



Republic of Uganda

OFFICE OF THE PRIME MINISTER

**Third Northern Uganda Social Action Fund
Project (NUSAF 3)**



**Environmental and Social Management
Framework**

April 10, 2015

TABLE OF CONTENTS

Table of Contents.....	i
Acronyms.....	vii
EXECUTIVE SUMMARY.....	viii
1 INTRODUCTION.....	1
1.1 Background.....	1
1.2 Successor Project to NUSAF2.....	1
1.3 The project development objective (PDO).....	1
1.4 Project Financing and duration.....	1
1.5 Project Components.....	1
1.5.1 Component 1: Labor-Intensive Public Works:and Disaster Risk Financing.....	1
1.5.2 Component 2: Livelihood Investment Support.....	2
1.5.3 Component 3: Strengthening Transparency, Accountability and Anti-Corruption (TAAC).....	3
1.5.4 Component 4: Social Protection System and Program Management.....	3
1.6 Project location.....	4
2 SAFEGUARD LESSONS ON PREVIOUS NUSAF2 PROJECT ESMF.....	5
2.1 GAPS IN THE ESMF for NUSAF2.....	5
2.1.1 LACK OF CHANCE FINDS PROCEDURES.....	5
2.1.2 Limited coverage of baseline data.....	5
2.1.3 Limited information on land TENURE systems.....	6
2.1.4 LACK OF ASSESSMENT OF SAFEGUARDS CAPACITY in INSTITUTIONS.....	6
2.2 Lessons learnt in the implementation of Safeguards in NUSAF2 Project.....	6
2.2.1 LACK OF ADEQUATE TRAINING IN safeguards issues.....	6
2.2.2 Capacity to implement Safeguards.....	7
2.2.3 Subproject Screening and Approval.....	7
2.2.4 Waste Management.....	8
2.2.5 Budgets for Mitigation.....	9
2.2.6 Public Consultation during mobilization.....	9

2.2.7	Inclusion of Women	10
2.2.8	SUBPROJECTS AND ACTIVITIES FOR VULNERABLE GROUPS	10
2.2.9	CONSULTATION AND Inclusion of PWDs	11
2.2.10	LACK OF SUPPORT TO BENEFICIARIES	11
2.2.11	Grievance Redress Mechanisms	12
2.2.12	Land Acquisition Issues.....	12
2.2.13	Monitoring and Reporting	13
2.3	NUSAF3 ESMF.....	13
2.3.1	Purpose and Justification	13
2.3.2	Approach and Methodology in ESMF Preparation	13
3	BASELINE ENVIRONMENTAL AND SOCIAL INFORMATION.....	15
3.1	KARAMOJA REGION	15
3.1.1	Physical AND BIOLOGICAL Environment	15
3.1.2	Social Environment	16
3.1.3	NUSAF3 Target Groups in Karamoja	20
3.2	BUNYORO REGION (BULIISA AND MASINDI DISTRICTS).....	21
3.2.1	Physical AND BIOLOGICAL Environment	21
3.2.2	Socio-economics	21
3.3	West Nile Areas.....	25
3.3.1	Physical AND BIOLOGICAL Environment	25
3.3.2	Socio-economics	25
3.4	Elgon and teso regions	29
3.4.1	Physical AND BIOLOGICAL Environment	29
3.4.2	Socio-economic.....	29
3.4.3	Natural Resource Use and Access.....	31
3.5	ACHOLI and lango REGIONS	32
3.5.1	Physical AND BIOLOGICAL Environment	32
3.5.2	Socio-economic.....	33

4	POLICY AND LEGAL FRAMEWORK.....	42
4.1	The Policy Framework.....	42
4.1.1	Uganda’s Vision 2040.....	42
4.1.2	Peace, Recovery, and Development Plan (PRDP2)	42
4.1.3	The National Environment Management Policy, 1994	42
4.1.4	The National Cultural Policy, 2006.....	42
4.1.5	The National Water Policy, 1999	43
4.1.6	The National Land Use Policy.....	43
4.1.7	The National Gender Policy, 1997	43
4.1.8	The National HIV/AIDS Policy, 2004.....	43
4.1.9	National Policy for the Conservation and Management of Wetland Resources, 1995	43
4.2	The Legal Framework.....	43
4.2.1	The Constitution of the Republic of Uganda, 1995.....	43
4.2.2	Inspectorate of Government Act, 2002	44
4.2.3	The Anti-Corruption Act 2009.....	44
4.2.4	The Whistleblowers Protection Act, 2010	44
4.2.5	The National Environment Act, Cap 153.....	45
4.2.6	The Agricultural Seeds and Plants Act (Cap 28)	45
4.2.7	The Plant Protection Act (Cap 31).....	45
4.2.8	The Agricultural Chemicals (Control) Act, No. 1 of 2006	45
4.2.9	The Land Act, Cap 227	46
4.2.10	Land Acquisition Act, 1965	46
4.2.11	The Mining Act of 2003	46
4.2.12	National Forestry and Tree Planting Act, 2003.....	46
4.2.13	The Occupational Safety and Health Act, 2006	46
4.2.14	Historical Monument Act, 1967	47
4.2.15	Environmental Impact Assessment Regulations, 1998	47
4.2.16	The National Environment (Audit) Regulations, 2006 (12/2006)	47

4.2.17	National Environment (Waste Management) Regulations, 1999	47
4.2.18	The National Environment (Wetlands, River Banks and Lakeshores Management) Regulations, 2000	47
4.2.19	The National Environment Regulations (Noise Standards and Control), 2003	48
4.2.20	The National Environment (Standards for Discharge of Effluent into Water or on Land) Regulations 1999	48
4.3	International Environmental instruments/obligations for Uganda	48
4.4	World Bank Safeguard Policies and EHS Guidelines.....	49
4.4.1	World Bank Policies	49
4.4.2	World Bank Group Environment, Health and Safety Guidelines	54
5	STAKEHOLDER AND COMMUNITY CONSULTATIONS AND DISCLOSURE.....	55
5.1	Overview	55
5.2	Goals of Consultations	55
5.3	Objectives of stakeholder AND COMMUNITY consultations	55
5.4	Some of the Preliminary Key Stakeholder COMMUNITY Concerns and views	56
5.5	Future Consultations.....	60
5.5.1	Issues for Consultation	60
5.5.2	Consultation during Mobilization and Sensitization	60
5.5.3	Consultations on ToRs for ESIA and RAPs.....	60
5.5.4	Consultations on draft ESIA and RAP Reports	61
5.5.5	Ongoing Consultations.....	61
5.5.6	Consultation of Special Groups.....	62
6	ENVIRONMENTAL AND SOCIAL ASSESSMENT PROCESS FOR NUSAF3 SUB-PROJECTS	63
6.1	Environmental Screening under OP 4.01 Environmental Assessment.....	63
6.2	APPLICATION OF Environmental and Social Assessment in Uganda.....	63
6.2.1	Step 1: Screening of subprojects	63
6.2.2	Step 2: Assigning the appropriate Environmental Categories	64
6.2.3	Step 3: Carrying out Environmental and Social Impact Assessment	66
6.2.4	Step 4: Public Consultations and Disclosure	68

6.2.5	Step 5: Review and Approval	69
6.2.6	STEP 6: SUBPROJECT Implementation	69
6.2.7	Step 7: Environmental Monitoring	69
6.3	Grievance Redress Mechanism	70
6.3.1	Importance	70
6.3.2	Involvement of the Inspectorate of Government.....	71
6.3.3	nusaf3 grievance Redress mechanism	73
6.3.4	The WORLD BANK’S Grievance Redress Service (GRS)	74
6.4	Chance Find Procedures.....	77
7	PROJECT ACTIVITIES, IMPACTS AND MITIGATIONS MEASURES	78
7.1	Project Activities	78
7.2	Potential Project Impacts and their Mitigations Measures	78
8	ESMF IMPLEMENTATION FRAMEWORK	81
8.1	detailed NUSAF3 Institutional Implementation Arrangements	81
8.1.1	Office of the prime minister	81
8.1.2	Inspectorate of Government	81
8.1.3	Ministry of Gender, Labor, and Social Development.....	82
8.1.4	Ministry of Health	82
8.1.5	Ministry of Agriculture, Animal Industry and Fisheries	82
8.1.6	Ministry of Works and Transport.....	83
8.1.7	Ministry of Education and Sports	83
8.1.8	The National Environment Management Authority (NEMA).....	83
8.1.9	Local Government Administration Structures-DISTRICTS & SUB-COUNTIES.....	84
8.1.10	The Role of the Contractors	85
8.1.11	Role of Office of Chief Government Valuer	85
8.1.12	World Bank.....	86
8.2	Capacity Building.....	86
8.2.1	Capacity Assessment Needs	86

8.2.2	Strategy.....	86
8.2.3	Training IN SAFEGUARDS IMPLEMENTATION	87
8.3	Monitoring and Evaluation.....	88
8.3.1	Overview	88
8.4	Reporting.....	88
9	BUDGET AND DISCLOSURE OF ESMF	90
9.1	Budget	90
9.2	ESMF Disclosure	90
10	CONCLUSION AND RECOMMENDATION.....	91
10.1	Summary and Conclusions	91
10.2	Key Issues and Recommendations	91
11	REFERENCES.....	93
12	ANNEXES	95
	Annex 1: Environmental and Social Screening Form (essf)	95
	Annex 2: Projects that will not be funded under NUSAF 3 (negative list).....	99
	Annex 3: typical Environmental and Social mitigations CHECKLISTS	100
	Annex 4: Pest Management Plan	106
	ANNEX 5: Waste Management Plan.....	118
	Annex 6: Detailed ESIA Process in Uganda.....	128
	Annex 7: Generic ToRs for Environmental and Social Impact Assessment (ESIA) for NUSAF3 Projects	133
	Annex 8: Sample Contract Clauses for Civil Works.....	138
	Annex 9: Details of Consultations	142

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
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
UBOS	Uganda Bureau of Statistics

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 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, development Agencies, and international NGOs.

The NUSAF2 Successor Project

The Government of Uganda with support of the World Bank (IDA) is preparing a successor project to the NUSAF 2 project which is currently under implementation. The proposed project will have four components: (i) Labor-intensive Public Works and Disaster Risk Financing – this will focus on a variety of asset creation activities, including rural access roads, tree nurseries, afforestation, construction of different soil and water conservation measures, and flood control structures, rainwater harvesting, rehabilitation and construction of market shelters, rural health facilities, and schools, among others. This component also includes Disaster Risk Financing - Risk Financing will be used to extend support to the Labor intensive public work beneficiaries or support new beneficiaries who have transitory needs. This activity will focus on Districts that will be selected to pilot this mechanism for delivering risk financing. Strong linkages between risk financing and the emergency response system are required to ensure a coordinated response to shocks over time.; (ii) Livelihood Investment Support – this will support the government’s aim to extend livelihood support to poor and vulnerable households and, by doing so, increase their productive assets and incomes. The LIS component is comprised of an Improved Household Income Support Program (IHISP) and a Sustainable Livelihoods Pilot (SLP); (iii) Transparency, Accountability and Anti-Corruption (TAAC) – this will continue to be implemented in four main ways but in a more systematic and effective manner: measures to prevent fraud through sensitization and awareness creation by IG; the engagement of citizens and stakeholders; the inspection and monitoring of project activities at all levels by IG and CMGs; and enforcement through investigation and prosecution by IG; and (iv) Social Protection System and Program Management – the Social Protection System sub component will lay the foundation for a social safety net system as envisioned in the draft Uganda Social Protection Policy (USPP). The component will support the MGLSD in establishing and strengthening systems to promote the harmonization of the direct income support elements of the social protection sector. The Program Management sub-component will support the operational expenditures related to the management and the monitoring and evaluation of the project. Its support will strengthen the planning and coordination of activities supported by the project, as well as the monitoring of

their implementation. The proposed project would be funded through a US\$ 130 million equivalent IDA credit and would operate over a period of five years.

The PDO for the Successor project is “to provide income support to and build the resilience of poor and vulnerable households in Northern Uganda.”

Given the Government’s priority is to improve household income and address the socio-economic imbalances in the North and North East where poverty levels are still severe the new project will focus on improving incomes and livelihoods of the poor and vulnerable communities in that region and contribute to the revitalization of the local economy. To this effect, the project builds on the experiences of NUSAF 1 and 2 by scaling up the labor intensive public works and the household income support components.

Lessons from NUSAF 2

A review of ESMF for NUSAF2 as well as field visits to the beneficiary areas coupled with field consultations which constituted one of the key tasks in the assignment and some of the salient observations noted include:

Good lessons

- a. The project made a deliberate provision for an Environmental Specialist to be responsible for mainstreaming environmental mitigation measures into its plans and activities;
- b. 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;
- c. Beneficiary communities and groups were asked to plant trees before receipt of the funding for the subprojects which had climate change mitigation measures;
- d. Screening of sub-projects was a pre-requisite before release of funds; and
- e. The project prepared appropriate environmental management tools for mainstreaming environmental management into its operations;
- f. 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;
- g. Gender and disability sensitivity informed the design of NUSAF 2 infrastructures. For instance, CIR component promotes took into account both gender, accessibility and equality considerations. The institutional VIP latrines designs ensured there were separate toilets for men, women, boys and girls. There are also provisions for separate shower rooms, access ramp and as well grip bars to cater for teachers, health workers and pupils with disabilities. These were all good safeguards mainstreaming measures in the project;
- h. NUSAF 2 exercised the obligation of ensuring that, development process should ensure that, there is broader universal social inclusion of sections of society in that; vulnerable categories such as People Living With Aids (PWDs), widows/widowers, orphans, child

mothers, ex- combatants, youth, the elderly, IDP returnees, dis-harmed Karimojong, and female headed households as well as maimed land mind 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;

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 initial 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 Ministry of Agriculture Animal Industry and Fisheries (MAAIF), Ministry of Labour Gender and Social Development (MLGSD), Ministry of Works and Transport (MoWT), Ministry of Education and Sports (MoES), and Ministry of Health (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 – this affected implementation of proposed mitigation measures because there was no proper guidance to include them in the BoQs;
- e. Inadequate coverage of Physical Cultural Resources in ESMF and no particular attention was paid to the un-known PCRs aspects.
- f. Lack of Grievance Redress Mechanism in the ESMF document which made resolution of community and stakeholder complaints un-coordinated with no proper documentation and provision of feedback.
- g. There was no environmental and social baseline data in the ESMF 2 document and this made initial monitoring not to have a proper benchmark.

Purpose and Scope of ESMF for NUSAF3

This ESMF provides guidance on how environmental and social aspects shall be identified, assessed and managed. 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 negative environmental and social impacts.

Approach and Study Methodology in 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.

Keys 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 Inspectorate of Government Act, 2002;
- The Anti-Corruption Act 2009;
- The Whistleblowers Protection Act 2010;
- The Agricultural Seeds and Plants Act, Cap 28;
- The Plant Protection Act, Cap 31;
- The Agricultural Chemicals (Control) Act, 2006;
- The Mining Act, 2003;
- 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 - 1989
- Stockholm Convention- 1972
- Montreal Protocol- 1987
- Rotterdam Convention - 1998
- 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 4.11 Physical Cultural Resources
- OP 4.12 Involuntary Resettlement

Key Stakeholder Issues Raised

ISSUE RAISED	CONSULTANT'S REMARKS/PROPOSED MEASURES
<p>Ms. Ali Munira – Head, Public and International Relations/Principal Relations Officer Inspectorate of Government (IGG) 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;</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 IGG 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"> • NUSAF 3 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 NUSAF 3 should be in place right from the beginning of the project not as was the case under NUSAF 2; • NUSAF 3 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"> • Cross-cutting issues including environment, gender, HI/Aids, waste management to be included in the budgets. • NUSAF Secretariat has an Environment and Social Safeguards Specialist to provide guidance on safeguards implementation • 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 NUSAF projects is in way that DEO are involved in subprojects right from screening through monitoring.
<p>Munguleni Alfred, NUSAF Desk Officer, Maracha District 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</p>	<p>This is a good practice that has to be strengthened further in NUSAF3.</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'</p>

<p>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.</p> <p>OPM should involve the office of the RDC and GISO in monitoring of NUSAF projects other than the IGG's office which is under staffed and overwhelmed by work, for example West Nile has 3 Officers under IGG's department to monitor all government activities in the region.</p>	<p>demands of extension services.</p> <p>Some NUSAF regions such as Karamoja region has continuously failed to attract more 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 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 and CIRs. A budget of UGX 600,000 was set aside, for the environmental issues on each project.</p> <p>Improve on the budget for environmental related issues in the design of NUSAF3 and there should be a provision for monitoring under NUSAF3</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 NUSAF3. This is catered for in the budget for this ESMF. OPM should ensure that monitoring is duly undertaken.</p>
<p>Dr. Samuel Onyait, District Health Officer, Buliisa District.</p> <p>NUSAF is a community demand driven project but sometimes the community doesn't accord health the attention for it to be a priority in terms of subprojects for funding.</p> <p>NUSAF has only considered staff quarters under the health sector yet there are other infrastructure needs at existing health units that if addressed could lead to improved health services. Structures such as OPD, IPD, functional ambulances, toilets and <u>medical waste management facilities</u> at health centers are other such projects that should be considered under NUSAF3.</p>	<p>There remain challenges of hazardous wastes generated at different facilities financed under NUSAF2 especially medical waste at health centers. The setting up of new structures at these health centers translates into more service delivery but also contributes to more generation of medical waste. This means the provision of additional infrastructure should be accompanied with provision of more waste management facilities which has not been the case. It is recommended that a specific budget for environmental mitigations is put in place to cater for waste management issues.</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 NUSAF3, 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 NUSAF3 project will focus on few geographic areas with higher</p>

	level of poverty, exposure to climatic hazards such as drought and flood.
<p>Ms. Teopista, NUSAF Trainer, NUSAF Desk Office, Nebbi District.</p> <p>Training of communities is 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 NUSAF 3.</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 the new project, 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>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>	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>Amilobo Women Group, Gulu district 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>	Such groups require adequate extension services on crop production to minimize losses. This echoes the need for OPM to closely work with MAAIF to strengthen extension services to the beneficiaries.
<p>Kuju Primary school Amuria District</p> <p>The school has realized increase in school enrolment from 631 before and 785 pupils after classroom construction. This is directly linked to more classes.</p> <p>Solar should be included in the package to allow students make revision.</p>	<p>This is a good positive impact by NUSAF3 to improve upon education and literacy in the area.</p> <p>Provision of solar panels could be considered for schools and hospitals in general to enhance service delivery. In addition, similar interventions have been initiated under the Electricity for Rural Transformation Phase 3 (ERT 3) that includes provision of solar to schools.</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>	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>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 of 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 IGG.</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 to ensure that women continue to benefit from the project.</p>

NUSAF 3 Project Categorization

Overall, the environmental and social impacts of the NUSAF 3 project 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, 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, NUSAF 3 project components 1 and 2 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, **NUSAF 3 Project has been assigned Environmental Assessment Category B.** Furthermore, the NUSAF 3 ties in the twin goals of the World Bank group of alleviating extreme poverty and improve 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 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. Subprojects with major/controversial issues will be cleared by both the DEC and the DTPC while the very straight forward ones with minimal issues/impacts will be technically reviewed by the DEO and recommended for DTPC's approval.

Recommendation for Subproject Approval: After analyzing the data contained in the environmental and social screening forms and after having identified the required level of environmental assessment 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 further environmental assessment 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 has been used to implement the NUSAF 2 project will be used to implement the new project. 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 (TST) 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 – NUSAF TST has a qualified Environment and Social Specialist</p>
IG	The Inspectorate of Government (IG) will conduct NUSAF3 specific IEC, oversight, grievance response and, where necessary, investigations. The IG under the TAAC will

	<p>undertake grievance handling especially in regard to corruption. The IGG 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 IGG will submit six-monthly reports to OPM, MFPED, Parliament and the World Bank.</p>
MoGLSD	<p>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 for public works, to which this Project will contribute. MGLSD will also lead efforts through the capacity building component of the Project to build the foundation for the direct income support program.</p>
DLG	<p>The following institutions 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) • IGG 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 new project and will be supported by the District Community Development Officer, District Engineer, and District Environment 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 will also be to ensure that NUSAF3 subprojects are implemented in accordance with environmental and social requirements. 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 within 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 NUSAF3. However, the</p>

	districts (specifically the DEOS and 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 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 – Some NUSAF regions such as Karamoja region have continuously failed to attract more 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 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>
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 NUSAF3, the Community Infrastructure Rehabilitation aims at improving access to basic socio-economic services through rehabilitation and improvement of existing community infrastructure such as schools, water points, Skills training centers, <u>health centers</u>, <u>teachers’ houses</u>, classrooms, sanitation facilities, solar lighting systems and furniture among others.</p>
MoES	<p>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.</p> <p>Under NUSAF3, the Community Infrastructure Rehabilitation aims at improving access to basic socio-economic services through rehabilitation and improvement of existing community infrastructure such as schools, water points, Skills training centers, health centers, <u>teachers’ houses</u>, <u>classrooms</u>, <u>sanitation facilities</u>, solar lighting systems and furniture among others.</p>
MoWT	<p>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 NUSAF3, the respective District Engineers will work closely with OPM to implement public works component.</p> <p>Capacity – The Environment, Gender equality, HIV/AIDS and Occupational Health and Safety issues are part of the standard roads contracts, as it is required by the Government of Uganda through the NDP. The Ministry of Works and Transport</p>

	(MoWT) has an Environmental Liaison Unit (ELU) responsible for these areas whose capacity includes the Principal Environment Officer, the Senior Environment Officer and the Senior Environment Officer (Social).
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 NUSAF 3 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 NUSAF3 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, 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.</p>

Grievance Redress Mechanism (GRM)

TAAC includes a grievance handling arrangement. 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 IGG at national level. The SACs established during NUSAF2 will ensure that where grievances arise, they are addressed at the lowest possible level (subsidiary) and will act as first point of call for resolving or reference of grievances. The SAC 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 World Bank’s Grievance Redress Service (GRS) has 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.

