E2040

UGANDA - SECOND NORTHERN UGANDA SOCIAL ACTION FUND (PRDP-NUSAF 2)

Republic of Uganda

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

PREPARED BY
OFFICE OF THE PRIME MINISTER
P.O BOX 341, KAMPALA

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ACRONYMS

CAO	Chief Administrative Officer
CDO	Community Development Officers
CF	Community Facilitators
CIG	Community Interest Groups
CIR	Community Infrastructure Rehabilitation
CIWs	Community Infrastructure Works
CSO	Civil Society Organizations
DEC	District Executive Committee
DEO	District Environment Officer
DRC	Democratic Republic of Congo
DTPC	District Technical Planning Committee
EA	Environmental Assessment
EIA	Environmental Impact Assessment
EIE	Environmental Impact Evaluation
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EPRA	Extended Participatory Rural Appraisal
ER	Environmental Review
ES	Environmental Screening
ESMF	Environmental and Social Management Framework
GDP	Gross domestic Product
GoU	Government of Uganda
HISP	Household Income Support Program
ID	Institutional Development
IDA	International Development Association
IDP	Internally Displaced People
IEC	Information Education and Communication
IPM	Integrated Pest Management
KIDDP	Karamoja Integrated Development Program
LIS	Livelihood Investment Support
LLG	Lower local governments
LRA	Lords Resistance Army
LTDP	Luwero Triangle Development Program
M&E	Monitoring and Evaluation
MEC	Municipal Executive Committee
MFPED	Ministry of Finance Planning and Economic Development
MIS	Management Information Systems
MOLG	Ministry of Local Government
MoU	Memorandum of Understanding

MTEF	Medium Term Expenditure Framework
NEMA	National Environment Management Authority
NFT	NUSAF II Fiduciary Team
NGO	Non-Governmental Organization
NOST	NUSAF II Operational Support Team
NPC	Northern Uganda Policy Committee
NUDC	Northern Uganda Data Centre
NUREP	Northern Uganda Rehabilitation Program
NUSAF	Northern Uganda Social Action Fund
OM	Operational Manual
OP	Operational Policies (of the World Bank)
OPM	Office of the Prime Minister
PB	Project Brief
PDC	Parish Development Committee
PEAP	Poverty Eradication Action Plan
PMC	PRDP Monitoring Committee
PRDP	Peace, Recovery and Development Plan
PSMG	Public Sector Management Group
PWD	People with Disabilities
RTI	Right to Information
SAC	Social Accountability Committee
SCEC	Sub County Executive Committee
SPIFs	Sub Project Interest Forms
STPC	Sub county Technical Planning Committee
TAAC	Transparency Accountability and Anti-Corruption
TST	Technical Support Team
TWG	Technical Working Group
UBOS	Uganda Bureau of Statistics
WB	World Bank

Table of contents

List of Tables

Executive Summary

The Government of Uganda (GoU) and Development Partners have continued to support reconstruction of northern Uganda. Over the past two decades, GOU proactively attempted to address the post conflict problems, rural poverty, extreme levels of vulnerability, poor service delivery, low agricultural productivity, social exclusion and weak local governments through a variety of policies and programs. With the recent peace talks with LRA, the GoU launched the Peace, Recovery and Development Plan (PRDP 2007/8-2010/11) for northern Uganda to respond to the reconstruction needs of the region. The PRDP will be contributing to return and resettlement of the 1.6million people in IDPs. Key investments required include access roads, water and sanitation investments, re-establishment of health and education facilities and services including infrastructure and staffing.

GoU and Development partners have agreed to support NUSAF 2 aimed at further strengthening the reconstruction of northern Uganda building on the achievements of NUSAF 1. The project development objective is to empower communities of northern Uganda to improve their livelihoods and access to basic socio economic services. NUSAF 2 builds on the achievements attained and lessons learnt under NUSAF 1 and aims at replicating and bringing to scale the successes registered to-date. The project is designed to fund a large number of small-scale rural community subprojects in 40 districts (in the north and East of the Country including the 18 that were covered by NUSAF 1) that will be identified and planned by the communities, with the support of project-financed extension teams, and then approved for funding by local government authorities.

The Environment and Social Management Framework (ESMF) provides a set of guidelines and procedures to be integrated into the implementation of NUSAF 2 and describes the principles, objectives and approach to be followed in minimizing and mitigating the adverse environmental and social impacts caused as a result of the implementation of the NUSAF 2 project activities.

CHAPTER 1

1. Introduction

Good environmental and social management practice is a well-established element of project preparation and implementation. The Environment and Social Management Framework (ESMF) details agreed policies, guidelines, procedures, implementation roles and responsibilities to be integrated into the implementation of the Bank-supported NUSAF 2 and describes the principles, objectives and approach to be followed in minimizing and mitigation of the adverse environmental and social impacts caused by implementation of the NUSAF project activities.

The ESMF is intended to be used as a practical tool during project formulation, design, implementation and monitoring. It describes the steps involved in identifying and mitigating the potential environmental and social impacts of future investment activities. This ESMF has been prepared in recognition of the fact the provisions of the national laws on EIA are less comprehensive than those of the World Bank's OP.4.01 which call for the environmental screening of all Bank-financed projects.

According to Ugandan Environmental law, EIA is a requirement for mainly large scale investment activities. However there are no clear EIA requirements for small scale investments such as those anticipated in NUSAF 2 which might have negative localized impacts that would require appropriate mitigation. This is the reason why NUSAF 2 will use the environmental and social screening process outlined in this ESMF. The ESMF is intended to be a practical tool during project formulation, design, monitoring and implementation and describes the steps involved in identifying and mitigating potential negative environmental and social impacts of future investment activities. It is a living document that may be revised from time to time to improve its effectiveness and efficiency based on the implementation experiences and feedback from stakeholders. Relevant Handbooks will be derived from the ESMF to guide its implementation.

Development of the ESMF attempts to respond to the needs of the reconstruction and the opportunities provided by it, and seeks to:

- Enhance positive and sustainable environmental and social outcomes associated with Project implementation;
- Support the integration of environmental and social aspects associated with the numerous sub-projects into the decision making process;
- Minimize environmental degradation as a result of either individual subprojects or their cumulative effects;
- Support and assist with the achievement of compliance with applicable laws and regulations and with relevant Bank policies on environment and social development issues.

Although most of the subprojects are not expected to lead to significant negative environmental impacts, localized impacts may occur and require appropriate mitigation. World Bank's projects such as NUSAF 2 (category B) trigger the World Bank Operational Policy on Environmental Assessment (OP 4.01). In order to manage potentially adverse environmental impacts, this policy (i.e., OP 4.01) will be used for assessing potential environmental problems and taking mitigation measures.

As the details of all the subprojects are not known at the time of project preparation, an Environmental and Social Management Framework (ESMF) is required. All proposed requests for funding community subprojects will be subject to environmental screening exercises in order to prevent execution of projects with significant negative environmental impacts; decrease potential negative impacts through adaptations in design, location or execution; prevent or mitigate negative cumulative impacts; enhance the positive impacts of subprojects; and prevent additional stress on environmentally sensitive areas.

The draft ESMF report is structured as follows:

Chapter 1:	Introduction
Chapter 2:	Description of NUSAF 2 Program & the Biophysical and Social-Economic Environment in northern Uganda
Chapter 3:	The Policy, Legal and Institutional Framework for Environmental Management
Chapter 4:	The World Bank's Safeguard Policies
Chapter 5:	Major Environmental and Social Concerns of Potential Projects under NUSAF 2
Chapter 6:	The Environmental and Social Screening Process
Chapter 7:	The Environment Management Plan
Chapter 8:	ESMF Coordination and Implementation
Chapter 9:	Capacity Building and Training

1.2 Methodology used to prepare the ESMF

This ESMF was prepared based on the following methodology

a) Review of existing literature including the following:

- State of the Environment Report in Uganda, 2004/2005 by NEMA,
- District and Urban Councils Development Planning Guidelines, 2006,
- The National Environment Statute 1995,
- The Environment Checklists for Districts/Municipalities, Sub-counties/Town Councils and Parishes/Wards with the appropriate mitigating measures for predicted adverse impacts,
- World Bank Safeguard Policies,
- The NUSAF documentation- draft operational manual NUSAF 2, Aide memoirs for NUSAF 2
- ESMFs from other projects in other countries

b) Discussions with key NUSAF staff in Kampala and the World Bank Senior Environment Specialist.

1.3 Principles and Considerations

The ESMF incorporates principles of due diligence in managing potential environmental and social risks in project implementation. Key ESMF principles taken into consideration include;

1. The proposed NUSAF 2 Project will support multiple subprojects, the detailed designs of which will not be known at project appraisal, although the general thrust is understood by the nature of the sectors covered (education, water, health, roads and community livelihoods). To ensure effective implementation of environmental and social criteria, the ESMF provides guidance on the approach to be taken during selection, design and implementation of subprojects and the planning of mitigation measures;

2. Subprojects with the potential for significant negative environment and social impacts are expected to be very few in number. If any are identified (through the subproject screening mechanism), subproject-specific environmental and/or social assessment will be prepared and subjected to review and approval by NEMA;

3. The people affected by project activities such as land acquisition for housing, infrastructure facilities and displacement of squatters occupying public lands to be used for reconstruction activities, will be offered assistance as appropriate in accordance with the principles and guidelines outlined in this framework. In the event that people are physically or economically affected by NUSAF 2 sub-projects, appropriate social studies, in accordance with GoU and the Bank's policies will be prepared.

CHAPTER 2

Project Description and Scope

2.1 Background

Northern Uganda has experienced economic stagnation arising out of two decades of rebel activity and civil strife. The insurgency in the region has taken a tremendous toll on the population and the economy in the region. An estimated 1.6 million people were forced to leave their homes and live in internally displaced peoples' camps (IDPs). In financial terms the cost of the conflict has been estimated at $ 1.3 billion (for the period 1986-2002) or over 3% of the overall annual GDP to the national economy.

As a result of the insurgency and the associated difficulties in service delivery, northern Uganda remains the poorest region in Uganda with some of the worst human development indicators. For instance results from the 2005/6 household survey revealed that the north has the largest proportion of people living in poverty estimated at 61%; almost twice the national poverty level which stands at 31%. The gap between the national and northern poverty levels widened from 17% in 1992 to 30% in 2005/6, with poverty in the north falling by less than any other region in the early 1990s.

Evidence from northern Uganda survey by UBOS (2005) indicates that both access to and utilization of social services such as health, water and education are lower in the region than in the rest of the country, and as a consequence, the level of development of human capital is lower. In many ways, therefore, northern Uganda characterizes a typical set of problems of a post conflict environment. Local government capacities remain weak, with low staffing levels. The north has some of the lowest non-income measures of well being and human development including demographic indicators such as unemployment, literacy, access to education, health services and water.

The Government of Uganda (GoU) and Development Partners have continued to support reconstruction of northern Uganda. Over the past two decades, GOU proactively attempted to address the post conflict problems, rural poverty, extreme levels of vulnerability, poor service delivery, low agricultural productivity, social exclusion and weak local governments through a variety of policies and programs. With the recent peace talks with LRA, the GoU launched the Peace, Recovery and Development Plan (PRDP 2007/8-2010/11) for northern Uganda to respond to the reconstruction needs of the region.

The PRDP is a national plan with the overarching goal to stabilize the north and is in line with the PEAP objectives and targets. The PRDP provides a framework and a platform for translating the strategic objectives into programs for the north that can be financed by GoU with the support of development partners. Under the PRDP, sectors have been mobilized to increase their budget ceilings under the medium term expenditure framework (MTEF). The PRDP will be contributing to return and resettlement of the

1.6million people in IDPs. Key investments required include access roads, water and sanitation investments, re-establishment of health and education facilities and services including infrastructure and staffing.

The World Bank has been supporting projects in northern Uganda over the last one-and-a half decades and most recently NUSAF 1. The design of NUSAF 1 focused on community demand driven interventions that combined direct community financing of public assets and support to the disadvantaged groups. In addition, the capacity of NGOs, local authorities and private sector to provide technical support to community initiatives was strengthened. NUSAF 1 made significant contributions to measurable development outcomes in various sectors although large scale poverty, vulnerability and service delivery challenges remain. GoU has requested the Bank to finance a follow on operation- NUSAF 2.

GoU and Development partners have agreed to support NUSAF 2 aimed at further strengthening the reconstruction of northern Uganda. **The Project Development Objective (PDO) is to improve access of beneficiary households' to income earning opportunities and better basic socio-economic services.** NUSAF 2 builds on the achievements attained and lessons learnt under NUSAF 1 and aims at replicating and bringing to scale the successes registered to-date. The project will be implemented over a 5-year period (2009-2013) and is designed to fund a large number of small-scale rural community subprojects in 40 districts in Acholi, Bukedi, Bunyoro, Elgon, Karamoja, Lango, Teso and West Nile sub regions in northern and Eastern Uganda. The project area in relation to the rest of Uganda is shown in Annex 9.

2.2 Project scope

Reviving livelihoods and ensuring sustainable recovery of the local economies in the affected areas necessitates a multi-pronged approach that rebuilds assets, enhances livelihoods and addresses the needs of the most vulnerable members of the community. NUSAF 2 project is multi-sectoral and has three basic components namely: Livelihood Investment Support (LIS), Community Infrastructure Rehabilitation (CIR) and Institutional Development.

