain hard/hazardous elements that are detrimental to the environment;
- vii. Increased solid wastes including wood, plastics, containers, metal rods, pieces of iron sheets, sharp objects (nails) etc. On completion and occupation, the project will be generating waste products from various operations and activities; mostly refuse, pesticides and accarisides containers including the polythene challenge;
- viii. Increased occupational exposure to dust, air and noise pollution. These plus other safety hazards such as accidents, falling objects, risks from poor scaffolding, ladder and formwork are considered negative impact
- ix. Bad behavior of the workers, such as indiscriminate solid waste disposal and use of abusive vulgar words during operation and issues related to HIV Aids.

Mitigation plans

As part of the screening process, Environmental and Social Management Plans (ESMPs) will need to be prepared and implemented. Effective implementation of ESMPs will ensure appropriate mitigation measures employed to minimize any potential impacts resulting from the proposed activities. OPM should agree with beneficiary district Local Governments on the supervision of the ESMP within the overall plan for the project. Proposed mitigation measures to address anticipated impacts during implementation of CIGs projects and during operation include:

- Vegetation removal should be done with care and trees that may not affect the construction of facilities should be left.
- Leguminous plants that have soil conservation qualities are particularly recommended.
- There is, therefore, need to create an instant grass cover which offers long term erosion control.
- Erosion control fences, silt traps, bare surface cover (mulching or geotextiles) to control soil erosion.
- In the foundation hard cores should be used to increase the firmness of the structure on the ground
- Waste management measures particularly re- use, collection and safe disposal in pits, sewage water management, and recycling methods should be employed in most of the projects implemented
- The Environmental and Social Management Plan (ESMP) will be implemented during all the phases of project. Accordingly, the supervision arrangements for the ESMP should summarize key areas on which supervision will focus such as critical risks to implementation of the ESMP and how such risks will be monitored during implementation and agreements reached with the Project. If identified as a requirement of the subproject through the screening process, a Resettlement Action Plan (RAP), a Pest Management Plan, and/or a Physical Cultural Resources Management Plan / Chance Finds Procedures or a combination of these, is prepared alongside or as an integrated part of the ESMP.

8 ESMF IMPLEMENTATION FRAMEWORK

8.1 DETAILED NUBSP INSTITUTIONAL IMPLEMENTATION ARRANGEMENTS

8.1.1 OFFICE OF THE PRIME MINISTER

Responsibility – The institutional arrangement which has been used to implement the NUSAF 2 project will be used to implement the NUBSP. The Office of the Prime Minister (OPM) will be the implementing agency of the project and will work with a wide range of institutions at central, district and sub-county levels to deliver the project. The OPM will continue to be supported by a Technical Support Team headed by a Project Coordinator and staffed by relevant technical experts. The exact composition and number of staff will be reviewed following further elaboration of the design but it is expected that the team will have a cost effective structure and more practical presence. The Permanent Secretary, Office of the Prime Minister will have overall responsibility for the coordination, accounting for the project resources and ensuring successful implementation of the Project.

At national level, OPM will take overall responsibility for overseeing progress in implementing the ESMF and assessing the effectiveness of mitigation measures against agreed indicators and parameters. OPM will consolidate and review monthly reports submitted by the different agencies. At the district level, the DEO and CDO will monitor environmental and social issues respectively.

Safeguards Capacity – NUSAF has a qualified Environment and Social Specialist in addition to the Technical Support Team to manage safeguards issues in NUBSP. The main role of the Environmental Specialist is to provide technical advice on environmental and social management and mitigation planning and ensure that the ESMF is fully implemented. The Environmental Specialist will report directly to the OPM- NUSAF responsible for project management activities of the NUBSP.

8.1.2 INSPECTORATE OF GOVERNMENT

NUBSP through NUSAF3 will strengthen the existing collaboration arrangement with the office of the IG. Ensuring the independence of the IG will form part of the guiding principles of this collaborative arrangement. The Inspectorate of Government (IG) will conduct NUBSP specific IEC, oversight, grievance response and, where necessary, investigations. The IG under the TAAC will undertake grievance handling especially in regard to corruption.

The IG will liaise with the PS-OPM, Chief Administrative Officers and Sub county Chiefs to ensure effective implementation of the TAAC Program at national, district and sub-county levels respectively.

Under this arrangement, the IG will submit six-monthly reports to OPM, MFPED, Parliament and the World Bank. These NUBSP TAAC reports will also be tabled in the PRDP Monitoring Committee. To maintain the independence of the IG, there will be under the TAAC support program an arrangement under which the IG will receive financial support directly from MFPED. The project will follow guidelines as laid down under the Local Government Good Governance and Anti-Corruption Strategy, the National Anti-Corruption Strategy and other measures aimed at fighting corruption.

8.1.3 MINISTRY OF GENDER, LABOR, AND SOCIAL DEVELOPMENT

Responsibility – While the OPM will be responsible for the overall resources management and implementation of the project, the Ministry of Gender, Labor, and Social Development (MGLSD) mandate as the government agency responsible for Social Protection sector policymaking and overall coordination of SP interventions. As a result, the MGLSD is leading the preparation of a national Policy and framework that includes Income generating related opportunities for Households to which this Program will contribute to build the foundation for the direct income support program.

8.1.4 MINISTRY OF HEALTH

Mandate and Responsibility -Health governance in Uganda is spearheaded by the MoH and shared with other ministries, health development partners, district leadership, providers (public and private), and representatives of civil society organizations (CSOs). The MoH is tasked with the role and responsibility of delivering on the health goals and objectives of government.

Under decentralization law in Uganda, power, authority and resources are decentralized from the central government directly to the districts. Health services in Uganda are delivered within the framework of decentralization. The local governments are empowered to appoint and deploy public servants, including health workers, within the districts, through the District Service Committees. The local governments also plan for and oversee service delivery within the districts. The MoLG steers the local governments, which govern the District Health Offices. District Health Officers District health Inspectors and Educators will be responsible for performing planning, sensitization and supervision functions required of monitoring health and safety services and products in the NUBSP projects. Health and safety activities will be clear in the Environmental and Social Management Plans (ESMP)for each project, where applicable.

8.1.5 MINISTRY OF AGRICULTURE, ANIMAL INDUSTRY AND FISHERIES

Mandate and Responsibility– MAAIF is responsible for policy formulation, planning, setting standards on irrigation, aquaculture and water for livestock. OPM will have to closely work with MAAIF to strengthen the afforestation, crop production, Marketing and veterinary extension services systems to address the beneficiaries' demands of extension services. The above is critical because of the need for training of the beneficiaries of NUBSP to ensure sustainability. Equipping and strengthening the e system at district and sub county level is critical and should be prioritized.

8.1.6 MINISTRY OF WORKS AND TRANSPORT

Mandate and responsibility – The mandate of this Ministry is to promote an adequate, safe and well-maintained transport infrastructure, an efficient and effective communications system, safe housing and buildings, and to contribute to the socio-economic development of the country. With regards to NUBSP, the respective District Engineers will work closely with OPM to implement any infrastructure related issues.

Capacity – The Environment, Gender equality, HIV/AIDS and Occupational Health and Safety issues are part of the standards any facility constructed, as it is required by the Government of Uganda through the NDP. The Ministry of Works and Transport (MoWT) has an Environmental Liaison Unit (ELU) responsible for these areas. In addition, guidance on environmental issues will be provided by the DEOs in line with the decentralized system of government in Uganda.

8.1.7 MINISTRY OF EDUCATION AND SPORTS

Mandate and Responsibility–The mandate of the Ministry of Education and Sports (MoES) is to provide quality Education and sports services in the country, which are constitutional obligations for the Government of Uganda.

Under NUBSP, Ministry of Education and Sports will play a key role specifically on linking beneficiaries to quality skills training centers, to facilitate skills training in arrange of areas from carpentry, metal fabrications and tailoring among others.

8.1.8 THE NATIONAL ENVIRONMENT MANAGEMENT AUTHORITY (NEMA)

Mandate and Responsibility - NEMA is specifically mandated by the National Environment Act (NEA) Cap. 153 as the principal agency in Uganda charged with the responsibility of coordinating, monitoring, supervising, and regulating all environmental management matters in the country. One of the key institutional mandates of NEMA include among others ensuring the observance of proper safeguards in the planning and execution of all development projects including those already in existence that have or are likely to have significant impact on the environment. The role of NEMA will be to review and approve environmental impact assessments and Project Briefs as well as monitoring project implementation in accordance with the National Environment Act and the respective regulations.

Safeguards Capacity – NEMA has adequate technical capacity to monitor the NUBSP through its Department of Environment Compliance and Monitoring in addition to the District Environment Officers in the respective project areas that will be able to report any cases of noncompliance. NEMA Environmental Inspectors do capture social issues/complaints during their inspections where feasible. However, NEMA is constrained by the small number of staff it has and in most cases does not monitor projects they deem of low-moderate environmental and social impacts. In addition, they are also resource constrained since they do not have enough funds to take care of projects monitoring and compliance follow up. Overall, NEMA captures both environmental and social issues either through the mandatory annual compliance audits or through monitoring reports by the respective District Environment Officers who are gazetted Environment Inspectors. Therefore, there is need for close coordination between the DEOs and CDOs in order to fully integrate social issues into the monitoring reports prepared by the DEOs.

8.1.9 LOCAL GOVERNMENT ADMINISTRATION STRUCTURES

Stakeholders

The following institutions will be involved in screening and implementation of mitigation measures, monitoring and evaluation of subprojects within the District:

- District Executive Council (DEC)
- District Technical Planning Committee (DTPC)
- The Sub County Technical Planning Committee (STPC)
- Parish Development Committee (PDC)
- Community Project Management Committee (CPMC)
- IGG Regional Office

Implementation - At District level, the Chief Administrative Officers will be in charge, as the Accounting Officers and overall Coordinators of the project. Building on the positive experience from NUSAF 2 project implementation, the districts will assign an officer (civil servant) who will be a full-time focal person for the NUBSP and will be supported by the District Community Development Officer, District Engineer, and District Environmental officer, among others. Multi-sectoral Technical Planning Committees (TPC) at the district and sub-county levels and the Parish Development Committee will ensure that the project's activities are: appropriately planned, approved and integrated into the budgets and work programs of the respective local governments and line ministry's technical agencies. The role of districts and sub-counties will be outlined in a Memorandum of Understanding between the OPM and Districts. The livelihoods component will be further supported by the creation of an implementation support team at sub-county level to support implementation at sub-county parish and community level. This team will be led by the CDO and comprises of Parish Chiefs, Parish Development Committee members, LC1, Extension staff and community facilitators. Key partnerships will include those with SACCOs, MFIs and banks, business entities that promote the marketing of agricultural produce and other organizations and programs providing financial literacy or business development services.

The Role of the DEOs and CDOs will also be to ensure that NUBSP subprojects are implemented in accordance with NEMA conditions of approval. They will also attend the monthly site inspection meetings for the project and be able to point out issues of concerns. Specifically the CDOs will oversee implementation of compensation aspects and other social issues such as complaints.

Safeguards Capacity—Every district has a designated District Environment Officer whose responsibility is to monitor all environmental affairs of the district including compliance of activities with their jurisdiction. In addition, every district has a Community Development Officer who is responsible for mobilizing communities to participate in projects as well as coordinating and reporting on the impact of projects (positive and negative) on the communities. District Land Tribunals are also in place for some of the project districts to handle land related issues of the NUBSP. However, the districts (specifically the DEOS and CDOs) will require facilitation to monitor project implementation as provided for in the ESMF budget.

8.1.10 THE ROLE OF THE NGOS

Involvement of NGOs in the project areas to deliver capacity building services is important to ensure participation of vulnerable groups. Capacity building at the community level will involve helping communities to conduct participatory needs assessments to identify, prioritize and plan projects and to choose members to represent them as part of the community level project coordination. NGOs could also perform an ombudsman role or serve as a steward of the 'rules of the game'. If a particular group feels that it was not being treated

fairly or the project components have not been implemented, it could contact an appointed NGO to share its grievance. The NGO will, in turn, make sure that the NUBSP operating norms are being respected.

Public consultation and information dissemination, for them to be effective and meaningful, in turn requires adequate community mobilization to ensure all stakeholders are well informed and have their voices heard. Vulnerable groups have to be mobilized to encourage their active participation in consultation and information dissemination processes. Where such groups lack capacity, local NGOs will be engaged to help mobilize them to carry out consultation and information dissemination.

8.1.11 ROLE OF OFFICE OF CHIEF GOVERNMENT VALUER

The application of the valuation exercise on ground will be done in the presence of at least two local council leaders with the participation of the affected persons. Values assigned to assets must be based on the market rates approved by the respective districts. Where this is not possible, the Chief Government Valuer (CGV) will be engaged to do this. In the event that a Government Valuer handles this process, the depreciation cost will not be imputed and the consent of the affected person on the outcome of the process must be sought in order to arrive at agreements on the total profile of losses and compensation.

8.1.12 WORLD BANK

The World Bank will be responsible for review and clearance of ESIA/Project Briefs as well as independently monitoring the project's environmental and social performance in relation to the respective safeguards through implementation support supervision missions. World Bank will also be responsible for reviewing regular monitoring reports and officially disclosing the ESIA/Project Briefs on its website. Technical guidance may also be provided by World Bank to OPM as needed from time to time.

8.2 CAPACITY BUILDING

8.2.1 CAPACITY NEEDSASSESSMENT

NUSAF 2 established a set of minimum standards of staffing and capacity which participating districts should have in order to be considered a full partner in the program. These standards will be revised in the light of the new design; and minimum standards established for sub-counties. Districts and sub-counties will be expected to meet this minimum standard of staffing and capacity before they can receive program resources.

The Project will involve funding of subprojects which will have various levels of impacts on the social and general environment set up. This implies that in order to effectively operationalize the ESMF, the line agencies need to have basic skills and understanding of general environmental and social dimensions and with specific reference to the NUBSP aspects. The overall objective will be to build and strengthen the institutional capacity of the implementing agencies to better support the development and integration of social and environmental measures into the project. The institutional capacity building strategy will seek to:

- Develop organizational mechanisms to ensure that environmental and social requirements of the World Bank and Uganda are followed throughout the NUBSP program.
- Assist OPM and the respective project implementing agencies in strengthening their capacity to deal with social and environmental issues and develop socially and environmentally sound projects.
- Ensure effective coordination between the respective implementing agencies
- Identify and assess overall needs for environmental education, information, awareness building and training.

8.2.2 STRATEGY

Prior to the subproject cycle, mobilization and sensitization of relevant technical teams and communities is important. The TST will put together a team of experts/consultants/persons that will orient the members of DEC, district and sub county technical planning committees on the ESMF and equip them with skills to analyse potentially adverse environmental and social impacts, prescribe mitigation approaches, integrate environmental standards for planning and implementation into subproject contracts and to prepare and supervise the implementation of the projects. This training will address such matters as community participatory methods; environmental analysis; social analysis, using the ER checklist, reporting; and subproject supervision and monitoring

Furthermore, the NUSAF TST, District and Sub County Authorities will undertake sensitization and awareness raising among key stakeholders of the project at national, district, Sub County and community levels. The CDO, together with Sub county Authorities will mobilize communities and sensitize them on the project objectives and its implementation modalities. Special emphasis will be put on the relevance and significance of environmental and social issues all through the sub project cycle so that they are familiar enough with these issues and can make informed and specific decisions and requests for technical support whenever need arises.