The grievance handling system will, depending on the severity and potential criminal liability of grievance, invoke referrals by the NUSAF3 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 General of Government (IGG) 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.
- The World Bank's Grievance Redress Service (GRS) via email: grievances@worldbank.org;

Under NUSAF2, the TAAC implemented a GRM through SMS and other convenient media of communication like mobile phone calls. 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 IGG Regional Offices spread throughout the NUSAF 3 areas of Mbale, Soroti, Lira, Arua, Tororo, Moyo, Gulu, and Moroto Districts. 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.

Proposed 5 Year ESMF Implementation Budget

Item	Cost in USD				
	Year 1	Year 2	Year 3	Year 4	Year 5
Training of CDOs, DEOs, and NDOs in safeguards management (environment, social, vulnerability issues, GRM issues, monitoring and reporting etc.)	200,000				
Training of sub-county stakeholders in safeguards management (environment, social, vulnerability issues, GRM issues, monitoring and reporting etc.)	500,000				
Facilitation of CDOs, NDOs and DEOs to screen and monitor implementation sub-projects (mitigation, health & safety, etc.)	300,000	300,000	300,000	300,000	200,000
Facilitation for CDOs and NDOs to undertake consultation and mobilization of communities including IEC materials	300,000	300,000			
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.)	150,000	150,000	150,000	150,000	150,000
Environmental monitoring and audits	100,000	100,000	100,000	100,000	100,000
Sub-totals	1,550,000	850,000	550,000	550,000	350,000
Total Budget Estimate	3,950,000				

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 infoshop 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, Project Briefs, ESMPs and RAPs (where applicable) for disclosure at the World Bank Infoshop for public access.

Conclusions

The overall environmental and social impacts of the NUSAF3 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 subprojects may involve limited degree of land take and displacement of land-uses and/or livelihoods. Therefore, by their nature, project components 1 and 2 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 extreme 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 NUSAF3:

1. **Extension services:** NUSAF 2 experienced a problem of limited extension services to the project beneficiaries especially in regard with veterinary extension services. There is therefore need to involve the relevant extension staff at the District and Sub-County level to provide required extension services.
2. **Training of beneficiaries:** There is need for an adequate budget for training of project implementers and 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; for example, rehabilitation of incinerators, improvement of collection (e.g. by providing color-coded waste bins), etc..
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 NUSAF3 Operations Manual would contain more guidance on management of environmental and social issues.

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 SUCCESSOR PROJECT TO NUSAF2

The proposed project is a successor project to the NUSAF 2 project currently under implementation and will have four components: (i) Labor-intensive Public Works and Disaster Risk Financing; (ii) Livelihood Investment Support; (iii) Transparency, Accountability and Anti-Corruption (TAAC); and (iv) Social Protection System and Program Management. The proposed project would be funded through a US\$ 130 million equivalent IDA credit and would operate over a period of five years.

1.3 THE PROJECT DEVELOPMENT OBJECTIVE (PDO)

The PDO for NUSAF 3 is to contribute “to provide income support to and build the resilience of poor and vulnerable households in Northern Uganda.”. Given the Government’s priority is to improve household income and address the socio-economic imbalances in the North and North East where poverty levels are still severe, the new project will focus on improving incomes and livelihoods of the poor and vulnerable communities in that region and contribute to the revitalization of the local economy. To this effect, the project builds on the experiences of NUSAF 1 and 2 by scaling up the labor intensive public works and the household income support components.

1.4 PROJECT FINANCING AND DURATION

The proposed project would be funded through a US\$ 130 million equivalent IDA credit and would operate over a period of four years.

1.5 PROJECT COMPONENTS

1.5.1 COMPONENT 1: LABOR-INTENSIVE PUBLIC WORKS AND DISASTER RISK FINANCING:

The public works will focus on a variety of asset creation activities, including rural access roads, tree nurseries, afforestation, construction of different soil and water conservation measures, and flood control structures, rainwater harvesting, rehabilitation and construction of market shelters, rural health facilities, and schools, among others. These assets would aim to help poor households

respond to and build resilience against the impacts of climate change by helping communities diversify risk, enhance incomes, and build skills and assets. For example, soil and water conservation activities lead to improved land productivity and increased income, while building roads, schools and health facilities lead to better access to markets and social services.

The project builds on evidence from other African countries on the benefits from creating quality infrastructure. The NUSAF 2 has sought to address the gap in infrastructure for health and education services, roads and markets, among other economic infrastructure, in northern and eastern Uganda. The proposed operation will continue to respond to deficits in infrastructure among communities in the program areas but this will be achieved directly through the public works component, rather than as a parallel initiative. The provision of technical inputs to the planning for the public works activities and provision of skilled labor, such as masons, carpenters, who would provide technical supervision and guidance to the public work participants during construction, will ensure that the public works are built to a high quality. Resources will be provided through the project for capital inputs for these works, as well as the tools required for the labors. Provisions will be made so that the works are labor-intensive.

The public works component would specifically finance: (a) Wages/transfers for the beneficiaries participating in the public works activities in a year, including support to poor and vulnerable households with no able-bodied members; (b) Equipment, materials and skilled labor that would be necessary inputs to complete the selected public works with reasonable quality, including building the capacity of communities and local officials to plan and implement the public works.

Component 1 also includes Disaster risk financing. Given the high exposure to disasters, and their impact on the poor and vulnerable in Uganda, the project shall contain a Disaster Risk Financing Component. This component shall support the development of a scalability mechanism that will enable the social protection program to rapidly scale up assistance to households when there is a disaster.

While the Labor Intensive Public work component focuses on chronically poor households, the Disaster Risk Financing component seeks to provide timely resources for those who will be affected by disasters such as drought or floods within existing program areas. This Component will be financed using a contingent grant, which will provide resources for scaling up activities under the Labor Intensive Public Work in response to localized or intermediate weather or price-related shocks in the project districts. This component will provide an early response that can more effectively prevent household asset depletion and increased levels of destitution.

Risk Financing can be used to extend support to the Labor intensive public work beneficiaries or support new beneficiaries who have transitory needs. This activity will focus on Districts that will be selected to pilot this mechanism for delivering risk financing. Strong linkages between risk financing and the emergency response system are required to ensure a coordinated response to shocks over time.

1.5.2 COMPONENT 2: LIVELIHOOD INVESTMENT SUPPORT

The Livelihoods Investment Support (LIS) component will build on NUSAF2 experience. It will comprise of two core interventions: (i) Improved Household Income Support Program (IHISP); and (ii) Sustainable Livelihoods Pilot (SLP). The IHISP intervention will follow a decentralized approach to empower Districts and focus on improving the efficiency and quality of sub projects implementation. The IHISP will aim to improve income generation of poor and vulnerable households in 55 target Districts in Northern Uganda through social mobilization, provision of technical training, business skills development, provision of grants, value addition support, financial and marketing support, follow up mentorship and partnerships.

The SLP will focus on enhancing the sustainability of support to household investments through two main shifts in approach: (i) a focus on the creation and capacity building of enabling community institutions amongst the poor to support household livelihood investments in the longer term; and (ii) a greater focus on self-help and the use of revolving village funds as opposed to grants. The proposed pilot would initially support poor and vulnerable households in 40 villages in 4 districts (cluster of 10 villages in each district) in Northern Uganda. The learning from the SLP will inform the framework and guidelines for future programming in Northern Uganda and implementation and scaling up of sustainable livelihoods interventions for the poor and the vulnerable households.

1.5.3 COMPONENT 3: STRENGTHENING TRANSPARENCY, ACCOUNTABILITY AND ANTI-CORRUPTION (TAAC)

The component objectives will be to (i) strengthen transparency, accountability and anti-corruption measures, (ii) introduce social accountability tools for increased citizens' participation in monitoring NUSAF 2 successor project interventions and other basic service delivery, and (iii) establish systems and tools for grievances handling at the community level. Consistent with the broader project objectives, the TAAC interventions will seek to establish enhanced constructive dialogue between the basic service delivery providers and beneficiaries, and among the beneficiaries as well as with other citizenry to increase likeliness that rightful target beneficiaries will benefit from project interventions and provide independent platforms for resolving grievances that will arise from time to time.

Interventions under the Strengthening TAAC will include: (i) preventive measures through sensitization and awareness; (ii) citizens engagement through promotion of education, communication and information on (a) social accountability, (b) financial transparency and accountability, (c) grievances handling mechanisms, and (d) materials on other project components activities selected in collaboration with implementers on the ground; (iii) inspection and monitoring of projects implementation, processes and procedures at central, local and community levels and (iv) enforcement through investigation and prosecution.

1.5.4 COMPONENT 4: SOCIAL PROTECTION SYSTEM AND PROGRAM MANAGEMENT

1.5.4.1 SUBCOMPONENT 4.1: SOCIAL PROTECTION SYSTEM

The aim of this subcomponent is to support the Government to lay the foundation for the social protection system that is envisioned in the draft Uganda Social Protection Policy. The component will thus support the MGLSD to establish and strengthen systems to promote the harmonization of the

direct income support elements of the social protection sector, such as the national framework for public works and mechanisms which can support the avoidance of the same households accessing benefits from similar types of interventions (such as SAGE and NUSAF project). It will also invest in the systems and procedures that are required to deliver predictable, multi-annual labor-intensive public works and the livelihoods component.

This component will also include the establishment of payment mechanisms for labor-intensive public works transfers to allow for timely and secure payments; and the development of program management information systems to support monitoring and decision making. As input to the development of payment mechanisms, the team explored the use of private sector payment service providers (such as mobile money providers) and other payment service options to ensure timely and secure payment to beneficiaries.

Monitoring and Evaluation (M&E) in the project will draw upon lessons from the previous operation to put in place simpler tools and effective institutional arrangements that encourage more decentralized decision making. The design will establish the responsibility for monitoring and data collection using the parish level structures that are closer to the community and it is expected that this will also invariably result in the revitalization of these structures over time. The NDOs who have acquired more capacity under NUSAF2 will continue to be integral to day-to-day coordination and periodic reporting for the project. There was agreement that the responsibilities for reporting should be more clearly defined for front-line implementers and focus on timelines, data quality and reliability to enable more decentralized and real-time evidence-based decision making.

1.5.4.2 SUBCOMPONENT 4.2: PROGRAM MANAGEMENT

The aim of this subcomponent is to support the Government to implement the proposed project. The details of institutional arrangements would be fleshed out further once the design of the other components and interventions is more advanced. However, key agreements regarding the direction were made. Overall coordination and accountability of project resources will remain the responsibility of the OPM Permanent Secretary and the TST staff. To ensure effective project implementation, the sub-component will support the OPM, relevant sector ministries and local government staff in coordination and routine monitoring of the project activities.

The new project will further support the principle of mainstreaming the core Government systems and the avoidance of parallel systems, with decentralized decision making. This reflects a desire to build sustainable systems for service delivery. While parallel systems can make up for capacity gaps in the short-term, they fail to treat these gaps and do not provide the mainstream implementers with the opportunity to develop capacity. In the successor project, such capacity gaps will, instead, be supported through dedicated capacity building efforts. Furthermore, agreement was reached that, the Technical Support Team arrangement is necessary with a more streamlined structure to provide practical presence and adequate technical guidance to districts. Ideas were then floated on the composition of the TST that would ensure project implementation is done effectively and efficiently at a minimum cost.

1.6 PROJECT LOCATION

The project will be implemented in selected districts. While NUSAF-2 is currently 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 World Bank operation will be determined as part of the design process and will aim to build on the capacity built in NUSAF 2 areas.

2 SAFEGUARD LESSONS ON PREVIOUS NUSAF2 PROJECT ESMF

NUSAF2 Safeguards Implementation has been guided by Environment and Social Management Framework, the NUSAF Environment Handbook, the NUSAF2 Operations Manual and as well as the Resettlement Policy Framework that were developed for the project. These four reference documents have been used to give guidance to ensure that the NUSAF2 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 NUSAF3 project 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 encounter of unknown PCRs.

However, in this ESMF for the NUSAF3, a Chance Finds Procedure has been outlined (Annex 8) for management of un-known Physical Cultural resources in the project as well as in the management of 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 NUSAF3 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 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. For example, land ownership and use in Karamoja is different from other NUSAF project areas.

This ESMF for NUSAF3 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 MAAIF, MoLGSD, MoWT, MoES, and 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 NUSAF 3 ESMF, attempts have made to assess the capacity needs of its partner implementing institutions was assess and proposals 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 TST at both national and at districts at local government level. Short terms 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 on implementation of environmental and social aspects has been encountered for both NUSAF1 and NUSAF2 projects and it is a critical issue that needs to be finally addressed in NUSAF3. 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. At district level, there are District Community development officers, District Environment Officers, Community development officers and Environment Focal Persons at the sub counties charged with the management of safeguards (NUSAF2, 2015).

2.2.2 CAPACITY TO IMPLEMENT SAFEGUARDS

According to the proposed NUSAF3 Concept Note, in NUSAF 2, the 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 is important.

However, of recent, their capacity has also been built through refresher trainings by OPM TST, Ministries and the World Bank and to date, a total of 275 district persons have been trained on safeguards management and these categories comprised of CDOS, DEOs, Agriculture extension staffs, DVOs and Forest officers. This capacity enhancement extended to districts has enabled proper institutionalization and management of safeguards up to the Lower Local Government. It has also enabled full participation of all required safeguards management staffs on monitoring and reporting on safeguards performance in all implemented projects and documentation of critical issues (OPM, 2015).

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. Where necessary, environmental and social management plans (ESMPs) were developed and implemented. 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).

2.2.4 WASTE MANAGEMENT

Types of waste and as well as 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 (droppings from piggery, diary, 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).

However, based on field observations, there remain challenges of hazardous wastes generated at different facilities financed under NUSAF2 especially medical waste at health centers (Figure 1). The setting up of new structures at these health centers translates not only into better service delivery but also contributes to more generation of medical waste. This means, provision of additional infrastructure should be accompanied with provision of more waste management facilities which has not been the case. Under NUSAF 3 therefore, if any sub project happens to support medical facilities, management of health care waste will be assessed and appropriate short term measures proposed, and these may include improvement of HCW management practices such as collection, storage, and disposal through coordination with referral or bigger health units. It is recommended that a specific budget item under environmental mitigations to cater for waste management issues.



Figure 1: Some of the Medical Waste handling at Buliisa Health Centre IV

2.2.5 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 subproject. 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 NUSAF3.

2.2.6 PUBLIC CONSULTATION DURING MOBILIZATION

In NUSAF 2, OPM noticed that, not all 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 NUSAF3 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 worship like Churches and mosques to mobilize the community.

2.2.7 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 road works though these varies across all components. For instance, in PWP road projects in certain districts, the percentage of women participating in road works is low reportedly due to cultural aspects, others have been dictated due to the work load and as well the wage rate, and season of work (OPM, 2015).

For instance communities in districts visited such as Kapchorwa, Budaka, Bududa, Maracha, Tororo, Kitgum, Kiryadongo and Lira 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, PWP menu and implementation time should be looked at critically to avoid low female participation. Adequate sensitization is also critical in this case (OPM, 2015). Women involvement has been observed to be low 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. IPFs as well are distributed equally according to the number of sub counties in districts and also special considerations given to marginalized regions such as Karamojong to ensure regional existing gaps are addressed (OPM, 2015).

2.2.8 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-armed Karamojong, and Female headed households, Land mind 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 to create diversified menu of possible and viable livelihoods to allow more diverse income generating options.

Under NUSAF3, The Public Works Component will have a participatory and gender sensitive approach that would take into account the special needs of women. Appropriate implementation guidelines and work site arrangements would ensure that public works activities would be conducted in close proximity to villages in order to ensure that at least 40 percent of the participants would be women.

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

2.2.10 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 implementation support and training in project management 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 the new project, 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 to support 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 successor project, EPRA facilitators will be selected from the community and trained by the project 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.

2.2.11 GRIEVANCE REDRESS MECHANISMS

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” 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 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 authorities 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 NUSAF projects other than the IG’s office which is under staffed and overwhelmed by work.

2.2.12 LAND ACQUISITION ISSUES

A Resettlement Policy Framework (RPF) for the NUSAF2 project has enabled to extensively guide on all issues related to land acquisition. 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 housing constructions, water installations, 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 construction projects done in the existing structures such as 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).

2.2.13 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). NUSAF3 monitoring, evaluation and reporting system should look critically on identifying clear KPIs that can support the project to demonstrate well safeguards results.

2.3 NUSAF3 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

The proposed project implementation areas (22 districts sampled out of 55) 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 AND COMMUNITY CONSULTATIONS

Stakeholder and community 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 and community 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 project on regional basis as summarized herein.

3.1 KARAMOJA REGION

3.1.1 PHYSICAL AND BIOLOGICAL ENVIRONMENT

3.1.1.1 TOPOGRAPHY

Karamoja region is bordered by the whole northern and eastern sides by mountain chain bordering the South Sudan and the Kenya from the north west to the south east and giving the region a general slope trend oriented from the north east to the south west side. The region can be split into three landscape predominant zones which are; the northern and eastern borders of Karamoja are mountainous and are evolving to hilly landscape (mainly Kaabong and Moroto) and in the south of Napak and Nakapiripirit districts. In the northern part of the region; spontaneous peaks are punctuating the regional relief and orienting surface water flow, such as the Inselbergs or Volcanic intrusions (i.e. Napak peak or Mount Moroto). The wetlands area assumed a plug effect for the whole upstream water flowing to Lake Bisina.

3.1.1.2 SOILS

Karamoja region lies within a particular ground which can potentially be linked to the particular local geology. Indeed, almost 50% of the region evolves within ferruginous tropical soils and vertisols which should be supposed to be resulting of acid gneisses, amphiboles or granulites rocks weathering. A quite clear evolution should also be observable according to altimetry and stream flow location. High reliefs (Karamoja mountains; Abim and Moroto peaks) present high lessived ferruginous tropical soil as well as lithosol, when Karamoja plain presents a predominance of vertisols.

3.1.1.3 CLIMATE

Rain patterns are low, with an average of 500-700 mm of rainfall per year. But in contrast to purely pastoralist areas in the region, like the neighboring Turkana, Karamoja is an agro-pastoralist area. However, the natural environment is subject to variations which are scarcely predictable, and are often unexpected. It is generally accepted in official reports that the rainy season 'normally' begins late in March or early April; and that the rains then continue with reasonable regularity until late September or early October when the dry season begins.

3.1.1.4 LAND USES / VEGETATION COVER

The Karamoja region is quite poor in term of land uses variety. The typical Karamoja landscape is characterized by semi-arid savannah with seasonal grasses, thorny plants, occasional small trees and rocks out-crop mountains. Link with geological and soils characteristics is easily done. Common perennial grass species include: Themeda traindra, Pannicum spp., Setaria spp which were

common at the margins of seasonally flooded areas. The areas are further overgrazed and engulfed in *Acacia hockii* which is characteristic of long-term seasonal fires. Browse species identified include Gum Arabica trees (*Acacia seyal*, *Acacia Senegal*, *Acacia sieberiana*, *Acacia gerrardii* and *Acacia nilotica* trees). Other common equally trees include *Balanites aegyptica*, *Calotropis procera*, *Maerua crassifolia*, *Salvadora persica* amongst other species.

3.1.2 SOCIAL ENVIRONMENT

3.1.2.1 GENERAL SOCIAL CHARACTERISTICS OF THE REGION

The region comprises seven districts and nine ethnic groups of the Matheniko and the Tepeth of Moroto district, the Bokora of Napak district, the Pian of Nakapiripirit district, the Jie of Kotido district, the Pokot of Amudat district, the Labwor (sometimes called the AcholiLabwor) of Abim district, the Dodoth, Nyangia (sometimes called the Napore) and Ik (sometimes called the Teuso) of Kaabong district. With an estimated population of just about 1.1 million people (UBOS, 2013), Karamoja region is the poorest and least developed region of the country (Ayoo et al., 2013) and is host to the worst human development indicators in key areas, including primary school enrollment, maternal and infant mortality, life expectancy, and population below poverty. As such Karamoja region has the highest Human Poverty Indices (HPI) of above 53% compared to the national average which is 37.5% (Ayoo et al., 2013).

According to the UNHS on decomposing total national poverty by region, incidence of income poverty varies significantly. The incidence of poverty remains highest in the Northern region and poverty in this region is driven largely by the North East sub-region although poverty intensity is higher in the mid-Northern sub-region.

Table: 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, Nakapiripirit, Katwaki, Amuria, Bukedea, Soroti, Kumi and Kaberamaido**

That notwithstanding, the mineral wealth, strategic geographic location and flat plains of the region are a priceless treasure from which Karamoja (with Uganda) can improve her dairy and beef outputs, build social amenities and infrastructure and command a leading position in the Ugandan polity and put an end to the unenviable notion of being Uganda's land of the lost.

3.1.2.2 LIVELIHOOD CHALLENGES AND PROGRESS IN KARAMOJA

Three livelihood zones exist within the region – the arid pastoral zone, the agro-pastoral zone (most of central Kaabong, most of Kotido, central Moroto, and central Nakapiripirit) and the wet-agricultural zone. Based on the social assessment study as well as findings by Ayoo et al. (2013), the major livelihood activities in Karamoja are agriculture, unskilled wage labour, livestock management and brewing.