Component 1: Livelihood Investment Support component

This component will invest 60% of the credit (USD 60 Million) and will finance activities to help revitalize livelihoods of affected families under 2 main sub components namely: Public Works Program (PWP) and Household Income Support Program (HISP).

Public Works Program (PWP)

The PWP will support labour intensive interventions that create public assets while paying wages to labour surplus poor households. The other sub component will support demand driven livelihood investments in income generating activities that will include both non-farm and farm activities. A typical PWP sub project will employ approximately 250 beneficiaries for 33 days and a pay of PWP wage of approximately three thousand

shillings only (3,000/=) per day. The largest projects under PWP will be about $20,000, and there will be over 1500 such projects over a 5-year period. Table 1 gives typical examples of sub projects that may be financed by PWP

Table 1Typical Examples of Projects under PWP

Sector	Subproject types	Negative Menu/non fundable list
Water Supply	1. Valley tanks 2. Small Valley Dams 3. Sewerage System	Trunk roads Large scale bridges Private investments
Roads Sector	1. Community roads 2. Bridges 3. Culverts	
Others	1. Drainage facilities, paving markets and car parks in urban areas 2. construction of dykes in flood prone areas 3. Re-afforestation 4. Land husbandry/soil conservation measures	

ii) Household Income Support Program (HISP).

The HISP will support demand driven livelihood investments in income generating activities that will include both farm and non-farm activities. The subcomponent will also develop skills for the creation of opportunities for self employment within communities. The support will be provided through community interest groups that will include poor and vulnerable households and unemployed youth among others. Table 2 gives examples of sub projects under this category.

Table 2 Typical examples of sub projects under household income support subprojects

Sector	Subproject type	Negative/non fundable list
Agricultural production, agribusiness and value addition.	1. Dairy production 2. High value crops 3. Poultry /egg production 4. Piggery 5. Improved goats 6. aquaculture/integrated farming 7. Labour saving technologies – animal traction 8. Apiary-honey production 9. Agroforestry/tree propagation	Large scale equipment Individual business loans Hydraform brick/block making machines Emergency assistance /relief (except for HIV/AIDs affected and infected population which is considered a risk mitigation

	10. post harvest handling 11. Value addition and Marketing	activity) Pesticide use on large/ commercial scale
Non agricultural activities	1. Carpentry and joinery 2. Metal fabrication 3. Hair dressing 4. Catering and hotel management 5. Tree propagation	

Component 2: Community Infrastructure Rehabilitation

This component will spend 30% of the credit (USD 30million) and will finance interventions that will improve access to socio-economic services through rehabilitation and improvement of the functionality of existing community infrastructure. The funds will support interventions such as (a) rehabilitation of existing community infrastructure and (b) improving functionality of existing infrastructure.

Table 3 Examples of Projects under Community Infrastructure Rehabilitation

Sector	**Sub project types**	**non fundable/negative list**
Health	1. Staff houses, 2. Incinerators, 3. Placenta pits, Latrines/toilets, 4. Photo-voltaic units	Stand alone electricity subprojects (electrification schemes), Private investments (e.g schools, boreholes, clinics, New health centres
Education-primary	1. Teachers' houses, Classrooms, 2. Sanitation facilities, 3. Water facilities, 4. Furniture 5. Photo-voltaic units	
Water	1. Springs protection 2. Deep boreholes 3. Shallow well protection 4. Gravity flow schemes 5. Rainwater Harvesting	

Component 3: Institutional Development

The component will take 10% of the credit (USD 10 million) and will finance activities at the national, district, sub-county and community levels aimed at improving accountability and transparency in the use of project resources. This component has two sub

components (a) Technical Support Team (TST) that will complement project implementation capacities of OPM, Line Ministries and Local Governments within the PRDP framework and (b) Transparency, Accountability and Anticorruption (TAAC) program to promote transparency and accountability at various levels of project implementation. This sub component will facilitate the dissemination of National Guidelines for use by Local Authorities (LAs) and Community Organizations (COs) in project implementation. The ID will also finance project management and incremental operating costs associated with project implementation, including financial audits, quality assurance and technical audits, project monitoring and evaluation, continuous social and environmental impact assessments.

2.3 Project Beneficiaries

The principal target beneficiaries of the project include;

a) The poor households
b) Communities with limited access to socio-economic services such as schools, road and water facilities

2.4 Description of project area-northern Uganda

2.4.1 Environment and natural resources

The northern Uganda region is endowed with renewable natural resources including land, forests, water, wetlands, diverse flora and fauna, climate and air.

Geology and Soils

The most dominant soil type in the NUSAF 2 sub region is ferralistic soils. Northern Uganda soils fall under the moderate to fair productivity, with a few places falling in the low productivity category. Soils in northern Uganda are still fertile (in relative terms) because there has been low cultivation and productivity over the last 20 years of the Lords Resistance Army (LRA) insurgency. The main crops produces by Northern Uganda are cereals and cotton.

Land resources

Land is the most important factor of production. Land in northern Uganda is predominantly owned under customary land tenure. This is a subject in many discussions; one school of thought argues that customary land tenure limits people's use of land as collateral to secure credit for development projects while others argue that it provides security for households where a family head would otherwise sell the land without the family's consent. Large chunks of land remain undeveloped due to the conflict situation that has prevailed in northern Uganda over the last 20 years.

Climate

Weather is an important resource for agriculture production-and the base for northern Ugandan economy). Daily maximum temperature ranges from 28-30 degrees centigrade. Rainfall is bi modal with 2 rainy seasons from March-April and September –October with an annual total precipitation of approximately 500-800mm. However some parts in northern Uganda get a typical annual rainfall as low as 100mm! Dry season ranges from 3 to 5 months. The erratic onset and cessation of rain as a result of climate variability makes it difficult for farmers in northern Uganda to plan when to plant crops. There have been instances of frequent crop failures as a result.

Forestry Resources

Uganda's forest resources cover approximately 24% of land surface; comprising of tropical moist high forests, plantations and woodlands. Because of the rainfall regime, northern Uganda forests fall under the small to medium sized woodland and trees. However some thicker forest is found in riparian forests along river Nile. These forest resources continue to provide biomass-the dominant source of energy. Areas around Internally Displaced Peoples' (IDP) camps have been heavily deforested to meet the demand for energy in these camps. There are approximately 200,000 hectares of central forest reserves and 50hectares of local forest reserves in the Acholi and Lango sub regions alone!

Rangeland resources and livestock production

Rangelands, mostly found in the *cattle corridor* occupy 107 000km2 or 44% of the country's land area and northern Uganda forms a big portion of this belt. In some places, the conditions of the rangelands are deplorably overgrazed or, and through wind, soil erosion and burning. The number of cattle, goats and sheep is on the increase and if not regulated may exceed carrying capacity of the rangelands. There is anecdotal evidence that in some locations the carrying capacities of the rangelands are being exceeded. Grasslands are dominated by *Combretum* and *Hyparrhenia spp.*

Wetlands

Wetlands cover about 13% of the area of Uganda and provide a number of direct and indirect values to the people of the country. Wetland degradation is still rampant as wetlands are reclaimed for housing, industry and agriculture expansion coupled with weak enforcement of the applicable environmental laws and fairly low levels of awareness among policy makers and rural communities. Northern Uganda has a large portion of wetlands that are adjacent to L. Kyoga and L. Kwania that are being encroached on by neighboring farming communities.

Water

Water is life, and Uganda has significant quantities of the resource. From both hydrological and social water scarcity considerations at the moment, Northern Uganda is not water stressed except for Karamoja and part of the Teso Subregion. L Kyoga, R. Nile, R Aswa are the large water bodies in northern Uganda.

The quality of the water from available sources is another area of concern principally as a result of pollution from residential and agricultural land discharges into the open water bodies. To some extent the buffering capacity of wetlands is making a contribution towards reductions in pollution, but this will continue only if the integrity of the wetlands can be sustained.

Fisheries

Fisheries resources in northern Uganda are mainly found in L. Kyoga, its surrounding wetlands and in River Nile. Two species (Nile Perch and Tilapia) account for over 80% of annual harvest from L. Kyoga. There is evidence of localized over-fishing in certain water bodies.

2.4.2 The Socio-Economic and Cultural Environment.

Since the 1990s the GoU has been promoting development agenda that has led to a reduction of poverty nationally from 56% in 1992 to 36% in 2003 and a further 31% in 2006 with simultaneous improvement in all other welfare indices relating to access health, education water and sanitation. However the welfare indices in northern Uganda have not improved at the same pace as the rest of the country. Income poverty remains high, literacy levels remain low and access to basic services is still poor. The presence of a prolonged conflict in northern Uganda for over 2 decades is the most important factor in explaining the poor living conditions in the north while at the same time it is the major impediment to increasing GDP growth in Uganda.

The LRA insurgency in northern Uganda left many families and traditional institutions that promoted social protection, self help and endurance to anxiety totally destroyed as families moved into internally displaced camps. Removal of these social support systems rendered the populations vulnerable and insecure to invest in infrastructure and overall development. While the people of northern Uganda may lack the means to sustain themselves because they lost all their productive, physical and financial capital while in camps under deplorable conditions, they are not lacking in resilience and hope to recover the lost years.

With the relative peace in the area the people are ready to return to their homes and engage in productive work. However the current optimism should not be misunderstood to mean that the situation in the region is satisfactory.

Safe water and sanitation

While access to safe water and sanitation in both urban and rural areas has increased compared to the situation 10 years ago, this region continues to lag behind because of the conflict situation they have been in for the last 20 years. Functionality of water points is another key issue in this region as most of the water points were destroyed during the insurgency. The distance traveled to and queuing at water points in rural areas easily undermine accessibility. As far as sanitation is concerned, latrines coverage, the board indicator (as a measure) of environmental health is still low as well.

Pollution

Solid waste disposal and management remains a source of pollution, in particularly in urban centres of northern Uganda. Other sources of pollution include poor disposal of effluents from processing plants, slaughtering houses, health centres. Pollution resulting from dust and noise is also significant and steadily increasing.

Poverty

The National Household Survey of the 2005/06 reveals that despite a small reduction in poverty, the Northern Uganda has the largest proportion of people living in poverty, estimated at 61 percent, almost twice the national poverty level of 31 percent. The gap between Northern Uganda and the national poverty levels has widened from 17 percent in 1992 to 30 percent in 2005/06, with poverty in Northern Uganda falling by less than any other region since the early 1990s. Natural resources constitute an important gift of nature and social safety nets on which people's livelihoods depend all the time or at certain critical periods such as droughts.

Environmental health

Over 80% of all the diseases in Uganda can be ascribed to poor environmental conditions. Malaria is the number one killer disease because mosquitoes have fertile breeding grounds. Water-borne diseases or water-related diseases are a result of poor sanitation. Respiratory diseases are encouraged by poorly ventilated houses and dusty environments as well as congestion in such dwellings. With impacts of climate change, we may see new epidemics such cholera, meningitis are emerging. The sick are unable to engage in productive work and are not able to provide for their households. Treatment costs mean the diversion of a greater share of user-income to purchase drugs and to consult with medical personnel, leaving little else for other expenditures, including purchase of food items. It is no wonder then that malnutrition is one of the important health problems among infants and young children in northern Uganda.

Cultural heritage

Cultural heritage is part of humanity's link with the world and its past, its achievements and discoveries. The LRA insurgency and the resultant migrations into camps undermined the kinship system in matters of social control thus undermining their ability for collective responsibility aimed at sustaining the common good. While the National Environmental Act provides for the protection of the country's cultural heritage, most of these sites in this region have not been attended to during the insurgency. Approximately 187 cultural, historical and para- archeological sites have been identified and there specific locations recorded. Unfortunately, Uganda's cultural heritage had not featured prominently among the country's tourist attractions. Yet the promotion of cultural heritage as a tourist attraction could enhance community participation and even bring districts on board with respect to tourism.

2.5 Institutional arrangements for project implementation

The institutional arrangements for project implementation will be as per the government structures. The structure will essentially enforce effective participation and coordination of the various stakeholders at the various levels of Project implementation.

At the central level, the Office of the Prime Minister, MoLG, MFPED, and the Office of the Auditor General shall be responsible for ensuring that project resources are budgeted for and disbursed within the national Medium Term Expenditure Framework (MTEF), and the project accounts are audited.

The Permanent Secretary, Office of the Prime Minister will have the overall responsibility for coordination, accounting for the Project resources and ensuring successful implementation of the Project. The execution of Project activities will be guided by this Operational Manual (OM) which may be updated from time to time in agreement with IDA.

In line with the efforts to mainstream project activities into the government central and local structures, the Permanent Secretary, Office of the Prime Minister will be assisted by the TST on project related activities. This TST will provide the necessary technical support during implementation, monitoring and evaluation.

Coordination Mechanism

NUSAF 2 has been designed as a multi-sector operation. Accordingly, coordination will take place at various levels as below:

National level:

Coordination will be ensured through the broader PRDP frame work. At a higher level, PRDP Monitoring Committee (PMC) to be chaired by the Rt. Hon Prime Minister with representation of all Senior Ministers and Heads of Missions. The PMC will discuss all high level PRDP results/outcomes including NUSAF 2. The PMC will be served by a PRDP Technical Working group (which will act as a National Steering Committee for NUSAF 2) for all PRDP related investments.