The NUSAF Environmental and Social Specialist that is charged with safeguards management in NUBSP will work through the CDOs and DEOs and other relevant forums to organize practical training to build the knowledge and awareness of local government officials and local communities, on social and environmental issues related to proposed NUBSP activities. Training will also seek to build the skills of local people to participate actively in identifying appropriate mitigation measures to avoid or reduce potential negative impacts of project activities. The Capacity building will be required to implement the recommendations outlined in the ESMF. The key areas of capacity building Project to include:

- a. World Bank Safeguards
- b. Understanding of the Environmental and Social Management Process in Uganda,
- c. Supervision of works
- d. How to monitor mitigation measures and reporting
- e. Waste Management and Disposal especially for electronic waste

8.2.3 TRAINING IN SAFEGUARDS IMPLEMENTATION

The training modules below are proposed to form part of the training program to ensure awareness of how to effectively implement the ESMF:

8.2.3.1 MODULE 1

- Introduction to Basic concepts on environment and social issues
- Their relevance and significance in project implementation
- Overview of environment and social regulations
- World Bank policies and safeguards

8.2.3.2 MODULE 2

- Environmental and social considerations in project implementation
- Lessons from NUSAF1 and NUSAF2

- Environmental and social concerns in typical NUBSP projects
- Good environmental and social practices in project implementation

8.2.3.3 MODULE 3

- Environmental and social assessment processes
- Screening using the ESSF
- Writing a project brief
- EIA process
- Identification and costing of mitigations
- Subproject monitoring and reporting
- Pests and pesticides management
- Mobilization and consultation of communities
- Vulnerability issues
- Management of Physical Cultural Resources

8.3 MONITORING AND EVALUATION

8.3.1 OVERVIEW

The purpose of the environmental and social safeguards monitoring includes:

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

The environmental and social safeguards monitoring will be carried out by the District Environment Officer or any officer delegated to carry out the function. Monitoring of environmental and social safeguards will be carried out during subproject implementation, as well as during subproject operation and maintenance.

Monitoring, evaluation and reporting on environmental issues will form part of the overall sub-project implementation processes and LG reporting systems. Communities will keep records of all activities done in their respective communities and submit the same to the local governments for consolidation.

The Assistant Community Development Officer (ACDO) through Parish Development Committee (PDC) will be responsible for environmental and social monitoring at the local level. They will submit their reports to the STPC/DTPC on monthly basis to facilitate compilation of environmental and social screening actions. Information on compliance to environmental and social safeguards will also be generated from quarterly reports, annual reports, evaluation reports, feedback meetings and Implementation Support Missions by the World Bank.

8.3.2 INDICATORS

Monitoring indicators will include gender and vulnerability specific indicators, and monitoring reports will present data disaggregated by gender and vulnerability. To effectively monitor project impacts on the vulnerable, the socio-economic baseline established for the project will include data on representative vulnerable households. The socioeconomic baseline indicators will be used for measuring the outcomes and impacts on vulnerable communities. The monitoring and evaluation mechanisms adopted for the project will ensure that in addition to process and outcome indicators, appropriate impact indicators are defined related specifically to impacts on vulnerable groups and their livelihoods. Indicators that can be monitored for this purpose include how many vulnerable people participated actively in project activities, benefited from target assistance to enhance livelihoods, documentation of their opinions on project impacts and if any of their specific concerns were addressed during implementation. Key indicators for both benefits and participation of vulnerable groups will include:

- Number of consultations with vulnerable groups at all stages of the NUBSP;
- Number of vulnerable groups and individuals employed by the project;
- Number of vulnerable households connected to the grid under the NUBSP.

Gender analysis will also be an integral part of monitoring and evaluation of NUBSP activities. It is recommended that an impact evaluation be undertaken about 6 months before project completion to assess the changes in the overall living standards compared to the former living status of living for these vulnerable groups.

8.3.3 EXTERNAL MONITORING AND EVALUATION

External assessment of compliance with mitigation measures will also be carried out on a regular basis by an external agency/independent party to be appointed by OPM and agreed to the World Bank with the results communicated to OPM and the World Bank.

The Independent Third Party Monitoring Agency will be responsible for the preparation of the semi-annual compliance report on RAPs and ESIA/ESMPs which will (i) update the status of PAPs against the socio-economic baseline of the RAPs, (ii) review how compensation and related resettlement assistance in cash or kind are being delivered to affected households and (iii) ensure ESIA/ESMP measures and commitments are adequately implemented.

The Independent Third Party Monitoring Agency will use the compliance report specifically to assess the status of project- affected vulnerable groups such as female-headed households, landless, disabled/elderly and poor families. The Independent Third Party Monitoring Agency's report will be a valuable tool to ensure that PAPs receive the compensation due to them under the RPF and that mitigation measures including offsets and other compensation program under the ESIA/ESMP are implemented with acceptable results/parameters. The report and any recommendations will be made available to the public. The cost of external Monitoring and Evaluation will be borne by the NUBSP.

8.4 REPORTING

Local authorities are normally required to report annually on their subproject activities during the preceding year. These annual reports should capture the experience with implementation of the ESMF procedures. The purpose of these reports is to provide:

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

The report shall include the following key information:

- Reporting period
- ESMF management actions undertaken during the reporting period
- Progress to date in implementing the ESMF

9 BUDGET AND DISCLOSURE OF ESMF

9.1 BUDGET

Most of ESMF costs are to be integrated as part of NUBSP budget covering aspects such as facilitation, training, monitoring and reporting among others. However, some of the items the Project costs that relate to ESMF with their costs include:

Proposed 3 Year ESMF Implementation Budget for NUBSP

ITEM	,000 UG SHS		
	Year 1	Year 2	Year 3
Training of CDOs, DEOs, and NDOs in safeguards management (environment, social, vulnerability issues, GRM issues, monitoring and reporting etc.)	50,000		
Facilitation of CDOs, NDOs and DEOs to screen sub-projects	40,000		
Facilitation for extension workers (DVOs, DFOs, Community Animal Health Workers, agricultural extension staff etc.) to train beneficiaries and monitor implementation of safeguards (IPM and pesticide use, soil conservation, animal husbandry, etc.)	50,000	50,000	
Capacity building of Technical Staff	50,000		
Technical Back stopping and Compliance assessment	20,000	20,000	20,000
Sub-totals	210,000	70,000	20,000
Total Budget Estimates			300,000

9.2 ESMF DISCLOSURE

This ESMF will be disclosed both in-country in one or two of the local dailies, in OPM's website, at the host Districts of Kitgum, Nebbi, Gulu, Soroti and at the World Bank's info-shop in compliance with relevant Ugandan regulations and the World Bank Operational Policies. OPM and implementing agencies will provide copies of the respective ESIA's and RAPs or disclosure at the World Bank Info-shop for public access.

10 CONCLUSION AND RECOMMENDATION

10.1 SUMMARY AND CONCLUSIONS

This ESMF provides a step-by-step guidance on how to identify potential adverse environmental and social impacts from project activities, and how to plan, implement and monitor measures to mitigate them. A Resettlement Policy Framework (RPF), which sets out the guidelines for the resettlement action plans (RAPs)

to be prepared for any subproject that triggers the Involuntary Resettlement Policy has been prepared alongside this ESMF.

The overall environmental and social impacts of the NUBSP project are expected to be positive through alleviating pressures on the poor that lead to unsustainable exploitation of natural resources and environmental degradation. The community sub-projects may involve limited degree of land take and displacement of land-uses and/or livelihoods. Therefore, by their nature, project component 1 may have limited and localized negative environmental and social impacts. For this reason, the project is rated as EA category B. The project ties in the twin goals of the World Bank group of alleviating poverty and promoting shared prosperity. The potential environmental and social impacts can be adequately managed by integrating environmental and social due diligence into the subproject cycle.

10.2 KEY ISSUES AND RECOMMENDATIONS

The following recommendations need to be put in place in order to achieve better safeguards implementation under NUBSP:

1. **Extension services:** NUSAF 2 experienced a problem of limited extension services to the project beneficiaries especially in regard with veterinary extension services. NUBSP needs to ensure this is strengthened in its implementation.
2. **Training of beneficiaries:** There is need for an adequate budget for training of communities on implementation of subprojects to ensure that environmental issues are well managed and to also ensure project sustainability.
3. **Waste Management Facilities:** OPM needs to consider providing a budget for waste management especially of medical waste at Health Centers to ensure that the waste generated due to increase in services at these health centers is well managed.
4. **Consultation and inclusion of PWDs:** Consultation and mobilization of communities should take into consideration PWDs. The approach should take care on not only the lame but also the deaf and the visually impaired. This will ensure that all categories of PWDs are systematically consulted and included in the planning and implementation of the project.
5. **Content of Operations Manual:** It was noted that most NUSAF Desk Officers didn't have a copy of the NUSAF Environment Handbook and rely entirely on the Operations Manual. It may be more useful if the NUBSP Operations Manual would contain more guidance on management of environmental and social issues. This would help the program officials to acquaint themselves with management of the critical environmental and social issues.

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ANNEX 1: ENVIRONMENTAL AND SOCIAL SCREENING FORM (ESSF)

(This form filled with appropriate information is to be attached to each subproject document)

Section A: Basic Information

District: _____ sub-county: _____ Parish: _____

Subproject In-charge: _____

Subproject Name: _____

Subproject Duration: _____

Brief description of subproject: _____

Section B: Environmental and Social Screening

The ESSF

The objective of this screening form is to provide information to evaluate the subproject above in terms of the following:

- Determine the level of environmental work required (i.e. whether or not an Environmental Impact Assessment is required; whether or not the application of simple mitigation measures will suffice; or whether or not no additional environmental work is required);
- Determine appropriate mitigation measures for addressing potential adverse impacts;
- Incorporate mitigation measures into the subproject design;
- Determine which subproject activities are likely to have potential negative environmental and social impacts;
- Determine if there will be land acquisition, impact on assets, loss of livelihood, and/ or restricted access to natural resources.
- Indicate the need for a Resettlement Action Plan (RAP), which would be prepared in line with the Resettlement Policy Framework (RPF)
- Facilitate the review and approval of the screening results regarding subproject proposals; and
- Provide guidelines for monitoring environmental and social parameters during subproject implementation, and operation and maintenance of subproject assets and related project activities.

SPECIFICATION STATUS

1. Will the subproject encroach onto an important natural habitat Yes [] No []
 - a. Wetlands Yes [] No []
 - b. Forests Yes [] No []
 - c. Land Yes [] No []
 - d. Water Yes [] No []
 - e. rangeland Yes [] No []

2. Will the subproject affect sensitive ecosystems Yes [] No []

If yes describe how it will affect

3. Will vegetation be cleared Yes No
If yes, are there proposed actions to restore cleared areas

4. Use firewood for fuel Yes No
5. Use petroleum-based fuel Yes No
6. Involves use of pesticides Yes No
7. Diversion or use of surface waters Yes No
8. New or rebuilt irrigation or drainage systems Yes No
9. Require the construction of a seasonal dam Yes No
9. Involves latrines, septic or sewage systems Yes No
10. Waste generation (e.g. slaughterhouse, medical waste, market etc.) Yes No
a. Description of type of waste generated solid (bulk), solid (particulate), liquid, gaseous, etc.
-

b. Proposed waste management/disposal methods

11. Residues that may be used as fertilizers: Yes No In part

Describe. _____

12 Does the subproject activities:

Occur within vicinity of a protected area Yes No

Affect any protected up or downstream Yes No

Affect any ecological corridors for migratory species Yes No

13 Are the sub project activities likely to introduce new species/varieties into the area Yes No
What type seeds, invasive species?

14. Will slope or soil stability be affected? Yes No

a. Will local resources such as sand, gravel, bricks, ground water be used? Yes No

b. Will activities cause soil salinity? Yes No

Socio Screening

15. Will subproject activities affect aesthetics of the landscape Yes No

16. Describe existing land use patterns (community facilities, tourism, agriculture etc.)

(i) Will sub project activities cause any changes in land use Yes No

(ii) Will the subproject activities restrict peoples' access to natural resources Yes No

(iii) Are there any cultural/ spiritual sites in the vicinity of the sub project site Yes No

(iv) Will the subproject alter any of these sites Yes No

(v) Will the subproject causes an losses in livelihood opportunities for households Yes No

(vi) Will the subproject activities affect any resources the people take from the natural environment Yes
No

- (vii) Will the subproject require any resettlement or compensation of residents including squatters Yes []
No []
- (viii) Will there be additional demand to local resources (e.g. water supply, sanitation facilities, health centers, lodging, etc.) Yes [] No []
- (ix) Will the subproject provide safeguard to workers' health and safety Yes [] No []
- (x) Measures in place to safeguard human health and safety
- (xi) Is the program likely to provide local employment opportunities including women and youth Yes []
No []

Field Appraisal Notes and any other comments:

Mitigating Measures Required

Potential Impacts	Mitigating Measures

Section C: EVALUATION

Environmental Category B

	Category	Justification
	Does not require further environmental or social studies	
	Requires submission of only a Project Brief	
	Requires a full ESIA to be submitted on date	
	Requires an ESMP to be submitted on date	
	Requires a RAP to be submitted on date	
	Requires an Indigenous Peoples Plan (IPP)	
	Requires a Physical Cultural Resources Plan	

Approved Unconditionally:

Approved subject to Special Procedures and/or Mitigating Measures:

**Notify TST as Subproject of
Environmental Concern:**

Subproject Rejected:

Screening conducted by (Sub county Level):

Signature:

Name.....

Position:

Date:

Screening approved by (District Level):

Signature:

Name.....