The region has suffered from cyclic drought which occurs every two to three years. The increase in poverty and vulnerability in recent decades is attributable to cattle raiding and the accompanying insecurity, proliferation of small arms and light weapons through the porous borders with Sudan and Kenya, lack of essential infrastructure, and climatic changes resulting in droughts and famine.

Karamoja has one of the poorest roads in the country. All the districts are connected through gravel murrum roads which are periodically washed by seasonal rains, hence rendering the region inaccessible. The above scenario has hampered effective delivery of social services and economic activities in the region.

Since 2008, disarmament and a transition to recovery programming have been implemented through the Karamoja Integrated Disarmament and Development Programme (KIDDP) 2007-2010. This medium-term framework harmonized the various interventions by the Government and its development partners. The livelihood component of the KIDDP is implemented through the Karamoja Action Plan for Food Security (KAPFS). The sustainable development of Karamoja has been guided by the Peace, Recovery and Development Plan (PRDP) for Northern Uganda. Central government policy for Karamoja now falls under the Minister for Karamoja Affairs.

Protected Kraals is one of the condition the local communities gave government to guarantee safety of the people and Animals. The police have developed their structure to provide security in all sub counties. Law and Order is returning. Cultural change is happening because law and order is returning but today these systems have been put in place. OPM implemented NUSAF2 successfully in a secure and stable environment. Social order continues to be restored using government and traditional systems and structures; this can all be used as an avenue to promote NUSAF3.

DFID is one of a number of development partners that are assisting the Government of Uganda (GoU) with recovery and reconstruction in Karamoja through a mixture of initiatives aimed at addressing risk and building the resilience of vulnerable people. Together with others, including the World Bank, DFID decided to provide support to the second Northern Uganda Social Action Fund (NUSAF 2) under the leadership of the Office of the Prime Minister (OPM).

3.1.2.3 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), unlike the rest of Uganda, Karamoja, has a 'unimodal' climate with roughly six months of rains (April – October) followed by a six month dry season so it benefits from only one annual harvest, normally around the month of October. This means that the effects of a poor harvest are felt more keenly in Karamoja than elsewhere in the country, because the resulting 'food gap' lasts for twice as long. Its hunger season generally lasts from April through to the following harvest (Sept/Oct) though it can often start

earlier if the previous harvest has been poor because of climatic conditions. In fact the region experienced three consecutive seasons of poor harvests (2006 – 2009) with delayed, lower than normal and poorly distributed rains reducing crop yields, pastures and livestock production and prompting high crop prices – all of which led to greater food insecurity (WFP and UBOS, 2013).

There is an increasing range of donor and NGO funded activities in Karamoja, working towards the broad goal of livelihood improvement/ building the resilience of food insecure households. These are of varying scale, maturity and orientation and expected to align with an overarching strategy – the Karamoja Action Plan for Food Security 2010-2015 – coordinated by the Department of Karamoja Affairs of the OPM.

3.1.2.4 LAND TENURE

Land tenure system is multiple i.e. individual, institutions, prisons, leased/Titled, Free Hold/Customary owned – Land for settlements and gardens is individually owned by families/grazing areas defined by individual – Fallow land primary access rites/wide range lands which have clans with primary users, secondary and tertiary users rights e.g. Turkana and Toposa. The danger of rangelands type of land use is that no clear ownership exists; everyone uses it without restrictions/communal use. So issues of carrying capacity and user rites, bush burning, environment degradation in general is high in this case. At present, customary tenure has evolved into individualized and communal sub-tenures, each with distinct characters and resource rights embedded therein for the individuals, households and the community at large.

Gardens plots have definitive boundaries marked by a variety of features including trees, anthills, and rocks. However, the most common boundary markers are strips or bands (ekikoru) of uncultivated land between garden plots. This type of land is in the realm of family authority and family heads hold conclusive rights over these plots, including the right to even engage in various land transactions. It is thus no surprise, that this is the type of land for which registration into title is taking place across the region in Karamoja. These landholdings are often of small sizes and are considered to be individual property. It can be transmitted to kin either by inheritance or sub-division within families. NUSAF3 needs to look critically at land tenure to inform program implementation.

3.1.2.5 WATER RESOURCES OWNERSHIP

Use and access to the different water sources is governed by both customary rules and practices and statutory provisions. Although, traditionally set rules are non-documented, they are still existent in the minds and hearts of the Karamojong and are effective in regulating water use and management. However, customary rules on use and access vary with seasonality and across clans and ethnic communities. Large water sources that have no customary access restrictions especially among clans and ethnic groups are controlled by the traditionally instituted structures and the community in general. Individual ownership of small water sources and catchments is predetermined by the private creation of a water source by a family or a clan group. Secondly, ownership is determined by the location of the source; if the water source is found on land owned by a clan or ethnic group, it is then privately owned. Therefore, if the water source meets these two conditions, clansmen and ethnic group members are entitled to unlimited access and user rights.

In Loletio parish among the Jie ethnic group, an elder is responsible for identifying a site for the construction of a water pond or a catchment rendering clansmen and ethnic groups to have exclusive customary rights over use, control and management of such water resources. By implication, access to water resources which are individually constructed and owned is subject to acquisition of user rights from clan leaders or community elders. This was particularly observed among the Jie of Panyangara, the Dodoth of Kalapata, and the Matheniko of Rongom. Among these communities, clansmen and ethnic group members have ownership and access rights over water resources constructed privately.

3.1.2.6 POPULATION

Table 1: Population of Karamoja Districts

District	Population Census 2002	Population Projection 2012	Population Projection 2014
Nakapiripiti	90,922	161,600	169,691
Abim	67,171	103,306	109,039
Kotido	122,541	233,300	178,909
Moroto	77,243	136,000	104,539
Kaabong	202,758	395,200	169,274
Napak	112,697	197,700	145,219
Amudat	63,572	113,700	111,758

(Source: UBOS 2014, National Population and Housing Census provisional results)

3.1.2.7 LITERACY LEVELS

Despite the existence of the Universal Primary Education (UPE), Functional Adult Literacy (FAL) and the Universal Secondary Education (USE), Karamoja continues to record the lowest literacy levels of 12%. The above scenario is aggravated by a complexity of factors that include the traditional agro-pastoral lifestyle that requires the labour of young boys and girls as herders; high levels of poverty and negative perceptions to education by the parents. Besides, there is a high failure rate in the existing schools due to poor quality of education and this phenomenon discourages the few parents who attempt to take their children to school.

The low literacy levels for Karamoja will influence NUSAF3 programme implementation and therefore, it will be critical to define effective mechanisms to package and disseminate information through media, prints, documentation, etc. in order to support programming.

3.1.2.8 ACCESS TO HEALTH SERVICES

Karamoja region has the poorest health indicators in the country. About 100 children below five years die each week from preventable illnesses. Only 3.4 % of households in Karamoja have two insecticide-treated bed nets and 5.9% have one, yet the regional target is 60% of households with two nets. The region is "off-track in meeting health and nutrition-related Millennium Development Goals and is the worst place to be a child, with highly elevated levels of early childhood mortality and morbidity". The above situation is attributed to low access and utilization of basic health services – averaging 24% compared with the national rate of 72%. The situation is compounded by lack of

awareness among local communities. Maternal mortality is at 750 per 100,000 live births – 50% higher than Uganda's national average.

3.1.2.9 WATER COVERAGE

In Karamoja, water sources are diversified and include ponds, BH, rivers, Valley Tanks, Dams, wetlands, swamps. Water resource management should be a key focus of interventions in the Karamoja Sub region if sustainable food security is to be attained. Water coverage in Karamoja still remains low. Dry rivers are a major challenge for both crop and livestock development in the Sub region.

The water and sanitation services in Karamoja are lagging behind the national average, although the coverage continues to improve. Water coverage ranges from 26.4% in Kaabong, 45% in Kotido, 74% in Abim, 68.9% in Moroto and 56% in Nakapiripirit, as compared to 65% in 2009 nationally. The household latrine coverage is less than 10% on average, compared to the national average of over 68% in 2009. The low functionality of the Water and Sanitation Committees and water sources farther reduces the effective access to services. There is need to continue providing water for livestock for first track of dry season and also determine the migratory patterns of cattle movement. These potential water areas as well are sources of conflict of resource use.

3.1.2.10 VULNERABILITY AND GENDER DIMENSION IN KARAMOJA REGION

Vulnerability in Karamoja is endemic and is a regular feature of 'normal' life, though cattle raiding, theft and insecurity, and drought exacerbate it. However, even within the same locality, vulnerability varies according to age, gender, marital status - especially polygamy -, and access to labour. There is a significant gender dimension to the experience of, and vulnerability to, poverty. Agriculture is associated with women and girls, cattle herding to men and boys. Polygamy is widespread and each wife is expected to support her own household. Household livelihoods do not provide women with sufficient access to food to meet the needs of their young children at the early stages of life. As a result of these challenges, stunting rates are well above 30 percent in most districts, and over 80 percent of children and 50 percent of women in Karamoja suffer from anaemia. In such a drought prone area accessing water, and firewood as the main source of energy and as virtually the only means for poor women to earn cash, places a significant work-burden on women and their children.

The women are treated as inferior and socially excluded from decision making and other civic engagements because society accords them little worth. The women's voice are not heard or not heard as loudly as of men because of the prejudice against women devalues their hearers' credibility judgments to what they say (World Bank, 2013). This prejudice has effects on gender inequality and poverty because a person whose word is devalued cannot influence others, cannot exercise authority, and cannot defend herself from violence. In fact many of the people we interviewed perceived that domestic violence is normal and wife beating is perceived as disciplining.

3.1.3 NUSAF3 TARGET GROUPS IN KARAMOJA

Karamojongs can be located in three places eree homestead, Awui cattle camp located outside eree especially when the young boy take cattle for grazing away from home able bodied and this area where the raids were common, elders are in eree. The third, place is in towns in urban settings.

3.2 BUNYORO REGION (BULIISA AND MASINDI DISTRICTS)

3.2.1 PHYSICAL AND BIOLOGICAL ENVIRONMENT

3.2.1.1 CLIMATE

This area lies in the one of the rich forested areas with Tropical high forests Budongo and Bugoma Forest reserves being by far the largest, with a lot of now highly degraded Riverine forests. The Albertine region with very high potentials in eco-tourism and rich bio-diversity falls in the project area.

Buliisa District receives a bimodal rainfall pattern with totals ranging from about 800 mm in the L. Albert flat rising rapidly further away to the East above the escarpment to between 1250 – 1500mm per annum before tapering off to 1000 mm in the Eastern border areas of the District. The peak periods are between March – May and September to December. This presents a very important potential for agricultural development in the crop-growing areas.

3.2.1.2 STATE OF ENVIRONMENT

Effective management of environmental resources is a critical component of the development process. Buliisa is largely an agricultural district with over 50 percent of the population engaged in peasant farming. This means that the major land use is agriculture. Some of the farming methods used in the district is not environmental friendly. There are no comprehensive land use plan and environment byelaws in Buliisa; as a result most activities are unplanned and therefore increased environment degradation. Environment issues therefore are a matter of concern in the district because they are closely linked to peoples' needs. It is important to look at the issues and concerns affecting all the natural resources in the district.

3.2.2 SOCIO-ECONOMICS

3.2.2.1 ETHNICITY

Banyoro are the majority in Buliisa followed by the Alur. The Bagungu are fifth in ranking. This also indicates that the major languages used are Lunyoro and Alur. The above ethnic composition may change in future due to oil exploration. While some ethnic groups may increase in number others may become smaller.

3.2.2.2 HOUSEHOLD CHARACTERISTICS AND GENDER ASPECTS

The average household size for Buliisa is 7 persons. There is no access to hydro-electricity in entire District and the majority of households in rural settings use paraffin or candles for lighting. Ninety eight percent of all households use wood for cooking. Domestic water is obtained from boreholes, protected springs and the lake.

Levels of income in the area are low and most depend on grazing as the main source of livelihood in the area. Being close to Buliisa, a small proportion of the community members are both in formal

and informal employment within the town. But this is not significant. A section of the local community is engaged in small scale businesses that includes food vending, sale of fish, charcoal and firewood. Fishing is another major economic activity for communities bordering Lake Albert. Protected areas such as the Bugungu Wildlife Reserve, Murchison Falls National Park and Karuma Wildlife Reserve under the Murchison Falls Conservation area have great tourism potential.

Like many areas of Buliisa, the gender roles of women are domestic work, and care for the sick and elderly, in addition to working in the fields. In terms of assets, both men and women have access to land and labour that they use in the fields although most women have no control over productive assets. The practical needs based on gender roles and resources have not been taken into account yet. Considering that women have a heavy workload, water points need to be more conveniently located so that women, who are the main water carriers, can save time and energy.

Gender issues that are of common concern for environment and natural resource conservation in Masindi District are dominance of men in decision making concerning natural resources at household level and the few women owning land. This is has been brought about by traditional cultures which consider men as superior to women and the perception that family assets belong to men. In turn this has led to limited participation of women and children in the decision making process; and income inequality.

3.2.2.3 EMPLOYMENT, LIVELIHOODS AND RESOURCE USE

The economy of Bunyoro Kitara Kingdom thrives on a number of economic activities, prominent among which is large scale commercial farming in tobacco, sugarcane, tea, cereals like maize, rice and ranching. Bordered by Lake Albert which sits astride the Albertine Oil Graben, where commercially viable deposits of oil and gas have been discovered, a bright spotlight should be cast on the future of Bunyoro region. The predominantly youthful population which stands at over one million represents a tireless engine of growth that can restore Bunyoro's leadership as a food basket for Uganda and beyond.

The major economic activities in Buliisa are fishing and livestock rearing. Other key occupations are cattle rearing, crop farming, fishing, and retail trade. Common crops include cassava, maize, millet, sesame (simsim) and pigeon beans. Commercial and ornamental trees are also planted on small-scale household level basis. Buliisa is also renowned for livestock trade, selling live cattle to Nebbi, Pakwach, Panyimur and as far as Democratic Republic of Congo.

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: Mid-Western includes Masindi, Bullisa, Hoima, Kibaale, Bundibugyo, Kabarole, Kasese, Kyenjojo and Kamwenge;

3.2.2.4 HEALTHCARE

There are few numbers of beds compared to the patients in the district, the biggest health unit in the district is Buliisa HC IV which has slightly more beds, but the number is not enough for the whole population. This has led many people sleeping down on mats while some come with their own mattresses. Based on consultations with Buliisa Health Centre IV, NUSAF Group, the OPD is a bit efficient, but for in-patients, the Theater is non- functional , wards are too small and patients like expectant mothers some times are referred to Hoima which is about 100Km away. One staff unit has been constructed under NUSAF2 project. There is a need for more structures at the health centre especially staff quarters because the current ones are overcrowded to the extent that up to five people share one house.

For medical waste, there is an incinerator which is partially functional and another alternative is a shallow pit where waste is dumped openly. Much as NUSAF has considered staff quarters under the health sector, there are other infrastructure needs at existing health units that if addressed could lead to improved health services. Structures such as OPD, IPD, functional ambulances, toilets and medical waste management facilities at health centers are other such projects that should be considered under NUSAF3.



Figure 2: Shallow Pit for Depositing Medical waste at Buliisa Health Centre IV

The accessibility to health services is still low compared to the population of the district. This describes the Households distance, the Ratios and the number of private clinics, doctors, clinical officers and nurse's population ratios and OPD utilization.

On average 70 percent of the population are within 5 kms to the health units while 30 percent walk over 5 km and these are people from areas like Bugana and waiga villages who seek for treatment from Buliisa HC IV.

3.2.2.5 EDUCATION AND SCHOOLS

The Educational Institutions are generally increasing in the district. This involves both Primary and Secondary schools. However, there is need for establishment of vocational institutions to cater for the big number of dropouts. There is need for more infrastructure especially staff quarters and classrooms although some has been done under the NUSAF2 project.



Figure 3: Staff quarters under construction as part of NUSAF 2 at Nyamasoga P/S, Biiso S/C, Buliisa District

3.2.2.6 LAND OWNERSHIP

Generally land in Buliisa district is/was customary owned, but the trend is now changing due to the presence of oil where the landlords expect a lot from the oil proceeds. The process of leasing land mainly began around 2008 and at least 50 percent of the land is on free hold.

3.3 WEST NILE AREAS

This covers the planned NUSAF3 areas of Arua, Yumbe, Nebbi and Moyo Districts and their baseline information is summarized as follows:

3.3.1 PHYSICAL AND BIOLOGICAL ENVIRONMENT

3.3.1.1 CLIMATE

The Districts receive about 1267mm of annual rainfall and have 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 lesser rain (860mm) than the rest of the district areas. The highest temperature is 45°C in the months of January to February and lowest 29°C in the months of August to October.

3.3.1.2 LAND DEGRADATION

According to the DDP 2013-2014 for Yumbe District, Soil erosion a single cause of soil degradation is affecting a large part of the district to one extent or another. Some of the most seriously affected areas include parts of Olivu, Orogbo and Nyori in Drajini; Mulele, Omba, Akuya, Dracanga, Matuma and Lomunga in Odravu; Kerila Wadada, and Okanga in Apo; Aliapi, Onziri and Govule in Kuru subcounties. 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.

3.3.2 SOCIO-ECONOMICS

3.3.2.1 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 500acres) 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.

3.3.2.2 SAFE WATER COVERAGE

There are a number of water sources in the four districts including boreholes, protected springs, open wells and piped water especially in urban centers. The safe water coverage of West Nile region is generally above 50% but below the national average of 63% due to drying up of water sources following climate change and decommissioning of some water sources that are non-functional for a long period of time. This leaves a very big percentage of the population in West Nile region without access to clean and safe water. NUSAF2 has worked towards improvement of access to safe water.



Figure 4: Children collecting water from a borehole constructed by NUSAF in Yumbe Town Council

3.3.2.3 HOUSING AND SETTLEMENT PATTERN

The Districts have a spatial population, which is unevenly distributed. Settlement in Nebbi, Yumbe, Arua, and Moyo like in other areas is determined by natural resources and availability of

infrastructure. The districts have two main patterns of settlements. These include: dispersed rural homesteads and nucleated urban centers. The project area has a mixture of household structures and the quality of buildings differ both 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.

3.3.2.4 HEALTH FACILITIES IN YUMBE DISTRICT

The number of operational health facilities is 22. These include: 1 general hospital, 1 health centre IV and 8 health centre III's and 12 health centre II's. Construction of 1 new health unit at Mocha in Midigo Sub County started in FY 2009/10 with funding from PRDP funds and will continue until the facility is ready for operationalization. Another health unit at Limidia in Romogi Sub County has a complete OPD and needs a staff house and VIP latrines to become functional. There are two PNFP units in Yumbe namely; Lodonga H/C III and Kei H/C III.

The infant mortality rate is 107/1000 live births which is higher than the national which stands at 84/1000 LB while Child mortality rate is 157/1000 LB compared to the national 84/1000 LB and the maternal mortality rate is very high at 506/100,000 births. While malaria and respiratory tract infections continue to be the main causes of morbidity and mortality in the community, the poor sanitary conditions seem to worsen the situation with the infestation of intestinal worms becoming the third commonest cause of morbidity among the adults.

3.3.2.5 HIV AND AIDS

HIV/AIDS/STIs and Tuberculosis together pose increasing threat to the survival of the people of not only Yumbe district but the country at large. A recent survey by MoH indicates that HIV/AIDS prevalence rate in Yumbe District is 8% above the national average of 6.1%

The effects of this scourge have impacts that cut across all the sectors and categories of people including effects on social, economic, political, 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.

3.3.2.6 POPULATION

Table 3: Population for NUSAF3 areas in the West Nile Region

DISTRICT	2002 CENSUS			Population projections					
				2012			2014		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
ARUA	268,746	290,329	559,075	373,700	403,000	776,700	373,762	411,427	414,904
NEBBI	126,832	139,480	266,312	164,700	181,500	346,200	184,507	200,713	385,220
YUMBE	126,226	125,558	251,784	282,000	263,500	545,500	229,811	255,771	485,582
ZOMBO	81,224	87,824	169,048	105,500	114,300	219,800	115,411	124,957	240,368

(Source: UBOS 2014, National Population and Housing Census provisional results)

3.3.2.7 POVERTY ESTIMATES

Most communities 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-Muslim families they also rear pigs. Major cash crops in the district include tobacco and cotton which is grown by few people.

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

3.3.2.8 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 aspect women is less privilege 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 board, 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.

3.4 ELGON AND TESO REGIONS

This covers the planned NUSAF3 areas of Kapchorwa, Sironko, Bukwo, Bududa, Mbale and Manafwa Districts for the Elgon region and Kaberamaido, Soroti, Amuria, Katakwi, Kumi and Bukedea Districts for Teso region. Their baseline information is summarized as follows:

3.4.1 PHYSICAL AND BIOLOGICAL ENVIRONMENT

3.4.1.1 GEOLOGY AND SOILS

The stratum of the districts above areas is an extension from a section of Karamoja region to the greater Teso areas and is comprised mainly of pre-Cambrian system, the Mesozoic and cenozoic groups. 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.

3.4.1.2 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*.

3.4.2 SOCIO-ECONOMIC

3.4.2.1 HOUSING SITUATION

The housing situation in the areas 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 to be unfavorable to human

health, bearing in mind that most households sleep on the floor with local materials like mats for bedding. There are very few permanent buildings. They exist mostly in trading centers and rural growth centers that are mushrooming in most parts of the district.