The PRDP Technical Working Group (PRDP-TWG) which is chaired by the Under Secretary-Pacification and Development, Office of the Prime Minister, will report to the Public Sector Management Group (PSMG) chaired by the Permanent Secretary, Office of the Prime Minister. The PSMG will in-turn report to the Minister responsible for Northern Uganda Rehabilitation who will in turn report to the Prime Minister, PMC, Cabinet and Parliament on progress in Project implementation**.**

The PRDP Technical Working Group (Project National Steering Committee)

The PRDP-TWG chaired by the Under Secretary, Pacification and Development, Office of the Prime Minister, will comprise of representatives of key Sector Ministries, Donor Groups, Local Authorities representatives, local opinion leaders, NGOs/CSOs, Interfaith organizations, the Private Sector and the TST Coordinator. The functions of the PRDP-TWG, specific to NUSAF 2, and consistent with other prescribed tasks assigned in the OPM Governance structure include:

(i). Provide implementation technical and operational guidance to local governments in implementation of NUSAF 2 in consultation with the Minister of State for Northern Uganda Rehabilitation, and where necessary, the Minister will liaise with other Ministers or Cabinet as appropriate;
(ii). Approve appointments of TST staff, based on recommendations from the contracted recruitment firm or body constituted to recruit personnel;
(iii). Annually review and approve criteria for inter-district allocation of the Project funds (US$ 100 million for endorsement by the NPC);
(iv). Review progress reports compiled by OPM/TST and where necessary provide technical guidance on issues raised in progress reports, and M&E exercises;
(v). Approve annual work plans, reports and audits of NUSAF 2; and
(vi). Account to the PSMG and the Minister of State for Northern Uganda Rehabilitation on whether the Project funds have made the desired impact on beneficiary communities.

The Office of the Prime Minister, heads the PRDP-TWG group based on four important considerations:

(i). The OPM is primarily responsible for the special development needs and interventions of the North, notably through NUSAF 2;
(ii). The fact that OPM operations are not sector-specific guarantees a large degree of neutrality that may be required for NUSAF 2 given its multi-sectoral nature and inter- governmental/inter district structure;
(iii). Being a co-ordination office, the coordination of NUSAF 2 activities easily fits in its co-ordination functions and activities; and
(iv). Being a supra ministry, speedy decision-making and implementation during NUSAF 2 implementation can be enforced.

Technical Support Team:

The TST will support the Permanent Secretary, Office of the Prime Minister and his technical team in day to day running of the project operations governed by the provisions of the Operational Manual and other appropriate legal instruments agreed to between the Government of Uganda (GoU) and the World Bank. TST is headed by a Project Coordinator.

The TST will be composed of two Units (i) NUSAF II Fiduciary Team (NFT) that will comprise of a Procurement Specialist and Financial Management Specialist; and (ii) NUSAF II Operational Support Team (NOST) that will comprise of Director of Operations and Specialists in Development Communication, M&E, MIS, Livelihoods, Infrastructure Development and Public Works. There will be persons designated to coordinate Transparency, Accountability and Anti-Corruption (TAAC) promotion and the Environmental Management and Social safeguard issues as outlined in the EMSF. The NOSTU will ensure that the implementation of the Project is undertaken in accordance with the set Project guidelines and existing sector standards and norms. NOSTU will in addition be responsible for capacity building, Information, Education and Communication (IEC), Monitoring and Evaluation (M&E) and the Management Information System (MIS). The TST will maintain contact with and submit to the PRDP-TWG, chaired by the PS/OPM or his/her representative.

The TST will provide technical support to OPM staff in performing the following functions:

(i). Developing sub-project component documentation (management and accountability handbook, training manuals, contracting and reporting guidelines, etc);
(ii). Consolidating annual plans as submitted by the District Councils (DCs);
(iii). Receiving, reviewing for compliance selectively, and finance proposals from the DC;
(iv). Overall monitoring and evaluation – including cummulative environmental effects;
(v). Processing Terms of Reference for TA appointments for specific assignments for 'No Objection' (NO);
(vi). Engage operational staff and supervise their work programmes;

(vii). Ensuring that the Safeguards Framework is used throughout the project and alert IDA of any potential safeguards violations;
(viii). Managing IDA funds on behalf of GoU by ensuring that the Special Account is replenished regularly and that GoU counter-part funds are received in time.
(ix). Working with District/Sub-County Councils in the development and review of delivery benchmarks and facilitate the decentralized management of NUSAF 2 activities;
(x). Procurement of goods and services for the Unit;
(xi). Documenting lessons for mainstreaming in LA systems; and
(xii). Faciltating the OPM to provide necessary documentation.
(xiii). Ensuring that local governments are trained in implmentation of ESMF and there is compliance to the guidelines and safeguards

District Level

The Chief Administrative Officer (CAO) supported by the District Community Development Officer and the District Environment Officer or any other person designated by the CAO will be responsible for the proper execution of the Project's activities in the district in line with the requirements stated in this Operational Manual.

Specifically the CAO will:

(i). Promote NUSAF activities throughout the district;
(ii). Prepare and submit to the DTPC the annual work programme and budget of the Fund for the district, and submit the same through the CAO to the District Council for approval. This plan is then forwarded to TST for their records and for future reference when the approvals are done and funding requests made;
(iii). Receive project proposals and co-ordinate appraisal of sub-project proposals by the sector specialist under the auspices of DTPC;
(iv). Make arrangements for implementation, support supervision, monitoring, evaluation and hand over of sub-projects to the beneficiaries;
(v). Alert OPM of any potential safeguards violations;
(vi). Facilitate the disbursement of funds to sub-project accounts by ensuring that the justification for expenditures are prepared and submitted with complete documentation in time;
(vii). Prepare and submit to the DTPC quarterly and annual physical implementation and Fund performance reports. The CAO would then submit the reviewed reports to the District Council for adoption and subsequent submission of the same to TST;
(viii). Provide technical advice to the District Council, DTPC, NGOs/CBOs/CSOs, communities and other stakeholders on the implementation of the project in the District;
(ix). Ensure that the Accounts Assistant prepares quarterly and annual financial reports for timely submission to the District Council and TST;
(x). Liaise with all stakeholders of the Fund in the district;

(xi). Support communities, NGO/CSO, CBO and private sector recruit and administer short term consultants following TST's basic principles of consultant's service procurement;
(xii). Coordinate training needs and capacity-building activities of the Fund at district and community levels;
(xiii). Ensure that the DTPC assesses capacity of CSOs/CBOs/NGOs to participate in implementation of NUSAF 2 sub-projects at community level;
(xiv). Establish an effective information management system for the Fund at District level;
(xv). Represent PRDP-NUSAF 2 in all its dealings with third parties in the district.

District Chief Finance Officer

In order to ensure the smooth flow and full accountability for the Fund's resources at district level, the District Chief Finance Officer will undertake accounting duties within prescribed policies and procedures of NUSAF 2 and the existing Local Governments Finance and Accounting Regulations. His/her functions include:

(i). Check documents submitted for payment for their validity, accuracy and completeness and detect and correct errors and irregularities;
(ii). Prepare payment vouchers to facilitate prompt payment and fulfill contractual obligations, e.g. maintain purchase order, fuel coupons and do the banking;
(iii). Maintain petty cash books on a daily basis, update the Cash Book after payment vouchers have been checked by the District Internal Auditor;
(iv). Ensure that all justification reports tally with relevant tranches before payments;
(v). Produce periodic financial reports on administrative expenses for the district to ensure cost controls;
(vi). Prepare cheques as duly authorized to facilitate prompt payment and fulfill contract requirements;
(vii). Ensure that all documents relating to financial transactions are properly filed in order to facilitate their retrieval and to safeguard district and NUSAF 2 interests;
(viii). Assist in the preparation of financial records for external audit;
(ix). Prepare bank reconciliation and maintain accurate and reliable accounting records;
(x). Participate in the management of computerized financial systems, preparation of annual budgets and accounts, designing and implementation of internal financial controls;
(xi). Participate in audit of community sub-projects; and
(xii). Provide support to communities in preparation of sub-project accountabilities.

LOCAL GOVERNMENT LEVEL RESPONSIBILITIES

A Memorandum of Understanding (MoU), which outlines the responsibilities of the respective parties, will govern the relationship between the Central Government and the Local Governments on NUSAF 2. The MoU will be reviewed at Midterm to take into

consideration Project implementation emerging lessons. The Local Governments will be responsible for receiving Sub-project Interest Forms (SPIFs) from communities, and the pre- to post sub-project phases. Any community desiring support from NUSAF 2 will fill a SPIF, with a unique number, in triplicate; one copy will be sent to district, one to the sub-county, and one to be retained by the community. A sub-project filing system will be designed and completed before project effectiveness.

District Level Responsibility

The specific functions at this level shall include the following**:**

(i). Receive appraised and approved sub-project proposals;
(ii). Alert District/OPM of any potential safeguards violations;
(iii). Incorporate community activities into the district plans and budgetary framework;
(iv). Forward to OPM a list of approved proposals, duly signed by the CAO, for funding;
(v). Reschedule activities not catered for by the funds allocated to the subsequent fiscal year;
(vi). Ensure and provide technical supervision, monitoring and reporting, including cummulative environmental effects.
(vii). Training for subcounties in relevant skills including implementation of ESMF
(viii). Ensuring compliance to ESMF guidelines and comliance

District/ Sub-County Council

The District Council members will be involved in the incorporation of approved community sub projects into the sector plans and budgets and subsequently in the development plans and overall budgets. Since NUSAF 2 proposals are multi-sectoral, there will be need for various standing committees to actively participate in the integration of NUSAF 2 activities into the District Plan, especially at the appraisal stages. The District Executive Committee will notify the council on sub-projects approved for funding.

District/Sub-County Executive Committee (DEC/SCEC)

The District Executive Council is responsible for policy formulation, overseeing the implementation and monitoring of Council programmes, co-coordinating the work of NGOs, addressing problems forwarded by Lower Local Councils (e.g. LC3), and annually evaluating the performance of Council against the approved work plans and programmes.

In the implementation of NUSAF 2, DEC/MEC/SCEC will perform the following functions on behalf of District /Municipal/Sub-county Councils:

(i). Ensure that the operations of NUSAF 2 within the district are carried out in accordance with the Operational Manual and Memorandum of Understanding entered into with the OPM;

(ii). Approve draft annual work programmes and budget proposals of the District for submission to OPM through the TST. Review and endorse funding for all District/Municipal Council sub-project proposals recommended by the District Technical Planning Committee chaired by the Chief Adminstrative Officer (CAO);
(iii). Approve criteria for determining what sub-projects are implemeted by the CPMC, CSOs/CBOs/NGOs and private sector, and Council Departments;
(iv). Decide on any other issues relating to the implementation and flow of funds within the district;
(v). Review delivery benchmaks as specified in the sub-project cycle and inform TST on readiness of Local Authorities to take over the management of TST funds for communities;
(vi). Approve annual reports prepared by the District Technical Officer before they are submitted to the Permanent Secretary Office of the Prime Minister.
(vii). Promote the Fund in the district.

District/Municipal Technical Planning Committee

For NUSAF 2, the DTPC/MTPC will be responsible for the appraisals and technical support during implementation and monitoring of sub-projects from the district level. The CAO will co-opt representatives from CSOs/NGOs/interfaith groups and the private sector during its meetings to deliberate on NUSAF 2 matters. The functions of the DTPC are:

(i). Advocacy of NUSAF 2 and awareness-creation among all stakeholders;
(ii). Facilitate the PRA processes to allow for participation of communities in identification and planning for their sub projects;
(iii). Integrate community activities under NUSAF 2 into the District Plan;
(iv). Appraise sub-project proposals and approve them for endorsement by the District Executive Committee and notation by the DLC;
(v). Plan mitigation measures, if needed, to counteract cumulative negative environmental effects;
(vi). Supervise and monitor sub and multi-community project implementation;
(vii). Participate in the evaluation of impacts of sub-projects;
(viii). Provide linkages with other departments in the district; and
(ix). Target sub-project areas in support of vulnerable groups and conflict affected areas and groups.

Sub-County Technical Planning Committee (SCTPC)

Where capacity exists, members of the SCTPC will liaise with DTPC to execute the following functions:

(i). Appraisal of community sub-projects action plans thereby ensuring technical compliance with sector norms, standards, guidelines and procedures and recommending for approval;
(ii). Ensuring conformity with CSO/sector mandates;

(iii). Ensuring no breach of the World Bank's safeguards as represented in the safeguards matrix in the ESMP and the OM;
(iv). Receipt of community action plan(s) and tabling it/them to the Sub-County Council for reviews;
(v). Incoporation of activities not eligible for funding under sub-components into the sub-county/CSO plans and budgetary framework;
(vi). Return incomplete proposals to relevant communities and sectors for improvement; and
(vii). Transmission of activities that do not meet the sub-project component criteria to relevant sector organizations/departments/institutions and CSOs.

Community Level

This is the level at which all interventions will be initiated by members of the community, traditional leaders, Parish Chairpersons/Councillors, Parish Development Committees (PDCs) and NGO/CBOs active in the area using information provided via the DC campaign. Other functions to be performed at this level include:

(i). Definition and identification of communities in need (project beneficiaries);
(ii). Election of the community project management committee (CPMC), and selection of civil society organizations to assist with community mobilization and and organization ;
(iii). Community needs/problem assessment;
(iv). Determination/identification of the power structures and social composition;
(v). Identification of project catalysts to start and accelerate the process and stakeholders (groups to relate/work with CSOs);
(vi). Agreement on identified priority and proposal writing using a standard format;
(vii). Recommend to sub-county councils and integrate sub-project activities into parish CAP;
(viii). Mobilization of community contribution;
(ix). Community-based procurement, contracting, accountability, monitoring and reporting;
(x). Operations and maintenance of community assets.