Position:

Date:

ANNEX 2: PROJECTS THAT WILL NOT BE FUNDED UNDER NUBSP (NEGATIVE LIST)

Natural Resource Management	Sub-projects involving significant conversion or degradation of critical natural habitats. Sub-projects involving the use of unsustainably harvested timber or fuel-wood Sub-projects supporting commercial logging in forested areas.
Agriculture and Markets	Subprojects requiring use pesticides that are not on the approved list of agro-chemicals Drainage of traditional wetlands for agricultural use. Construction or rehabilitation of seasonal dams with adverse downstream affects.
Sanitation and Waste Management	Sub projects requiring new or significant expansion of disposal facilities which may result in pollution contamination to nearby water sources. New or significant expansion of disposal sites requiring involuntary public participation.
Road /Construction	Closing of gaps, culverts etc. in existing roads which may affect water flow significantly. Projects that require Compensation for loss/replacement costs will not be funded under NUBSP

ANNEX 3: TYPICAL ENVIRONMENTAL AND SOCIAL MITIGATIONS CHECKLISTS

(a) Agriculture, Tree Nurseries and Afforestation

Potential Impact	Recommended Mitigation
Wet season soil disturbance	Schedule activities for the dry season
Potential for debris flows or landslides	Prepare a watershed plan that identifies and address drainage/slope instability
Sensitive downstream ecosystems	Identify and avoid effects of diversion or dams on downstream ecosystems
Removal of native plant/tree species	Protect and encourage regeneration of endemic species
Introduced plant/tree species invasion of native species	Ensure non-native species are compatible with native species
Wildlife habitats or populations disturbed	Identify and avoid effects on habitats and migration routes of key species
Environmentally sensitive areas disturbed	Identify and avoid activity in forest, riparian and wetland habitats with particular biodiversity
Land Acquisition	Avoid occupied land. Prepare procedures to ensure equitable resolution.
Private assets displaced	Avoid occupied land. Prepare procedures to ensure equitable resolution.
Informal land uses displaced or access restricted	Avoid interference with informal land users, and take measures to provide access to alternative lands or resources
Insufficient capacity to manage new plantations/pastures	Establish a local committee, where appropriate, and/or bylaws and provide appropriate controls
Other (specify):	

(b) Community buildings/ Facilities

Sitting/preparation stage:

- Choose an appropriate site for your project approved by the community
- Avoid dumpy or water logged sites and wetland areas
- Look at other alternatives and weigh the advantages against disadvantages of different sites
- Avoid termite infested areas; where there are no alternatives take measures against termites in the designs and during construction.
- Consider other existing structures on site in relation to your new project
- Incorporate indigenous customs and building techniques in project designs if possible
- Consider adapting layouts to fit natural patterns on project sites
- Remember to clear only the project site and not to cut trees when not necessary
- Ensure a holistic design approach, taking into account the operations of the existing building, buildings to be added and support facilities like water supply, sanitation and the environment
- Base design criteria and selection of materials according to local conditions and availability of resources

Construction

- Always take measures to manage offsite impacts like quarries and how to restore them;
- Ensure all your building waste is attended to – do not bury paint tins and plastics as they do not decompose;
- Incorporate permanent erosion control plans on the site –provide a drainage system in the areas close to the school and always include dish drains around your buildings;
- Make sure you clear all the debris or broken bricks from the kilning site and use them in the construction for back filling (when crushed), brick drains construction of paved walkways etc.;
- Avoid excessive disruption of top soils during construction;
- Cover haulage site trucks carrying cement or lime and avoid vegetation destruction to create temporary access roads to the construction site

- Provide enclosed storage for cement, lime, and soils
- Outline safety techniques and accident emergency measures during construction activities;
- Collect only adequate wood for brick making (killing)-consider alternative brick making technologies if forest cover is deteriorating
- Use water to suppress dust;
- Remove excess materials of laterite, stone aggregate, concrete blocks, bricks, timber pieces

Operation stage

- Dig a pit for ordinary waste; do not throw tins, glass and plastics in pits;
- Plant trees and flowers around the school;
- Maintain trees around the premises;
- Do not allow animals to use the school premises for grazing;

(c) Cattle watering points and water retention reservoirs

Sitting/preparation stage

- Make sure the community agrees on the site and the usage;
- Ensure that the lay out of the furrows or field is not too steep (gradient);
- Ensure the sitting of the project avoids or minimizes encroachment on swamps and other ecologically sensitive areas;
- Avoid dislocation of populations and communities.

Construction stage

- Follow technical guidelines from Ministry of Water and Environment;
- Avoid excessive topsoil disruption of population;
- Mitigate topsoil disruption;
- Plant trees and other ground cover.

Operational stage

- Take measures to avoid siltation from the feeding streams;
- Take measures to avoid erosion around the water point/reservoir;
- Make sure community agrees on usage of the water.

ANNEX 4: PEST MANAGEMENT PLAN

Food and cash crops in Uganda are constantly threatened by epidemic pests and diseases and weeds. Both foreign and indigenous pests, weeds and diseases are a threat to the country's agricultural sector. Climate change, modern means of travel, trade liberalization, and agricultural intensification could trigger the occurrence of new pest problems. Future outbreaks of existing or new pests, weeds and diseases are a certainty, and although all outbreaks will result in losses, the key risk is that badly and ineffectively managed responses to new outbreaks in the country will significantly raise the scale and impact of the losses. With the onset of climate change, which has extended warm temperatures to new regions, Uganda is bound to see pest-related problems spread to even wider areas since warmer temperatures due to climate change are expected to both encourage the spread of pests into new areas as well as render some plants more susceptible to their effects.

KEY LAWS AND POLICIES

National Laws

- The Constitution of the Republic of Uganda, 1995
- The Agricultural Chemicals (Control) Act, No. 1 of 2006
- The National Environment Act, Cap 153
- The National Agricultural Advisory Services Act, 2001
- The Public Health Act Cap. 281
- Occupational Safety and Health Act No. 9, 2006
- Uganda National Bureau of Standards Act, Cap 327
- Water Act, Cap 152

Policy Framework

- The National Environment Management Policy, 1994
- Plan for Modernization of Agriculture (PMA)
- The National Trade Policy, 2006

International Conventions

- Basel Convention
- Rotterdam Convention
- The International Maritime Dangerous Goods (IMDG) Code
- The International Code of Conduct for the use and distribution of pesticides
- The Safety and Health in Agriculture Convention

Scope

This Pest Management Plan is meant to enhance IPM within Uganda. The scope of this pest management plan includes:

- A history of pest problems, present pest problems and crop history;
- Analyzes the vulnerability of Uganda to pest attacks;
- Quantifies the losses attributed to these pests and diseases;
- Identifies the key pests and diseases of the major crops in Uganda;
- A review of the impact of the current pest control measures;
- Proposes appropriate integrated pest management strategies for the pests and diseases;
- Defines an appropriate implementation strategy for the proposed measures;

- Comprehensive strategies for handling, transportation and application of pesticides in compliance with national and international requirements relating to the different chemicals;
- Identifies capacity building and training needs;

CLASSIFICATION OF PESTICIDES

The WHO bases its toxicity ratings on the lowest published rat oral LD₅₀, the lethal dose (in milligrams of substance per kilogram of body weight) that kills 50% of the test animals in a standard assay (WHO, 2010). WHO gives a hazard ranking of Ia (Extremely Hazardous) to the most hazardous pesticide active ingredients. While the WHO ratings generally reflect acute toxicity, they also take into account other toxic effects such as reproductive and developmental toxicity. WHO does not evaluate the fumigants, a class of gaseous pesticides that are generally extremely hazardous, nor does it evaluate pesticides believed obsolete or discontinued (WHO, 2010).

WHO Toxicity Classification		Rat LD ₅₀ (mg of chemical per kg of body weight)			
Class	Description	Solids (oral)	Liquids (oral)	Solids (dermal)	Liquids (dermal)
Ia	Extremely hazardous	< 5	< 20	< 10	< 40
Ib	Highly hazardous	5-50	20-200	10-100	40-400
II	Moderately hazardous	50-500	200-2,000	100-1,000	400-4,000
III	Slightly hazardous	> 500	>2,000	>1000	> 4,000
Table 5	Unlikely to present acute hazard in normal use	> 2,000	> 3,000	---	---
Table 6	Not classified: believed obsolete				
Table 7	Fumigants not classified by WHO				

Procurement of Pesticides

The following criteria will apply to the selection and use of pesticides in activities under NUBSP:

- Pesticide financed under NUBSP must be manufactured, packaged, labeled, handled, stored, disposed of, and applied according to standards that, at a minimum, comply with the FAO's guidelines on pesticides.
- Consistent with World Bank OP 4.09, NUBSP financing will not be used for formulated products that fall in WHO classes IA and IB, or formulations of products in Class II, if (a) the country lacks restrictions on their distribution and use; or (b) they are likely to be used by, or be accessible to, lay personnel, farmers, or others without training, equipment, and facilities to handle, store, and apply these products properly.
- NUBSP financing will not be used for any pesticide products which contain active ingredients that are listed on Annex III of the Rotterdam Convention (on Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade), unless the Country has taken explicit legal or administrative measures to consent to import and use of that active ingredient.

- NUBSP financing will not be used on any pesticide products which contain active ingredients that are listed on Annex A & B of the Stockholm Convention on Persistent Organic Pollutants, unless for an acceptable purpose as defined by the Convention, or if an exemption has been obtained by the Country under this Convention.
- NUBSP financing will not be used for any pesticide products which contain active ingredients that are listed on Annex III of the Rotterdam Convention (on Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade), unless the Country has taken explicit legal or administrative measures to consent to import and use of that active ingredient.

IPM Plan

Key Elements - The elements of the IPM will include the following:

- (a) Preventing pest problems;
- (b) Monitoring for the presence of pests and pest damage;
- (c) Establishing the density of pest population, which may be set at zero, that can be tolerated or corrected with a damage level sufficient to warrant treatment of the problem based on health, public safety, economic or aesthetic threshold;
- (d) Treating pest problems to reduce population below those levels established by damage thresholds using strategies that may include biological, cultural, mechanical and pesticidal control methods and that shall consider human health, ecological impact, feasibility and cost effectiveness; and
- (e) Evaluating the effects and efficacy of pest treatments.

Decision Making - Detecting a single pest under the Project will not always mean control is needed. A decision to use pesticides will be taken only as the very last resort and will also be based on conclusions reached from an agro-ecosystem analysis and trials. The decision will also depend on the number of pest and diseases found in the respective crop and the level of damage they are doing. If it is absolutely necessary to spray crops with pesticides, use of selective rather than broad-spectrum pesticides shall be strictly observed.

Pest Monitoring and Surveillance - A process for the reporting and identification of unusual plants, animals and pests will be established to track and document all pest cases, be it minor or major in a pest inventory register. Pest surveys will be conducted on a regular basis to detect new infestations and will include the types, abundance, location of pest plants, date when first spotted or seen, and date when reported. This information will be gathered from surveillance or monitoring system to be put in place, periodic surveys to be conducted and feedback from farmers/farm assistants. The data will be managed in a standardized way so that trends can be established. A rapid response process for the management of new infestations will be established to treat and manage new pest infestations as soon as they are identified. The potential to exploit mobile phones to enhance field surveillance of disease outbreaks and the efficacy of recommended control options is massive and will help to bridge the current gap between science and practice. Furthermore, enhanced field surveillance through interventions such as this will permit the project to recognize risks due to disease earlier and to deploy control measures to prevent catastrophic disease epidemics.

Key Crop Pests and Diseases

According to literature sources as well as consultations with DAOs and NAADS Coordinators as well as the smallholder farmers interviewed, the following is a summary of the key common pests and diseases of beans, rice, cassava, maize, and coffee:

Crop	Key Pests	Key Diseases
Coffee	Coffee Twig Borer, Coffee Meal Bug, and the Coffee Berry Borer Antestia bugs and lace bugs.	Coffee Wilt Disease and Coffee Leaf Rust Disease (Fungus).
Maize	Stalk Borer, Armyworm and Maize Weevil	Maize streak disease, Maize Leaf necrosis, Grey leaf spot, and Maize smut. Maize Lethal Necrosis disease
Beans	Cutworms and Aphids	Bean Root Rot (fungal), Bean anthracnose, Bean wilt, and the Bean Rosette (viral), Bean Common Mosaic Disease
Rice	<i>Quelea quelea</i> birds, Termites, Aphids, Rice Stem Borers	Rice Yellow Mottle Virus (RYMV), Rice Bright and Rice Blast
Cassava	Mealy Bug, Cassava White Fly	Cassava Mosaic and the Cassava Brown Streak Disease

The four key steps to be followed under the IPM strategy will be as follows:

Set Action Thresholds

Before taking any pest control action, the IPM will first set an action threshold, a point at which pest populations or environmental conditions indicate that pest control action must be taken. Sighting a single pest will not always mean control is needed. The level at which pests will either become an economic threat be a critical criterion to guide future pest control decisions.

Monitor and Identify Pests

Not all insects, weeds, and other living organisms require control. Many organisms are innocuous, and some are even beneficial. The IPM program will work to monitor pests and identify them accurately, so that appropriate control decisions can be made in conjunction with action thresholds. This monitoring and identification will remove the possibility that pesticides will be used when they are not really needed or that the wrong kind of pesticide will be used.

Prevention

As a first line of pest control, the IPM program will work to manage the crop to prevent pests from becoming a threat. This will include using cultural methods, such as rotating between different crops, selecting pest-resistant varieties, and planting pest-free rootstock. These control methods are expected to be very effective and cost-efficient and will present little to no risk to people or the environment.

Control

Once monitoring, identification, and action thresholds indicate that pest control is required, and preventive methods are no longer effective or available, the IPM program will then evaluate the proper control method both for effectiveness and risk. Effective, less risky pest controls will be chosen first to disrupt pest mating, or mechanical control, such as trapping or weeding. If further monitoring, identifications and action thresholds indicate that less risky controls are not working, then additional pest control methods will be employed, such

as targeted spraying of pesticides. Broadcast spraying of non-specific pesticides will only be conducted as a last resort.

IPM Pest Management Practices

The following measures will be adopted by all farmers where feasible:

Pest Preventive Measures: Diseased plants or affected portions of the plant will be removed and burned. Phytosanitary measures, such as physical removal of pests, affected plant parts, infected plants (virus-infected plants, severely disease-infected or pest-infested plants) should be undertaken. It may also be possible for farmers to minimize pest attack through good timing.

Use of Host Resistance and Early Maturing Varieties: Choice of crop and variety can help to reduce pest problems. An important result consistent across countries and crops is that growing more varieties of the same crop within the farm, leads to a decreased variance of pest and disease damage. This means that even though certain pests and diseases might affect crops on a farm, overall, the risk of having a severe infection or pest outbreak is lower, e.g. they might just have a few spots, lesions or bites. In general, it is much better to farm 'with nature' than against it. This means choosing a crop that is naturally suited to the soil type and environmental conditions of the farm, rather than trying to adapt the farm to suit the chosen crop.

Crop genetic diversity has the potential to curb epidemics and outbreaks to save farmers from high yield losses and is overall a more resilient system, where crops are unlikely to suffer significant damage when and if a new pest or disease comes around. Traits needed by plants to adapt to pathogen threats following climate change generally come in the categories of resilience and durable resistance. In addition, 'early maturing' varieties of crop reach maturity and are ready for harvesting sooner than normal varieties. If pests only become a problem later in the growing season, choosing an early maturing variety may be a good idea.

Some varieties of crop have been developed that have resistance to certain pests and the Project will ensure that the smallholder farmers plant them if pests are a major cause of lost harvest. Every effort will be made by the Project to select and use crop varieties resistant or tolerant to disease and pests in an attempt to check on regular usage of agro-chemicals. The Project will collaborate with NARO and other research institutions to get information and varieties resistant to disease and pests for their usage. This strategy is one of the measures the project hopes will render usage of agro-chemicals to be very minimal or unnecessary.