3.4.2.2 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 Serere, Kumi and Soroti areas (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.

3.4.2.3 SOCIO- ECONOMIC AND ASPECTS OF LIVELIHOODS

Iteso are an agro-pastoralist community. The Teso sub-region has 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 sub 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 5: 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 6: 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, Katwaki, Amuria, Bukedea, Soroti, Kumi and Kaberamaido

3.4.2.4 GENDER IN PRODUCTION IN Teso

As in most districts in Uganda, crop farming for consumption and sale is the predominant economic activity of both women and men in the communities in the areas of Teso and those of NUSAF3. Apart 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.

3.4.2.5 LAND TENURE IN Teso REGION

In Teso region, the most common mode of land ownership is customary system, which is almost the same as customary law in other parts of northern Uganda. Under customary tenure in Teso, 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 all the 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'.

3.4.3 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.

3.4.3.1 POPULATION

Table 7: Population Summaries for Serere, Soroti and Kumi NUSAF3

DISTRICT	2002 CENSUS 2002 Census			Projections					
				2012			2014		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
KUMI	79,518	85,847	165,365	125,100	130,400	255,500	125,289	132,784	258,073
SERERE	85,925	90,554	176,479	145,800	148,300	294,100	137,657	145,973	283,630
SOROTI	94,222	99,088	193,310	159,800	162,200	322,000	144,408	152,746	297,154

(Source: UBOS 2014, National Population and Housing Census provisional results)

3.5 ACHOLI AND LANGO REGIONS

These comprise NUSAF3 areas of Gulu, Lira, Amuru, Oyam, Nwoya and Dokolo Districts.

3.5.1 PHYSICAL AND BIOLOGICAL ENVIRONMENT

3.5.1.1 TOPOGRAPHY

The relief of Gulu, Lira, Oyam, Amuru, Nwoya and Dokolo Districts consists 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 Amuru 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 (Kilak County). Generally, the altitude ranges between 1,000-1,200 meters above sea level.

3.5.1.2 GEOLOGY

The major rock types that form the geology of Amuru and Gulu 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. In Lira district, the major geological formations are the basement complex (mainly undifferentiated acid gneiss) covering most of the district. Dokolo areas are underlain by Precambrian Basement Complex, comprising undifferentiated gneisses and granulite facies rocks. 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.

3.5.1.3 SOILS

According to Langlands (1974) classifications, the soil of Gulu and Amuru 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 moulded into large, weak coherent clods that are very porous. Gulu, and Lira districts are endowed with vast fertile soils like in Orapwoyo in Odek and Adak in Lalogi and this has resulted to very high crop yield. Dokolo 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.

3.5.1.4 CLIMATE

The type of climate experienced in Gulu 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. The otherwise continental climate of Lira District is modified by the large swamp area surrounding the southern part of the District.

The continental climate of Lira District is modified by the large swamp area surrounding the southern part of the district. The rainfall in the district is bimodal with one peak during April-May and the other in August-October. The average annual rainfall in the district varies between 1200-1600 mm decreasing northwards. The average minimum and maximum temperatures are 22.5°C and 25.5°C, respectively.

3.5.1.5 DEFORESTATION

There has been indiscriminate cutting of trees in Uganda 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 to address the deforestation problem. A good example is the Community Tree Planting Initiative in Lira District by Friends of Environment for Development which aims at creating 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 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.

3.5.2 SOCIO-ECONOMIC

3.5.2.1 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.

3.5.2.2 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).

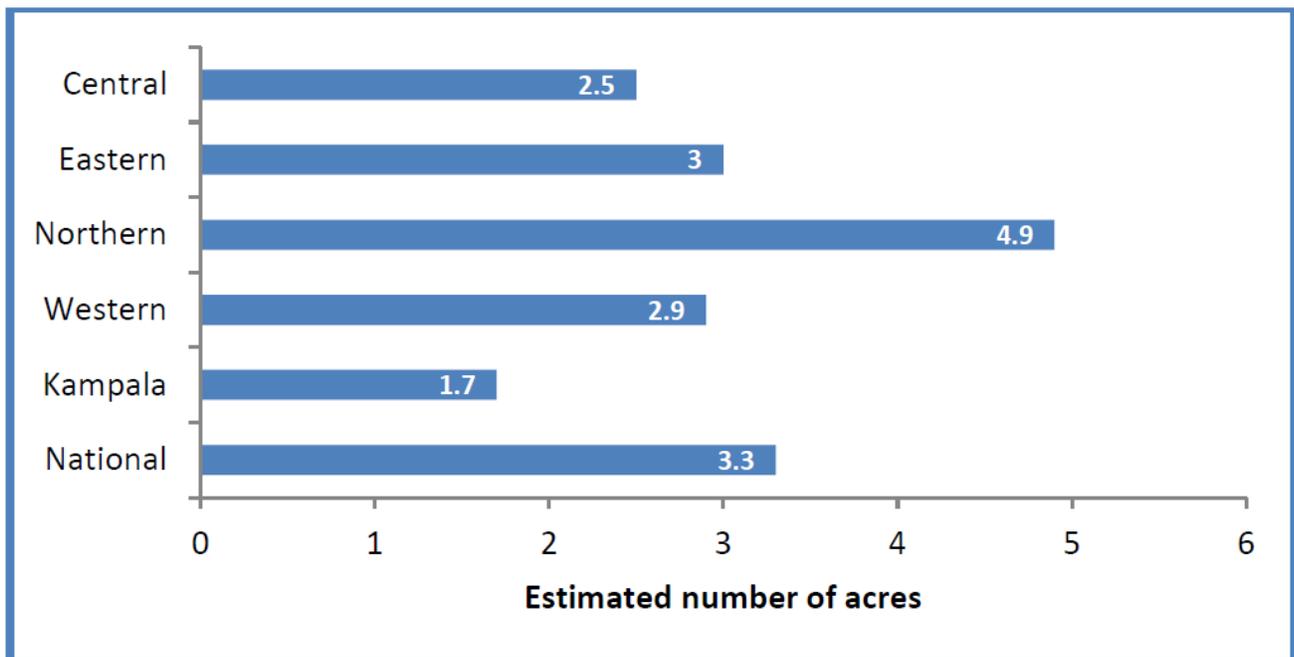


Figure 5: Acreage available per household

(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.

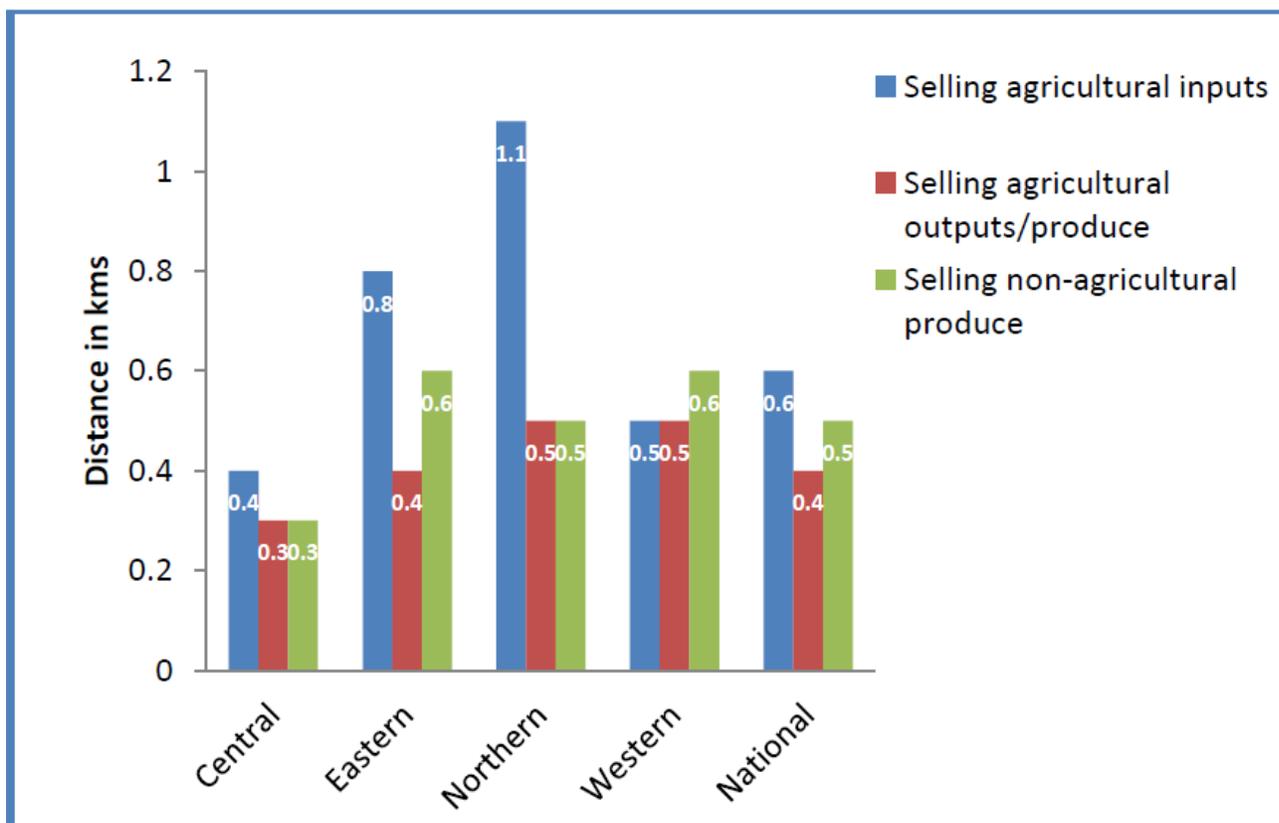


Figure 6: Average distance of household to nearest market by region
(Source: WFP and UBOS, 2013)

3.5.2.3 POPULATION

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

Table 8: UBOS Population Estimate for a sample of Acholi and Lango Districts

DISTRICT	2002 CENSUS			Project Populations					
	Male	Female	Total	2012			2014		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
AMOLATAR	47,828	48,361	96,189	63,200	64,200	127,400	72,492	74,412	146,904
AMURU	66,919	68,804	135,723	88,000	90,800	178,800	92,502	98,014	190,516
DOKOLO	62,988	66,397	129,385	88,900	94,500	183,400	88,650	93,929	182,579
GULU	146,750	151,777	298,527	196,300	200,200	396,500	215,610	228,123	443,733
LIRA	142,380	148,221	290,601	196,400	206,700	403,100	196,891	213,625	410,516
OTUKE	30,514	31,504	62,018	42,200	43,800	86,000	51,444	54,173	105,617

(Source: UBOS 2014 Population Summaries)

3.5.2.4 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).

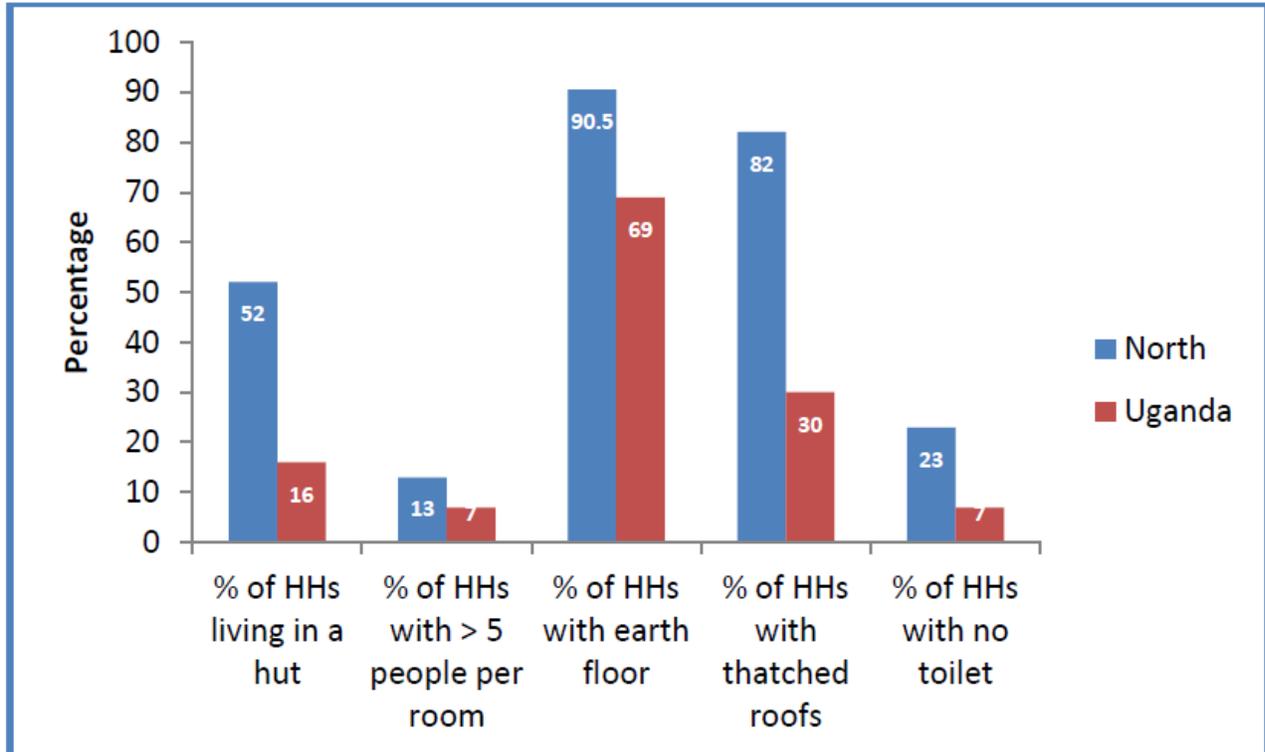


Figure 7: Housing, sanitation and crowding: northern Uganda vs national average

(Source: WFP and UBOS, 2013)

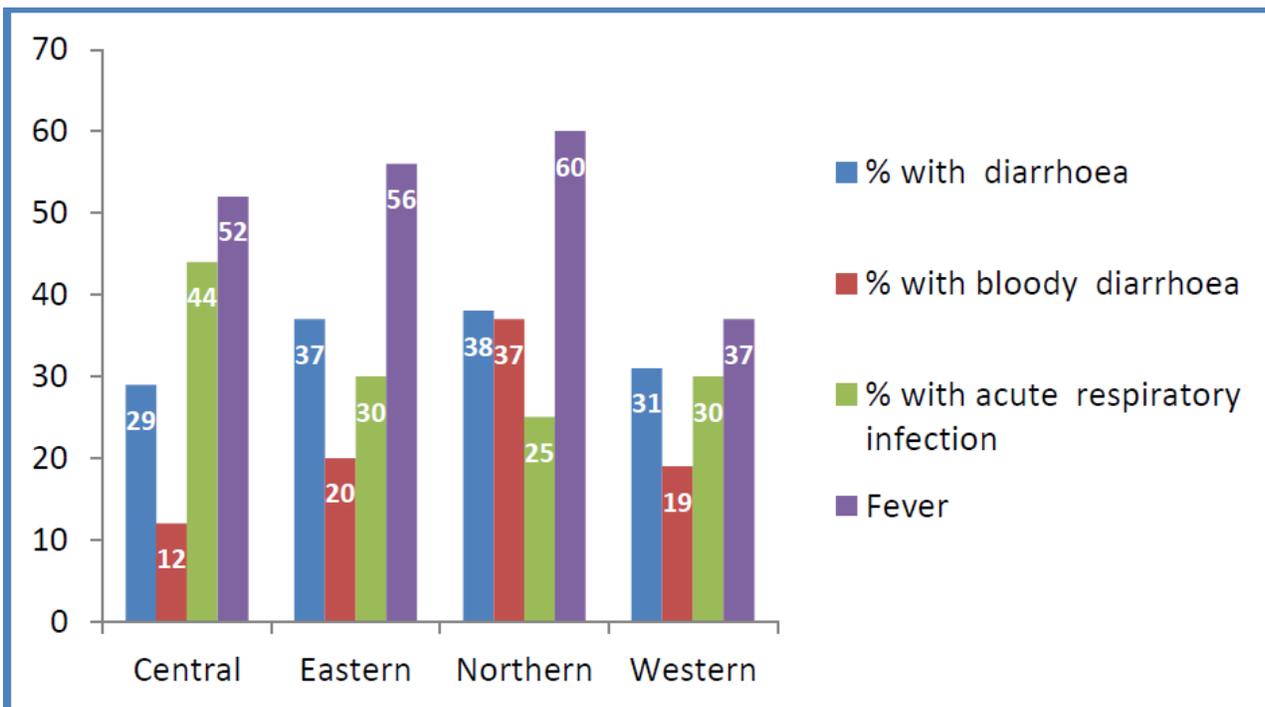


Figure 8: Child illness by region in the two weeks preceding the survey

With the exception of acute respiratory infection, child illness rates (diarrhoea, bloody diarrhoea 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.

3.5.2.5 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).

Until recently, the population of Northern Uganda has been receiving long term humanitarian aid including food aid delivered by a range of non-state actors in response to the effects of both conflict and economic crisis. This context is changing. Following the return of relative peace to the region the Government of Uganda embarked on a programme of recovery and reconstruction, under the Peace, Recovery and Development Plan (PRDP) for Northern Uganda.

After decades of humanitarian aid provision in the north, the international community has scaled down its humanitarian programme significantly in recent years as the IDPs have returned home, with WFP ceasing most of its food aid operations in 2009, and agencies such as ECHO, OCHA, and OFDA and UNHCR closing their missions in the country. The agencies which have remained in Northern Uganda are shifting their approach from food relief toward recovery oriented interventions and from food distribution to cash transfers. Poverty is now being framed as a 'catch-up' problem, requiring the physical rehabilitation of infrastructure and livelihood promotion, and social protection is

being proposed as an interim measure to address chronic poverty, pending the development of the north.

In this context 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 a PWP component, alongside a number of other smaller programmes. In Acholi alone PWP are implemented by ACTED, CESVI, Goal, Mercy Corps, NUDEIL and the Diocese of Northern Uganda, as well as the GoU NUSAF 2 programme.



Figure 9: Amilobo Women’s Group one of the NUSAF2 beneficiaries in Gulu district in their banana plantation

Table 9: 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 10: 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: Mid-Northern included Gulu, Amuru, Kitgum, Pader, Apac, Oyam, Lira, Amolatar and Dokolo

3.5.2.6 KEY ECONOMIC ACTIVITIES

The Acholi and Lango are traditionally agro-pastoral communities. Most people (80% of households) report that crop production is their main economic activity¹⁰, 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.

3.5.2.7 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.

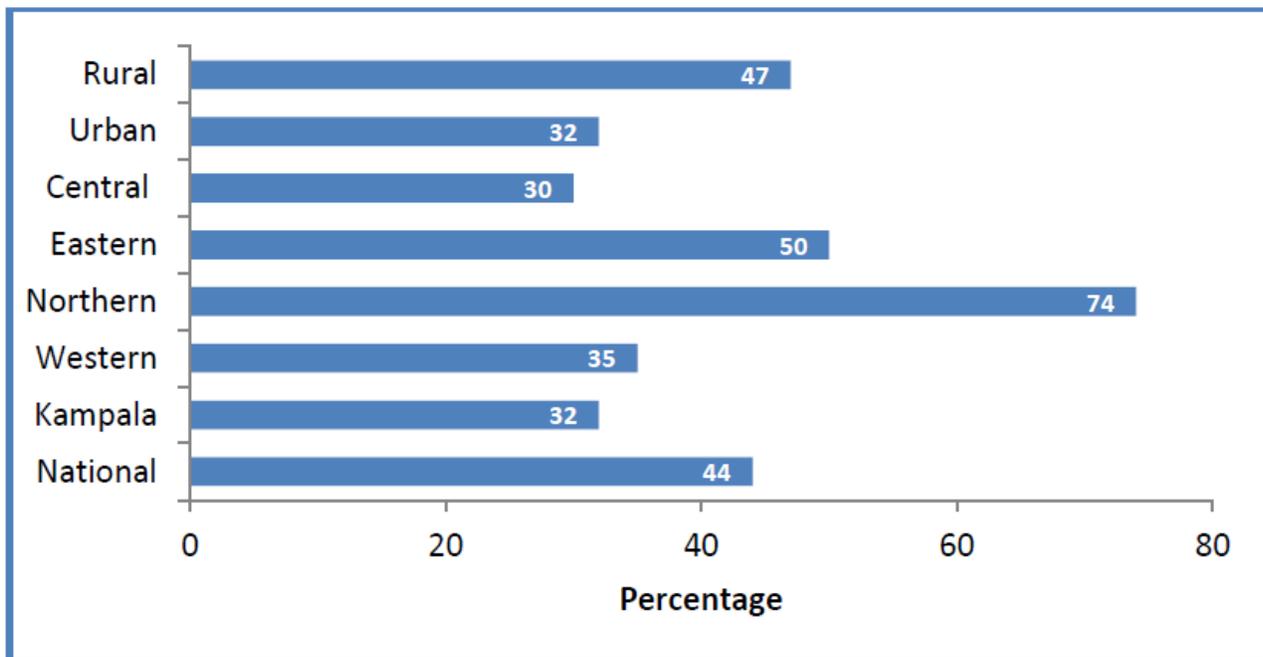


Figure 10: Households that reported they did not have enough to eat by region Sept 08-09 (%)

(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, Kitgum and Pader (WFP and UBOS, 2013).

However, it is worth to note that Northern Uganda has experienced significant transformation since the 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 and Lango is unlikely to persist for many years, if climatic conditions are not too unfavourable. 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).