Community Facilitators (CF)

Communities can identify a Community Facilitator (CF) to support them in mobilization, priority setting and development of sub-projects proposals. In that case, the communities will pay the CF based on a negotiated fee, which will be part of the sub-project cost.

Sectoral Linkages

NUSAF 2 will work with national level sector departments with respect to policy direction, and enforcement of norms and standards. The line ministries will provide sector policies, norms and standards. Sub-project conformity to these sector guidelines at implementation is ensured by the district sector specialists. Line ministries provide guidelines to ensure that the sub-projects contribute to attainment of the sector objectives and the PEAP pillars.

Table 4 Roles and Responsibilities of Key Stakeholders

LEVEL	INSTITUTION	MEMBERSHIP	ROLE/RESPONSIBILITY
1. National	PRDP Monitoring Committee	- Rt. Hon. PM-Chairperson - Ministers from key Sector Ministries - Development Partners - District Chairpersons - Representatives of CSOs - Representatives of the Private Sector (eg. UIA, PSF, UMA..) - PS/OPM-Secretary	- Monitor Project implementation - Resource mobilization - Budget harmonization - Policy advice - Meets quarterly and reports to cabinet
	Northern Uganda Policy Committee	- MSNUR-Chairperson - MoS Karamoja - MoS General Duities (MFPED) - MoS Disaster & Refugees - Mister of Agriculture Animal Industry & Fisheries - Representatives of MPs from the NUSAF II sub-regions (8) - Representative of UHRC - Representative of ULGA - Representative of CSOs	- Policy and budget oversight - Advocacy for Northern Uganda - Resource mobilization - Meets quarterly and reports to the Prime Minister
	PSMWG	- PS-OPM- Chairperson - OPM (Coordination, monitoring and evaluation) Secretariat - Directors OPM - Under Secretaries OPM - President's Office - Ministry of Local Government - Ministry of Finance, Planning & Econ. Dev't - Ministry of Public Service - National Planning Authority - Local Government Finance Commission - Uganda Urban Authorities Association - Uganda Local Authorities Association - Development Partners - Civil Society Organizations - Humanitarian Assistance Group	- Discuss issues of Policy & strategic nature from all participating Ministries, Departments & Agencies with a view to give a sense of direction to the Sector - Formulate & Coordinate Sector Strategies for long, medium & short term investment plans and budgets - Receive reports from Technical Working Groups & consider their consistency with with the objectives of the Sectoral Plans - Develop and Monitor Sector Performance Indicators - Resource mobilization for funding identified resource gaps - Approve ToRs for Technical Assistance - Harmonize sector policies & programmes and monitoring and evaluation reporting formats - Submit to OPM Top management Committee
	PRDP-TWG	- US/P&D-Chairperson - Commissioner, DM &R - Commissioners PRDP	- Coordination & liaison among specialized projects /programmes under PRDP

		- Directors (KIDDP, LTDP, NUREP, NUSAF) - Project Manager (NUDC) - Representative of Development Partners - Humanitarian Assistance Group - Representative of CSOs - Representative of NGOs - Representative of Private Sector - Ministry of Education & Sports - Ministry of Health - Ministry of Water & Environment - Ministry of Lands, Housing and Urban Development - Ministry of Gender,Labour & Social Dev - Ministry of Agric,Animal Industry& Fisheries - President's Office - Ministry of Defence - Ministry of Internal Affairs - Ministry of Justice & Constitutional Affairs - Ministry of Works & Transport - Ministry of Finance, Planning & Economic Development - Ministry of Local Government - Ministry of Energy & Mineral Development	- Ensure Project implementation in line with the PRDP framework - Coordinate the submission of the relevant respective sector and agency budgets, work-plans for consideration under resource mapping for PRDP implementation - Receive and analyze progress reports on the interventions by Sectors, Programmes, Agencies & other stakeholders - Organize mechanisms for effective monitoring and evaluation of PRDP activities - Document emerging implementation challenges on a case by case basis as may be experienced and/or reported by the PRDP implementing agencies - Guide the formulation of evidence based decision making pertaining to recovery investments in Northern Uganda - Submit to the PSMWG
	Technical Support Team (TST)	-	- Plan and facilitate capacity enhancement activities for implementers at District, Sub-county and community levels - Preparation of Project technical and management handbooks, training materials and guidelines. - Provide technical supervision during project implementation - Participate in Monitoring and Evaluation of Project activities - Alert OPM on the potential violation of safeguards - Prepare quarterly progress reports and briefs for the PRDP-TWG - Prepare Terms of Reference for various consultancy services - Document lessons, best practices and challenges in Project implementation - Participate in evaluation of bids
2. District	DEC	- District Chairperson - LC V Secretaries - CAO-Secretary	- Approval District work plans & budgets - Mobilization & sensitization - Monitoring and supervision - Advocacy

			- Approval of subprojects
	DTPC	- CAO –Chairperson - Heads of Department - Rep. of NGOs/CSOs	- Preparation of monthly, quarterly and annual work plans & budgets - Incorporation of Project activities in District Plans & budgets - Preparation of monthly, quarterly & annual financial and progress reports - Technical supervision - Internal audit of project activities - Monitoring & evaluation - Capacity building of sub-county staff and communities - IEC promotion - Justification of subprojects for funding - Endorsement subproject proposals - Contribute to operations & maintenance of Project assets established - **Ensuring compliance with ESMF guidelines and safeguards** - **Field appraisal of sub project sites to determine magnitude of environmental and social issues** - **Training for sub counties in ESMF implementation** - **Monitoring and supervision-ESMF implementation**
	RDC	-	- Mobilization & sensitization - Monitoring & evaluation
3. Sub-county	SEC	- Sub-county Chairperson - LC III Secretaries - Subcounty Chief-Secretary	- Approval Sub-county work plans & budgets - Mobilization & sensitization Supervision , monitoring & evaluation - Advocacy - Endorsement of Subproject proposals
	STPC	- Sub-county Chief –Chairperson - Sub-county Heads of Department - Rep. of NGOs/CSOs	- Preparation of monthly, quarterly and annual work plans & budgets - Incorporation of Project activities in Sub-county Development plans & budgets - Preparation of monthly, quarterly & annual financial and progress reports - Technical supervision - IEC promotion - Subproject appraisal - Subproject generation - Monitoring & evaluation - **Appraising projects for environmental and social safeguards** - **Monitoring and supervision of ESMF implementation**
4. Community	CPMC	- Elected members of the community	- Day to day subproject

	CPC Social Audit committees	(9)	implementation - Preparation of monthly financial and progress reports - Mobilizing community contribution - **Implement some environmental and social safeguards as part of community contribution** - **Identify environmental and social safeguards associated with their subprojects** - **Address grievances associated with environmental and social mitigation measures**
	Community	- Subproject beneficiaries	- Community needs identification - Participating in identification and preparation of subprojects - Election of community subproject leaders - Participate in implementation of subprojects - Making community contribution - Monitoring & evaluation of subproject implementation - Receive subproject accountability reports from the Community subproject management committee - Operations and maintenance of completed subprojects
	NGOs/CSOS	-	- Mobilization & sensitization - Technical support in subproject cycle management - Capacity building activities - Monitoring and evaluation
	Private Sector	-	- Provision of contract activities for works, goods & services - Capacity building activities - Monitoring and evaluation

CHAPTER 3

Policy, Legal and Institutional Framework

The selection, planning, design and implementation of the subprojects under NUSAF 2 has to be consistent with the relevant national environmental and social management requirements and as well as the Bank's safeguard policies applicable to the Project and its subprojects. In each case, national and local institutions to be involved in reviewing and approving subprojects will be identified; and these will carry out their respective roles and responsibilities. The responsibilities may include issuing approvals for undertaking a subproject and ensuring compliance to obligatory requirements under laws and regulations.

3.1 National Environmental Laws and Regulatory Frameworks

This section gives a brief synopsis of selected environmental laws, polices, regulations and programs which are particularly important to the design and implementation of the project.

The requirements for compliance with environmental regulations are laid down by the policy, legal and regulatory framework in Uganda. The most important of these are the National Environment Management Act (1995) and the Environment Impact Assessment regulations. However, there are many of the other laws that are cross-sectoral and are only partially related to environmental issues. The environmental provisions under these laws are equally mandatory.

The Constitution of the Republic of Uganda

This is the supreme law of the land. The constitution provides for, *inter alia*, matters pertaining to land, natural resources (such as swamps, rivers and lakes) and the environment. Objective XXVII of the constitution declares that the state shall promote sustainable development and public awareness of the need to manage natural resources and to ensure that the utilization of the natural resources of Uganda shall be managed in such a way as to meet the needs of present and future generations. Under Article 237 (2) of the Constitution, the government holds in trust for the people and is required to protect natural lakes, rivers, wetlands, forest reserves, game reserves, national parks and any land to be reserved for ecological or tourism purposes for the common good of all citizens. In this regard, it is in the interest of the Government of Uganda that all socio-economic development activities protect and preserve the environment from abuse, pollution and degradation, thus sustainable development. The constitution also provides for a right to a clean environment for every citizen.

National Environment Act (1995)

The National Environment Act (1995) is the framework legislation for environmental management in Uganda. This Act points out cross-sectoral guiding principles and strategies to achieve sustainable socio-economic development. The National Environment Act also established the National Environment Management Authority (NEMA), which is charged, *inter alia*, with the responsibility to oversee, coordinate, and supervise all environmental issues in Uganda. This is done in liaison with lead agencies, which may be a ministry, department, parastatal, or public officer in whom any law vests functions of control or management of any segment of the environment. There is also the National Environment Management Policy (1994), which provides a set of strategies to achieve sound environmental management.

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Over the years, NEMA has issued several guidelines and regulations to ensure sustainable management of the environment. For implementation of NUSAF 2 the following will be critical.

- The National Environment Impact Assessment Regulations S.I. No. 13/1998
- The National Environment (Wetlands, River Banks and Lake Shores Management) Regulations, 2000
- The National Environment (Noise Standard and Control) Regulations (2002)
- The National Environment (Waste Management) Regulations 1999
- The National Environment (Standards For Discharge of effluent into Water or on Land) Regulations, 1999

Other relevant policies to be considered in the implementation of NUSAF 2 are summarized in table 4 below.

Table 5 Existing Legal Provisions on Environmental Management in Uganda

Law	Provisions
Local Government Act Cap 243	• Decentralized the environmental management functions to Local Governments: Land surveying, Land Administration, physical planning, Forests and wetlands, environment and sanitation, protection of streams, lake shores • Empowers districts to plan for the sustainable development • Empowers districts and other sectors to make and enforce bye laws and ordinances
Land Act Cap 227	• Provides that land and resources on land be managed and utilized in accordance with existing laws
Uganda Wildlife Act Cap 200	• Recognizes individual or community participation in the management of wildlife resources • Provides for community based wildlife management approaches
Water Act Cap 152	• Provides for the formation of water user groups
Forest and Tree	• Provides for the conservation, sustainable management and

Planting Act 2003	development of forests for the benefit of the people of Uganda • Provides for gazettement of forest reserves for purposes of protection and production of forests • Promotes tree planting and enhancement of the productive capacity of forests • Encourages public participation in the management and conservation of forests and trees, • Promotes the decentralization and devolution of functions, powers and services within the forestry sector

The EIA Process in Uganda

The National Environmental Act CAP 153 defines programs in the third schedule for which an EIA is a requirement. It also provides for guidelines and regulations for undertaking an EIA and emphasizes public participation in the conduct of an EIA. Sections 19, 20 and 21 of the Act lay out the EIA process, and Sections 22 and 23 make it a requirement to undertake environmental audits and monitoring of the exploration drilling activities. The EIA guidelines (NEMA 1997) and the EIA regulations (NEMA 1998) recognize the following stages of the EIA process:

- Project brief formulation;
- Screening;
- Environmental Impacts Study;
- Decision Making; and
- Environmental Monitoring and Auditing.

In addition, public consultation is required throughout the EIA process. The figure below gives an overview of the EIA process showing the responsibilities and the necessary steps.