However, it is also important to note that the use of agricultural improved inputs remains low generally and particularly among women farmers. This is due to lack of access to or non-availability, of inputs lack of knowledge about inputs and the cost barriers. Increased use of improved inputs is very important to enhancing yields and production at farm level and ultimately increasing individual and household incomes (FOWODE, 2012). This is to be addressed by the ACDP by distributing quality seeds and resistant varieties to the smallholder farmers.

Biological Control: This tactic takes advantage of the fact that organisms depend or even feed on each other for survival. Thus biological control method tries to ensure that pests are reduced by organisms which are their natural enemies. These natural enemies can be conserved by taking care with farming practices so that they are not killed but are actually encouraged. Under ACDP, biological control will be considered by the Project as the first line of control for pests and diseases, when incidence is noticed and where an appropriate biocontrol agent is available. In this case, the project will adopt measures such as ensuring existence of an environment conducive to the proliferation of pests' bio-control agents is to be maintained in the crop areas in the project

and these include regular application of *Trichoderma* spp., *Pochonia chlamydosporia*, *Pseudomonas fluorescens* and other antagonistic microorganisms. For insect pests, the project will engage in planting of biocontrol agents such *Neem* trees which can be planted along the plots of crops. For successful introduction of biological control agents the Project will consider the following:

- The environment must be suitable for the population to flourish.
- Be certain the control agent will virtually feed only on the weed or pest species itself, and not on crop plants.
- The control agents must not be native to the area.

Cultural Practices: Cultural control methods will include:

- Crop rotation - Crop rotation helps to prevent pest populations building over a number of years.
- Inter-cropping,
- Field sanitation and seed bed sanitation,
- Use of pest-resistant crop varieties,
- Managing sowing, planting or harvesting dates;
- Water/irrigation management,
- Practices to enhance the buildup of naturally existing predator populations;
- Hand-picking of pests or hand-weeding;
- Use of traps or trap crops.

Chemical Control: With the above measures for control pests and diseases, chemical control will therefore be an addition and its application will be undertaken with utmost care as per applicable standards governing safe applications of agrochemicals (e.g. [FAO Guidelines](#)) to ensure safety of the environment and the farmers. Agro-chemicals to be used should be registered for use in Uganda as well as acceptable for procurement under World Bank Safeguard Policies. In all, the application of agro-chemicals shall follow recommended practices by FAO.

Management of Livestock Diseases in Uganda

Livestock disease has been identified as one of the most significant constraints to animal production in the NUSAF project areas. According to the Karamoja Annual District Veterinary Office reports, the most significant animal diseases in the region are; tick-borne diseases (Anaplasmosis, Babesiosis, Heart water, Theileriosis) and Contagious Diseases like Contagious Bovine Pleuropneumonia (CBPP), Foot and Mouth Disease (FMD), Peste des Petits ruminant, Sheep Pox and Goat Pox, Fowl Cholera, Fowl Typhoid, Newcastle Disease (NCD) and Camel Pox.

The success of any disease surveillance programme in the NUBSP project will have to involve the deployment of personnel who will be moving in the field in a well-planned manner, using various methodologies to detect signs of livestock disease. Therefore the active participation of the District veterinary services (management and field staff), other extension staff, Community Animal Health Workers, farmers and other organizations operating on the ground is very important.

Management of Tree Nurseries Pests and Diseases

Damping off: Damping-off is a collective name for a number of non-specific fungal diseases that cause a serious threat to seedlings after germination. The seedlings begin to rot from the stem tissue just above the root collar resulting in the seedlings toppling over. The disease begins in patches and finally spreads to the entire bed. The humid environment created for the maximum growth of the seedlings also favours the growth of the

fungi. The disease occurs in very wet conditions, often induced by over watering and excessive shading. Because of the quick spread of the disease, you have to respond to it promptly.

If the attack is at an early stage, chemicals, such as copper oxide and Benlate (Benomyl 50%) are available on the market. The dosage must be according to the instructions of manufacturer but care needs to be taken not to routinely use the same product since resistance may build up. Spraying should generally be done in the afternoon and no watering must be done after spraying. All infected stock must be removed and burnt as soon as possible. The growing medium should not be reused and all sowing equipment and the germination environment must be disinfected.

Fusarium circinatum (pitch canker fungus) is a major pathogen in almost all commercial tree nurseries in RSA, where the main focus has been on nursery hygiene and monitoring (with early detection and removal of infected plants). Deaths occur not only in the nursery but in the field after planting out too. In the nursery tip-dieback of the small seedlings is the most common symptom of *Fusarium*. Little is currently known about the disease's transmission but worryingly, it can be spread from untreated seed.

Pesticides: Pesticides protect seedlings from insect pests, and fungal diseases while they are growing. They come in many forms but usually in liquids (for spraying) or powder. Several types of control procedures are available. Pest and disease control begins with the site selection and physical plant development. The most likely insects to attack a nursery stock are termites, crickets and grasshoppers. Insecticides for controlling these insects are available on the market.

Safety Issues: Chemical use has become common in many tree nurseries; unfortunately, the safe use of chemicals is not equally common. Some of them are highly toxic to humans. The degree of toxicity is usually stated on the label of the container as a LD₅₀ value, but it is better to treat all pesticides with the respect due to any poisonous material. The workers handling the chemical must follow the product instructions. Strictly, dispose of excess chemical and empty containers properly, wear the right PPE and wash thoroughly when the spraying is finished.

Training Needs and Strategy

Training Needs - The Agricultural extension staff working with the NUSAF project will assist and train farmers to be able to develop their IPM approaches to the management of pests and diseases. This will be done holistically from seed selection, land preparation, through planting and farm maintenance to harvesting and post harvesting issues. Farmers will be trained and encouraged to make detailed observations in their fields regularly so that they can detect early infestations and make the appropriate management decisions using agro-ecosystem analysis (AESAs). In this way, it will be ensured that pest and disease problems do not escape notice and are not allowed to develop to the extent that they cause very severe damage and heavy crop losses. The decision to use chemical pesticides will be taken only as the very last resort as already indicated in the IPM principles above.

Tree Nursery Development: The aim of the training will be to equip participants with basic knowledge and skills necessary for the identification and management of tree pests and diseases. Specifically, the training should focus on:

- (i) Recognition, interpretation and diagnosis of pest and disease problems in tree nurseries and plantations based on symptoms and signs

- (ii) Procedures of pest and disease sample collection, packaging and submission for laboratory diagnosis
- (iii) Basic principles and practice of pest and disease management in tree nurseries and plantations

Livestock Management:

Filling of human resource gap by training Community Animal Health Workers (CAHWs) in the program area will be important in livestock management and these sub-professional groups (veterinary assistants, auxiliaries and community animal health workers and the like) are often important elements in surveillance systems, if properly supervised and hence must be singled out for special training.

Pesticides Use Training - The key training needs that have been identified among others include post-harvest handling of crops, storage, disposal as well as safe use and handling of pesticides. Training for “safer pesticide use” is a common approach to mitigate the potential negative health and environmental impacts of pesticides. This conventional approach will promote reducing health risks of pesticides by safer use of the products through training, use of protective equipment and technology improvements, as well seeking to reduce pesticide hazards via regulations and enforcement in addition to the training. A well-illustrated booklet on safe pesticide use designed for self-learning will be developed and distributed to farmers, Extension staff, stockiest and their staff.

Pest Management and Monitoring Plan

Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility
Threat from other crop pests and diseases	Educate and train farmers to adopt good agricultural practices (GAP)	Adoption of IPM techniques/ approaches	Farmers trained in IPM techniques and GAP	1. Number of farmers trained, Training records 2. Incidence of crop pests 3. Production losses from crop pests	MAAIF, CPMC, STPC
	Apply ACB approved or recommended pesticide if necessary	Inspection of pesticides at farm/storage gate prior to use (Project Policy)	Applied pesticides registered and approved by key stakeholders and in conformity with IPM principles	Records of pesticides applied at each farm	MAAIF, CPMC, STPC
Impact on post-harvest losses due to pests	1. Provide adequate and proper storage facilities	Post-harvest loss reduction plan based on IPM techniques in place	a.) Post harvest losses avoided or minimized b) Applied pesticides registered and approved by key stakeholders and in conformity with IPM principles	Number of farmers trained in IPM techniques for post-harvest storage; Number and condition of storage facilities in use	MAAIF, CPMC, STPC
	2. Monitor incidence of post-harvest pests			Number of cases of post-harvest pests	MAAIF, CPMC, STPC
	3. Confirm status and integrity of pesticides at storage gate prior to use	Inspection of pesticides at farm/storage gate prior to use (Project Policy)			Records of pesticides applied at storage sites/ rooms

Pesticides Management and Monitoring Plan

Potential Impacts and Risks	Mitigation Measures	Implementation tool	Expected result	Monitoring indicators	Responsibility
Improper use of pesticides by farmers and extension staff	Educate farmers and extension staff on proper use of pesticides and pesticide use hazards including use of PPE.	Pesticide hazards and use guide manual or leaflet for the project (include simple pictorial presentations)	Proper use of pesticides by farmers and farm assistants	Number of cases of pesticide poisoning occurring under the project	DAO, CPMC, STPC
	Control and supervise pesticide use on farms	Adoption of IPM approaches/ techniques	Farmers trained in IPM techniques	Number of farmers trained, Training records	DAO, CPMC, STPC
	Monitor pesticide residue in crops	Random sampling procedure for crops and storage products	Pesticide residue in crops within acceptable limit/MRL	1. Levels and trend of pesticide residue in sampled crops 2. Number of times exported crops are rejected due to pesticide residues	DAO, CPMC, STPC
Pollution of water resources and aquatic life	Control and supervise pesticide use by farmers	Adoption of IPM approaches/ techniques	Farmers trained in IPM techniques	Number of farmers trained, Training records	DAO, CPMC, STPC
	Proper disposal of pesticide containers by resellers/farmers	Pesticide container collection and disposal plan	Pesticide container disposal plan developed and implemented	1. Number of farmers/ resellers aware of pesticide container disposal plan 2. Number of containers collected	DAO, CPMC, STPC
	Monitor pesticides in water resources	Environmental quality monitoring plan (linkage with Project ESMP)	Pesticide concentration in water resources (boreholes, streams etc.)	Levels of pesticides in water resources	DAO, CPMC, STPC

Abuses in pesticide supply and sales	Identify all pesticide distributors and resellers interested in providing services and products to farmers under the Project	Registration policy for all interested distributors and resellers under project	Only approved and licensed dealers and resellers supply pesticides under project	a) Company registration documents b) Evidence of license/permit to operate in pesticides c) Evidence of location and contacts of suppliers/resellers	DAO, CPMC, STPC
	Confirm status and integrity of pesticides supplied under project Ban big pesticide containers to minimize decanting cases	a.) All pesticides are to be in the original well labeled pesticide containers prior to use b.) No decanting of pesticides under this project c) Inspection of pesticides at farm gate prior to use Decanting policy (No decanting of pesticides under project)	a) Only approved and registered pesticides used under project b) Banned pesticides avoided c) Fake and expired pesticides avoided d) Integrity of pesticide guaranteed at farm gate level All pesticides delivered for use are in the original containers	a) List of pesticides supplied and used in line with Agricultural Chemicals Board b) Cases of pesticides found in non-original containers c) Inspection records for pesticides at farm gate prior to use Cases of pesticides found in non-original containers	DAO, CPMC, STPC
Poisoning from improper disposal of pesticide containers	1. Educate farmers, extension staff and local communities on health hazards associated with use of pesticide containers	1. Pesticide hazards and use guide manual or leaflet for the project	Farmers, extension staff, local communities educated on pesticide health hazards	Number of cases of pesticide poisoning through use of pesticide containers; Number of farmers returning empty pesticide containers at collection points;	DAO, CPMC, STPC
	2. Properly dispose pesticide containers	2. Pesticide container cleaning and disposal plan	Pesticide container cleaning and disposal	Number of farmers, extension staff, and resellers trained in proper cleaning of pesticide containers	

General health and safety of farmers/crops and environmental hazards	Educate farmers to adopt Best Practices based upon IPM techniques; and do not use chemical pesticides unless advised by MAAIF	IPM techniques with emphasis on cultural and biological forms of pest control	Compliance with national laws and WB policy on Pest/ pesticide management	Number of farmers trained in IPM techniques; Number of farmers implementing IPM on their farms Frequency of chemical pesticides usage	DAO, CPMC, STPC
	Provide PPEs to farmers/extension staff for pesticide use in the fields	Health and safety policy for farm work	Farmers and accompanying dependants (children) protected against pesticide exposure in the fields	Quantities and types of PPEs supplied or made available under the project	DAO, CPMC, STPC
	Educate farmers/ farm assistants in the proper use of pesticides	Pesticide hazards and use guide manual or leaflet for the project (include simple pictorial presentations)	Farmers know and use pesticides properly; pesticide hazards and use guide leaflet or flyers produced.	Number of farmers trained in pesticide use; Number of farmers having copies of the pesticide hazard and use guide flyers;	DAO, CPMC, STPC
	Properly dispose obsolete and unused pesticides	Obsolete and unused pesticide disposal plan	obsolete and unused pesticide disposal plan prepared and implemented	Relationship between pesticide supply and usage	DAO, CPMC, STPC

	Educate farmers to obtain or purchase quantities of pesticides required at a given time and to avoid long term storage of pesticides	Pesticide use policy/plan	Only pesticides needed are purchased; long term storage of pesticides by farmers avoided	Relationship between pesticide supply and usage	DAO, CPMC, STPC
	Provide emergency response to pesticide accidents and poisoning	Emergency response plan	Pesticide accidents and emergencies managed under the project	Number of pesticide accidents and emergencies	DAO, CPMC, STPC

Introduction

This Waste Management Plan (WMP) has been prepared to address waste management issues associated with the NUBSP project in line with legal and regulatory requirements. All stakeholders in the project shall have to adhere to this Plan. The NUSAF Environment Specialist together with the DEOs are responsible for ensuring that waste is managed in accordance with this Plan by providing the necessary resources and by issuing instructions and guidance during the course of project.

Definition of Waste

The National Environment (Waste Management) Regulations 1999 state that "waste" includes any matter prescribed to be waste, and any radioactive matter, whether liquid, solid, gaseous or radioactive which is discharged, emitted or deposited into the environment in such volume, composition or manner as to cause an alteration of the environment.

Key Laws and Regulations

Reference will be made to the provisions in the following legal framework:

- Constitution of the Republic of Uganda, 1995
- The National Environment Act (Cap 153)
- Water Act Cap 152
- National Environment (Waste Management) Regulations, 1999
- The National Environment (Standards for Discharge of Effluent into Water or on Land) Regulations, 1999
- The National Environment (Audit) Regulations, 2006
- The National Environment Management Policy, 1994
- General Specifications for Roads and Bridge Works 2005

Waste Management Principles

Waste will be managed in line with the hierarchy of waste management options ordered by preference as follows:

Waste Prevention – It is the responsibility of all project stakeholders to limit the amount of waste produced, insofar as is reasonably and economically practicable. This is to be achieved by careful consideration of the disposal implications of all developments and purchases.