3.5.2.8 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 Purongo sub-county (Nwoya District), one health centre serves all five parishes within the subcounty, and in Pabit Parish (Purongo sub-county), some communities travel 60km to access the nearest health centre located in Paraa. Access to primary schools is less problematic in terms of physical distance, although not all villages have their own schools. In Alebtong, two schools serve three villages and to access these services, children travel between three and five km (McCord et al., 2013). 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 the Eyama-Okut-Anang community access road under NUSAF 2 was motivated by the need to ensure safety of children particularly at spots where they have to cross streams. In Nwoya, it was noted that dew along the paths affected young children, exposing them to cold and sickness. Other examples of similar access road interventions under NUSAF2 include Onyomtil-Adimola 8km community in Nwoya District and Kilembe-Buramali Community access road in Maracha District.



Figure 11: Sections of Kilembe-Buramali Community access road, Maracha 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 NUSAF3, 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 NUSAF3 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 sanitary wastes 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 NUSAF3 project 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. ***NUSAF3 will have to mainstream HIV/AIDS interventions into its plan, Projects and activities as was the case in NUSAF 2.***

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 NUSAF3 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 INSPECTORATE OF GOVERNMENT ACT, 2002

The Act makes provisions for the Inspectorate of Government in line with Chapter Thirteen of the Constitution and in particular to give effect to the provisions of that Chapter as required by articles 225, 226 and 232 of the Constitution, to repeal the Inspectorate of Government Statute, 1988 and to provide for other related matters.

The Inspectorate of Government is an independent institution charged with the responsibility of eliminating corruption, abuse of authority and of public office. The powers as enshrined in the Constitution and IG Act include to; investigate or cause investigation, arrest or cause arrest, prosecute or cause prosecution, make orders and give directions during investigations; access and search – enter and inspect premises or property or search a person or bank account or safe deposit box among others. It is mandated to eliminate corruption, promote and foster the rule of law and principles of natural justice in public offices and enforce the Leadership Code of Conduct.

The Inspectorate of Government (IG) will conduct NUSAF3 specific IEC, oversight, grievance response and, where necessary, investigations. The IG under the TAAC will undertake grievance handling especially in regard to corruption.

4.2.3 THE ANTI-CORRUPTION ACT 2009

The Act provides for the effectual prevention of corruption in both the public and the private sector, to repeal and replace the Prevention of Corruption Act, to consequentially amend the Penal Code Act, the Leadership Code Act and to provide for other related matters.

Practices that are deemed by the law under the Anti-Corruption Act 2009 as corrupt include such acts as bribery, extortion, diversion of public resources, influence peddling, conflict of interest, abuse of office, loss of public property, sectarianism, nepotism, embezzlement, causing financial loss, false assumption of authority, fraudulent disposal of trust property, false accounting, false claims, uttering of false certificates by public officers and illicit enrichment.

The IGG is required to educate the public about their Constitutional right to access public services without having to pay bribes or any other extra costs and made aware of their civic duties and responsibilities to demand for accountability from their leaders, value for money and to report corrupt practices, mismanagement or abuse of public office to the Inspectorate of Government. Workshops will be carried out in various areas of NUSAF 3 to effect the above.

4.2.4 THE WHISTLEBLOWERS PROTECTION ACT, 2010

The Act provides for the procedures by which individuals in both the private and public sector may in the public interest disclose information that relates to irregular, illegal or corrupt practices; to provide for the protection against victimization of persons who make disclosures; and to provide for related matters. **Whistleblowers of corruption cases under NUSAF 3 will be protected by the provisions of the above Act.**

4.2.5 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 NUSAF3 as well as mechanisms for conducting further assessments on the project sub-components.**

4.2.6 THE AGRICULTURAL SEEDS AND PLANTS ACT (CAP 28)

This Act provides for the promotion, regulation and control of plant breeding and variety release, multiplication, conditioning marketing, importing and quality assurance of seeds and other planting materials. It establishes the National Seed Authority and a Variety Release Committee. The Act also establishes the National Seed Certification Service which is responsible for the design, establishment and enforcement of certification standards, methods and procedures, registration and licensing of all seed producers, auctioneers and dealers, advising the Authority on seed standards and providing the Authority with technical information on any technical aspects affecting seed quality. The Act imposes stringent requirements for variety testing. **Under NUSAF3, interventions are required to strengthen services of seed testing, certification and marketing under the livelihood support component to ensure beneficiaries receive quality seeds.**

4.2.7 THE PLANT PROTECTION ACT (CAP 31)

The Act provides for the prevention of the introduction and spread of disease destructive to plants. Section 4(i) states “Every occupier or, in the absence of the occupier, every owner of land shall take all measures as he or she may be required to take by virtue of any rules made under section 3 and, in addition, such other measures as are reasonably necessary for the eradication, reduction or prevention of the spread of any pest or disease which an inspector may by notice in writing order him or her to take, including the destruction of plants. **These services governed under this Act will be implemented by MAAIF through the respective DAOs at the district level.**

4.2.8 THE AGRICULTURAL CHEMICALS (CONTROL) ACT, NO. 1 OF 2006

This Act was enacted to control and regulate the manufacture, storage, distribution and trade in, use, importation and exportation of agricultural chemical and other related matters. Under this Act, the requirement of packaging, labeling or advertisement of agricultural chemicals is relevant in pesticides management to prevent illegal activities related to mislabeling and mis-packaging. In addition, section 13(2) provides for the period in which the seized agricultural chemicals can be detained and the power to dispose them off. The person in whose possession the chemicals were

got has to consent in writing for these chemicals to be destroyed by the Government. It is therefore important to put in place an effective and efficient mechanism for disposal of the seized/expired chemicals. **Similarly, a Pest Management Plan has been developed to among others guide the use of pesticides in NUSAF3.**

4.2.9 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 NUSAF3 has integrated Environmental Assessments in its ESMF in compliance with the Act provisions.**

4.2.10 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 NUSAF3.**

4.2.11 THE MINING ACT OF 2003

Road construction has auxiliary activities including stone quarrying and borrow materials extraction involve excavations or working where any operations are connected with mining including erections and appliance used in connection with such operations. These activities, therefore, are subject to the requirements of this Act. Requirements under Part XI for the Protection of the Environment under the Act are therefore, relevant. Such requirements include need for an ESIA and Audits as well as observance of environmental standards for the prevention and minimization of pollution of the environment and waste management. Relevant environmental studies are required for this license application as described in Part XI. Ideally, the extraction of stone and murram materials will be undertaken in line with the provision of this Act. **Issues of restoration of the sites after murram extraction are important in the operationalization of the NUSAF3 Project.**

4.2.12 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 under NUSAF3.**

4.2.13 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 NUSAF3 activities especially for public works among other subprojects.***

4.2.14 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 project will undertake the Chance Finds Procedures in addressing possible encounters of any archaeological resources during project implementation.***

4.2.15 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.***

4.2.16 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 NUSAF3 Project.***

4.2.17 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.***

4.2.18 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.

4.2.19 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.***

4.2.20 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 11: 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	to protect those species of that migrate across or outside national boundaries

species of wild animals (1979).	
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 trans-boundary Movement of Hazardous Wastes and their disposal - 1989	to reduce trans-boundary movements of waste subject to a 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
The FAO International Code of Conduct on the Distribution and Use of Pesticides	Establishes voluntary standards for public and private institutions involved in the distribution and use of pesticides. The revised version of the Code, adopted in 2002, sets out a vision of shared responsibility between the public and private sectors, especially the pesticide industry and government, to ensure that pesticides are used responsibly, delivering benefits through adequate pest management without significant adverse effects on human health or the environment.
The Safety and Health in Agriculture Convention	The Safety and Health in Agriculture Convention (Convention 184) adopted by the conference of the International Labor Organization (ILO) addresses the protection of workers in the agricultural sector.
Strategic Approach to International Chemicals Management (SAICM)	Uganda UNEP/UNDP Partnership initiative for the implementation of SAICM is intended to assist the Government, through the National Environmental Management Authority (NEMA), to take up the strategic priorities of SAICM Quick Start Program (SQSP), namely: develop and strength national chemicals management institutions, plans, programs and activities to implement the Strategic Approach, building upon work conducted to implement international chemicals-related initiatives; and undertake analysis, interagency coordination, and public participation activities directed at enabling the implementation of Strategic Approach by integrating the sound management of chemicals in national development priorities and strategies.

4.4 WORLD BANK SAFEGUARD POLICIES AND EHS GUIDELINES

4.4.1 WORLD BANK POLICIES

NUSAF 2 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, OP/BP 4.11 on Physical Cultural Resources 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 12: Summary of World Bank Safeguards in relation to NUSAF3

OP N ^o .	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>Because of the public works and livelihoods support projects there are likely negative environmental and social impacts to be generated, though localized and readily manageable. The details including the locations of the sub-components activities of projects are not known, a framework for conducting Environmental Assessments on such activities has been provided in this ESMF. The ESMF has been prepared in a consultative manner, and shall be disclosed both in-country and at info-shop before project appraisal. Specific safeguard instruments (ESIA, ESMPs) shall be prepared during project implementation following guidance in the 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>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>The project shall not support any activities that affect natural habitats.</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>Under project Component 2 Livelihoods Support, the project may support CDDs that involve small scale use of pesticides that may be applied to veterinary care of animals.</p> <p>A Pest Management Plan (PMP) has been developed as part of the ESMF. A guiding note on safe procurement, transportation, storage and use/application of pesticides and disposal of contaminated containers shall be included in the project operational manual.</p>

OP N ^o .	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	OP/BP 4.10 is not triggered because there are no Indigenous Peoples in the project area. The project is focusing on the North, North-East and Eastern regions of Uganda where there is overwhelming majority of vulnerability and marginalization. The elements of vulnerable/marginalized people will be included in the overall project design, and therefore a separate V-M/ IPPF is not required. The project will adhere to the basic principles of a free, prior, and informed consultation leading to broad community support for the project, the more vulnerable among the PAPs will be consulted extensively and their needs specifically addressed.
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.	√	Component 1 involves public works which will focus on a variety of asset creation activities, including rural access roads, tree nurseries, afforestation, construction of different soil and water conservation measures, and flood control structures, rainwater harvesting, rehabilitation and construction of market shelters, rural health facilities, and schools, among others. Though the level of impacts on PCRs cannot be ascertained with certainty at this stage, a Chance Finds Procedure has been outlined in the Annex 8 of this ESMF for management of accidental encounters with PCRs.
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 NUSAF 3 alongside this ESMF which defines measures and modalities of handling resettlement challenges 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 policy is not triggered because NUSAF-3 supported activities will not have any direct impacts on the health and quality of forests, or on the health and safety of people who depend on forests. There is no intention to change the management, protection, or utilization of forests.

OP N°.	Summary of Safeguard Policy	Safeguard Policy Triggered/Not Triggered	Remarks
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 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.	X	The Safety of Dams (OP 4.37) policy is not triggered. The project does not include construction of 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. The project will not be implemented on international waters.
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	NUSAF 3 project activities will not be undertaken in disputed areas.

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 NUSAF3 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 AND COMMUNITY 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 ESIA process. The consultation process gives stakeholders and Project Affected Persons (PAPs) 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 and PAPs in assessing and managing the potential environmental and socioeconomic impacts of the NUSAF3;
- Help manage risks, concerns and public expectations through ongoing dialogue with stakeholders;
- Improve decision-making, and build understanding by actively involving key project stakeholders and PAPs in two-way communication. Through this process, the implementing agencies will better understand the concerns and expectations of stakeholders and PAPs, and the opportunities to increase project value to the local community.

5.3 OBJECTIVES OF STAKEHOLDER AND COMMUNITY CONSULTATIONS

The consultations with stakeholders and communities 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 and PAPs to discuss their opinions and concerns respectively;
- 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 NUSAF3.

5.4 SOME OF THE PRELIMINARY KEY STAKEHOLDER COMMUNITY 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 (IGG)</p> <p>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;</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 IGG 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. 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 Ngeya – Senior Engineer, Dept. of Construction Standards and Quality Management, MoWT</p> <ul style="list-style-type: none"> • NUSAF 3 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 NUSAF 3 should be in place right from the beginning of the project not as was the case under NUSAF 2; • NUSAF 3 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>Cross-cutting issues including environment, gender, HI/Aids, waste management to be included in the budgets.</p> <p>NUSAF Secretariat has an Environment and Social Safeguards Specialist to provide guidance on safeguards implementation</p> <p>The ESMF recommends facilitation of DEOs and CDOs to enforce safeguards; this item has been included in the budget for ESMF implementation.</p> <p>The design of the NUSAF projects is in way that DEO are involved in subprojects right from screening through monitoring.</p>
<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 proposed mainstreaming of NUSAF and NAADS has no budgetary provisions yet it is expected to be operational.</p> <p>OPM should involve the office of the RDC and GISO in monitoring of NUSAF projects other than the IGG's office which is under staffed and overwhelmed by work, for example West Nile has 3 Officers under IGG's department to monitor all government activities in the region.</p>	<p>This is a good practice that has to be strengthened further in NUSAF3.</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>Some NUSAF regions such as Karamoja region has continuously failed to attract more 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 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 and CIRs. A budget of UGX 600,000 was set aside, for the environmental issues on each project.</p> <p>Improve on the budget for environmental related issues in the design of NUSAF3 and there should be a provision for monitoring under NUSAF3</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 NUSAF3.</p> <p>This is catered for in the budget for this ESMF. OPM should ensure that monitoring is duly undertaken.</p>
<p>Dr. Samuel Onyait, District Health Officer, Buliisa District.</p> <p>NUSAF is a community demand driven project but sometimes the community doesn't accord health the attention for it to be a priority in terms of subprojects for funding.</p> <p>NUSAF has only considered staff quarters under the health sector yet there are other infrastructure needs at existing health units that if addressed could lead to improved health services. Structures such as OPD, IPD, functional ambulances, toilets and <u>medical waste management facilities</u> at health centers are other such projects that should be considered under NUSAF3.</p>	<p>There remain challenges of hazardous wastes generated at different facilities financed under NUSAF2 especially medical waste at health centers. The setting up of new structures at these health centers translates into more service delivery but also contributes to more generation of medical waste. This means the provision of additional infrastructure should be accompanied with provision of more waste management facilities which has not been the case. It is recommended that a specific budget for environmental mitigations is put in place to cater for waste management issues.</p>

<p>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.</p> <p>Under NUSAF3, 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 NUSAF3 project will focus on few geographic areas with higher level of poverty, exposure to climatic hazards such as drought and flood.</p>
<p>Teopista, NUSAF Trainer, NUSAF Desk Office, Nebbi District.</p> <p>Training of communities is 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 NUSAF 3.</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 the new project, 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>Building capacity within the communities for pest and disease management is important for sustainability especially as access to agricultural advisory services in the regions remains poor.</p>
<p>Amilobo Women Group, Gulu district 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>Such groups require adequate extension services on crop production to minimize losses. This echoes the need for OPM to closely work with MAAIF to strengthen extension services to the beneficiaries.</p>

<ul style="list-style-type: none"> The initial training was not adequate as the group was trained for two days only. 	
<p>Kuju Primary school Amuria District</p> <p>The school has realized increase in school enrolment from 631 before and 785 pupils after classroom construction. This is directly linked to more classes.</p> <p>Solar should be included in the package to allow students make revision.</p>	<p>This is a good positive impact by NUSAF3 to improve upon education and literacy in the area.</p> <p>Provision of solar panels something that could be considered for schools and hospitals in general to enhance service delivery. In addition, similar interventions have been initiated under the Electricity for Rural Transformation Phase 3 (ERT 3) that includes provision of solar to schools.</p>
<p>Katushabe Stella, NUSAF Front Desk Officer, Buliisa District</p> <p>For livelihood support projects, there are incidences of theft and death of animals.</p> <p>Some target communities are too poor and illiterate yet they have been given too much authority over money e.g. in some groups you find that all group members are not able to write and read yet they have to fill forms, register their groups and open up bank accounts. This increases the work load of the NUSAF technical person. And at times, this leads to mismanagement of funds, and the NUSAF Focal person carries the blame for not guiding the group well.</p>	<p>Considering the high poverty levels and vulnerability of the beneficiary individuals and the fact that it was the first time for some households to own cows and goats they need adequate extension services which have been limited and that could be the reason for death of the animals.</p> <p>The animals especially cattle take longer to yield returns and so beneficiaries can also easily sell of the animals to make quick money and claim that the animals died. OPM needs to find out the truth.</p> <p>Despite that, it is important for OPM to strengthen extension services at District and Subcounty if communities are going to genuinely benefit from the livelihood improvement projects.</p>
<p>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>Akena Geoffrey, NUSAF Desk Officer, Nwoya District</p> <p>Much as there are no IDP camps, there are individuals still in transit i.e., communities that have not yet reached their original villages where they came from during the LRA war.</p>	<p>These are some of the vulnerable people that the project should select as beneficiaries so that they can be empowered to improve their livelihoods.</p>
<p>Ayesiga Mukama NUSAF Group, Kigwera subcounty 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 of 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 IGG.</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</p>

	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>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>	Gender mainstreaming has been observed across all project components of NUSAF2 and the practice should continue to ensure that women continue to benefit from the project.

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 public 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, sub-county and community levels. This will help create a good understanding of Project objectives, activities, 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 community and

stakeholders' inputs on the ToRs and particularly to check that no issue of concern to communities/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 NUSAF3 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 Infoshop.

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 Infoshop. 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 NUSAF3. 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, disarmed Karamojong, youth, Elderly, Child head families, Persons with disability and Landmine victims.

Interest in the NUSAF3 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 NUSAF3 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 NUSAF3 project 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 NUSAF3 Implementation Manual should clearly provide details on consultation of PWDs.

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 NUSAF3 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.**

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 APPLICATION OF 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 NUSAF3.

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 similar to Bank's category A 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 (Components 1 and 2) will fall under this EA category B. For NUSAF3 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. Components 3 & 4 fall under this category.

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. Based on required level of assessment and if deemed necessary, applicable ESMPs shall be drafted at this stage.

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). The DEO verifies the screening undertaken and reviews the drafted ESMPs for appropriateness and completeness.

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; 	Sub-project Appraisal Report with recommendation to either accept sub project as submitted or to accept sub project with modifications, or reject it.

		<ul style="list-style-type: none"> Finalize social part of project appraisal report. 	
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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 National Environment Act information feedback and 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 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. Subprojects with major/controversial issues will be cleared by both the DEC and the DTPC while the very straight forward ones with minimal issues/impacts will be technically reviewed by the DEO and recommended for DTPC’s 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 further environmental work is required; (b) the implementation of simple stated 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 after NEMA has issued EIA certificate of approval. Review and clearance of ESMPs that may be developed after or as part of screening will be cleared by NUSAF Environmental Specialist at TST.

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 basis, 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. The Project Brief will always contain an ESMP.

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 PAPs, 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 NUSAF3 project 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 (RPF) 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 Project Brief level of assessment, 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 including assessment of alternatives;
- 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 and public consultations in Project Briefs.

6.2.4 STEP 4: PUBLIC CONSULTATIONS AND DISCLOSURE

Wide-ranging public and stakeholder 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 members of the public/communities 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 PAPs and 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's 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 public libraries, websites and through the daily print media by PCU and at WB's Infoshop by IDA.

6.2.5 STEP 5: REVIEW AND APPROVAL

If an ESIA study is recommended, it 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/she may issue EIA certificate of approval.

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 NUSAF3 project 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 environmental issues by projects. The respective management plans across components will be prepared and will include a mitigation cost to address environmental 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 NUSAF 3, 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, DTPC, 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 NUSAF Environmental Specialist and with reference to the guidance contained in the ESMF, and Project Operational Manual. 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 public works.

Overall, OPM will have the lead role in monitoring and reporting to ensure that various project environmental and social obligations are met, and will ensure where applicable 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.

6.3 GRIEVANCE REDRESS MECHANISM

6.3.1 IMPORTANCE

The Grievance Redress Mechanism (GRM) will provide a way to provide an effective avenue for expressing concerns and achieving remedies for communities, promote a mutually constructive relationship and enhance the achievement of project development objectives. It has been learned from many years of experience that open dialogue and collaborative grievance resolution simply represent good business practice both in managing for social and environmental risk and in furthering project and community development objectives. In voicing their concerns, they also expect to be heard and taken seriously. Therefore, OPM has to assure people that they can voice grievances and the project will work to resolve them without bias. The project GRM will be augmented by the World Bank's Grievance Redress Service, which provides an easy way for project-affected communities and individuals to bring their grievances directly to the attention of Bank Management. The GRS will ensure that complaints are directed promptly to relevant Bank Task Teams and/or Managers for review and action, as appropriate. The goal is to enhance the

Bank’s involvement, responsiveness and accountability. The GRS is described in detail in Section 6.3.4 below.

6.3.2 INVOLVEMENT OF THE INSPECTORATE OF GOVERNMENT

One of the components of NUSAF 3 is Transparency, Accountability and Anti-Corruption (TAAC). This sub-component is aimed at ensuring transparency, accountability and putting in place anticorruption measures in the implementation of the project.

As part of the TAAC program, the Inspectorate of Government will continue to use both enforcement and preventive/proactive measures to ensure that the project is not frustrated by corruption and other malpractices. 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.

In terms of grievances, to link communities to the national anti-corruption institutions, TAAC will include a grievance handling arrangement. Grievance handling will at grassroots level be anchored in Social Accountability Committees (SAC), and ultimately linked to the Inspectorate of Government (IG) headed by the Inspector General of Government (IGG) at national level.