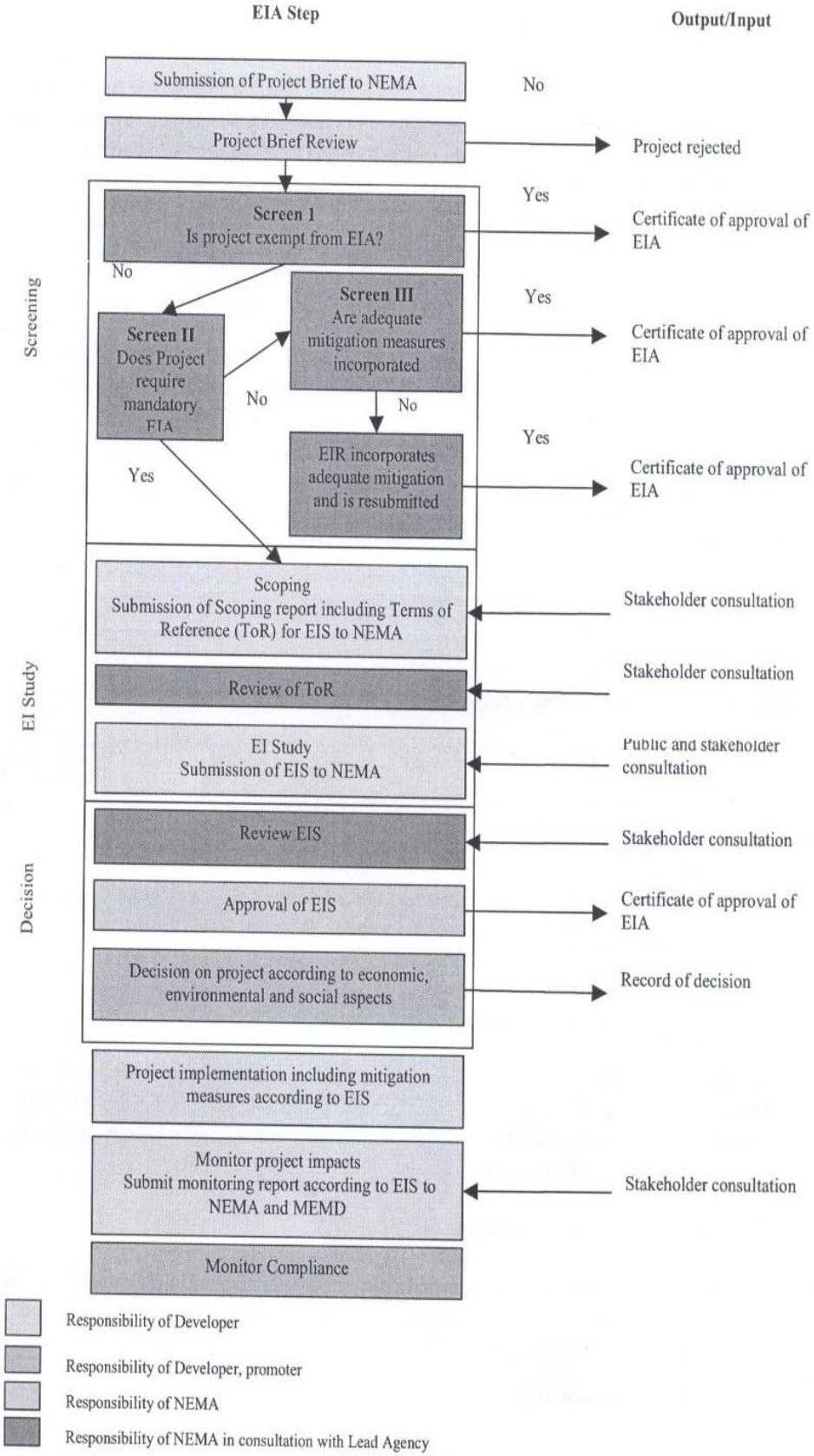


Figure: The EIA process in Uganda

3.1.1 International Environmental instruments/obligations for Uganda

Uganda is a signatory to several international instruments on environmental management. These are summarized in table 5 below.

Table 6 International Environment Instruments/Obligations in 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 over-exploitation by means of a system of import/export permits
The Convention on the conservation of migratory species of wild animals (1979).	to protect those species of that migrate across or outside national boundaries
The Vienna Convention for the protection of the Ozone Layer (1985)	to protect human health and the environment against adverse effects resulting from modification of the ozone layer
Montreal Protocol on Substances that deplete the Ozone layer (1987)	to protect the ozone layer by taking precautionary measures to control global emissions of substances that deplete it.
The Basel Convention on the trans-boundary Movement of Hazardous Wastes and their disposal	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 green house 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
Lake Victoria Fisheries Organization (1994)	to regulate and enhance fisheries in Lake Victoria covering Uganda, Kenya and Tanzania.
Lake Victoria Environment Management Programme (1994)-	to improve the management of the environment in the Lake Victoria region by addressing water quality, land use, wetlands, fisheries and control of water hyacinth
The technical Cooperation Committees for the promotion of resources Development and Environmental Protection of the Nile Basin (1992)	to promote Basin wide cooperation for the integrated and just development, conservation and use of the Nile Basin water and to determine the equitable entitlement of each state of the Nile
The Basin Cooperation enforcement Operations Directed at illegal trade in Wild Fauna and Flora (the Lusaka Agreement 1996)	To control illegal trade in Wildlife and Wildlife products
The Inter-Government Authority in Development (1986)-	to improve environment management particularly early warning system and food security and reduce conflict in Sudan, Eritrea, Djibouti, Ethiopia, Kenya, Uganda and Somalia

3.2 National Social Policy Framework

The National Gender policy

The National Gender Policy prescribes the aspects of social development and relevant safeguards such as social protection. The policy strives to promote sustainable socio-economic development that ensures and resilience of ecosystems to deliver ecosystem goods and services.

The Poverty Reduction Strategies

The Poverty Reduction Strategies aim to provide the blueprint for economic and social development and reflect the commitments of both the Government and its external partners. The overall goal is to reduce income disparities and disparities in access to

sources of income and empowerment. The PRSPs concentrate on four development objectives. To avoid the occurrence of the weaknesses in the previous strategies, the already guaranteed political commitment must be translated in terms of ensuring performance-based management towards implementation. Allocating adequate resources to support the planned activities must also be reinforced by:

- Creating an enabling Policy for Environmental Management, for Economic
- Growth and Poverty Reduction,
- Improving Productive Capacity and Social Protection of the Poor and Vulnerable,
- Increasing coverage of Basic Social Services needs of the poor and vulnerable (Social Protection/Safety Nets),
- Building the Capacity of Local Communities & Civil Society Organizations to play an active role in the process of poverty reduction;
- Issues of development concerns (Gender, Environment, Nutrition, HIV/AIDS, Population, Governance and Youths) are now integrated/mainstreamed into the above four pillars to be addressed using cross-sectoral approach.

International Long-term Commitments

The Millennium Development Goals (MDGs) are broad sets of goals that respond to the world's main development challenges to be achieved by 2015. The MDGs are drawn from the actions and targets contained in the Millennium Declaration that was adopted by 189 nations-and signed by 147 heads of state and governments during the UN Millennium Summit in September 2000

- Goal 1: Eradicate extreme poverty and hunger
- Goal 2: Achieve universal primary education
- Goal 3: Promote gender equality and empower women
- Goal 4: Reduce child mortality
- Goal 5: Improve maternal health
- Goal 6: Combat HIV/AIDS, malaria and other diseases
- Goal 7: Ensure environmental sustainability

For Uganda to achieve these goals, it is imperative to expedite socioeconomic development in northern Uganda.

Social Security

Act 21of Parliament 1967 established the social security provident fund, however social security remains urban- biased and in favour of wage earners yet the majority of the population in northern Uganda are rural based and in the informal sector. So the challenge is to encourage the revival of the traditional social support systems as the people return to their homes.

CHAPTER 4

World Bank Guidelines

The provisions in the ESMF have to comply with the World Bank's operational policies on Environmental and Social Assessment (OP 4.01). Other operational policies can be optionally used for the screening of subprojects if considered useful. These safeguard policies are designed to help ensure that programs proposed for Bank financing are environmentally and socially sustainable; thereby improving decision making, provide for a sustainable stream of direct or indirect benefits to alleviate poverty and to enhance community income and environmental protection.

4.1 Environmental Assessment (EA)

The World Bank has mandatory EA guidelines in the form of OP/BP/GPs. The World Bank has several policies governing environmental assessment (EA) of projects of which OP 4.01, issued in January 1999, is the central document that defines the Bank's environmental assessment requirements. This directive outlines the Bank policy and procedures for the environmental assessment of Bank lending operations. Environmental consequences should be recognized early in the project cycle and taken into account in project selection, siting, planning, and design by preventing, minimizing, mitigating or compensating for adverse environmental and social impacts and enhancing positive impacts. EA includes the process of mitigating and managing environmental impacts throughout project implementation. The Environmental Assessment Sourcebook (1993) and its updates (1996, 1997) provide technical guidance on these issues.

In addition to OP 4.01, there are other policies that cover a number of specific environmental issues which will be considered when screening activities in this project. These include;

OP 4.04 (*Natural Habitats)* which clearly stipulates that projects involving the significant conversion or down grading of natural habitat can not be supported unless the projects include adequate mitigation measures.
OP 4.09 (*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
OP 4.10 (I*ndigenous people)* - the objective of the policy is (i): ensure that the development process encourages full respect of dignity, human rights and cultural features of indigenous people
OP 4.11 (*Physical Cultural Resources)* - the objective of this policy is the help countries avoid or reduce the adverse impacts of development projects on physical cultural resources
OP 4.36 (*Forest)* – provides guidance for forestry projects are provided, detailing policy on commercial logging operations or acquisition of equipment for use in primary moist

tropical forests and in forests of high ecological value. The Bank finances can only be utilized for preservation and light, non-extractive uses of forest resources.

A screening process for all World Bank projects classifies them into one of three environmental assessment categories:

Category "A" projects potentially cause significant and irremediable environmental impacts.
Category "B" projects cause lesser impacts, which are often essentially remediable or can be mitigated.
Category "C" projects can be expected to have little or no environmental impact.

Category A projects require a full, detailed Environmental Impact Assessment, which needs to be approved before the Bank can give its support. Category B projects require the implementation of an Environmental Impact Evaluation (EIE), which requires far less details than an EIA. Category C projects do not require an EIE or EIA.

NUSAF 2 triggers OP 4.01 on Environmental Assessment, OP 4.09 on Pest Management, and OP 4.12 on Involuntary Resettlement, and has been classified as Category "B" because as a whole, as it may have limited adverse environmental impacts. In practice, most subprojects are likely to belong to Category C. In some cases subproject may fall under Category B, and subprojects that fall under Category A will not be eligible for funding under NUSAF 2.
World Bank safeguard policies and how the NUSAF 2 will comply with them are summarized in Annex 7.

CHAPTER 5

Major environmental and social concerns in NUSAF 2

5.1 Lessons learnt from NUSAF 1

It was observed that in most projects under NUSAF 1 environmental issues were considered in subproject design and funds budgeted for mitigation measures out of community contribution; however mitigation measures were largely not implemented. It was universally reported that this was due to lack of funding for such expenditures from project costs, and due to an unrealistic assumption that the poor people involved in project implementation would be able to afford such expenditures from their own pocket.

In addition, there was limited explicit environmental review or considerations during subproject preparation and implementation. Furthermore, capacity to undertake environmental review processes for different sub projects at the sub county and community levels was limited.

Building on lessons learnt from NUSAF 1, NUSAF 2 will emphasize that environmental and social mitigation measures are adequately budgeted and financed by the project, and implemented concurrently with the subproject other activities. Similarly, NUSAF 2 will strengthen environmental review in subprojects, particularly at sub county levels and build capacity essential for this purpose.

5.2 Potential negative environmental and social impacts of possible NUSAF 2 subprojects

The table below summarizes the potential negative environmental and social impacts of possible NUSAF 2 subprojects

Table 7 Potential Negative Environmental and Social impacts of possible NUSAF 2 Projects

Medium/area	Potential impact of activities	Mitigation
Wetlands	Wetland degradation through dumping of waste and soil from construction, filling of wetlands to construct roads, excessive clay and sand mining for construction industry, for settlements and cultivation	The wetland policy is clear about **no dumping in wetlands and no drainage of wetlands**. Anybody found dumping in or draining wetlands will be required to restore that wetland. The wetland policy allows for **wetland edge gardening and paddy rice growing in wetlands**- follow the wetland edge gardening and paddy rice growing guidelines published

		by the Wetland Management Department In case of road construction, ensure use of appropriate technology such as culverts and pipes to allow for the water flow. Restore wetlands as guided by the District Wetland Officer The sub-projects will identify alternative disposal sites for effluents instead of wetlands. The program will not fund any subprograms that will have negative impacts on wetlands (see OP 4.04) or any endangered species or habitats.
Forests	Deforestation to expand agricultural land, clearing for construction, charcoal production, and for biomass energy.	Tree planting, agro forestry and af-forestation interventions will be funded under the program The program will work with district forest officers to promote energy saving cook-stoves The program will promote forest based enterprises such as Apiary, fruit tree growing ecotourism etc where appropriate to motivate forest conservation The program will not finance projects that cause large scale forest clearance
Land	Land degradation through poor land use and management practices leading to soil erosion, loss to soil fertility, excessive burning, overgrazing, un regulated	Program will work with sub-county agriculture extension workers to deliver appropriate extension services ③ practices that enhance

	agro-chemical use as well as waste disposal	soil fertility, ③ soil and water conservation practices ③ Soil erosion control practices. ③ Crop rotation ③ proper disposal of non-biodegradable waste such as Kavera ③ anti-burning and anti-overstocking campaigns
Soils	Increased exploitation of sand and murram for construction mining/quarrying operations, loss of fertile top soil layer(which would be used for farming) through construction and brick making Exposure and erosion of topsoil due to vegetation removal.	Ensure suppliers of construction materials have the required licenses from local authorities; Rehabilitate the borrow pits after use and stop illegal mining/quarrying operations Set aside an area to stockpile topsoil for future landscaping; Aim as much as possible to site projects in areas that may not be suitable for farming. As much as possible use excavated soil from construction sites for brick making. Re-plant grass and vegetation and undertake appropriate landscaping on exposed areas
Rangeland degradation	Overstocking of animals may result in overgrazing which in turn leads to loss of vegetation cover and soil erosion.	Grow napier grass and leguminous trees on farm to supplement feeding Diversify enterprises to include those hat reduce pressure on the rangeland for instance poultry and piggery. However these should be socially acceptable.