Reuse – It is the responsibility of all stakeholders in so far as is reasonably and economically practicable to reuse articles that have not yet reached the end of life.

Recycling – Where opportunities exist and where regulations apply, waste recycling shall be encouraged and implemented to minimize the amounts of waste destined for landfill.

Transport – Waste will be collected from site waste hold/storage areas at regular intervals to authorized transfer, treatment or disposal sites only. Transportation of waste shall be done by NEMA Licensed Waste Transporters. Any vehicle used for the transportation of waste must be fit for purpose.

Treatment - Where wastes are sent for treatment to render safe or reduce hazardous properties of waste prior to recycling or disposal, it must be ensured that the segregation, storage, handling, transport and treatment processes comply with legislation.

Disposal – Where the production of waste is unavoidable, it shall be ensured that the segregation, storage, handling, transport and disposal processes comply with legislation and contract requirements. Hazardous wastes where possible shall be treated using appropriate technologies to remove or minimize the hazardous properties prior to disposal. All treatment/sorting facilities shall be licensed by NEMA such that they are permitted to accept, transfer and treat wastes accordingly.

Waste Management Hierarchy

In deciding on the best method for managing any waste, there is a hierarchy for decision making which addresses issues such as sustainability, cleaner production, health, safety, and environmental protection. The same hierarchy will be applied to the NUSAF3 project at each level, starting at the top of the hierarchy. The hierarchy will be as follows:

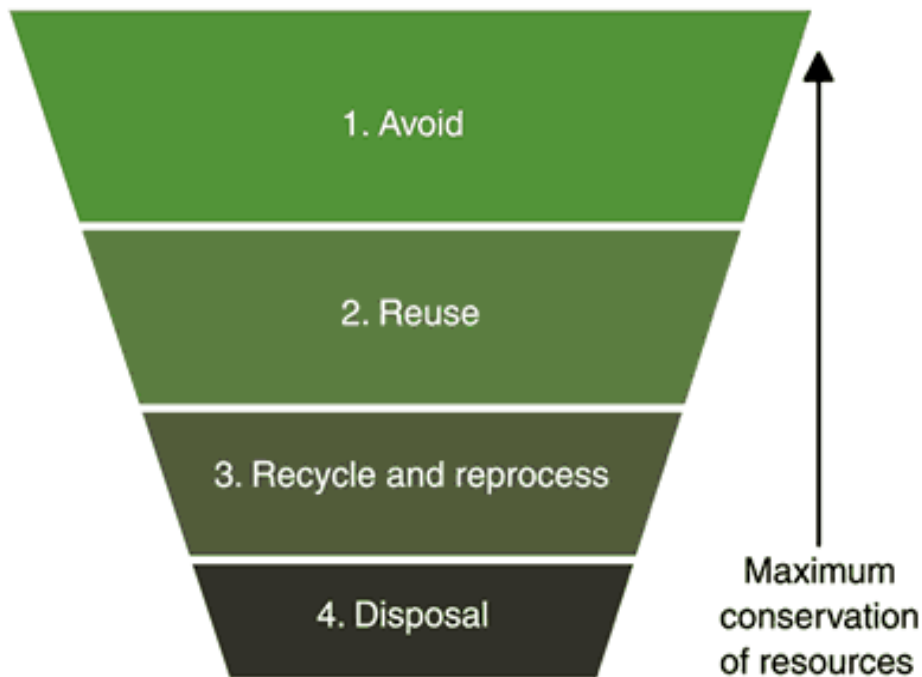


Figure: Waste Minimization Hierarchy

Avoid/Prevent: Waste avoidance by reducing the quantity of waste being generated. This is the simplest and most cost-effective way to minimize waste. It is the most preferred option in the Waste Management Hierarchy and is therefore ranked first. All waste generators shall endeavor to prevent waste by tight estimating to ensure that large surpluses of construction materials are not delivered to site; supplier coordination (requiring the supplier to take back/buy back surplus and sub-standard/rejected materials); operate a “just in time” delivery system (coordinating material delivery with its use).

Reuse: Reuse occurs when a product is used again for the same or similar use with no reprocessing. Reusing a product more than once in its original form reduces the waste generated and the energy consumed, which would have been required to recycle.

Recycle and Reprocess: Recycling involves the processing waste into a similar non-waste product consuming less energy than production from raw materials. Recycling spares the environment from further degradation, saves landfill space and saves resources.

Dispose: Removing waste from worksites, compounds and offices and dumping in a licensed landfill site, or other appropriately licensed facility.

General Storage, Collection and Transport of Waste

The following measures to minimize adverse impacts will be instigated:

- Handle and store waste in a manner which ensures that it is held securely without loss or leakage, thereby minimizing the potential for pollution;
- Use waste haulers authorized or licensed to collect specific categories of waste;
- Remove waste in a timely manner;
- Maintain and clean waste storage areas regularly;
- Minimize windblown litter during transportation by either covering trucks or transporting waste in enclosed containers;
- Obtain the necessary waste disposal permits from NEMA, if they are required, in accordance with the National Environment (Waste) Management Regulations 1999;
- Dispose of waste at licensed waste disposal facilities;
- Develop procedures such as a ticketing system to facilitate tracking of loads, particularly for chemical waste, and to ensure that illegal disposal of waste does not occur; and
- Maintain records of the quantities of waste generated, recycled and disposed where feasible.

Temporary Waste Storage and Segregation

Waste storage facilities will be provided as a secure, short term store for all waste streams generated on site prior to them being collected by relevant waste carriers for final disposal. Wastes must be classified and segregated in accordance with the National Environment (Waste) Management Regulations 1999 to ensure that each category of waste transported by or on behalf of the project meets the waste acceptance criteria of the authorised waste receiving site/process. All Contractors' staff has a responsibility to ensure that the waste generated by their activities are segregated and identified as follows:

Waste Electrical and Electronic Equipment

Waste Electrical and Electronic Equipment (WEEE) is any item that that is powered by mains or battery electricity. WEEE must be segregated from other waste.

Waste Batteries – There are certain battery types that are classified as Hazardous Waste and so must be segregated, stored and transported for recycling separately from non-hazardous batteries and or other waste.

Waste Destined for Recycling – Contractors will as opportunities arise implement waste recycling schemes to minimise the amount of biodegradable waste that goes to landfill and to reduce the impact to the environment from the final disposal of other wastes. Plastic bottles, glass, aluminium cans, and metals will be stored onsite and then given away for recycling.

Domestic Waste – Domestic Waste is the non-infectious and non-hazardous waste found in any household or office. It shall be segregated according to the labels.

Food (Catering) Wastes

- Catering waste is divided into food waste and non-food waste.
- Catering waste shall be collected and separated by personnel in the catering team and then transported by the waste collector.
- Food waste shall be removed daily from the kitchen.
- Food waste shall always be contained in plastic bags for disposal to prevent pest like flies and rats e.g. from breeding.
- Non-food waste (beverage cans, packing materials, etc.) shall be collected in separate containers

Medical Waste

The key to minimization and effective management of health-care waste is segregation (separation) and identification of the waste. The most appropriate way of identifying the categories of medical care waste is by sorting the waste into color-coded plastic bags or containers (WHO, 1995). In addition to the color coding of waste containers, the following practices are recommended (WHO, 1995).

- Bags and containers for infectious waste will be marked with the international infectious substance symbol;
- All sharps will be collected together, regardless of whether or not they are contaminated. Containers should be puncture-proof (usually made of metal or high-density plastic) and fitted with covers. They should be rigid and impermeable so that they safely retain not only the sharps but also any residual liquids from syringes. To discourage abuse, containers should be tamper-proof (difficult to open or break) and needles and syringes should be rendered unusable. Where plastic or metal containers are unavailable or too costly, containers made of dense cardboard are recommended (WHO, 1997); these fold for ease of transport and may be supplied with a plastic lining.

Table 10: WHO Color codes for medical waste segregation


Type of Waste	Color and Markings	Type of Container
Infectious	Yellow	Strong leak-proof plastic bag or bin with biohazard symbol.
Pathological	Red	Strong leak-proof plastic bag or bin with biohazard symbol.
Sharps	Yellow (marked sharps)	Puncture proof containers.
Chemical and pharmaceutical	Brown	Plastic bag or container.
Noninfectious/non-hazardous (non-clinical)	Black	Plastic bag or container.
Radioactive waste		Lead box, labeled with radioactive symbol.



Figure 10: Illustration of the coding system recommended by World Health Organization

Chemical Waste

Chemical waste that is produced should be handled in accordance with the National Environment (Waste)

Management Regulations, 1999. Containers used for the storage of chemical waste should:

- Be suitable for the substance they are holding, resistant to corrosion, maintained in good condition, and securely closed;
 - Display a label in English
- Containers used for the storage of chemical wastes shall be suitable for the substance they are holding, resistant to corrosion, maintained in a good condition, and securely closed. Display a label. Proper labelling is essential.
- The storage area for chemical waste shall:
 - ✓ Be clearly labelled and used solely for the storage of chemical waste;
 - ✓ Have an impermeable floor and bundling, of capacity to accommodate 110% of the volume of the largest container or 20% by volume of the chemical waste stored in that area, whichever is the greatest;
 - ✓ Have adequate ventilation;
 - ✓ Be covered to prevent rainfall entering (water collected within the bound must be tested and disposed as chemical waste if necessary);
 - ✓ Be arranged such as to separate incompatible materials.

Waste Management and Disposal Practices

Excavated Materials

- Excavated materials are not considered likely to cause adverse impacts, since they may be possible to be used as reclamation fill, which is considered a useful reuse of the material. Any uncontaminated inert material may be delivered to public fill site.
- Surplus excavated material, quarry overburden, rock rejected for aggregate, aggregate surplus to the requirements and the like shall not be discarded indiscriminately.
- Different types of surplus excavated materials shall be deposited separately in the spoil dumps or quarries requiring restoration.

Construction and Demolition Waste

- Careful planning and good site management can minimize over ordering and waste of materials such as concrete, mortars and cement groups;
- If feasible, the noise enclosure shall be designed so that the materials are reusable after it has been dismantled and removed;
- The design of formwork could maximize the use of standard wooden panels so that high reuse levels can be achieved;
- Alternatives such as steel formwork or plastic facing could be considered to increase the potential for reuse;
- Disposal of construction waste can either be at a specified landfill, or a private landfill to be acquired by the Contractor.

Medical Waste

Description – Medical care based wastes including used and/or contaminated sharps will be generated at health care centers. This particular waste is hazardous by its nature and is basically classified in infectious and non-infectious wastes.

Disposal Options

In the project, medical waste will be handled as follows:

- General medical care based wastes (packaging e.g. boxes etc.) will be disposed just like for domestic refuse;
- Highly infectious waste shall, whenever possible, be sterilized immediately by autoclaving. It therefore needs to be packaged in bags that are compatible with the proposed treatment process: red bags, suitable for autoclaving, are recommended.
- Small amounts of chemical or pharmaceutical waste may be collected together with infectious waste;
- Disposal by incinerating aims at complete combustion of medical waste is to totally burn it up to complete sterile ashes.

There are incinerators locally fabricated in Uganda. A good example is the MAK IV incinerator that has been specially invented for the burning of medical waste such as used cotton, syringes and safety boxes. The stainless steel machine uses waste paper as fuel and burns at up to about 1200 degrees Celsius. The top of the incinerator is covered with sand, to stop air leakage but also work as refractory powder, to prevent heat loss. It can burn 5 kilos of waste in about 25 minutes.

Domestic Solid Waste and Management

This includes solid waste that is typically non-infectious and includes: Kitchen waste, paper and cardboard, plastics, glass, metals, etc. Aluminum cans, glass bottles, paper, other office waste and packaging materials such as plastic and cardboard will be recovered at the Municipal respective Municipal Composting Sites.

Hazardous (Chemical) Waste

- For the process which generates chemical waste, it may be possible to find alternatives which generate reduced quantities or even no chemical waste, or less dangerous types of chemical waste.
- The wide range of materials and chemicals involved such as oil, lubricants, cutting oils, sludge, paints etc. Hazardous waste shall be identified, classified, handled and disposed of safely.
- The machinery used during construction will require maintenance that will include change of engine oil, hydraulic oil and coolants.
- The maintenance schedule varies from machine category and the type of fluid changed. Typically, maintenance is determined by the number of hours of operation of a machine as shown below for bulldozers:
 - ✓ Every 250 hours or monthly - Engine oil & filters plus transmission filters.
 - ✓ Every 500 hours or 3 months - Fuel filters and hydraulic system filters.
 - ✓ Every 1000 hours or 6 months - Transmission oil and final drive oil.
 - ✓ Every 2000 hours or one year - Hydraulic system oil and Coolant
 - ✓ For small vehicles, maintenance is typically carried out after accumulation of 2500 miles usually after 3 months i.e. 4 oil changes per year. The number of machines and the frequency of service are related to construction activity.

A NEMA-Licensed Contractor will be engaged to transport and dispose of chemical waste.

Advice should be sought from the DEO or NUSAF Environment Specialist about safe handling, storage, transport, treatment and disposal for any other waste substance or material that is not covered in this WMP.