The Inspectorate of Government is an independent institution charged with the responsibility of eliminating corruption, abuse of authority and of public office. The powers as enshrined in the Constitution and IG Act include to; investigate or cause investigation, arrest or cause arrest, prosecute or cause prosecution, make orders and give directions during investigations; access and search – enter and inspect premises or property or search a person or bank account or safe deposit box among others.

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. 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.

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. Complaints can also be filed online at <http://www.igg.go.ug/complaints/>

To take its services closer to the people, pursuant to the provisions of Article 228 of the Constitution, the Inspectorate has so far established sixteen (16) Regional Offices headed by Principal Inspectorate Officers. The Regional Offices are structured to perform the functions of the Inspectorate and are distributed over the country. Those relevant to NUSAF 3 are as follows:

IG Office	Contacts
Arua Regional Office (Arua, Koboko, Zombo, Nebbi, Maracha and Terego)	arua@igg.go.ug 0476-420317
Gulu Regional Office	gulu@igg.go.ug

(Gulu, Kitgum, Pader, Agago, Lamwo, Nwoya and Amuru)	0471-432569
Lira Regional Office (Lira, Apac, Oyam, Dokolo, Otuke, Aleptong, Kole and Amolatar)	lira@igg.go.ug 0473-420099
Mbale Regional Office (Mbale, Bukwo, Kapchorwa, Sironko, Budaka, Pallisa, Bulambuli, Kibuku and Kween)	mbale@igg.go.ug 0454-435029/35255
Moroto Regional Office (Moroto, Abim, Nakapiripirit, Amudat, Kotido, Napak and Kaabong)	moroto@igg.go.ug 0352-278373
Moyo Regional Office (Moyo, Adjumani and Yumbe)	moyo@igg.go.ug 0372-280102
Soroti Regional Office (Soroti, Amuria, Kaberamaido, Katakwi, Bukedea, Ngora, Serere and Kumi)	soroti@igg.go.ug 0454-463201
Tororo Regional Office (Tororo, Busia, Butaleja, Manafwa and Bududa)	tororo@igg.go.ug 0454-445534
HOT LINES	0414-347386 0312-101346
Inspector General of Government	0414-259723 Email: imulyagonj@igg.go.ug
Director – Regional Affairs and Follow-up	0414-346116/254421 regional@igg.go.ug

Implementation

In the implementation of the Anti-Corruption function the IG carries out investigations where commission of any offence under the Anti-Corruption Act 2009 or the Leadership Code Act is alleged. Where the subject of an investigation is found to have committed an offence he/she may be arrested and prosecuted. Disciplinary action in varying degrees from warnings to dismissal may also be recommended to the supervisors of public officers and monies lost or embezzled recovered from them. Assets may be confiscated from a public officer who investigations establish to have acquired them through corrupt means.

Awareness – The IGG is required to educate the public about their Constitutional right to access public services without having to pay bribes or any other extra costs and made aware of their civic duties and responsibilities to demand for accountability from their leaders, value for money and to report corrupt practices, mismanagement or abuse of public office to the Inspectorate of Government. Workshops will be carried out in various areas of NUSAF 3. The purpose of these workshops will be to educate and inform the various NUSAF 3 stakeholders about the NUSAF 3 project in terms of its goals and strategy of implementation so as to maximize value to intended beneficiaries.

Arrests – The IG has powers to arrest or cause arrests of people who investigations reveal to have engaged in corrupt practices and abuse of office or authority or who for no good reason refuse or ignore to respond to summons issued by the IG.

Prosecutions – The powers of the Inspectorate of Government to prosecute or cause prosecution of suspects alleged to have been engaged in corruption and abuse of office are derived from the Constitution of the Republic of Uganda.

6.3.3 NUSAF3 GREVIANCE REDRESS MECHANISM

6.3.3.1 COMMUNITY LEVEL GRM

The Social Accountability Committees (SAC) established under the Community Subproject Management Committee in NUSAF2 will continue to promote social accountability at the community level. The SAC will be constituted by 5 democratically elected members of proven integrity (5 members of the beneficiary community (who are neither members of the Community Project Management Committee (CPMC) nor Community Procurement Committee (CPC)). Where possible, the Chairperson and/or the Secretary of the SAC should be literate. 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 SAC mechanism will:

- Ensure that where grievances arise, they are addressed at the lowest possible level (subsidiary);
- Act as first point of call for resolving or reference of grievances.

The SAC will initiate a response to such grievances that shall be based on prevention, detection, and consequence. The SAC will be focused on cases of:

- Gender exclusion and deliberate or ignorant obstruction of achieving the project's gender equity process and output targets;
- Nepotism (misuse of station, power and influence to benefit relatives and friends),
- Collusion (secret or illegal cooperation to divert or pervert project resources, including manipulation in reaching the intended target groups); and
- Corruption (dishonest and fraudulent conduct of power and office holders, typically involving soliciting and/or accepting bribes).

6.3.3.2 REFERRAL OF SEVERE OR UNRESOLVED GRIEVANCES

The communities using various social accountability mechanisms will hold each other as well as government officials and bureaucrats accountable. The grievance handling system will, depending on the severity and potential criminal liability of transgressions, invoke referrals by the NUSAF3 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 General of Government (IGG) 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 for all Ugandan citizens in cases of criminal liability for collusion and corruption.
- The World Bank’s Grievance Redress Service (GRS) via email: grievances@worldbank.org;

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” and the hotline **0414-347387** will allow citizens to report grievances to the IGG at no cost and at any time in addition to the regional offices whose contacts have been provided above.

6.3.3.3 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 THE WORLD BANK’S GRIEVANCE REDRESS SERVICE (GRS)

6.3.4.1 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.

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank’s attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), please visit www.worldbank.org/grs. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

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 referring them to the responsible Task Teams/Managers. The GRS undertakes the following 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.

6.3.4.2 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 Lumuba 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 CHANCE FIND PROCEDURES

Chance find procedures will be used as follows:

- Stop the construction activities in the area of the chance find;
- Delineate the discovered site or area;
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Directorate of Museums and Monuments take over;
- Notify the supervisory Engineer who in turn will notify the responsible local authorities and the Directorate of Museums and Monuments under the Ministry of Tourism, Wildlife and Antiquities (within 24-48 hours or less);
- The Directorate of Museums and Monuments would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archeologists of the Directorate of Museums and Monuments (within 24 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values;
- Decisions on how to handle the finding shall be taken by the Directorate of Museums and Monuments. This could include changes in the layout (such as when finding an irremovable remain of cultural or archeological importance) conservation, preservation, restoration and salvage;
- Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Directorate of Museums and Monuments; and
- Construction work could resume only after permission is given from the responsible local authorities and the Directorate of Museums and Monuments concerning safeguard of the heritage;
- These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered are observed;
- Construction work will resume only after authorization is given by the responsible local authorities and the National Museum concerning the safeguard of the heritage; and
- Relevant findings will be recorded in World Bank Implementation Supervision Reports (ISRs), and Implementation Completion Reports (ICRs) will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

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: Labour-Intensive Public Works and Component 2: Livelihood Investment Support.

The labour intensive public works will focus on a variety of asset creation interventions, including rural access roads, tree nurseries, afforestation, construction of different soil and water conservation measures, and flood control structures, rainwater harvesting, rehabilitation and construction of market shelters, rural health facilities, and schools, among others. These assets would aim to help poor households respond to and build resilience against the impacts of climate change by helping communities diversify risk, enhance incomes, and build skills and assets.

The project will also support 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. In addition, NUSAF 3 will finance activities aimed at improving accountability and transparency in the use of project resources at national, district, sub-county and community levels, strengthening governance and accountability at all levels.

Component 2 may involve use of pesticides and other veterinary chemicals or result in their increased usage through Livelihoods Investments support 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 POTENTIAL PROJECT IMPACTS AND THEIR MITIGATIONS MEASURES

The project supports interventions designed to improve livelihoods and access to basic socio-economic services in the target areas. These interventions are expected to have limited local adverse environmental impacts. The overall environmental impact of the project is expected to be positive through alleviating pressures on the poor that lead to unsustainable exploitation of natural

resources and environmental degradation. The menu of subproject activities and the experience from NUSAF2 suggest that potential environmental issues can be adequately managed by integrating environmental due diligence into the subproject cycle.

A simplified Pest Management Plan (PMP) has been prepared for the proposed investments when applicable as part of this ESMF (Annex 4). The purpose of the PMP is to describe a Plan by which the project can promote and support safe, effective, and environmentally sound pest management. The objective of the Pest Management Plan is to:

- Promote the use of environmentally friendly practices (hygienic, cultural, biological or natural control mechanisms and the judicious use of chemicals) in pest control;
- Effectively monitor pesticide use and pest issues amongst participating farmers/groups;
- Provide for implementation of an Integrated Pest Management (IPM) action plan in the event that serious pest management issues are encountered, and/or the introduction of technologies is seen to lead to a significant decrease in the application of pesticides;
- Assess the capacity of the existing regulatory framework and institutions to promote and support safe, effective, socially and environmentally sound pest management and to provide for appropriate institutional capacity support recommendations;
- Ensure compliance with national laws, regional standards, and regulations;
- Ensure compliance with World Bank safeguard policy OP 4.09

People affected by potential land acquisition for infrastructure development will be addressed in a participatory and inclusive manner. An RPF, which sets out the guidelines for the 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 NUSAF3 project is 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 components 1 and 2 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.

The likely negative impacts associated with project and their proposed mitigation measures include the following:

- **Health and safety issues:** The civil works and use of pesticides will pose health and safety issues. These shall be addressed first and foremost by providing and ensuring use of appropriate PPE. In addition, workers and farmers shall be sensitized and/or trained on the importance and use of PPE in civil works and use of pesticides.
- **Vegetation clearance and soil erosion:** The likely environmental and social impacts of community access roads rehabilitation are expected to be minor given the low mechanized road works that will be involved. Where losses of vegetation are inevitable, compensation

measures be instituted as per approved Government rates and as outlined in the RPF for NUSAF 3.

- **Impacts on PCRs** – There may be graves or other physical cultural resources along proposed community access routes. The subsequent environmental and social assessments should take into account specific measures to address mitigations for such resources during project implementation. As for this ESMF, it is proposed that, the design stages should propose alignments that avoid graveyards. In addition, measures outlined in the Chance Finds Procedures should be operationalized as well.
- **Waste Management** – One critical issue observed during NUSAF 2 was waste management especially hazardous waste. The NUSAF 3 Waste Management Plan (WMP) has been prepared to address waste management issues associated with the NUSAF3 project in line with legal and regulatory requirements as detailed in Annex 5.

A generic ESMP as well as individual management plans has been appended to this ESMF to guide implementation of mitigations to effectively manage the potential negative impacts.

8.1 DETAILED NUSAF3 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 new project. 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.

8.1.2 INSPECTORATE OF GOVERNMENT

The Inspectorate of Government is an independent institution charged with the responsibility of eliminating corruption, abuse of authority and of public office. The powers as enshrined in the Constitution and IG Act include to; investigate or cause investigation, arrest or cause arrest, prosecute or cause prosecution, make orders and give directions during investigations; access and search – enter and inspect premises or property or search a person or bank account or safe deposit box among others.

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

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

Under this arrangement, the IGG will submit six-monthly reports to OPM, MFPED, Parliament and the World Bank. These NUSAF3 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 framework for public works, to which this Project will contribute. MGLSD will also lead efforts through the capacity building component of the Project 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 are responsible for performing the policy, planning, and supervision functions required of monitoring health services and products in the districts.

Under NUSAF3, the Community Infrastructure Rehabilitation aims at improving access to basic socio-economic services through rehabilitation and improvement of existing community infrastructure such as schools, water points, Skills training centers, health centers, teachers' houses, classrooms, sanitation facilities, solar lighting systems and furniture among others. Due to the decentralized system of government, these will be implemented by the Local Governments working together with the different communities and NUSAF groups.

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 and veterinary extension services systems to address the beneficiaries' demands of extension services.

Some NUSAF regions such as Karamoja region have continuously failed to attract more 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 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.

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 NUSAF3, the respective District Engineers will work closely with OPM to implement public works component.

Capacity – The Environment, Gender equality, HIV/AIDS and Occupational Health and Safety issues are part of the standard roads contracts, 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 whose capacity includes the Principal Environment Officer, the Senior Environment Officer and the Senior Environment Officer (Social). 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 NUSAF3, the Community Infrastructure Rehabilitation aims at improving access to basic socio-economic services through rehabilitation and improvement of existing community infrastructure such as schools, water points, Skills training centers, health centers, teachers' houses, classrooms, sanitation facilities, solar lighting systems and furniture among others. Due to the decentralized system of government, these will be implemented by the Local Governments working together with the different communities and NUSAF groups.

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 NUSAF3 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-DISTRICTS & SUB-COUNTIES

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 new project 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 NUSAF3 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

within 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 NUSAF3. However, the districts (specifically the DEOs and CDOs) will require facilitation to monitor project implementation as provided for in the ESMF budget.

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 NUSAF3 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.

8.1.10 THE ROLE OF THE CONTRACTORS

The Role of the Contractor, which will be as per the contract will be accountable for the overall implementation of the mitigation measures and this will be monitored and supervised by the OPM Environmental Unit. As such, an ESMP will be prepared for each sub-project. In the schedule of works, the Contractor will include all proposed mitigation measures, and the Supervising Engineers will also ensure that, the schedules and monitoring plans are complied with. This will lend a sense of ownership to the Contractor. The Contractor on his part will also be responsible for planning, implementing and reporting on mitigation measures during the execution of the project works. The Contractor will also be required to apply standard quality assurance procedures in full compliance with the NEMA's Approvals.

Capacity – The Contractors are unknown at this point. However, the selection criteria will include past environmental performance as well as adequacy of contractor's staff to effectively put mitigations in place.

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 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 ASSESSMENT NEEDS

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 NUSAF3 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 NUSAF3 project.
- 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 will work through the CDOs and DEOs and other relevant fora 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 NUSAF3 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 in the Project to include:

- a. World Bank Safeguards policies and requirements
- 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

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 NUSAF 3 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
- Operation and functionality of of GRM and GRS

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.

8.4 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;
- to assess the occurrence of, and potential for, cumulative impacts due to project-funded and other development activities; and

- 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:

- An introduction, Reporting period and monitoring locations
- Scope of works and status of implementation of activity being reported on
- ESMF management actions undertaken during the reporting period
- Progress to date in implementing the ESMF, including key aspects monitored: such as waste management, health and safety practices, procurement/storage/and use of pesticides including their disposal, dust management, water quality, other environmental incidents and accidents, environmental awareness and training undertaken, etc.
- Key recommended follow up issues, actions, time frame and responsibility center.

Below is the proposed reporting format:

1 INTRODUCTION

- 1.1 Purpose
- 1.2 Scope
- 1.3 Reporting Period
- 1.4 Key Project Activities in reporting period

2 ENVIRONMENTAL AND SOCIAL IMPACT MITIGATIONS

- 2.1 Summary of Mitigations
- 2.2 Non-compliances and violations
- 2.3 Implementation of World Bank Safeguards
- 2.4 Challenges and lessons learnt

3 RESULTS OF ENVIRONMENTAL AND SOCIAL MONITORING AND MITIGATIONS

- 3.1 Air Quality
- 3.2 Noise
- 3.3 Physical Cultural Resources
- 3.4 Waste Management
- 3.5 Social Issues
- 3.6 Recommendations

4 FORECAST AND SCHEDULE

- 4.1 Key Activities for next reporting period (e.g. road construction, tree nurseries, etc.)
- 4.2 Key Environmental and Social Activities (e.g. e.g. training, waste disposal, recruitment, etc.)
- 4.3 Budget

5 ANNEXES

Annex I: Waste Records

Annex II: Training Records

9 BUDGET AND DISCLOSURE OF ESMF

9.1 BUDGET

Most cost of ESMF costs are to be integrated as part of NUSAF3 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:

Item	Cost in USD				
	Year 1	Year 2	Year 3	Year 4	Year 5
Training of CDOs, DEOs, and NDOs in safeguards management (environment, social, vulnerability issues, GRM issues, monitoring and reporting etc.)	200,000				
Training of subcounty stakeholders in safeguards management (environment, social, vulnerability issues, GRM issues, monitoring and reporting etc.)	500,000				
Facilitation of CDOs, NDOs and DEOs to screen subprojects	300,000	300,000	300,000	300,000	200,000
Facilitation for CDOs and NDOs to undertake consultation and mobilization of communities including IEC materials	300,000	300,000			
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.)	150,000	150,000	150,000	150,000	150,000
Environment monitoring and audits	100,000	100,000	100,000	100,000	100,000
Sub-totals	1,550,000	850,000	550,000	550,000	350,000
Total Budget Estimate	3,950,000				

9.2 ESMF DISCLOSURE

This ESMF will be disclosed both in-country in one or two of the local dailies, in OPM's website and at the World Bank's infoshop 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 Infoshop 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 NUSAF3 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 components 1 and 2 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 NUSAF3:

- 1) **Extension services:** NUSAF 2 experienced a problem of limited extension services to the project beneficiaries especially in regard with veterinary extension services. There is therefore need to involve the relevant extension staff at the District and Sub-County level to provide required extension services.
- 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; for example, rehabilitation of incinerators, improvement of collection (e.g. by providing color-coded waste bins), etc.
- 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 NUSAF3 Operations Manual would contain more guidance on management of environmental and social issues. This would help the different NUSAF 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 C B A

	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 NUSAF 3 (NEGATIVE LIST)

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

(a) Environmental Impacts and Mitigations for Road Construction/Maintenance

Siting

- If the route is other than the old road, make sure environmental assessment of new road bed is done
- Make sure the communities agree with the route of the road
- Select your road route such that there are no or less disturbances of human communities
- Consider alternative options
- Make adequate consultation and ensure participation of all potentially affected communities
- Select your road route such that there are no or less disturbance of human communities
- Pay particular attention to the drainage along the road
- Minimize the loss of natural vegetation during construction
- Incorporate adequate and effective drainage works in the designs
- Ensure careful siting and management of construction camps to avoid environmental and social disruption

Activity	Impact	Mitigation Measures
Manual road maintenance	<ul style="list-style-type: none"> • Creation of employment opportunities • Increase in household incomes • Sense of ownership of the road • Prompt road maintenance • Reduction in vandalism of road structure • Development of construction skills 	<ul style="list-style-type: none"> • Give preference to local communities in awarding road maintenance labor based contracts
Ditch Cleaning	<ul style="list-style-type: none"> • Flooding of agricultural lands and homesteads due to modification of points or direction of discharge of ditches 	<ul style="list-style-type: none"> • Form offshoots to spit flow in the drain. Construct infiltration ditches, soak pits to prevent water being discharged towards agricultural lands and homesteads
Culvert repairs/replacement	<ul style="list-style-type: none"> • Disruption of traffic • Increase in turbidity of water due to excavated materials being washed into the affected stream 	<ul style="list-style-type: none"> • Erect road warning signs and advise road users to use alternative roads • Excavated materials should be suitably stockpiled and covered so that they will not be washed into water sources
Remix pothole patching	<ul style="list-style-type: none"> • Littering of the landscape due to the disposal of materials excavated from potholes to be repaired • Loss of vegetation through extraction of firewood for heating bitumen • Traffic accidents due to potholes left open overnight • Accidents due to disruption of traffic flows by road works 	<ul style="list-style-type: none"> • Excavated materials should be used for backfilling borrow and gravel pits • Firewood for heating the bitumen should be obtained from sites approved by the forest department and local communities • Excavated potholes should be covered with crushed stones and sand if they are going to be left open overnight • Erect road signs warning road users about ongoing road maintenance works
Medium and light grading	<ul style="list-style-type: none"> • Disruption of traffic flows • Increased pressure on water 	<ul style="list-style-type: none"> • Warn the public about planned and on-going road works and advise an alternative

	sources used by the community	route to avoid delays due to road works <ul style="list-style-type: none"> Water for road maintenance should be obtained from sources which do not affect water supply to communities
Heavy grading, re-gravelling and spot gravelling	<ul style="list-style-type: none"> Reduced land use option on sites where borrow pits will be located Loss of land values on properties on which borrow pits will be located Gulley formation through collapsing offside walls or borrow pits Breeding of disease causing vectors in stagnant water collecting in borrow pits Dust during transportation of field materials Noise due to haulage trucks Delays in traffic due to detours and diversions Objectionable vision intrusion of gravel pits particularly on prominent relief features Disruption of traffic flows Increased pressure on water sources used by the communities 	<ul style="list-style-type: none"> Compensate adequately owners of properties affected Rehabilitate borrow pits by backfilling or reducing slopes of side walls Backfill borrow pits if possible Watering of roads to reduce dust and covering materials to be transported Erect transport calming measure near settlements sensitive to noise e.g. schools, hospitals Warn road users about road works and suggest alternative road routes to avoid traffic delays. Ensure road maintenance works are completed promptly Gravel pits should be located on prominent relief features. If unavoidable, they should be rehabilitated by backfilling and re-vegetating them Fence gravel pits and provide only limited access to them Reduce slopes of pits. Ideally backfill and re-vegetate pits Warn the public about planned and ongoing road works and advise on alternative routes to avoid delays due to the road works Water for road maintenance work should be obtained from sources which do not affect the water supply to communities

(b) 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):	

(c) Community schools and buildings

Siting/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;

(e) Community Health Centers

Siting /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
- Ensure the appropriate guidelines for disposal of waste is followed

- Ensure the construction plans are according to MoH guidelines, but incorporating community views and wishes;
- Make sure you consult experts on the equipment required for the full operations of the health center and if not among the project components, find out the cost and who will provide it upon completion of the project.