		Stock numbers will not exceed livestock grazing requirements set for those areas by the District and sub county veterinary officers.
Biodiversity	loss of flora and fauna through habitat conversion, mono cropping introducing new varieties of crops without preserving/improving on the indigenous ones	Restore degraded/modified areas through re- planting appropriate plants. Practice crop rotation and as much as possible mixed cropping. As much as possible collect, grow and preserve indigenous varieties of seeds and plants – they are often well adapted to climatic and soil conditions.
Groundwater	Construction of pit-latrines, septic tanks and soak ways could cause seepage of contaminated water into aquifers.	Pit latrines will be excavated avoiding high water table areas or with appropriate technologies such as lining. Construction will be monitored by sub county/district public health officials notably in the siting of these items. Where possible, the pit latrines should be lined. Standard siting and construction guidelines will be provided. Environmental Guidelines for Rural Water Supply and Sanitation sub-programs should be applied as appropriate.
Surface water including lakes and rivers	Contamination through siltation where soils are left bare, poor sanitation practices and waste disposal	All sub-programs should be required to pre-treat their effluent before it is sent to the treatment works. This should be included as a clause in their contracts

		As much as possible restore vegetation (grass & trees) on exposed areas to reduce on erosion Promote soil and water conservation practices such as terracing, tree growing and mulching to reduce on erosion from farms neighboring surface water resources.
Pollution	As a result of dust, poor waste and noise from construction sites, stone quarries. Un-paved access roads that will be used daily by trucks and other construction vehicles will generate large amounts of dust. Some industrial processes may expose their employees to large amounts of dust and articulate matter	During construction, un-paved roads should be water sprayed / to reduce dust levels. Employers should provide protective equipment e.g. dust masks and construct well-ventilated workshops as necessary
Drainage	Drainage channels blocked due to erosion from construction sites	Construct/open drainage channels Don't fill in wetlands and drainages during excavation
Waste disposal	Improper waste disposal leading to spread of diseases, blockages of drainage channels and air pollution	Identify and designate specific areas for waste disposal Use biodegradable waste for compost making especially at household level. Incinerators for waste from health centres
Pesticide use	Contamination of water sources (surface and groundwater due to erosion and leaching. Improper pesticide use poses a threat to human health and safety through diseases and pollution	Project will not fund activities that require large scale use of pesticides In case of use of permitted pesticides for, agriculture and veterinary officers/assistants will train farmers on appropriate

		use, storage and disposal methods. To a large extent, use of integrated pest management is recommended.

Social concerns

Social concerns	Absence of a participatory process involving local communities in project identification, siting and overall decision making Exclusion of vulnerable groups from participating in and benefiting from program activities, due to stigmatization, harmful cultural practices, acute poverty among vulnerable groups, discrimination and lack of participation in the planning process etc. Air pollution, noise, traffic accidents during construction which may result in poor health for those affected. Land acquisitions for subprojects resulting in involuntary resettlement or loss of land and or assets and livelihoods.	Provide for participatory process and stakeholder involvement at every stage of the project cycle. Identified projects targeting the different social groups in society Affirmative action for women to get involved in project activities is provided for in the OM Contractors to drench the dusty areas with water before and after work (particularly during road constriction) Activities that generate a lot of noise should be stopped by an agreed upon time with the contractor.

CHAPTER 6

Environmental and Social Screening Process

The sections below illustrate the stages of the environmental and social screening process leading to the review and approval of subprojects to be implemented. The purpose of this screening process is to determine which activities are likely to have negative environmental and social impacts; to determine appropriate mitigation measures for activities with adverse impacts; to incorporate mitigation measures into the project as appropriate; to review and approve the project's proposals and to monitor environmental parameters during the implementation of activities.

6.1 Environmental Principles

This section proposes key principles to be considered in the design and implementation of NUSAF 2. These principles propose a framework for considering issues, remedial options and opportunities to enhance environmental management and outcomes associated with manmade and natural systems.

Mainstreaming environmental considerations into sectoral plans and budgets. There are environmental dimensions to practically all sectors; health, education, water and roads. This requires that environmental issues are considered in all sectoral reconstruction planning and action, particularly the siting of temporary and permanent settlements. Actions related to reconstruction and recovery should seek to ensure that the sustainability of ecosystems (land, wetlands forests, rivers, air, water, etc) is not compromised, and is ideally enhanced as the goods and services they provide underpin the livelihoods and immediate welfare of local communities. Wherever possible, options with fewer adverse environmental impacts should be favored over those that may involve changes in ecosystem integrity and other natural processes. In the short-term, monitoring is key to identifying environmental damage and prioritizing environmental restorations in plans and budgets

Adaptation to impacts of climate – Impacts of climate change are evident in Uganda and this project offers an opportunity to enhance the resilience of natural and modified ecosystems and households to such extreme events, which in turn will help plan mitigation of the potential impacts of a range of natural risks and hazards including floods, droughts and, diseases. Monitoring can also help plan against the anticipated adverse impacts of climate change. Economic, environmental, social and cultural factors must all be taken into account when developing disaster risk mitigation strategies and solutions must be anchored in the prevailing circumstances of local situations. This will ensure that the projects implemented are climate change sensitive.

6.2 Sub-Project Cycle and the Screening Criteria

Subproject identification and preparation, design, appraisal, approval, contracting, implementation, monitoring and supervision will be consistent with agreed guidelines, requirements and documentation as required under the Screening and Review Process which is fully integrated into the Project Implementation Plan and Operational Manual. Annex 8 gives a detailed description of the project cycle. The sections below describe actions to be undertaken in each step of the subproject cycle in relation to implementation of environmental and social safeguards.

6.2.1. Pre sub project cycle

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 analyze 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.

6.2.2. Sub project identification and preparation

At the identification and preparation stage, the Sub county technical staff under the coordination of the Community Development Officer supported by relevant sector experts will facilitate an Extended Participatory Rural Appraisal (EPRA) process in the communities to enable the communities participate fully in identifying, prioritizing and planning their development. Communities will then generate their subproject proposals and applications, in cognizance of environmental and social issues. The communities will then submit their subproject proposals to the Sub-county Technical Planning Committee (STPC) through the CDO.

i) Screening Process

Screening is vital and is 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 provides a mechanism for ensuring that potential adverse environmental and social impacts of NUSAF 2 funded sub-projects are identified, assessed and mitigated as appropriate, in a systematic way. The assignment of environmental categories will be consistent with; The Environmental and Social Screening Process complements the National EIA procedures for meeting the Environmental and Social Management requirements, The Environmental and Social Safeguards Policy and Sector Guidelines and the Local Government Environmental and Social Checklists for Municipal, Sub county and Parish projects contained in the Legal Notice Supplements of May 2004 under the National Environment Act 1995.

MOLG formulated comprehensive checklists that target a broad spectrum of sub-projects with the appropriate mitigation measures for adverse environmental and social impacts that can be easily discerned especially at the level of LLGs. This ensures that environment and social issues are adequately mainstreamed in all development plans, projects and activities. In addition to checklists outlined in table 5 and Annex 2, local government checklists for parish, Sub County and Municipal projects will also be widely used for screening. These checklists are attached as Annex 9-in a separate folder.

Table 8 Summary of Sub Project Environmental and Social Screening process

Milestones	Objectives	Process	Responsibility	Decision/output
Environmental Screening	to assess subprojects from an environmental perspective	Review of the subproject proposal, fill ER form and assign an Environmental category. Assess whether appropriate mitigation measures are planned and budgeted for	Sub-county appraisal teams/ Environment Focal Person/DEO District appraisal teams	Completed ER form for subproject proposal subproject assigned an Environmental Category mitigation measures are adequate and well integrated in proposal
Social screening	To Scope subprojects for stakeholder participation in decision making, equity and any negative impacts on human health and safety.	Review and determine level of stakeholder participation, if project offers public good, if there is equitable benefit sharing, and if there are any negative impacts on human health and safety	Sub-county appraisal teams	Evidence of stakeholder participation, equity in benefit sharing and mitigation measures for human health and safety.

6.2.3 Subproject appraisal

Appraisal is the second stage in the sub project cycle. STPC appraisal teams will undertake desk and field appraisals for all subprojects while the DTPC teams will undertake desk and field appraisals of selected projects to cross check and verify information provided in the application form and ensure that environmental and social safeguards, guidelines and checklist are complied with.

i) Desk Appraisal

The STPC with guidance from the CDO 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 sub project proposals and appraise them for appropriateness, compliance to safeguards, sectoral standards and norms, project guidelines and budgets and fill the ER form. The ER form 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 ER form and assign the environmental category at Sub county level, the DEO and his district team 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.

ii) 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 SEC for onward submission to the DTPC.

Table 9 Detailed Environmental and Social Field Appraisal Matrix

Milestones	Objectives	Process	Responsibility	Decision/Product
Detailed Environmental Appraisal	to appraise environmental aspects of subprojects	DTPC and STPC conducts necessary site visits to crosscheck ③ type and magnitude of Environmental issue; ③ adequacy of mitigation measures provided; ③ cost of implementing mitigation measures; ③ recommend any modifications to be incorporated in environmental actions of the subproject; ③ appropriate changes in other activities of subproject; and ③ Finalize environmental component of project appraisal report.		Sub-project Appraisal Report • Confirming environmental category • with recommendation to either accept sub project 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 ③ Whether group members participated in proposal preparation ③ Whether beneficiaries are right target ③ Whether project will bring about improvements in peoples lives; ③ Whether project has any other negative impacts on the community ③ Cost of mitigating negative social impacts ③ Identify any modifications to be incorporated in the social aspects of the subproject; ③ appropriate changes in other components of subproject; ③ Finalize social part of project appraisal report.		Sub-project Appraisal Report with recommendation to either accept sub project as submitted, accept sub project with modifications or reject it.

Typical types of projects and mitigation measures are attached as annex 2.

Note: To satisfy the requirements of the Bank's safeguards policies, it should be emphasized that in some subproject situations mitigation measures will be specified more precisely than others, either in the application or as an annex. It is expected that, with proper training, the Sub county technical staff will be able to assist Community Project Management Committees (CPMCs) in adequately addressing these issues when preparing their applications. For example where subproject may affect a natural habitat such as a wetland, the application must describe how this subproject will avoid causing adverse effects on the area/habitat.

6.2.4 Disclosure of Subproject Information

The information on environmental and social issues in a subproject will be disclosed together with the other subproject information in order to comply with the Bank's Policy on Disclosure of Information. This policy requires that, *before a subproject is approved*, its environmental implications (ER) 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. Detailed information disclosure procedures are further elaborated in section 8.3 of this document.

6.2.5 Subproject approval

After the desk and field appraisals, the Sub county Chief will forward all the sub projects to the Sub county Executive Committee for endorsement., after which the Sub county Chief will forward all the recommended and endorsed sub project proposals to the Chief Administrative Officer to initiate the approval process by the District Technical Planning Committee (DPTC) and the DEC for final approval. Once the District Executive Committee/Council approves, the sub project will be submitted to TST for funding. In cases where sub projects require an EIA, approval will be done by NEMA after which proposal will be submitted to TST for funding.

6.2.6 Implementation

At the time of implementation of the sub-projects, the potential environmental and social impacts are clearly identified. A management plan will be formulated and implemented. 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 2, communities will be required to make their contribution to environmental and social mitigation measures upfront and not after project completion as was done in NUSAF 1. As much as possible local communities will participate fully in sub project implementation.

6.2.7 Funds Disbursement

Before disbursement of funds, the TST will carry out a limited review of the appraisal and approval processes the sub-projects have undergone at the district and sub-county levels as a quality control measure to crosscheck and confirm that environment and social management issues were well taken care of in all the sub project cycle processes. Sector norms and standards as well adherence to environmental and social guidelines and checklists will also be checked.

6.2.8 Monitoring and Supervision

Environmental and social monitoring will be undertaken by communities themselves, the STPC, DTPC, selected councilors, DEO and CDO during all stages of the sub project 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 (section 9.5 for examples). 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.

In addition, regular monitoring visits (semi annually) to selected projects by a national team comprising of officers from TST, NEMA and other environmental and social experts will be undertaken to provide management oversight. OPM and World Bank officials may participate in these visits as well.

The World Bank will assess the implementation of the ESMF by reviewing the first 5-10 approved sub projects and recommend any additional measures for strengthening the management framework and implementation performance. The reporting framework, screening procedures and preparation of management and mitigation plans will be discussed and agreed by the Bank team and implementing agencies. A comprehensive review of ESMF's application could be undertaken to assess relevance and effectiveness in implementation annually.