Detailed Hazardous Waste Inventory and Management Plan

Waste Type	Description	Source	Hazardous Characteristics	Management Or Treatment Option
<ul style="list-style-type: none"> Acidic Wastes 	<ul style="list-style-type: none"> Spent pickling and cleaning acids 	<ul style="list-style-type: none"> During construction and maintenance of equipment/machinery. 	<ul style="list-style-type: none"> Corrosive (sulphuric acid, hydrochloric acid), will contain heavy metals. 	<ul style="list-style-type: none"> Neutralize with lime and dispose residues to landfill
<ul style="list-style-type: none"> E-Waste 	<ul style="list-style-type: none"> VDU's Computer Waste Cell Phones Printer Cartridges 	<ul style="list-style-type: none"> Various 	<ul style="list-style-type: none"> Heavy metals including Cadmium, Nickel and Lithium from batteries 	<ul style="list-style-type: none"> Recycle or treat, contain and dispose to Landfill
<ul style="list-style-type: none"> Oily (Hydrocarbon) Waste 	<ul style="list-style-type: none"> Oily water 	<ul style="list-style-type: none"> Oily Water Drains from vehicle maintenance areas 	<ul style="list-style-type: none"> Petroleum Hydrocarbons, PAHs 	<ul style="list-style-type: none"> Oil separators for recovery of oil and send offsite for incineration
	<ul style="list-style-type: none"> Lubricating Oil 	<ul style="list-style-type: none"> Mechanical Workshops 	<ul style="list-style-type: none"> Petroleum hydrocarbons, heavy metal compounds present as additives, e.g. Zn, Mo, etc. 	<ul style="list-style-type: none"> Incineration
	<ul style="list-style-type: none"> Grease 	<ul style="list-style-type: none"> Mechanical Workshops 	<ul style="list-style-type: none"> Can contain Heavy Metals and Antimony as additives 	<ul style="list-style-type: none"> Incineration
	<ul style="list-style-type: none"> Contaminated Rags 	<ul style="list-style-type: none"> Mechanical Workshops 	<ul style="list-style-type: none"> Petroleum hydrocarbons, Degreasers 	<ul style="list-style-type: none"> Incinerate
	<ul style="list-style-type: none"> Oil Contaminated Soil / Adsorbents 	<ul style="list-style-type: none"> Mechanical Workshops 	<ul style="list-style-type: none"> Petroleum hydrocarbons, Degreasers 	<ul style="list-style-type: none"> Incinerate
	<ul style="list-style-type: none"> Oil Filters 	<ul style="list-style-type: none"> Mechanical Workshops 	<ul style="list-style-type: none"> Petroleum, hydrocarbons, Degreasers 	<ul style="list-style-type: none"> Recover oil and send for recycling of metal components.
<ul style="list-style-type: none"> Clinical waste 	<ul style="list-style-type: none"> Sharps 	<ul style="list-style-type: none"> Health Centres 	<ul style="list-style-type: none"> Infectious – needle stick, injuries, etc. 	<ul style="list-style-type: none"> Incineration at in high temperature incinerator
	<ul style="list-style-type: none"> General Infectious Waste 	<ul style="list-style-type: none"> Health Centres 	<ul style="list-style-type: none"> Infectious 	<ul style="list-style-type: none"> Incineration at in high temperature incinerator
	<ul style="list-style-type: none"> Pharmaceutical / Chemical Waste 	<ul style="list-style-type: none"> Health Centres 	<ul style="list-style-type: none"> Toxic; can include solvents 	<ul style="list-style-type: none"> Incineration at in high temperature incinerator
<ul style="list-style-type: none"> Waste Chemicals 	<ul style="list-style-type: none"> Detergents and Cleaning Chemicals 	<ul style="list-style-type: none"> Offices 	<ul style="list-style-type: none"> May be corrosive and can contain chlorine chemicals. Are toxic to aquatic organisms. 	<ul style="list-style-type: none"> Treat, contain and dispose as hazardous waste.

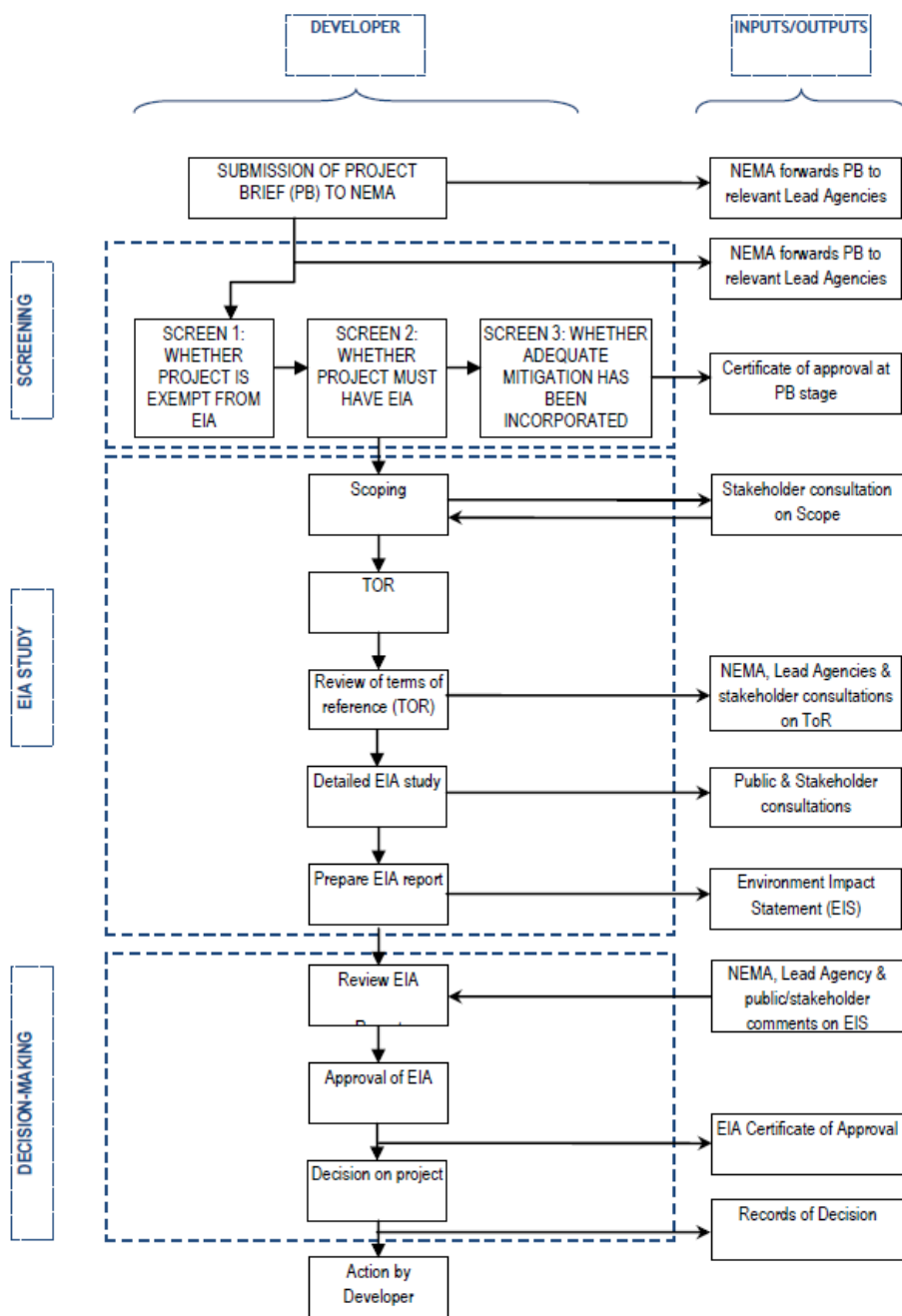
Detailed Non-hazardous Waste Inventory and Management Plan

Waste Type	Description	Source	Management Or Treatment Option
Scrap Metal	Various	During construction especially from fabrication works	<ul style="list-style-type: none"> Waste metals can be sold as scrap for recycling
Domestic (General) Waste including wood waste, office waste, and Canteen waste	Packaging, paper, food	Administration office block, kitchen, etc.	<ul style="list-style-type: none"> To be stored onsite to be collected by NEMA licensed Waste Collector to nearest Municipal Composting Site; Further sorting and recovery of material to be conducted by the facility staff at nearest Composting Site; Composting
Sand/Soil/Overburden /Rubble from construction	Mainly during road construction	Various	<ul style="list-style-type: none"> Utilize as fill material for stone quarries and borrow pits and take excess material to landfill.
“Clean” Run-off Water		“Clean” areas of site including Batching Plant	<ul style="list-style-type: none"> Discharge to drainage system; Collect and utilize as water for dust suppression (sprinkling) if acceptable contamination levels.

ANNEX 6: DETAILED ESIA PROCESS IN UGANDA

Overview

The ESIA guidelines (NEMA 1997) and the ESIA regulations (NEMA 1998) recognize the following stages in an ESIA process: Project Brief formulation; Screening; Environmental impacts study; and Decision making. In addition public consultation is required throughout the ESIA process.



(Source: ESMF MoES, 2013)

The EIA process in Uganda as described is initiated by the submission of a project brief – a document that contains the same sorts of information that are in the ESSF and a format for which is contained in the EIA guidelines. Once the information is judged to be complete, NEMA requests comments from the lead agency and then screens the project. The Executive Director has three options: (a) approve the proposed project, if the EIA is not mandatory and the project brief includes adequate mitigation measures, or (b) request the developer to prepare an Environmental and Social Impact Study (ESIS) if a decision cannot be made on the basis of the project brief. If OPM's Environmental Specialist has ascertained that the project is on the mandatory ESIA list, NEMA state that the project brief stage is normally omitted, moving straight into the ESIA process. If the decision is for an ESIS, the proponent obtains NEMA approval of the proposed ESIA consultant, conducts a scoping exercise, and agrees with NEMA on the study terms of reference. The study is conducted, and culminates in submission of an Environmental Impact Statement (ESIS) to NEMA for review and decision. Stakeholder consultation is mandatory at scoping, Terms of Reference preparation, during the environmental study, and preparation of the draft Environmental and Social Impact Statement (ESIS). The content of an ESIS, as specified in the EIA regulations, covers the recognized elements of environmental and social assessment good practice, including consideration of technical and site alternatives and induced and cumulative impacts.

The EIA Regulations (First Schedule) list the issues to be considered in an EIA, including:

- Biodiversity
- Ecosystem maintenance
- Fragile ecosystems
- Social considerations including employment generation, social cohesion or disruption, immigration or emigration, local economy
- Effects on culture and objects of cultural value
- Visual impacts

Preparation of Project Brief

According to the National Environment Act, "project brief" means a summary statement of the likely environmental effects of a proposed development referred to in section 19 of the Act. Unlike the ESIA, a project brief does not require a scoping report and neither submission of terms of reference for approval by NEMA.

According to Regulation 5 of the ESIA Regulations, 2006, a Project Brief is supposed to contain the following:

- the nature of the project in accordance with the categories identified in the Third Schedule of the Act;
- the projected area of land, air and water that may be affected;
- the activities that shall be undertaken during and after the development of the project;
- the design of the project;
- the materials that the project shall use, including both construction materials and inputs;
- the possible products and by-products, including waste generation of the project;
- the number of people that the project will employ and the economic and social benefits to the local community and the nation in general;
- the environmental effects of the materials, methods, products and by-products of the project, and how they will be eliminated or mitigated;
- Any other matter which may be required by the Authority.

If the Executive Director is satisfied that the project will have no significant impact on the environment, or that the Project Brief discloses sufficient mitigation measures to cope with the anticipated impacts he may approve project. The Executive Director of NEMA or his delegated official shall then issue a Certificate of Approval for the project. However, if the Executive Director finds that the project will have significant impacts on the environment and that, the Project Brief does not disclose sufficient mitigation measures to cope with the anticipated negative impacts, he shall require that, the developer undertakes an ESIA for the planned project.

Environmental Screening

The purpose of screening is to assist categorize the type of ESIA required for the project i.e. does it require a full ESIA, a Project Brief or no ESIA at all is required. This is important to enable the application of the appropriate ESIA level based on the project's anticipated levels of significant impacts as elaborated in the National Environment (EIA) Guidelines 1997.

Scoping and Preparation of ToRs

Scoping is the initial step in the ESIA process. Its purpose is to determine the scope of work to be undertaken in assessing the environmental impacts of the proposed project. It identifies the critical environmental impacts of the project for which in-depth studies are required, and elimination of the insignificant ones. The scoping exercise should involve all the project stakeholders so that consensus is reached on what to include or exclude from the scope of work. It is also at this stage that project alternatives are identified and taken into consideration. The contents of the scoping report are the same as the project brief; however, more detail is likely to be needed. This may involve some preliminary data collection and fieldwork. The Developer takes the responsibility for scoping and prepares the scoping report after consultation with NEMA, Lead Agencies and other stakeholders. The developer with assistance from technical consultants will draw up the ToRs for the ESIS and submit a copy to NEMA that shall in turn be forwarded to Lead Agencies for comments, in this case including the District Environment Officer.

Preparation of the ESIS

In preparing an ESIS, relevant information is collected on issues of real significance and sensitivity. These are then analyzed, mitigation measures developed for the adverse impacts and compensatory measures recommended for unmitigated environmental impacts. Measures aimed at enhancing beneficial or positive impacts are also given. An ESIS documents the findings and is submitted to NEMA by the developer.

Review of ESIS and Decision on Project

The Developer is required to submit ten (10) copies of the ESIS to NEMA for review and approval. NEMA then forwards a copy to the Lead Agencies for comments. NEMA in consultation with the Lead Agencies shall review the contents of the ESIS, paying particular attention to the identified environmental impacts and their mitigation measures, as well as the level of consultation and involvement of the affected stakeholders in the ESIS process. In this review, the level to which the ToRs set out for the study is addressed shall be considered. In making a decision about the adequacy of the ESIS, NEMA shall take into account the comments and observations made by the Lead Agencies, other stakeholders and the general public. NEMA may grant permission for the project with or without conditions, or refuse permission. If the project is approved, the Developer will be issued a Certificate of Approval.

Environmental and Social Management Plan

The Environmental and Social Management Plan (ESMP) is intended to ensure efficient management of environmental and social issues in subprojects. The ESMP consists of:

- The relevant project activities,
- The potential negative environmental and social impacts,
- The proposed mitigating measures,
- The institutions responsible for implementing the mitigation measures,
- The institutions responsible for monitoring the implementation of the mitigation measures and the frequency of the afore-mentioned measures;
- Capacity building needs and
- The cost estimates for these activities.

In many cases, NUSAF3 will likely have sub-projects, most of which are small in nature without significant environmental impacts. This calls for ESMP specific actions to mitigate these impacts and conforming to the obligations stipulated in the screening exercises, the environmental checklists and all legal instruments in force. At the time of the implementation of the sub-projects, the potential environmental and social impacts must be clearly identified and a management plan formulated, implemented and the plan's performance monitored during and after execution of sub-project activities. The impacts must be avoided or neutralized where possible or mitigated in conformity with Uganda's and the World Bank's prescriptions for sound environmental management.

Environmental Management and Monitoring Plan

Monitoring is the continuous and systematic collection of data in order to assess whether the environmental objectives of the project have been achieved. Good practice demands that procedures for monitoring the environmental performance of proposed projects are incorporated in the ESIS. Monitoring provides information on the occurrence of impacts. It helps identify how well mitigation measures are working, and where better mitigation may be needed. The monitoring program should identify what information will be collected, how, where and how often. It should also indicate at what level of effect there will be a need for further mitigation. How environmental impacts are monitored is discussed below.

- Responsibilities in terms of the people, groups, or organizations that will carry out the monitoring activities be defined, as well as to whom they report amongst others. In some instances, there may be a need to train people to carry out these responsibilities, and to provide them with equipment and supplies;
- Implementation Schedule, covers the timing, frequency and duration of monitoring are specified in an implementation schedule, and linked to the overall sub project schedule;
- Cost Estimates and Source of resources for monitoring need to be specified in the monitoring plan;
- Monitoring methods need to be as simple as possible, consistent with collecting useful information, so that the sub project implementer can apply them.
- The data collected during monitoring is analyzed with the aim of:
 - Assessing any changes in baseline conditions;
 - Assessing whether recommended mitigation measures have been successfully implemented;
 - Determining reasons for unsuccessful mitigation;
 - Developing and recommending alternative mitigation measures or plans to replace unsatisfactory ones; and
 - Identifying and explaining trends in environment improvement or degradation.