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

Operational stage

- Make sure the system for disposal of waste is adequate and functional
- Planting another tree in the community for every tree cut is a good environmental practice
- Separate disposal systems for medical or hazardous wastes especially clinical waste as per WHO guidelines for handling, storage and disposal of medical waste;

(f) Latrines and Water Borne Toilets

Siting /preparation stage

- Ensure the VIP is built downhill from water sources (wells and boreholes) to reduce the chances of ground water pollution
- Incorporate into larger waste disposal systems where possible
- Select appropriate technology for wastewater disposal
- Weigh siting alternatives with environmental considerations in mind
- Check the type of soils at the site –construction on of VIP latrines in sandy soils shall require extra care and expertise;
- Design centralized systems to avoid leakage – do not scatter pit latrines around the site unnecessarily, this spreads ground contamination on site.

Construction stage

- Study the latrine technical drawings carefully before construction especially in sandy soils
- Make sure you have the technical drawing all the time on site.
- Incorporate permanent erosion control plans on the site

Operation stage

- Ensure education on the uses of the facilities
- Do not throw toxic or hazardous waste in pit latrines

- Provide soap and water for hand washing
- Keep the pit latrine clean all the time
- Provide toilet covers to control flies

(g) Wells and boreholes

Siting:

- Always site your wells or bore holes at a higher ground level compared to the pit latrines or septic tanks and soak pits
- Make sure that the community and water point committee understands and agrees with siting
- Weigh siting alternatives with environmental considerations in mind
- Select workable water extraction or booster systems
- Make efforts to have the water tested periodically

Construction stage

- Make sure water point committee understands the design and is involved in supervision of the construction;
- Provide effective drainage for water spills at water pumping or collection points;
- Install adequate pumps approved by the Ministry of Water and Environment;
- Confirm water yielding levels before implementation;
- Dig wells preferably in the dry season.

Operation stage

- Provide adequate protection from live stock;
- Regulate the use of water points through community agreements or local bye laws (e.g. no washing at water points, no water wastage, user fee payments, etc.);
- Make sure the water point committee have adequate tools and learn how to maintain the water points.

(h) Cattle watering points and water retention reservoirs

Siting/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 siting 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.

(i) Bridges/culverts

Siting

- Make sure communities agree with bridge sites and consider alternative sites
- Ensure that special attention is paid to the drainage system along the road leading to the bridge
- Regulate through local agreements or bye laws the transportation of materials through the bridge
- Ensure safety is considered in the design e.g. the provision of bridge side barriers

Construction

- Clean up construction sites, recycle building waste materials
- Construction during dry season, take measures to minimize erosion of river banks
- Minimize the disruption

Operation

Agree with community and district council on maintenance of structures

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 application and use of IPM practices in NUSAF3 . The scope of this pest management plan includes:

- Identifies the key pests and diseases of the major crops in Uganda;
- 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 NUSAF3:

- Pesticide financed under NUSAF3 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, NUSAF3 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.
- NUSAF3 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.
- NUSAF3 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.

- NUSAF3 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 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 NUSAF3, 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 NUSAF 3 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. However in the case of the Karamoja region, the existing government veterinary structure is poorly facilitated and understaffed let alone to manage properly a surveillance system but also to provide the needed coordination in the veterinary sector at district level.

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 (AESA). 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: Karamoja region has continuously failed to attract more 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 and the effects of this are being felt with the re-emergency of previously controlled livestock disease like CBPP, CCPP, FMD. Furthermore it has led to the emergency of easily controllable diseases like ECF, Babesiosis, Anaplasmosis and Heart water as major livestock diseases in terms of morbidity and mortality in the region.

Attempts have been made by various stakeholders to fill the human resource gap by training Community Animal Health Workers (CAHWs). 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, stockists 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	MAAIF, CPMC, STPC

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, DEO, 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, DEO, 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, DEO, 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, DEO, 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, DEO, 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, DEO, DWO, 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	a.) All pesticides are to be	a) Only approved	a) List of pesticides supplied	DAO, CPMC,

	<p>integrity of pesticides supplied under project</p> <p>Ban big pesticide containers to minimize decanting cases</p>	<p>in the original well labeled pesticide containers prior to use</p> <p>b.) No decanting of pesticides under this project</p> <p>c) Inspection of pesticides at farm gate prior to use</p> <p>Decanting policy (No decanting of pesticides under project)</p>	<p>and registered pesticides used under project</p> <p>b) Banned pesticides avoided</p> <p>c) Fake and expired pesticides avoided</p> <p>d) Integrity of pesticide guaranteed at farm gate level</p> <p>All pesticides delivered for use are in the original containers</p>	<p>and used in line with Agricultural Chemicals Board</p> <p>b) Cases of pesticides found in non-original containers</p> <p>c) Inspection records for pesticides at farm gate prior to use</p> <p>Cases of pesticides found in non-original containers</p>	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	<p>Number of cases of pesticide poisoning through use of pesticide containers;</p> <p>Number of farmers returning empty pesticide containers at collection points;</p>	DAO, DEO, 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	<p>Number of farmers trained in IPM techniques;</p> <p>Number of farmers implementing IPM on their farms</p> <p>Frequency of chemical pesticides usage</p>	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, DEO, 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, DEO, 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, DEO, DHI, CPMC, STPC

Introduction

This Waste Management Plan (WMP) has been prepared to address waste management issues associated with the NUSAF3 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 co-ordination (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 hauliers 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 13: 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 12: 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.



Figure 13: MAK IV Incinerator

Therefore, OPM will engage local fabricators to fabricate small-scale incinerators to help health centers to safely dispose medical waste.

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

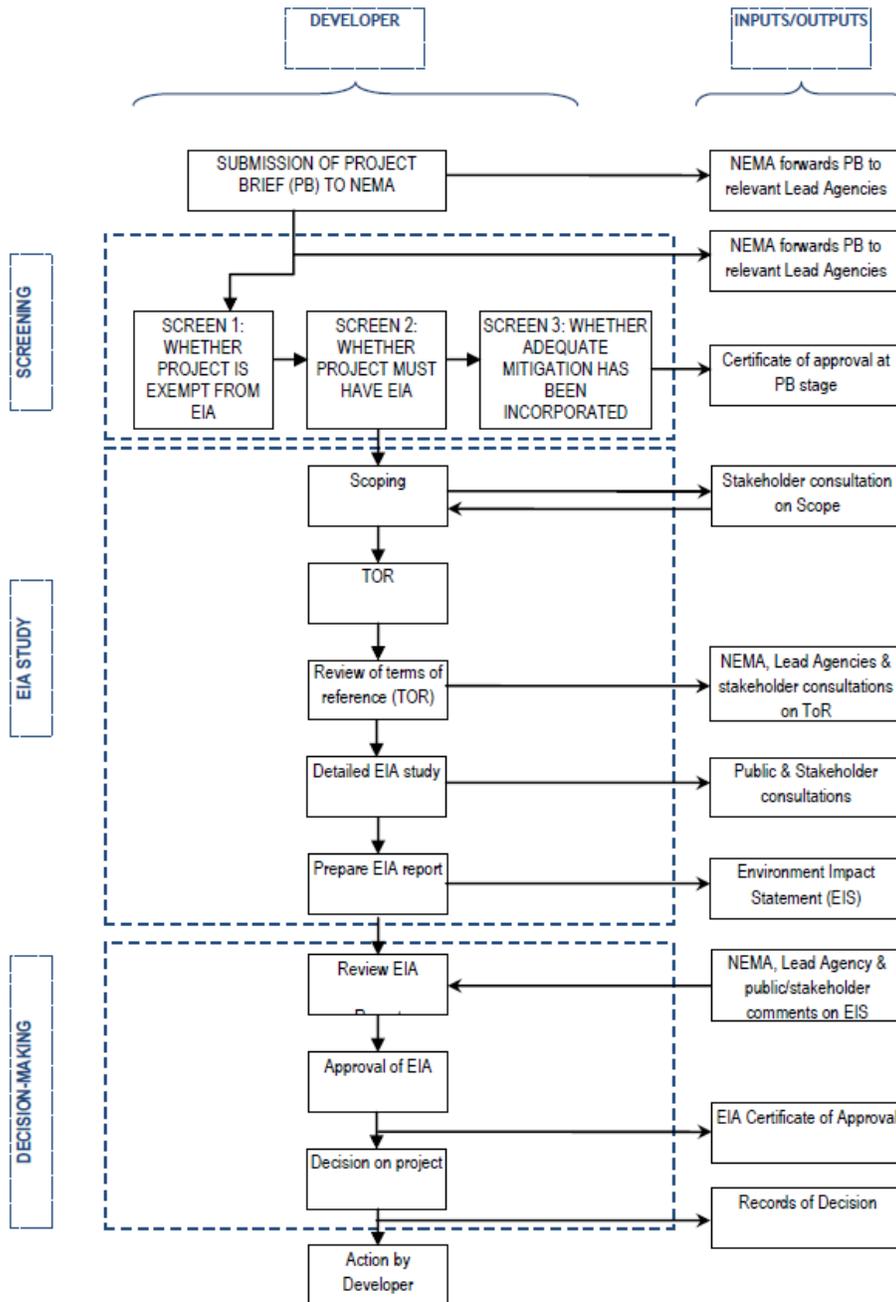
Waste Type	Description	Source	Hazardous Characteristics	Management Or Treatment Option
• Acidic Wastes	• Spent pickling and cleaning acids	• During construction and maintenance of equipment/machinery.	• Corrosive (sulphuric acid, hydrochloric acid), will contain heavy metals.	• Neutralize with lime and dispose residues to landfill
• E-Waste	• VDU's Computer • Waste Cell Phones • Printer Cartridges	• Various	• Heavy metals including Cadmium, Nickel and Lithium from batteries	• Recycle or treat, contain and dispose to Landfill
• Oily (Hydrocarbon) Waste	• Oily water	• Oily Water Drains from vehicle maintenance areas	• Petroleum Hydrocarbons, PAHs	• Oil separators for recovery of oil and send offsite for incineration
	• Lubricating Oil	• Mechanical Workshops	• Petroleum hydrocarbons, heavy metal compounds present as additives, e.g. Zn, Mo, etc.	• Incineration
	• Grease	• Mechanical Workshops	• Can contain Heavy Metals and Antimony as additives	• Incineration
	• Contaminated Rags	• Mechanical Workshops	• Petroleum hydrocarbons, degreasers	• Incinerate
	• Oil Contaminated Soil / Adsorbents	• Mechanical Workshops	• Petroleum hydrocarbons, degreasers	• Incinerate
	• Oil Filters	• Mechanical Workshops	• Petroleum, hydrocarbons, degreasers	• Recover oil and send for recycling of metal components.
• Clinical waste	• Sharps	• Health Centres	• Infectious – needle stick, injuries, etc.	• Incineration at in high temperature incinerator
	• General Infectious Waste	• Health Centres	• Infectious	• Incineration at in high temperature incinerator
	• Pharmaceutical / Chemical Waste	• Health Centres	• Toxic; can include solvents	• Incineration at in high temperature incinerator
• Waste Chemicals	• Detergents and Cleaning Chemicals	• Offices	• May be corrosive and can contain chlorine chemicals. • Are toxic to aquatic organisms.	• 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.

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.

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 NUSAF3 project 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 NUSAF3 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 studies 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.

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 9: DETAILS OF CONSULTATIONS

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"> • The ESMF needs to propose a way forward regarding refugees concerns in the project areas in Northern Uganda. There are also issues of refugees in western Uganda (Kyangwali, Nyakivale etc.). Further consultations will be held to understand what appropriate tools will be required i.e., ESIA or ESMF; • 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 NUSAF 3.
<p>9th March, 2015</p> <p>Oloya Collins, Commissioner, Department Wetlands; Eng. Gaetano Okello, Principal Engineer.</p> <p>MoWE Ministry of Water and Environment</p>	<ul style="list-style-type: none"> • Provide for deliberate tree planting in schools in form of woodlots to supply fuel wood for the schools; • Roadsides be planted with trees; • Soil erosion and siltation control measures be instituted in the projects; • Provide for waste management in and around schools; • A number of issues could be best guided by related subsectors in the Ministry such as Climate Change Unit, Directorate of Environmental Affairs, Water for Production and NFA; • There are challenges regarding sustainability of valley dams arising from improper systems of watering animals which brings destruction of valley dams protection infrastructures such as fences; • Mechanisms for community management and ownerships of valley dams need to be built in the project designs; • There should be wider water catchment measures to address land degradation and siltation of the valley dams facilities by erosion.
<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 and Karamoja regions; • Karamoja Integrated Development Programme (KIDP) is geared towards addressing special needs of Karamoja region; • All the programmes under Office of Karamoja Affairs, have in them mainstreamed environment and cross-cutting issues as is a requirement from donors and

	<p>Gou;</p> <ul style="list-style-type: none"> The implementation of NUSAF 3 should be based on existing institutional government framework so that it builds sustainability at the end of the interventions. There shouldn't be a repeat of "Karamoja Modality" which brings in third parties with their over-heads.
<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.
<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; Issues of refugees need to be assessed as their impacts are high in Northern Uganda with varying impacts on the environment; Land for infrastructures in the interventions is normally a contribution by the communities and is offered after consultations and passing resolutions right from the communities, LC3 Councils up to the districts; PRDP's mode of implementing environmental issues is fairly complex because each of the constituent financiers have their own requirements which makes it fairly different from NUSAF 2 under World Bank financing and follows its safeguards; 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 Dept. of Construction Standards and Quality Management, MoWT</p>	<ul style="list-style-type: none"> NUSAF 3 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 NUSAF 3 should be in place right from the beginning of the project not as was the case under NUSAF 2; NUSAF 3 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 (NUSAF 3) 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

	<ul style="list-style-type: none"> • 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 for works; • 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; • Provide for tree planting in institutions and there should be mechanisms in the contract and the project to ensure survival of the trees planted. Most important, the institutions must own up the trees and protect them.
<p>11th March, 2015</p> <p>Ms. Ali Munira</p> <p>Head, Public and International Relations/Principal Relations Officer Inspectorate of Government (IGG)</p>	<ul style="list-style-type: none"> • The Inspectorate of Government is involved in NUSAF 2 through Transparency, Accountability and Anti-Corruption (TAAC) Component; • TAAC promotes 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; • 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 thought 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.

Consultations in Buliisa District

Particulars	Issues raised
<p>Name: Tile J Mike</p> <p>Designation: Head Teacher, Nyamasoga P/S</p> <p>Date: 2/03/015</p>	<p>Question: What are the current projects under NUSAF 2 at this school?</p> <p>Response: There is ongoing construction of two full house units with a kitchen and latrine to serve as teachers' quarters.</p>
<p>Meeting Venue: Head Teacher's Office</p>	<p>Question: How will the school and community at large benefit from this project?</p> <p>Response: It's anticipated that after construction, absenteeism and late coming of teachers will be minimal. He also added that there will be improved performance since teachers will be staying within school premises.</p> <p>Question: What is the current criterion for procuring contractors?</p> <p>Response: The community gets contractors through open bidding where the best bidder is awarded the contract. The community has authority to revoke a contractor if quality of work does not meet expected standards. For example a staff house project in Biiso sub county flopped because of poor quality work from the contractor; so the community is currently seeking services of another service provider. The school or benefiting community is directly involved in the procurement of construction materials.</p> <p>Question: What have been the major challenges under NUSAF 2?</p> <p>Response: The major challenge has been delay in the release of funds which has led to completion of works being behind the scheduled time frame.</p>
<p>Name: Katushabe Stella</p> <p>Designation: NUSAF Front Desk Officer, Buliisa</p> <p>Date: 2/03/015</p> <p>Venue: Buliisa District Head Quarters</p>	<p>Question: What are current projects under NUSAF 2 in Buliisa District?</p> <p>Response: Household income enhancement projects and community infrastructure Rehabilitation.</p> <p>Under the CIR, there is construction of classroom blocks, staff quarters for teachers and health workers and proposed community access roads.</p> <p>There are 13 CIR funded projects in Buliisa, 6 of which have been completed and 7 are ongoing. These projects are located in Buliisa Town Council and Kigwera and Biiso subcounties.</p> <p>Question: What criterion is used for choosing benefiting communities?</p> <p>Response: NUSAF 2 is a community demand driven project whereby sector trainers present the project to the community and those with interest contact the district for further information. The community members with interest are then informed about group formation and all required registration procedure. Special groups such as women, youth, children, and the elderly are given priority for inclusion during group formation.</p>
	<p>Question: How do you ensure sustainability of the implemented projects?</p> <p>Response: For livelihood support projects such as goat and cattle rearing, the benefiting groups are trained by sector specialist in the specific management of such livestock before the animals are</p>

procured. There is also follow-on training within the community groups even after the project has commenced. For the CIR projects, the benefiting community is involved in monitoring quality of work delivered by the contractor.

Question: How is land for community infrastructure rehabilitation acquired?

Response: For schools and health Centers, respective management bodies provide the land needed. For proposed community access roads such as Kitahura, Nyapeya and Kizikya access roads, the community has provided the land where the roads will be aligned.

Question: Are there any formal agreements between NUSAF and target communities regarding land acquisition for the community access roads?

Response: Land ownership in Buliisa is communal, so issues of compensation are unlikely to arise. However the district will sign a financing agreement with the community ascertaining consent by the later.

Question: Are there any challenges you have encountered during implementation of NUSAF 2?

Response: Late disbursement of second batches of funds has led to delays in completion of projects. For livelihood support projects, there are incidences of theft and death of animals. There is also a tendency of some group members to dominate others. Some target communities are too poor and illiterate yet they have been given too much authority over money e.g. in some groups you find that all group members are not able to write and read yet they have to fill forms, register their groups and open up bank accounts. This increases the work load of the NUSAF technical person. And at times, this leads to mismanagement of funds, and the NUSAF Focal person carries the blame for not guiding the group well.

Question: From your experience with NUSAF 2, what are some of the issues you would recommend to be included in NUSAF3?

Response: During group formation, there should be at least one or two people who can read and write so that the paper work processing is easy.

Question: Have you received any complaints rising from contractors' interaction with the community during NUSAF 2 projects' implementation, for example sexual harassment?

Response: No complaint has registered with the NUSAF Office regarding such acts.

Question: Are there NGOs with similar activities as those for NUSAF that you are liaising with?

Response: No, NUSAF is implementing its projects independently.

<p>Name: Kyalisiima Lydia</p> <p>Designation: Treasurer, Buliisa Health Centre IV, NUSAF Group</p> <p>Date: 2/03/015</p> <p>Venue: Buliisa Health Centre IV</p>	<p>Question: Is there any NUSAF funded project within the health center? Response: Yes, there is an ongoing construction of one staff unit.</p> <p>Question: How was the project chosen? Response: Accommodation was identified as one of the main challenges to health care delivery at this Health Centre since medical personnel live far away from the health unit.</p> <p>Question: How will NUSAF support to the Health Centre improve the surrounding community's livelihood? Response: It will directly impact on people's livelihoods as medical workers will be close to their work stations hence timely delivery of needed health care services.</p> <p>Question: Are there any challenges regarding the implementation of NUSAF project at the Health Centre? Response: Yes, the original plan of the structure was altered at district without informing the group which has led to an increase in the amount of money budgeted for.</p> <p>Question: What is the state of structures at this Health Centre? Response: The OPD is a bit efficient, but for in-patients, the Theater is non- functional , wards are too small and patients like expectant mothers some times are referred to Hoima which is about 100Km away.</p> <p>Question: How does the Health Centre manage both medical and other wastes? Response: 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>Question: What would you like to see incorporated in NUSAF 3 which was lacking in NUSAF 2? Response: There is a need for more structures at the health centre especially staff quarters because the current ones are overcrowded to the extent that up to five people share one house.</p>
<p>Name: Ayesiga Mukama NUSAF Group</p> <p>Date: 02/03/015</p> <p>Venue: Kigwera subcounty Headquarters</p>	<p>Question: what was the selection criterion for the group members? Response: The project was introduced to the community by NUSAF technical personnel and willing and interested members came together and formed this group of 12 people.</p> <p>Question: Were special groups such as widows, orphans, and elderly deliberately included during group formation? Response: Yes, the group consists of members with disabilities for example; there is member with impaired sight, also women and orphans.</p> <p>Question: Did any community members express concern or feeling of exclusion? Response: Yes this surfaced during later stages as fund were about to be disbursed but before this, such members expressed no interest in the proposed project activities.</p>

Question: What was the procurement procedure for the animals you received?

Response: The procurement was done through open bidding for services and the best bidder was awarded the contract, but the group was involved at each stage of procurement.

Question: What exactly did your group receive from NUSAF2 project?

Response: The group received twelve heifers and one Bull.

Question: How has this project impacted on the livelihood of you as beneficiaries?

Response: Some animals were pregnant by the time of receiving them so group members are benefiting through sell of milk which has directly improved on house hold income. A few group members own more than one cow and they collect and sell dung which is used for making manure and biogas.

Question: Has this group faced any challenges in relation to NUSAF2 implementation?

Response:

- Yes, group budgets for proposed projects are always reduced without clear explanation to group members for such action.
- There are threats of animals being targeted by thieves since they are always tagged hence easy to associate with NUSAF. This though has not happened to this particular group.
- Concern about the procurement process saying they should be allowed to directly procure their livestock because sometimes contractors supply animals with defects.
- Another challenge of late disbursement of funds by NUSAF saying the time lag between submission of project proposals and release of funds often creates deficits in the budget due to market price changes.
- Group members were also disgruntled about the fact that most NUSAF decisions are taken at district level without directly involving the targeted beneficiary communities. They added that there is a high discrepancy between NUSAF funds at the district level and what actually gets down to the community. To stress this they said district leaders often waste a lot of resources on workshops and seminars yet these do not directly benefit the community.