6.2.9 Commissioning

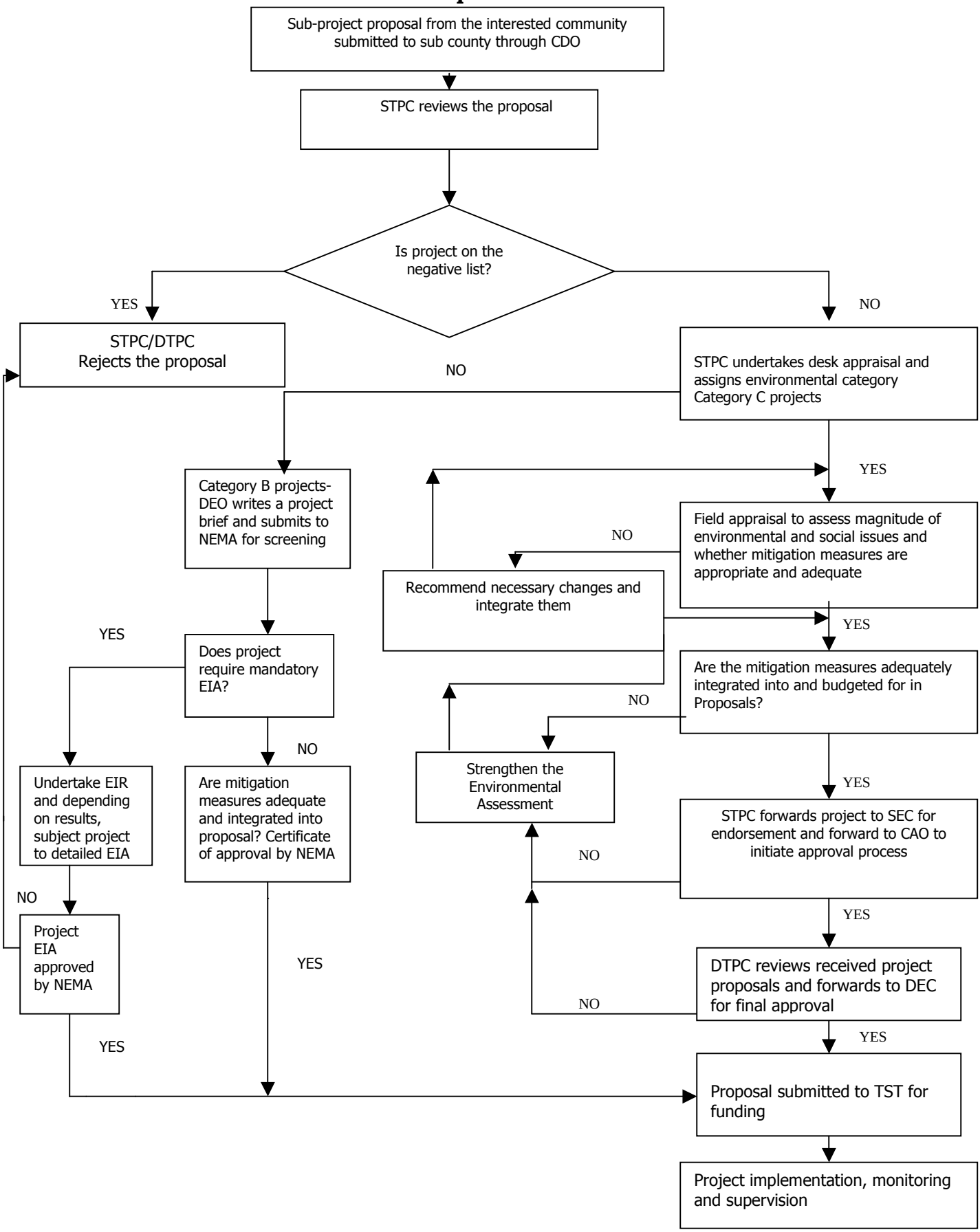
Upon completion, each sub project will be commissioned by the local authorities at a community commissioning ceremony. No certificate of completion will be issued to projects that will not have complied with environmental and social safeguard procedures.

6.2.10 Post Sub project cycle

This stage largely deals with sustainability of project interventions and ensuring equitable sharing of benefits and project maintenance. The STPC and DTPC teams will continue to

undertake site visits to provide technical support to communities to ensure that environmental and social standards are upheld.

Figure 2: Flowchart of the Screening and Review process for Environmental and social Impacts



CHAPTER 7

Environmental and Social Management Plan

The Environmental Management Plan (EMP) for NUSAF 2 is intended to ensure efficient management of environmental and social issues in subprojects. The EMP consists of

(a) The relevant project activities,
(b) The potential negative environmental and social impacts,
(c) The proposed mitigating measures,
(d) The institutions responsible for implementing the mitigation measures,
(e) The institutions responsible for monitoring the implementation of the mitigation measures and the frequency of the afore-mentioned measures;
(g) Capacity building needs and
(h) The cost estimates for these activities.

This section of the ESMF describes how subprojects will respond to the needs for environmental management. As indicated earlier, only environmental safeguards policy OP4.01 is triggered to the overall project but other policies may be triggered by some sub projects.

NUSAF 2 will have diverse sub-projects, most of which are small in nature without significant environmental impacts. This calls for EMP 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 neutralised where possible or mitigated in conformity with Uganda's and the World Bank's prescriptions for sound environmental management.

"Environment" is broadly defined to include the natural environment (air, wetland, forests, rangelands, soil, flora and fauna, water and land), and human health and safety. Environmental Management describes how communities and extension teams will use the environmental review checklists and participatory processes to support good environmental planning.

7.1 Environmental Categories for NUSAF 2

The subproject planning will strive for plans and designs that avoid creating adverse environmental and social impacts that could be explicitly managed. The assignment of an appropriate environmental category will be based on the provisions in World Bank OP 4.01 Environmental Assessment and Environmental Laws of Uganda. Consistent with these policies, NUSAF 2 sub projects will fall under 2 environmental categories:

Category B: Subprojects that may be more complex with significant environmental and social impacts. These require a environmental project brief.

Category C: Subprojects that have environmental and social impacts which are small in scale and mitigation measures are readily available for inclusion in the project design

The assignment of the appropriate environmental category to a particular sub project will be based on the information provided in the environmental and social screening forms.

The subprojects in NUSAF 2 are likely to be rather small operations, with no significant negative impacts on environment and human health and safety, thus a finer categorization for environmental screening is recommended. Based on the magnitude and implications of environmental and social issues and for management purpose, the subprojects in NUSAF are further divided into following categories;

Category B: Subprojects where potential negative environmental and social impacts are significant such as some construction projects and will require a comprehensive project brief.

Category C: Subprojects that have environmental and social impacts which are small in scale and mitigating measures are readily available for inclusion in the project design such as road maintnance, infrastructure rehabilitation and pit latrine construction.

Category C+: Subprojects that have only positive and no negative environmental impacts. These include projects such as Woodlot establishment (Community Based projects on public land), Community tree nurseries, Anti-erosion interventions (e.g., Slope, Stream and river bank protection), Agro forestry, Fruit tree growing, Eco-tourism and Apiary.

Some infrastructure projects, water and sanitation facilities, will be the subject of a contractor's manual embodied in their contracts (Annex 5) and strictly monitored in this regard. Such projects could well be classified C and allowed to proceed immediately.

7.2 Environmental Management in Subprojects

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 Technical Planning Committee whether: (a) no environmental work is required; (b) the implementation of simple mitigation measures will be enough; or (c) a project brief will be required.

Depending on the results of the screening process, the following environmental work can be carried out:

(a) Use of the environmental and social check list (Annex 1): The environmental and social checklist will be filled by the Environmental Focal Persons/DEO.

- Sub projects in category C+ will be allowed to proceed immediately.

- Subprojects in category C environmental and social issues will be identified, mitigation measures developed and planned for. These projects will benefit from the application of simple mitigation measures outlined in the checklists. Appropriate mitigation measures developed, planned and budgeted for and are integrated into project implementation. These will be verified in the approval, monitoring and supervision processes.

(b)Writing a Project Brief:

Subprojects in category B where potential negative and social impacts are significant, an explicit project brief (PB) will be required. A concise project brief shall be prepared by the sub county environment focal person/DEO and submitted to NEMA. The PB shall provide essential project information to guide NEMA on the screening criteria to which the proposed project should be subjected. Detailed content of the PB is provided in Annex 1.

Once submitted, NEMA will undertake a screening process using information provided in the PB. The objective of screening is to determine the extent to which a project is likely to affect the environment and therefore, be able to determine the level of assessment required. Screening is generally guided by the following criteria:

③ Size or location of project;
③ Type of project; and
③ Potential impacts compared against set thresholds and standards.

There are three screening stages:

Screen I: The first screening decides on the projects that do not require an EIA.
Screen II: Projects that require mandatory EIA are directly subjected to a detailed EIS.
Screen III: Projects that do not fall under any of the above two categories do not require a mandatory EIA though they are associated with some adverse impacts. If adequate mitigation measures are already prescribed for a project, it can be approved directly, and if not, then an Environmental Impact Review (EIR) is required. Depending on the results of the EIR, the project can be approved or subjected to a detailed EIS.

If a decision is made at the screening stage to exempt a project, or to approve its environmental aspects on the basis of identified adequate mitigation measures, such a decision shall be contained in a Certificate of Approval of the EIA issued by NEMA.

(c) Carrying out Environmental Impact Assessment (EIA):

In some cases, the results of the environmental and social screening process may indicate that the planned subprojects are more complex and would therefore require conducting a full EIA. The EIA may be conducted by consultants/ authorized persons/agreed by the appropriate DEO/NEMA.

The EIA will identify and assess the potential environmental impacts for the planned activities, assess alternative solutions and will design the mitigation, management and monitoring measures to be adopted. These measures will be quoted in the Environmental Management Plan (EMP) that will be prepared as part of the EIA for each subproject. The preparation of the EIA and the EMP will be done in collaboration with all stakeholders including the people likely to be affected by the project.

The EIA will follow the national procedure established in the framework of the Environmental Management Statutes and decrees in force (attached as Annex 1) and consistent with the WB OP 4.01.

7.3 Pest Management

Pests are defined in the broad sense. In addition to agricultural insect pests and plant diseases, pests also include weeds, birds, rodents, and human or livestock disease vectors. Similarly, the FAO defines pesticides as any substance or mixture of substances:

- intended for preventing, destroying or controlling any pest, including a) vectors of human and animal disease, b) unwanted species of plants or animals causing harm during, or otherwise interfering with, production, processing, storage, transport or marketing of food, agricultural commodities, wood and wood products or animal feedstuffs;
- that may be administered to animals for the control of insects, arachnids or other pests in or on their body;
- intended for use as a plant-growth regulator, defoliant, desiccant, or agent for thinning fruit or preventing the premature fall of fruit; and
- Substances applied to crops either before or after harvest to protect the commodity from deterioration during storage and transport.

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 can 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;

- ③ Diversification into new agricultural crops;
- ③ Intensification of existing low-technology agriculture systems;
- ③ Development of veterinary facilities, cattle dips, etc.; and
- ③ Control of vector-borne diseases (e.g. malaria).
- ③ Animal traction projects
- ③ Improved goats sub projects
- ③ Piggery sub projects
- ③ Poultry/egg production projects

To address pest management, Integrated Pest Management (IPM) will be used. IPM is an effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices. IPM is not a single pest control method but, rather, a series of pest management evaluations, decisions and controls and is used to manage pest damage by the most economical means and with the least possible hazard to people, property, and the environment. IPM takes advantage of all appropriate pest management options including, but not limited to, the judicious use of pesticides. In practicing IPM, farmers who are aware of the potential for pest infestation follow a four-tiered approach.

The four steps include:

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

2. **Monitor and Identify Pests:** Not all insects, weeds, and other living organisms require control. Many organisms are innocuous, and some are even beneficial. Monitor the pests and identify them accurately, so that appropriate control decisions can be made. This monitoring and identification removes the possibility that pesticides will be used when they are not really needed or that the wrong kind of pesticide will be used.

3. **Prevention:** As a first line of pest control, manage the crop, garden, or indoor space to prevent pests from becoming a threat. In an agricultural crop, this may mean using cultural methods, such as rotating between different crops, selecting pest-resistant varieties, and planting pest-free rootstock. These control methods can be very effective and cost-efficient and present little to no risk to people or the environment.

4. **Control:** Once monitoring, identification, and action thresholds indicate that pest control is required, and preventive methods are no longer effective or available, and then evaluate the proper control method both for effectiveness and risk. Effective, less *risky* pest controls are chosen first, including highly targeted chemicals, such as pheromones 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 would be employed, such as targeted spraying of pesticides. Broadcast spraying of non-specific pesticides should be avoided and used only as a last resort.

7.5 Protected Areas, Natural Habitats and Forests

Natural habitats need to be conserved when planning and implementing subprojects. These are land, wetlands, forests and water areas whose ecological functions have not been essentially modified by human activities. As subprojects are likely to be typically small, these are unlikely to lead to significant conversion or degradation of natural habitats. However, Bank's policy on natural habitat OP 4.04 will be used to see if a subproject would significantly convert or degrade a natural habitat. It is recommended that such a subproject should incorporate acceptable mitigation measures such as minimizing habitat loss and establishing and maintaining an ecologically similar area even for minor impacts.

Significant conversion means eliminating or severely reducing the integrity of a natural habitat through long-term change in land or water use. It may include, for example, land clearing; replacement of natural vegetation; permanent flooding; and drainage, dredging, filling, or canalization of wetlands. It can occur as the result of severe pollution or it can result directly from subproject activities or indirectly (e.g. through induced settlement along a road). Degradation means substantially reducing the ability of a natural habitat to maintain viable populations of its native species. Subprojects involving the significant conversion or degradation of critical natural habitats (including forests) cannot be funded.

These are natural habitats that:

- are protected by government (e.g. parks, World Heritage Sites) or by tradition ; or
- have known high suitability for biodiversity conservation; or
- are critical for rare, vulnerable, migratory, or endangered species.
- Perform ecological functions that are critical to the livelihoods of the people there

Subprojects designed to support community-based forest management and involving forest restoration or plantation development need to address the following issues:

- the potential of forest restoration to improve biodiversity and ecosystem functions;
- the potential to establish plantations on non-forest lands that do not contain critical natural habitats.