Public Consultation

The environmental impacts or effects of a project will often differ depending on the area in which it is located. Such impacts may directly or indirectly affect different categories of social groups, agencies, communities and individuals. These are collectively referred to as project stakeholders or the public. It is crucial that during the ESIA process, appropriate mechanisms for ensuring the fullest participation and involvement of the public are taken by the developer in order to minimize social and environmental impacts and enhance stakeholder acceptance. An effective consultation process should generally ensure that:

- The public has a clear understanding of the proposed project; and
- Feedback mechanisms are clearly laid out and known by parties involved.

Different stages of the ESIA process require different levels of public consultation and involvement. The key stages are:

- Public consultation before the commissioning of the ESIS;
- Public consultation during the ESIS; and
- Public consultation during ESIS review.

Consultation can be before, during the ESIA study or during its review as outlined below:

Consultation before the ESIA

On submission of the project brief to NEMA, it might be decided that views of the public on the project are sought. NEMA is obliged to publish the developer's notification and other relevant documents in a public notice within 4 weeks from the date of submission of the project brief and/or notice of intent to develop. It is important therefore, that a plan for stakeholder involvement is prepared before the ESIS begins. Such a plan should consider:

- The stakeholders to be involved;
- Matching of stakeholders with approaches and techniques of involvement;
- Traditional authority structures and political decision-making processes;
- Approaches and techniques for stakeholder involvement;
- Mechanisms to collect, synthesize, analyze and, most importantly, present the results;
- The ESIS team and key decision-makers;
- Measures to ensure timely and adequate feedback to the stakeholders;
- Budgetary/time opportunities and constraints

Public consultation during the ESIS

During the ESIS, the study team should endeavor to consult the public on environmental concerns and any other issues pertaining to the project. Though consultations are very critical at the scoping stage, ideally, it should be an on-going activity throughout the study. During the ESIS review, the public is given additional opportunity for ensuring that their views and concerns have been adequately addressed in the ESIS. Any earlier omissions or oversight about the project effects can be raised at this stage. To achieve this objective, the ESIS and related documents become public after submission to NEMA. An official review appointment will be announced, where the reviewing authority has to answer questions and remarks from the public. These questions have to be handed in writing prior to the meeting.

ANNEX 7: GENERIC TORS FOR ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) FOR NUBSP PROJECTS

Background

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

Objectives of ESIA study

The main objective of the ESIA should be stated. The environmental and social impacts study should take into consideration all environmental and social impacts of the proposed subproject activities and identify the main environmental and social aspects that are likely to be raised by key stakeholders in order to optimize the

project from the environmental and social point of view, by avoiding, minimizing, reducing or off-setting negative and enhancing positive impacts.

ESIA Study Methodology

1. Desk Research and Literature Review

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

2. Site Investigation

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

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

3. Public and Institutional Consultations

The consultant shall carry out extensive consultations with all key stakeholders including but not limited to the following:

- NEMA
- MoES
- MoH
- OPM
- District Local Government Officials

4. Analysis of Project Alternatives

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

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

5. Impact Analysis

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

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

Due to the recent increase in renewable energy developments in Uganda, it is important to follow a precautionary approach to ensure that the potential for cumulative impacts are considered and avoided where possible. Cumulative impacts shall be assessed by combining the potential environmental and social impacts of the proposed NUBSP with the impacts of substantial projects that have occurred in the past, are currently occurring, or are proposed or planned in the future within the proposed Project cumulative impact corridor.

For the case of hydropower projects, the Consultant shall assess both the effects on the baseline situation and the cumulative effects on a set of pre-identified Values Environmental Components (VECs) of the project in combination with other feasible foreseen future hydropower developments (i.e. Cascading dams in the same watershed), as well as other development activities (including non-hydropower) either currently underway or planned in the watershed which may have impacts that reasonably could interact with project-related impacts to generate a cumulative effect. These assessments will be based upon a compilation of information from existing hydrological and power generation studies as well as regional development plans. The selection of the VECs to be the focus of the analysis should take into account stakeholder inputs.

6. Preparation of the ESMP

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

7. Capacity and Training Needs

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

8. Preparation of Environmental and Social Monitoring Plan

The Consultant will prepare a specific description, and details, of monitoring measures for the Environmental and Social Monitoring Plan including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, and definition of thresholds that will signal the need for corrective actions as well as deliver a monitoring and reporting procedure. The monitoring program would enable verification of the adequacy of the management plans and other mitigation measures identified in the ESMP, and would provide a

basis for determination of any remedial measures or adjustments to management aspects if required. The Consultant should provide a time frame and implementation mechanism, staffing requirements, training and cost outlays.

Team Composition

The ESIA Experts for NUBSP Subprojects shall comprise of experts proposed herewith. It is important that, the ESIA teams are constituted taking into account the prevailing conditions on the proposed subproject sites.

1. Environmental Management Specialist (Team Leader)

Key Qualifications:

He/she should possess the following qualifications:

- At least an MSc. Environmental Management, Natural Resource Management or Environmental Engineering and four years of experience or a good BSc degree with experience of at least 6 years in conducting EIAs for infrastructure projects
- Should be registered with NEMA as an Environmental Practitioner and also certified as a Team Leader;

Tasks:

He/she will perform the following roles:

- Provide overall coordination and leadership to an ESIA team;
- Take a leadership role in steering stakeholder consultations during ESIA for slaughterhouse projects;
- Play an inter-phase role between client, NEMA and other stakeholders during EIA process;
- Conduct site visits of planned subprojects;
- Identify impacts of the project activities on the social and associated environment items;
- Participate in the elaboration of technical, legal and regulatory norms to comply with environmental requirements in all the chain of project activities;
- Identify, assess and propose environmental mitigation measures for the NUSAF3 subproject under study; and
- Prepare an ESMP for the project.

2. Occupational Health and Safety Specialist

Key qualifications:

- In addition to relevant formal training, should have undertaken training in OHS;
- Should have undertaken trainings in ESIA and or Environmental Audits;

Tasks:

- Participate in stakeholder consultations to discuss energy issues and safety aspects;
- provide OSH input throughout the assignment;
- provide public health aspects in the assignment;
- Participate in development ESIA for projects and participate in stakeholders' workshop.

3. Ecologist

Key qualifications:

- Must have a postgraduate training in natural sciences (forestry, botany or zoology);
- Must have undertaken an ESIA training;
- Conducted at least 5 ESIA studies in development projects.

Tasks:

- Take a lead in the ecological investigations of the project;
- Consult with stakeholder institutions on ecological aspects of the project;

- Review various literature sources on ecological matters of the projects; and
- Participate in write up of Environmental Impact Report.

4. Socio-economist

Key qualifications:

- He/she should have undertaken postgraduate training in the fields of sociology, anthropology or social work or related social sciences;
- He/she should have conducted ESIA's with experience of at least 5 years; and
- Must be registered with NEMA.

Tasks:

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

5. Aquatic Ecologist

Key qualifications:

- Must have a postgraduate degree or training in natural sciences (fisheries, aquatic ecology or zoology);
- Must have undertaken an ESIA training;
- Conducted at least 5 ESIA studies in water resources development projects.

Tasks:

- Take a lead in all aquatic ecological assessments of the project;
- Assess impacts on aquatic ecology including fish;
- Consult with stakeholder institutions on ecological aspects of the project;
- Participate in write up of Environmental and Social Impact Report.

6. Hydrologist

Key qualifications:

The Hydrologist shall possess proven experience in river management in developing countries. He/she shall have a minimum of BSc Degree qualification in a relevant field as well as post graduate qualifications in river management with a minimum of fifteen (15) years overall experience. Knowledge of sediment transport modeling in rivers will be an advantage.

Tasks:

- Review the hydropower designs and their potential impact on the river's hydrology;
- Assess the potential impacts of any river diversions or other activities;
- Overall evaluate the different dam safety designs

Expected Deliverables

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

- a. the project description and the activities it is likely to generate;
- b. the proposed site and reasons for rejecting alternative sites;

- c. a description of the potentially affected environment including specific information necessary for identifying and assessing the environmental effects of the project;
- d. the material in-puts into the project and their potential environmental effects;
- e. an economic analysis of the project;
- f. the technology and processes that shall be used, and a description of alternative technologies and processes, and the reasons for not selecting them;
- g. the products and by-products of the project;
- h. the environmental effects of the project including the direct, indirect, cumulative, short-term and long-term effects and possible alternatives;
- i. the measures proposed for eliminating, minimizing, or mitigating adverse impacts;
- j. an identification of gaps in knowledge and uncertainties which were encountered in compiling the required information;
- k. an indication of whether the environment of any other State is likely to be affected and the available alternatives and mitigating measures;
- l. such other matters as the Executive Director may consider necessary.

ANNEX 8: SAMPLE CONTRACT CLAUSES FOR CIVIL WORKS AND FACILITIES

The following information is intended solely as broad guidance to be used in conjunction the national laws. Based on this information, environmental rules for contractors should be developed for each project, taking into account the subproject size, site characteristics, and location (rural vs. urban). After choosing an appropriate site and design, construction activities can proceed. As these construction activities could cause significant impacts on and nuisances to surrounding areas, careful planning of construction activities is critical. Therefore the following rules (including specific prohibitions and construction management measures) should be incorporated into all relevant bidding documents, contracts, and work orders.

Prohibitions

The following activities are prohibited on or near the project site:

- Cutting of trees for any reason outside the approved construction area;
- Hunting, fishing, wildlife capture, or plant collection;
- Use of unapproved toxic materials, including lead-based paints, asbestos, etc.
- Disturbance to anything with architectural or historical value;
- Use of firearms (except authorized security guards); and
- Use of alcohol by workers.

Protection of Archaeological and Historical sites

A clause for “**Protection of Archaeological and Historical Sites**’ should be added to all bidding documents for the works contract which explains the steps to follow whenever new archaeological remains, antiquity or any other object of cultural or archaeological importance are encountered during construction.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the Department of Museums and Monuments in order to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

- a. Stop construction activities.
- b. Delineate the discovered site area.
- c. Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a night guard should be present until the responsible authority takes over.
- d. Notify the responsible foreman/archaeologist. Who in turn should notify the responsible authorities, Department of Museums and Monuments and local authorities (within less than 24 hours)
- e. Responsible authorities would be in charge of protecting and preserving the site before deciding on the proper procedures to be carried out.
- f. An evaluation of the finding will be performed by the Department of Museums and Monuments. The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values.
- g. Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage.
- h. Implementation of the authority decision concerning the management of the finding.

- i. Construction work could resume only when permission is given from the Department of Museums and Monuments after the decision concerning the safeguard of the heritage is fully executed.

In case of delay incurred in direct relation to Archeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archeological findings works and protections.

Construction Management Measures

Waste Management and Erosion:

Solid, sanitation, and, hazardous wastes must be properly controlled, through the implementation of the following measures:

Waste Management:

- Minimize the production of waste that must be treated or eliminated.
- Identify and classify the type of waste generated. If hazardous wastes (including health care wastes) are generated, proper procedures must be taken regarding their storage, collection, transportation and disposal.
- Identify and demarcate disposal areas clearly indicating the specific materials that can be deposited in each.
- Control placement of all construction waste (including earth cuts) to approved disposal sites (>300 m from rivers, streams, lakes, or wetlands).
- Dispose in authorized areas all of garbage, metals, used oils, and excess material generated during construction, incorporating recycling systems and the separation of materials.

Maintenance:

- Identify and demarcate equipment maintenance areas (>30m from rivers, streams, lakes or wetlands).
- Ensure that all equipment maintenance activities, including oil changes, are conducted within demarcated maintenance areas; never dispose spent oils on the ground, in water courses, drainage canals or in sewer systems.
- Identify, demarcate and enforce the use of within-site access routes to limit impact to site vegetation.
- Install and maintain an adequate drainage system to prevent erosion on the site during and after construction.

Erosion Control

- Erect erosion control barriers around perimeter of cuts, disposal pits, and roadways.
- Spray water on dirt roads, cuts, fill material and stockpiled soil to reduce wind-induced erosion, as needed.
- Maintain vehicle speeds at or below 10mph within work area at all times.

Stockpiles and Borrow Pits

- Identify and demarcate locations for stockpiles and borrow pits, ensuring that they are 30 meters away from critical areas such as steep slopes, erosion-prone soils, and areas that drain directly into sensitive water bodies.

- Limit extraction of material to approved and demarcated borrow pits.

Site Cleanup

- Establish and enforce daily site clean-up procedures, including maintenance of adequate disposal facilities for construction debris.

Safety during Construction

The Contractor's responsibilities include the protection of every person and nearby property from construction accidents. The Contractor shall be responsible for complying with all national and local safety requirements and any other measures necessary to avoid accidents, including the following:

- Carefully and clearly mark pedestrian-safe access routes.
- If school children are in the vicinity, include traffic safety personnel to direct traffic.
- Maintain supply of supplies for traffic signs (including paint, easel, sign material, etc.), road marking, and guard rails to maintain pedestrian safety during construction.
- Conduct safety training for construction workers prior to beginning work.
- Provide personal protective equipment and clothing (goggles, gloves, respirators, dust masks, hard hats, steel-toed and-shanked boots, etc.) for construction workers and enforce their use.
- Post Material Safety Data Sheets for each chemical present on the worksite.
- Require that all workers read, or are read, all Material Safety Data Sheets. Clearly explain the risks to them and their partners, especially when pregnant or planning to start a family. Encourage workers to share the information with their physicians, when relevant.
- Ensure that the removal of asbestos-containing materials or other toxic substances be performed and disposed of by specially trained workers.
- During heavy rains or emergencies of any kind, suspend all work.
- Brace electrical and mechanical equipment to withstand seismic events during the construction.

Nuisance and dust control

To control nuisance and dust the Contractor should:

- Maintain all construction-related traffic at or below 15 mph on roads within 200 m of the site.
- Maintain all on-site vehicle speeds at or below 10 mph.
- To the extent possible, maintain noise levels associated with all machinery and equipment at or below 90 db.
- In sensitive areas (including residential neighborhoods, hospitals, rest homes, etc.) more strict measures may need to be implemented to prevent undesirable noise levels.
- Minimize production of dust and particulate materials at all times, to avoid impacts on surrounding families and businesses, and especially to vulnerable people (children, elders).
- Phase removal of vegetation to prevent large areas from becoming exposed to wind.
- Place dust screens around construction areas, paying particular attention to areas close to housing, commercial areas, and recreational areas.
- Spray water as needed on dirt roads, cut areas and soil stockpiles or fill material.
- Apply proper measures to minimize disruptions from vibration or noise coming from construction activities.

Community Relations

To enhance adequate community relations the Contractor should:

- Follow the Ugandan and EA requirements i.e. inform the population about construction and work schedules, interruption of services, traffic detour routes and provisional bus routes, as appropriate.
- Limit construction activities at night. When necessary ensure that night work is carefully scheduled and the community is properly informed so they can take necessary measures.
- At least five days in advance of any service interruption (including water, electricity, telephone, and traffic routes) advise the community through postings at the project site, and affected homes/businesses, or through any other means as deemed adequate.