Question: What is your group's overall take on the project?

Response: It has positively impacted on our livelihood and we request that performing groups under NUSAF2 should be considered for further funding under NUSAF3.

Question: What measures have you put in place as a group to ensure sustainability of group activities?

Response: The group has in place different committees to handle specific aspects. For example right now the management committee is charged with ensuring that veterinary medical requirements for the group are met although sometimes treatment of the animals is done at individual level.

<p>Name: Dr. Samuel Onyait District Health Officer Date: 2nd March, 2015 Venue: Buliisa District Headquarters</p>	<p>Question: How has the health department at the district benefited from NUSAF2 Response: We have benefited from infrastructure development in form of staff house construction. This has translated into improved service delivery because some health workers now stay near their work stations.</p> <p>Question: Are you comfortable with the current NUSAF arrangement in regard to health care support? Response: No because the prioritization criterion is not clear. NUSAF is a community demand driven project but sometimes the community may not relate the quality of services offered at health units to lack of accommodation of health workers. This though has a direct implication yet it may not be accorded the attention it deserves because it is not ranked highly by the community.</p> <p>NUSAF has only considered staff quarters under the health sector yet there are other infrastructure needs at existing health units that if addressed could lead to improved health services. Structures such as OPD, IPD, functional ambulances, toilets and medical waste management facilities at health centers are other such projects that should be considered under NUSAF3.</p> <p>Question: What should be done differently under NUSAF3? Response: Apportion shares for anticipated beneficiary departments such as health, education, and engineering and let them do the planning together with the community.</p>
<p>Name: Muhambura Stephen Designation: DWO Date: 2nd 03 2015 Venue: Buliisa District Headquarters.</p>	<p>Question: What is the current state of NUSAF projects in the district? Response:</p> <ul style="list-style-type: none"> • Some projects have been completed, others are ongoing and a few especially roads are yet to start. • The main challenge is delay in disbursement of funds which is done in two bits. The second bit is only released after 80% of the first bit has been accounted for. This has cost implications because sometimes the contractors have to be on site for up to 5 months before the second bit of the resources are released. • There is also a challenge with the designs for example of health workers' quarters where a water storage tank was provided but no provision was made for gutters. This has rendered tanks useless especially in rural setting where there is no running water. • Designs for school staff quarters had the pitch of the roof too low and this was altered leading to extra costs to the contractor. • During NUSAF3, project assessment for infrastructure development in Buliisa should be given special consideration because construction materials are sourced from Hoima making the construction process very expensive. <p>Question: How is land for infrastructure development acquired? Response:</p> <ul style="list-style-type: none"> • Right now land acquisition is through persuasion of community members by telling them about proposed project benefits. Alignment of projects such as the proposed community roads

	<p>also tries to avoid existing structures.</p> <ul style="list-style-type: none"> • There is a challenge of NUSAF roads being purely labor based which is sometimes not practical because sometimes there is need to transport gravel and compacting of the road may both require machines. Labor is scarce because people prefer animal rearing and fishing to any other economic activity. • The proposed community roads should conduct full EIAs and findings that have cost implications be considered before submitting of such project proposals for funding.
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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? Response: NUSAF2 is being implemented in all of the 13 subcounties and 2 town councils i.e., Nebbi Town Council and Pakwach T/C.</p> <p>Question: How do you select the NUSAF benefiting communities? Response: The District informs the subcounties of upcoming NUSAF projects; then village meetings are convened in the respective subcounties 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 subcounty for assessment.</p> <p>Question: how do you choose the subprojects to be implemented? Response: There are technical people at subcounty 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? Response: The subcounty technical committees review community proposals and then forward them to subcounty executive committee. The executive committee of the sub county then reviews these proposals and forwards them to the District Technical committee. The District Technical Committee reviews these proposals and makes recommendations which are forwarded to District Executive Committee. 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? 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? Response: <u>No because benefiting communities are ill prepared. Training is supposed to be continuous but there are no budgetary provisions for this.</u></p>
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	<p>Question: How was land for the construction of community access road acquired? Response: The Community had a need for the road, so they freely provided the land where the road passed. But before construction an MoU was signed between community and Nebbi Town council.</p> <p>Question: Are there incidences when a proposed community subproject is rejected? 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? 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? 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? 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 NUSAF 3.</p> <p>Question: How are structures maintained after completion and handing over to project beneficiaries? 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.</p>
<p>Name: Gadilaya Tree Planting Group Date: 3/03/2015 Venue: Jupuyik Village, Nebbi Subcounty Type of Project: Tree Nursery</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? 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>

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.

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.

Question: What benefits have you realized from this NUSAF2 subproject?

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.

Question: What are the main challenges associated with group activities?

Response:

- Delays in payment for seedlings supplied to government funded programs.
- The procedures for approval of projects are too lengthy.
- Seedlings are often attacked by pests and diseases which cause great losses to the group.
- 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.
- There is also inadequate information about where to obtain quality seeds and other inputs such as pesticides.

Question: In case 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.

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.

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.

Question: Do you use pesticides and fertilizers at the tree nursery?

Response: Yes, pesticides are used and we received training on how

	<p>to use them. As for fertilizers, the group no longer uses them because they became too expensive to afford.</p>
<p>Name: Bedijo Joel Designation: Director of Studies Date: 3/03/215 Venue: Namrhodho P/S</p>	<p>Question: How was the school selected to be among the benefiting communities under NUSAF? Response: The need for staff quarters was identified by the community who are the parents of this school. The parents took an initiative filled the NUSAF forms and submitted them to the district. Then after appraisal, our school was chosen as one of the beneficiaries</p> <p>Question: who owns the land where the staff quarters were constructed? Response: Land on which school and staff quarters where established was donated by the community and the school management has supporting documents.</p> <p>Question: How has the community/school benefited from this subproject? Response: The subproject has improved the accommodation conditions of teachers. It has also reduced incidences of vandalizing school property since teachers reside within the school premises.</p> <p>Question: Who is responsible for maintenance of these structures after construction? Response: The PTA foresees the use of this staff quarters and is responsible for maintenance</p> <p>Question: Are there any changes you would wish to see in design of NUSAF3? Response: NUSAF should change the design of staff units from two in one house to only one unit per house. The design of staff units should be left to the benefiting community, for example, the school would have got about five unit using the same amount of money instead of the two constructed.</p> <p>Question: Did you receive any complaints regarding sexual harassment against the girl child by the contractor's workers? Response: No, such complaints were not registered since the contractor was a parent of this school and also mobilized labour from the surrounding community some of whom are relatives to these children.</p>

Consultations in Maracha District

<p>Name: Munguleni Alfred Designation: NUSAF Desk Officer, Maracha Date of meeting: 04/03/015 Venue: Malacha District Headquarters</p>	<p>Question: What projects are being implemented by NUSAF2 in Malacha District? Response: The community subprojects being implemented under NUSAF2 in Marachar District include;</p> <ul style="list-style-type: none"> • 2 public works- community access roads, 1 completed and another still at implementation stage • 31 community infrastructure rehabilitation projects(CIRs) • 104 Household Income Support Projects(HISPs) <p>HISPs are divided into agricultural and Non-agricultural income support projects. Under agricultural, there are;</p> <ul style="list-style-type: none"> ➤ 4 Apiary subprojects (supporting 43 households, and mostly these are people with HIV/AIDS) ➤ 1 Crop subproject (supporting 14 HHs) ➤ 28 Piggery subprojects (supporting 179 HHs) ➤ 6 Cattle rearing subprojects (supporting 51 HHs) ➤ 12 Goat rearing subproject (supporting 168 HHs) ➤ 31 sheep rearing (supporting 448 HHs) <p>Under non- agricultural, there are;</p> <ul style="list-style-type: none"> ➤ 1 Carpentry and joinery supporting 14 HHs ➤ 2 Grinding mills supporting 30 HHs ➤ 4 Saloon and Hairdressing -59 HHs ➤ 1 Rice Huller supporting 15 HHs ➤ 2 Tailoring and Garments supporting 26 HHs <p>Under Community Infrastructure Rehabilitation subprojects there are 03 teachers' staff quarters, 13 Health workers units and 09 Boreholes.</p> <p>Question: What was the criterion for choosing these subprojects? Response: 60 interest forms were distributed to each subcounty, and these were then sent to communities. Meetings were held with community members for 7 days in which potential enterprises for funding were identified. Filled forms from the community are then sent to the subcounty technical committee (STC). A day is then set for field appraisal to make sure the right beneficiaries have been chosen. At the district, forms are appraised by respective expertise such as the DVO for animal rearing, District Engineer for public works and community infrastructure rehabilitation, DAO for crop husbandry.</p> <p>Question: What is the capacity of Expanded participatory Rural appraisal trainers? Response: These EPRs were trained by Office of the Prime Minister and there is one for each subcounty</p> <p>Question: How are vulnerable groups integrated into NUSAF Projects? Response: In Marachar, Vulnerable groups that are benefiting from NUSAF2 projects include;</p> <ul style="list-style-type: none"> ➤ 498 Unskilled youth ➤ 88 People living with HIV/AIDS
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- 89 People with disabilities
- 106 Windows
- 02 Orphans
- 24 Female Headed households

Question: What are some of the land acquisition challenges during implementation of NUSAF 2 projects?

Response: So far, there are no land acquisition challenges in this district since the community willingly donated land for the NUSAF subprojects and voluntary land contribution forms were filled by community members donating land.

Question: Have there been any grievances registered during implementation of NUSAF subprojects in this district?

Response: No, because the community identifies the project and those whose land is affected are given priority to work especially with public works projects (PWP).

Question: What is the mechanism of addressing land conflicts/disputes in this district?

Response: Most land conflicts are solved by the land board committees at the subcounty and district levels.

Question: Is NUSAF2 structured in a way that it ensures maintenance of infrastructure established?

Response: The operation and maintenance of subprojects is left to lower level leadership, for example boreholes have water user committees and PTA takes care of teachers' quarters. If the damage is beyond the available resources, it is forwarded to the subcounty and when the subcounty cannot afford the costs, it's then sent to the district.

Question: Was there screening for environmental issues during project design, especially public works?

Response: Yes, 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.

Question: In your own observation, what are some of the positive impacts attributed to NUSAF2 projects in this district?

Response:

- NUSAF2 has increased community access to clean water due a large number of boreholes drilled in the district
- Teachers' standards of living have been improved as a result of improved accommodation facilities constructed.
- There is improved service delivery in the health sector due to the fact that health workers no longer live far away from their work places.
- CIRs such as new classroom blocks have led to an increase in the number of school going children since they no longer have to attend lessons under trees or sit on the floor.
- HISPs have enabled benefiting communities to send their children to school, buy scholastic materials.

	<ul style="list-style-type: none"> • NUSAF 2 has led to gender mainstreaming since women form part of each group formed. <p>Question: What are some of the challenges you have experienced during implementation of NUSAF2 in this district?</p> <p>Response:</p> <ul style="list-style-type: none"> • Some inputs for certain subprojects are not locally available in the district for example, poultry feeds • The district lacks adequate capacity to provide technical advisory services to the benefiting communities. • There is a lot of delay in disbursement of NUSAF funds which directly affects deadlines for implementation of projects. • Line ministries have not harmonized their activities with NUSAF2, for example MAAIF. • No operational funds are provided under NUSAF yet activities are continuous. <p>Question: what are some of the issues you would recommend to be included in NUSAF3 that were lacking in NUSAF2?</p> <p>Response:</p> <ul style="list-style-type: none"> • The OPM should involve the office of the RDC and GISO in monitoring of NUSAF projects other than the IGG's office which is under staffed and overwhelmed by work, for example West Nile has 3 Officers under IGG's department to monitor all government activities in the region. • The MoU signed between the beneficiaries and government is weak and often abused by beneficiaries. This has to change if government is to realize its intended target of poverty eradication. • The OPM should work with line ministries such as Agriculture so that capacity needs are improved in project implementation. • The district technical committee should be involved in field appraisal to eliminate tendencies of corruption during selection of group members. • They should be budgetary provisions for continuous training of beneficiaries in NUSAF3
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Consultations in Yumbe

<p>Name: Ojok Brian Designation: NUSAF Desk Officer, Yumbe Date: 05/03/2015 Venue: NUSAF Office, Yumbe</p>	<p>Question: Which projects are under NUSAF2 in your district?</p> <p>Response: All NUSAF subprojects such as HISPs, CIRs and PWPs are all operational in Yumbe district. But the dominant one is household income support especially animal rearing.</p> <p>Question: What is the selection criterion for group members?</p> <p>Response: This 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</p>
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assertive members end up being beneficiaries even when they do not qualify.

Question: How are enterprises for funding selected /chosen?

Response: Meetings are convened and community members are guided by technocrats to identify viable enterprises for funding.

Question: What steps are there to ensure that the capacity of benefiting groups is enhanced for project sustainability?

Response: There is a 3 day training for each enterprise selected, for example DVO trains groups on good animal husbandry practices by skilling them with the basics. All animals are screened by district veterinary officer before procurement. They are always screened for weight, colour, and diseases. Each beneficiary fills a form that captures the tag number of the animal before it's handed over.

Question: Is there screening for environmental issues before projects are implemented?

Response: All environmental issues have been decentralized to the district environment office and the DEO is responsible for screening all projects. For each approved project, UGX 300,000 is dedicated to the above cause, and in some cases subprojects were abandoned because groups failed to comply with environmental requirements.

Question: How was land for CIRs and PWPs acquired?

Response: Normally schools and health centres have land where such structures are constructed but there was an incident where the available land for the health centre was not enough. Here an agreement was signed between management of the health centre and the land owner.

Question: What measures are in place to ensure maintenance of the established infrastructure during the operation phase?

Response: For Boreholes, the water user committees are in place and are responsible for maintenance of boreholes. For staff quarters, respective schools and health centres are responsible for maintenance.

Question: What benefits have been the realized from NUSAF2 funded subprojects?

Response:

- Complete transformation of some communities
- Increase in safe water coverage in the district which has reduced on water borne diseases like Cholera.
- School enrollment has improved especially in primary
- Improved living standards for health workers and teachers
- Improved health care service delivery
- Improved transport

Challenges faced by NUSAF2 in Yumbe district

- ✓ Operational fees are uniform for all districts yet conditions

	<p>are not similar</p> <ul style="list-style-type: none"> ✓ The IGG has been given too much authority to investigate cases and no timeline has been set to deliver reports of investigations. This hinders implementation of some projects under investigation. ✓ 65% of operational funds are supposed to be given to sub counties yet there is no technical expertise to implement subprojects. ✓ Insufficient technical capacity at the district, for example there is only one veterinary doctor and one animal husbandry specialist in the whole district. ✓ Some Contractors have capacity problems and this delays completion of works. ✓ Some line officers are uncooperative ✓ The proposed mainstreaming of NUSAF and NAADS has no budgetary provisions yet it is expected to be operational. <p>Recommendations</p> <ul style="list-style-type: none"> ➤ Put in place pilot projects to identify gaps before full implantation of the whole project is done ➤ NUSAF3 should provide a budget for continuous training for beneficiaries to ensure sustainability ➤ The MoU signed between government and beneficiaries should have a clause for penalty for example if a person sells off the animal received within a very short period. ➤ Beneficiaries should be trained in basic entrepreneurship skills so that they view projects as businesses. ➤ There should be a provision for the IGG to prosecute community members who misuse funds other than civil servants only. ➤ Sector specialist such as the Veterinary officer, district Engineer, Agricultural officer should be involved in enterprise selection.
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Consultations in Nwoya

<p>Name: Akena Geoffrey Designation: NUSAF Desk Officer Date: 6/03/2015 Venue: Nwoya District Headquarters</p>	<p>Question: What projects are under NUSAF2 in Nwoya district? Response: All the three components under NUSAF2 , i.e. HISP,CIR and PWP are being implemented in Nwoya district</p> <p>Question: Was screening for environmental issues done for NUSAF2 subprojects? Response: Yes, environmental issues were considered and a budget of UGX 600,000 was availed for each project. However the timing was sometimes not appropriate because in some cases trees were planted at some construction sites but did not survive because the climatic conditions were so harsh.</p> <p>Question: How was land for infrastructural development projects under NUSAF2 acquired? Response: Respective institutional land was used for the construction of community infrastructure rehabilitation projects. As for community roads the beneficiary communities provided the land and agreements of</p>
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	<p>consent were signed. But there were isolated cases where some community members demanded for compensation but these were handled amicably by the respective community leadership.</p> <p>Question: How has the project impacted on beneficiary communities? Response: The CIRs especially schools has improved on school enrollment for example, Gok Primary School had 336 pupils in 2012, but this number has increased to 647 after NUSAF2 constructed 4 classrooms at the school.</p> <p>Question: How does NUSAF ensure that the infrastructure put up is maintained during the operation phase? Response: Several agreements are signed with infrastructure users to ensure good maintenance. For example between teachers occupying a staff quarter and the head teacher, the subcounty and a school, the district school and subcounty.</p> <p>Question: How are land issues resolved in the communities of Nwoya district? Response: Land in Nwoya is a personal property and there is a fully fledged district land board that handles all land issues.</p> <p>Question: Are there any displaced people’s camps in Nwoya district? Response: No, but there are individuals still in transit i.e., communities that have not yet reached their original villages where they came from during the war.</p> <p>Question: How were such communities catered for under NUSAF2? Response: These were considered together with the native communities. Community members gave them some land to use for a specified period based on mutual understanding.</p> <p>Challenges</p> <ul style="list-style-type: none"> • Training of beneficiaries is not continuous • Some community members demanding for compensation yet it is not catered for by NUSAF2 • Delay in the release of funds <p>Recommendations</p> <ul style="list-style-type: none"> ○ Redefine communities so that it goes beyond geographical area i.e. different interest groups such as the displaced are catered for ○ Include a component of continuous training for the beneficiaries in NUSAF3
<p>Lamoki Village Onyomtil – Adimola 8km Community Access Road Date: 6/03/2015</p>	<p>Question: Why did the community select a road among the many subprojects that were available? Response: The community considered all the subprojects presented to them and finally decided to have a road since the benefits would accrue to most members as compared to projects like goat rearing that only benefited individual homesteads.</p>

	<p>Question: What were the criteria of obtaining land for the construction of the community access road? Response: The community member freely consented to give up land for construction of the road without compensation.</p> <p>Question: Was there an agreement of consent signed between land owners and the community regarding giving up their land for road construction? Response: Yes, an agreement was signed between affected land owners and the community.</p> <p>Question: How are land wrangles resolved among community members in this area? Response: All land disputes are reported to the village chief who is the responsible authority.</p> <p>Question: What were the criteria for selecting community members who participated in construction of the road? Response: 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. Also the distribution of work depended on the seriousness of the person; those that put in more effort received more money.</p> <p>Question: Who was responsible for procurement of equipment and materials used during construction of the access road? Response: The community elected a procurement committee among themselves and this was tasked to carry out all procurement activities. They would withdraw money from the bank and purchase the equipment like wheelbarrows, hoes, and spades from Gulu Town.</p> <p>Question: Who is responsible for maintenance of the road after construction? Response: The road is voluntarily maintained by the community and every community member freely participates.</p> <p>Benefits of the road to the community</p> <ul style="list-style-type: none"> ➤ Easy accessibility to market for agricultural produce ➤ Easy access to health facilities ➤ Income to community members who participated in road construction <p>Challenges faced during road construction</p> <ul style="list-style-type: none"> ➤ Funds were not released in time while community members expected to be paid when they finished their work, this somehow brought misunderstandings ➤ Community members had complaints about the money paid for the work, for example UGX 30,000 was paid for every 20 meters of road constructed. Some community members were not happy with this amount.
<p>Name: Ocaya Amos Designation: Deputy</p>	<p>Question: Why was the school chosen as a NUSAF2 beneficiary? Response: The community together with the teachers wrote to the</p>

<p>Headteacher, St. Kizito Bidati P/S Date: 6/03/015 Venue: Head teacher's Office</p>	<p>district requesting for construction of teachers' quarters because it was the biggest challenge to the school.</p> <p>Question: Who is responsible for maintaining the structures constructed? Response: There is a contingency fund under UPE which is used for minor repairs. The PTA also has provisions for school structure maintenance fund.</p> <p>Question: How has this project benefited the school? Response: Teachers occupying the structure are now punctual at work since they stay within school premises. There is also improvement in school performance since absenteeism of teachers at work has reduced</p> <p>Challenges</p> <ul style="list-style-type: none"> ○ Delayed completion of construction due to delay in release of funds by NUSAF <p>Question: If the school is given another opportunity in NUSAF3, what subproject would you opt for? Response: The school would continue with the same project since most of its teachers are still accommodated in grass thatched huts.</p> <p>Question: How do you maintain the environment around the staff quarter in terms of disposal of waste? Response: NUSAF2 also constructed for us a pit latrine, but we have dug shallow pits for disposal of solid and institutional waste.</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?</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
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	<ul style="list-style-type: none"> 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 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>
Name: Atto Francisca K Designation: DEO, Gulu Date: 6/03/2015 Venue: DEO's Office	<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. 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 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.</p> <p>Challenges</p> <ul style="list-style-type: none"> 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 <p>Recommendations</p> <ul style="list-style-type: none"> Build capacity for environmental management under NUSAF3 Need for detailed sensitization before projects are implemented Improve on the budget for environmental related issues in the design of NUSAF3 There should be a provision for monitoring under NUSAF3 Special consideration should be given to former IDP land owners because they offered their land which has reduced in productivity.