Environmental Supervision during Construction

The bidding documents should indicate how compliance with environmental provisions and design specifications will be supervised, along with the penalties for non-compliance by contractors or workers. Construction supervision requires oversight of compliance with the manual and environmental specifications by the contractor or his designated environmental supervisor. Contractors are also required to comply with national laws governing the environment, public health and safety.

ANNEX 10: DETAILS OFCONSULTATIONS

Particulars	Issues raised
<p>9th March, 2015</p> <p>Dr. Limlim, Director Mr. Alfred Odera, Programme Officer Ms. Caroline Lorika, Environmental Specialist Mr. Sam Musana, Procurement Officer</p> <p>NUSAF2 Secretariat OPM</p>	<ul style="list-style-type: none"> • There is need to present the draft ESMF and RPF to the wider stakeholders to receive their inputs which will further enrich the quality of the documents; • There is need to consult key stakeholders in this project to gain an insight to possible synergies to enhance delivery of the project. This applies within OPM, sector agencies, development partners and NGOs; • The Safeguards documents should reflect on the on-going National Development Plan 2016-2021 aspirations; • The ESMF and RPF should clearly outline institutional framework for the implementation of NUBSP.
<p>9th March, 2015</p> <p>Oloya Collins, Commissioner, Department Wetlands; Eng. Gaetano Okello, Principal Engineer.</p>	<ul style="list-style-type: none"> • Soil erosion and siltation control measures be instituted in the projects; • And as well Provisions made for waste management in and around structures and facilities under NUBSP.
<p>10th March, 2015</p> <p>Mr. Ambrose Lotyang, Senior Economist Ministry of Karamoja Affairs, Office of the Prime Minister</p>	<ul style="list-style-type: none"> • OPM has a number of inter-related but independent programmes largely geared towards uplifting livelihoods of the Northern Uganda. All the programmes under Northern Uganda, have in them mainstreamed environment and cross-cutting issues as is a requirement from donors and Gou; • The implementation of NUBSP through NUSAF3 should be based on existing institutional government framework so that it builds sustainability at the end of the interventions.
<p>10th March, 2015</p> <p>Dr. Emmanuel Iyamulemye Niyibigira National Programme Coordinator</p> <p>Northern Uganda Agriculture Livelihoods Recovery Programme and Karamoja Livelihoods Programme</p>	<ul style="list-style-type: none"> • These are inter-related programmes geared to improved households incomes through deliberate areas of results; • The Programme had well mainstreamed environmental and health and safety considerations addressing agro-chemicals handling, application, storage and disposal and was possible because of training and sensitization. The same needs to be done in NUBSP implementation.
<p>10th March 2015</p> <p>Mr. Mayanja Gonzaga Assistant Commissioner/Northern Uganda Office of the Prime Minister</p>	<ul style="list-style-type: none"> • NUSAF 2 is under the overall umbrella project of PRDP and its implementing pillars 2 and 3 of PRDP; • Since NUBSP is going to be implemented through NUSAF 3 Environmental and social mitigations should be inbuilt into the project and resources provided as part of the project overall budget.
<p>10th March, 2015</p> <p>Eng. Charles Ngeya Senior Engineer</p>	<ul style="list-style-type: none"> • NUBSP needs to integrate cross-cutting issues into the project designs early enough and they should be integrated

<p>Dept. of Construction Standards and Quality Management, MoWT</p>	<p>even in the Business Plans;</p> <ul style="list-style-type: none"> • The Environmental Management Specialist for NUSAF 3 should be in place right from the beginning of the project not as was the case under NUSAF 2 in order to coordinate well Safeguards issues in NUBSP; • NUBSP should not assume the districts will monitor and enforce compliance on safeguards without allocating facilitation. The DEOs have challenges of resources and any additional load should be matched with resources; and • If the DEOs are to follow up works, they should be brought on board in the project early enough not much later in the project.
<p>11th March, 2015</p> <p>Mr. Arnold Waisswa Director, Environmental Monitoring and Compliance NEMA</p>	<ul style="list-style-type: none"> • The Developer (NUBSP) will need to have in place, proper screening processes to enable keying out of pertinent environmental and social issues in the project to enable appropriate follow up assessments be done; • At implementation, there will likely be need for independent project based ESIA's need for the various infrastructures; and • Some of the infrastructures that cross ecologically sensitive areas (wetlands, forests and hills) will require environmental assessments commensurate with works anticipated which can be by use of Project Briefs, ESMPs or wider ESIA's; • Environmental Mitigation measures need to be integrated into the BoQs and business plans for all CIGs; • There should be clear reporting on environmental and social performance of the project compliance and performance as part of the overall project contractual reporting schedules; and • Mechanisms for acquisition of land for the project ought to be transparent and participatory but not coercive. Where land is contributed by the community for a community infrastructure, the modalities for such processes ought to be transparent and participatory and has to be endorsed by the various stakeholders;
<p>11th March, 2015</p> <p>Ms. Ali Munira</p> <p>Head, Public and International Relations/Principal Relations Officer Inspectorate of Government (IG)</p>	<ul style="list-style-type: none"> • During Implementation of NUBSP, the Inspectorate of Government will be involved in Transparency, Accountability and Anti-Corruption (TAAC) Component and coordinating CMGs activities that oversee all government projects and programs • TAAC will promote accountability and transparency at community levels through provision of mechanisms for timely reporting of grievances on a number of aspects in the community amongst others; • Under TAAC, Inspectorate of Government has undertaken a number of initiatives to sensitize and empower the communities to report corruption and maladministration tendencies through media channels and seminars;

	<ul style="list-style-type: none"> • The Inspectorate has instituted avenues such as e-mails, Report 2 IG using Short Message System (SMS), telephone calls on 0414347387 (hot line) and other general lines, physical reporting to any of the 16 IGG Regional Offices spread throughout the country; and • The powers of IGG as enshrined in the Constitution and IG Act which all includes to investigate or cause investigation, arrest or cause arrest, prosecute or make and give directions during investigations will be undertaken in ensuring NUBSP activities are free from fraud
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Consultations in Nebbi District

<p>Name: Teopista Designation: NUSAF Trainer Date: 3rd /03/2015 Venue: NUSAF Desk Office, Nebbi District</p>	<p>Question: What is the current coverage of NUSAF 2 in Nebbi District?</p> <p>Response: NUSAF2 is being implemented in all of the 13 sub-counties and 2 town councils i.e., Nebbi Town Council and Pakwach T/C.</p> <p>Question: How do you select the NUSAF benefiting communities?</p> <p>Response: The District informs the sub-counties of upcoming NUSAF projects; then village meetings are convened in the respective sub-counties targeting mostly vulnerable groups like the very poor community members, widows, and orphans among others. Interested members of the community then fill out forms which are then forwarded to the sub-county for assessment.</p> <p>Question: how do you choose the subprojects to be implemented?</p> <p>Response: There are technical people at sub-county level who guide the community members upon which projects to choose without necessarily selecting for them.</p> <p>Question: How and who appraises community subprojects?</p> <p>Response: The sub-county technical committees review community proposals and then forward them to sub-county executive committee. The executive committee of the sub county then reviews these proposals and forwards them to the District Technical committee.</p> <p>The District Technical Committee reviews these proposals and makes recommendations which are forwarded to District Executive Committee.</p> <p>The District Executive Committee then forwards the proposals to the Office of the Prime Minister for approval and funding.</p> <p>Question: How is capacity of benefiting groups enhanced?</p> <p>Response: The district has technical people who offer initial training before projects are undertaken.</p> <p>Question: In your own view, do you think the training offered is sufficient for sustainability of the project?</p>
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	<p>Response: No because benefiting communities are ill prepared. Training is supposed to be continuous but there are no budgetary provisions for this.</p> <p>Question: How was land for the construction of community access road acquired?</p> <p>Response: The Community had a need for the road, so they freely provided the land where the road passed. But before construction and MoU was signed between community and Nebbi Town council.</p> <p>Question: Are there incidences when a proposed community subproject is rejected?</p> <p>Response: Yes, some proposed projects are rejected on basis of lack of sustainability but reason for rejection is always explained to the affected group.</p> <p>Question: Do you think the communities have benefited from NUSAF2 projects?</p> <p>Response: Yes, there is improvement in accommodation of health workers and teachers under the CIR subprojects. Household income subprojects have directly improved on the livelihood of participating households.</p> <p>Question: What major challenges have you noted as a NUSAF technical person?</p> <p>Response: When meetings are convened, some community members do not show up because there are no sitting allowances and lunch. They miss out on information and later complain that they were excluded from NUSAF projects.</p> <p>Question: Do you think NUSAF has in place structures to offer adequate and continuous capacity building to benefiting communities?</p> <p>Response: No, because communities often complain that they were not sufficiently trained in respective enterprises. Some groups seek advice from sub counties which they do not receive because they are always asked to pay for the service. There should be a component of continuous training but this is not provided for in the budget, therefore this should be considered when designing NUBSP.</p> <p>Question: How are structures maintained after completion and handing over to project beneficiaries?</p> <p>Response: For every project especially under CIR and PWP, there is a committee for operation and maintenance. The committee members set guidelines which have to be followed cautiously by facility users. In case of any defects 6 months or less, the contractor meets the maintenance costs and this is clearly stated in the contract. O&M committees need to be established in the Business support projects and O&M plans for each projects should be developed and attached to the business plans submitted for grants. This is to ensure sustainability of investments.</p>
<p>Name: Gadilaya Tree Planting Group Date: 3/03/2015</p>	<p>Question: How many members make up this group? Response: There are 15 members in Gadilaya Tree Planting Group</p> <p>Question: Why did you choose the Nursery Tree Project?</p>

<p>Venue: Jupuyik Village, Nebbi Sub county Type of Project: Tree Nursery</p>	<p>Response: The Community had established the nursery project but lacked funds to operate efficiently. So when NUSAF 2 came on board, the community decided to maintain their original project of the Tree Nursery although only 15 members were selected.</p> <p>Question: Are there any structures within the group to ensure sustainability? Response: There is a subproject Management Committee that comprises a Chairperson, Treasurer, Secretary, Nursery Man that is responsible for managing the Tree Nursery and funds accruing from the subproject.</p> <p>Question: Did you receive training in management of tree nurseries? Response: Yes, some energetic group members were selected and trained in Nursery management but the training was inadequate because the trainer only appeared for 3 days. There is need for more training in nursery management and production of quality seedlings.</p> <p>Question: What benefits have you realized from this NUSAF2 subproject which can be replicated in NUBSP? Response: The group has produced coffee seedlings which have been distributed among group members. These seedlings were planted by each member and soon harvesting will start. The government is also providing market by buying the seedlings from the community nursery and distributing them to the nearby communities.</p> <p>Question: What are the main challenges associated with group activities? Response:</p> <ul style="list-style-type: none"> • Delays in payment for seedlings supplied to government funded programs. • The procedures for approval of projects are too lengthy. • <u>Seedlings are often attacked by pests and diseases which cause great losses to the group.</u> • Some seeds are too expensive for the group to purchase while other seeds are not locally available on market, so sometimes the group obtains seeds from the bush instead of using recommended quality seeds. • <u>There is also inadequate information about where to obtain quality seeds and other inputs such as pesticides.</u> <p>Question: In case NUBSP besides NUSAF presents another opportunity, would your group still continue with the same project? Response: No, the group would choose another enterprise so that they compare the benefits and challenges.</p> <p>Question: Who owns the land where the tree nursery is established? Response: Land belongs to Gadilaya group and it was purchased with proceeds from the sale of seedlings.</p> <p>Question: Are there any community members who felt left out during group formation? Response: Yes, because tree planting was already in place and the group had seventy (70) members. Only 15 members were considered for NUSAF2 and those left were disappointed.</p>
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	<p>Question: Do you use pesticides and fertilizers at the tree nursery?</p> <p>Response: Yes, pesticides are used and <u>we received training on how to use them</u>. As for fertilizers, the group no longer uses them because they became too expensive to afford.</p>
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Consultations in Gulu District

<p>Name: Amilobo Women Group, Gulu district subproject: Banana plantation Date: 6/03/015 Venue:</p>	<p>Question: Why did your group choose this enterprise? Response: The group decided to select the project after considering associated benefits.</p> <p>Question: How did the group acquire land for the banana plantation? Response: One of the group members offered land to the group for some time until the group can acquire its own but there was no written document signed and also no specified time stated for use of the land.</p> <p>Question: How has your group benefited from this project? Response: The group has formed a SACCO from the proceeds of the plantation lending out money to group members at minimal interest.</p> <p>Question: What are some of the challenges facing the group regarding this project to inform NUBSP?</p> <ul style="list-style-type: none"> • The plants wilt during prolonged dry season • It also becomes had to maintain the garden during the rainy season due to the vigorous growth of weeds. • The yields from the plantation are very low especially last year no sales were made because wind brought down all plants that had fruited • The initial training was not adequate as the group was trained for two days only. <p>Question: If your group is given another opportunity by NUBSP and or NUSAF, would you still choose banana growing? Response: No, the group would select another enterprise as the current one is a bit challenging to the members.</p>
<p>Name: Atto Francisca K Designation: DEO, Gulu Date: 6/03/2015 Venue: DEO's Office</p>	<p>Question: Was screening for environmental issues done for NUSAF2 projects especially PWPs? Response: Most projects were screened especially the road works and CIRs. A budget of UGX 600,000 was set aside, for the environmental issues on each project.</p> <p>Question: What particular interventions were put in place? Response: Tree planting was the most common intervention for restoration of sites and as well waste management and proper husbandry measures were key to HISP. . In some areas there was back filling where marrum was extracted. Also project specific environmental committees were formed to handle environment issues at community level. There were gender considerations, for example how many women were employed and how they were being treated. Also issues to do personal protective equipment (PPE) were emphasized at construction sites.</p> <p>Question: How would you rate the performance of NUSAF2 in Gulu</p>

district?

Response: NUSAF2 has performed better than NUSAF1 due to its design. It has improved lives of teachers and health workers in terms of accommodation. There is also improved school enrollment although this is yet to translate into better academic performance.

Challenges

- In some areas, communities have stolen the tree seedlings planted to restore the environment after construction activities
- Some trees have dried due to prolonged drought and inadequate care given to them by communities where they are planted
- Also wild fires destroy the planted trees
- Communities lack a feeling of ownership of the project, claiming the planted trees are for NUSAF
- In some cases, community members have claimed for compensation yet there no budgetary provisions for this under NUSAF2

Recommendations

- Build capacity for environmental management under NUBSP
- Need for detailed sensitization before projects are implemented
- Improve on the budget for environmental related issues in the design of NUBSP
- There should be a provision for monitoring under NUBSP
- Special consideration should be given to former IDP land owners because they offered their land which has reduced in productivity.