Projects that will involve large scale clearing of forested land, drainage of wetlands and large scale vegetation clearing will not be funded under NUSAF 2.

7.6 Protecting cultural Heritage

Cultural Resources may range from thousands of acres of rural tracts of land to a small homestead with a front yard of less than one acre. A cultural site is defined as "a

geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. These may include residential gardens and community parks, scenic/impressive geological structure/areas, ceremonial grounds, cemeteries, battlefields and religious sacred sites. They are composed of a number of character-defining features: vegetation, topography and water features such as ponds, streams and falls, animals, etc.

There is need for careful planning prior to undertaking sub project work to avoid causing irrevocable damage to cultural resources. Generally, preservation of cultural resources is recommended as it is the most respectful of cultural resources. It maintains their existing forms and functions.

Preservation planning generally involves the following steps:

- ③ Cultural resources will be identified, documented and preserved during project siting and implementation. Together with the local community, undertake a rapid field investigation and reconnaissance to inventory, map and document any existing cultural resources and their conditions. Documentation should also record the location- registration points can be set to indicate the precise location, the significant features as they exist and their orientation. Photographs should be taken as part of documentation.

- ③ Develop a cultural resources management plan including a strategy for ongoing maintenance and their continued access to the cultural resources by the community.

- ③ New additions such as limited and sensitive upgrading of mechanical, electrical and plumbing systems and other required work to make properties functional for instance in an eco-tourism project is appropriate. This should be discussed and agreed upon with the community.

- All necessary and adequate care shall be taken to minimize impact on cultural resources and properties. No works will spillover to these properties, premises and resources unless it is an agreed upon sub project.

CHAPTER 8

ESMF Coordination and Implementation

The overall management framework, including roles and responsibilities, for the implementation of the ESMF will be consistent with the government structures as already outlined in Section 2.5. In addition, in order to ensure that the safeguards in the Environmental and Social Framework (ESMF) are operationalized, the support structure for subproject planning, review and implementation has to be appropriately organized. The following sections outline the institutional arrangements in place for ESMF implementation and coordination.

8.1 institutional Structures

The TST Operational Support Team will designate a person to coordinate and ensure compliance to the Environmental Management and Social safeguards, sector guidelines and checklists as outlined in the EMSF.

The primary responsibility for compliance with ESMF will rest with the District Environment Officers (DEO), the Community Development Officer (CDO) and the designated Environmental Focal Person at the Sub County who will be responsible to oversee proper execution and implementation of ESMF safeguards in all sub projects.

Identification of environmental and social issues, ensuring that appropriate mitigation measures are planned and budgeted for, filling in the ER form and assigning environmental categories will be the responsibility of the STPC (led by the Environment focal person). Furthermore, the STPC will sensitize the communities on environmental and social aspects of the sub projects and support them to prepare and oversee the implementation of environmental and social safeguards of their subprojects. Designated Environment Focal Persons at Sub County will be adequately trained to undertake this role. In case of limited capacity in environmental review at the sub county, the DEO will perform this role.

The DEO and CDO will ensure that mitigation measures are adequate and are well integrated in the sub project proposals. DEO and CDO, working closely with the SPTC and DTPC, will oversee implementation, monitoring and supervision of the ESMF safeguards and ensure their effective implementation.

Roles & Responsibilities of District Environment and Community Development Officers

1. Review the ER forms prepared by the STPC to assess adequacy under the World Bank Safeguard policies including the OP4.01 and Uganda Environmental and Social laws

2. Undertake desk and field appraisals to verify information submitted by Sub Counties
3. Review the EIA Documents prepared by the consultants to assess adequacy under the World Bank Safeguard policies including the OP4.01 and Uganda Environment and Social laws.
4. Coordinate application, follow up processing and obtain requisite Environmental Clearances from NEMA required for the project, when necessary.
5. Advise DTPC and STPC on compliance with statutory requirements.
6. Develop, organize and deliver training programs for the Sub county staff, the Contractors and others involved in project implementation, in collaboration with the designated Environmental Focal Person and Community Development Officer of the Sub county level.
7. Liaise with various central Government and Environment Agencies on environmental and Social regulatory matters.
8. Continuously interact with the NGOs and Community groups that would be involved in the sub projects
9. Review environmental and social performance in sub projects, Compile periodically environmental and social monitoring reports and submit them to DEC, TST and other project stakeholders.
10. Monitor and supervise the implementation of environmental and social mitigation measures during the construction as well as operation stages of the sub projects
11. Document the good practices in the sub projects on incorporation and integration of environmental and social issues into sub projects.

At community level, community members will be responsible for identifying the environmental, social issues and local practices that may be adopted to mitigate them. Communities will also play a role in implementing some mitigation measures such as planting trees and grass during sub project implementation. In addition, members of the CPMC will be involved in monitoring the implementation of agreed upon environmental and social safeguards.

Annex 8 gives a summary of the institutional arrangements and their responsibilities.

8.2 Responsibility Allocation

The majority of the sub projects to be financed are expected to be environmentally benign or those where best practices available can be easily applied (C and C+ categories). The DEO will ensure that environment focal persons at Sub counties are trained and have adequate capacity to provide competent support to the community. Initial training will be provided at the start of the project and refresher courses will be provided based on progress as evidenced by annual performance reviews. Attempts will be made to involve local inhabitants wherever possible to ensure local input into development of appropriate environmental and social management measures in all stages of subproject cycle. Additionally, the DEO will identify resource persons from among individuals or

organizations who have the expertise to address environmental concerns related to anticipated subprojects; whom he can hire from time to time to address project specific environmental issues as and when necessary. Such tasks may include;

- Advising community and local government on environmental issues and how to address them
- Selective review of ER and other documents from the proponents for quality assessment;
- Selective monitoring and evaluation of subprojects;

The service of the consultants may also be utilized to undertake the annual sample environmental audit of all the financed subprojects.

8.3 Information Disclosure procedures

The Right to Information Act (RTI), 2005, encourages disclosures and universal access to information wherever in public interest. The Act requires that records be maintained and be available to the public. Compliance with the Act is required for all public entities and shall be adhered to by NUSAF 2.

This Disclosure Policy is intended to ensure that information concerning the NUSAF 2 activities will be made available to the public in the absence of a compelling reason for confidentiality. Information disclosure procedures are mandated to provide citizen - centric information as well as all documentation necessary for addressing any queries under Right to Information Act that came into effect from October 2005. The mechanism of information dissemination should be simple and be accessible to all. In compliance to this requirement, information in NUSAF 2 will be disclosed at 2 levels: National and at community level.

i) National level

NUSAF Technical Support Team will disclose information contained in this ESMF in the leading national Daily newspapers for public information 90 days before approval of the project. In addition, computer based information management systems will be employed to disseminate information pertaining to the NUSAF 2 on the project and World Bank websites. Additional information about the project will be disseminated through project brochures, leaflets and posters that will be distributed throughout the project period. A designated Officer in TST will be responsible for ensuring timely and complete dissemination in accordance with this policy.

Disclosure procedures to be followed are;

1. Submit the ESMF to NEMA for review. Inform NEMA in writing that these are provisional drafts so that they get a go ahead to disclose.
2. Draft a disclosure advert for the leading daily newspapers
3. Write to the World Bank informing them of clearance by NEMA

ii) Community level:

At community level, information on environmental and social issues in a subproject will be disclosed together with other subproject information. **Before a subproject is approved**, its environmental implications (ER) will 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. In addition, project information on environmental and social issues will be disseminated through community sensitization meetings that will also be organized at regular intervals by the STPC members.

Community consultation meetings may also be organized as and when necessary to seek their opinion and consensus on issues of common interest in the project such as siting subprojects and management of common and cultural resources.

Information will be provided in a timely and regular manner to all stakeholders, affected parties, and the general public. Access by the public to information and documentation held or generated by NUSAF 2 and participating local governments will facilitate the transparency, accountability, and legitimacy as well as operations overseen by it. As a part of its disclosure policy, all documents shall be made available to the public in accordance with relevant provisions of the RTI Act, except when otherwise warranted by legal requirements.

Type of information to be disclosed includes

- Project document and ESMF. These should be posted on project website and other disclosure locations throughout the project period.
- Sub project specific information need to be made available at each contract site through the CPMC
- Reports and publications, as deemed fit, shall be expressly prepared for public dissemination e.g., English versions of the EA, EMP, SA, RAP, Executive Summary of project documents, Executive summary of the project documents in local language etc.

8.4 Annual reviews and updating of ESMF

The ESMF will be utilized for screening of projects as well as implementation of the specified environmental and social safeguard in the sub-projects of NUSAF 2 and is considered to be a 'living document' enabling revision where necessary. It is imminent that certain factors that would have been overlooked or not considered due to the preparation of this document upfront in the project cycle with minimum ground verification would crop up during project implementation.

A comprehensive review of the ESMF's application to assess its effectiveness in mitigating adverse environmental and social associated with NUSAF 2 sub project

implementation will be conducted annually. It is expected that these annual reviews will be carried out by an independent consultant not involved in the subproject implementation.

The purpose of the reviews is two-fold:

- To assess compliance with ESMF procedures, learn lessons, and improve future ESMF performance; and
- To assess the occurrence of, and potential for, cumulative impacts due to project-funded and other development activities.

The review report will cover the following but not limited to; progress made in implementing ESMF safeguards, the challenges encountered, emerging issues, lessons learnt and recommendations for improvement. Recommendations from these reviews will be addressed through revision and updating of the ESMF.

These annual reviews will be a principal source of information to project management for improving performance, and to the World Bank supervision missions. Thus, they should be undertaken after the annual report has been prepared and should be available for Bank supervision of the Project.

8.5 Grievance Redress

Outside of their official conflict resolution mandate, the local governments will set up a procedure to address complaints and grievances. The procedure will not pre-empt and aggrieved person's right to seek redress in the courts of law. All complaints will first be reported and attempts to address them initiated at the community levels with the CDO, the Social Accountability Committee (SAC) (sub committee of Community Project Management Committee) and Contractors. If this fails, the SAC will refer the complaints to Sub County Chief through the CDO with the minutes of the hearing that took place at community level. If this also fails, the Sub County chief will refer the case to the Chief Administrative Officer for a decision and the decision agreed upon will be binding to all the concerned parties. The community and sub county will keep the records of all complaints and grievances which may remain unresolved. Type of grievances addressed at this level may include failure to implement agreed upon mitigation measures, inequitable sharing of benefits from project intervention, neglect of assigned responsibilities by community members, corruption among others.

CHAPTER 9

Capacity Building for local governments to implement ESMF

NUSAF 2 involves funding of multiple, small-scale subprojects that are highly and unavoidably dependent on the capacity of communities and local and national government authorities to carry out the associated design, planning, approval and implementation work if the environmental and socio sustainability is to be achieved. Thus, to ensure that capacity, it is vital that NUSAF 2 allocates sufficient resources to training and capacity building for the different stakeholders who will be involved in project implementation especially in the early years. These efforts will not only benefit the NUSAF implementation, but will also build local capacity to undertake other development initiatives funded locally or by other donors.

9.1 Institutional Capacity Assessment

This section focuses on the adequacy of the institutions to carry out their ESMF responsibilities. It assesses, at a minimum, the adequacy of:

- the institutional **structure,** and its authorities at all relevant levels, to address environmental management issues;
- the number and qualifications of staff to carry out their ESMF responsibilities;
- **resources** to support staff in their work; and
- **knowledge and experience** relevant to carrying out environmental analyses and designing mitigation measures for small-scale infrastructure.

The local governments have a very limited institutional capacity to implement the ESMF. Except for a DEO who usually keeps track of all environmental activities in the district, there is very limited capacity for environment management at local government level. The DEO's office is understaffed; with only one staff (DEO) to oversee environmental management in the entire district. In addition, the office is poorly funded from government funds-often providing funds for DEO's salary and nothing else for any activity implementation and monitoring. Often the DEO has no transport (vehicle or motorcycle) to enable him traverse the whole district. At sub/county level an officer (usually agriculture extension worker or CDO) is designated to oversee the environment portfolio, even at this level the funding for environment management is not earmarked. Although environmental issues are integrated into district and sub county development plans, there are always not prioritized during budget allocation and end up not being implemented all the time.

The local environment committees at district and sub-county levels, who would otherwise assist the DEO oversee environmental management are largely non functional; they are comprised of the local councilors including the chairmen, who are elected community representatives with little knowledge on environmental issues. These committees don't sit/meet at all because they are no funds to pay their sitting allowances and often times they don't even know their roles and responsibilities.

At community level, there is secretary for environment but who does nothing to enhance environmental management. While communities are knowledgeable about their relationship with the environment as reflected in their indigenous knowledge, cultural beliefs, norms and practices; they don't prioritize environmental issues in their planning. Environmental resources are taken as a God give which don't have to be managed. The capacity building under NUSAF 2 will help improve the effectiveness of local governments in the management of environmental and social impacts during planning, implementation and operation of proposed investments.

9.2 Capacity Building

Capacity building and training constitute an integral component of ESMF and adequate resources will be allocated to ensure effective implementation of the ESMF.

The resources are needed to implement the following items.

- Institutional development activities
- The training program for communities, extension teams and local authorities to implement their ESMF responsibilities
- Annual reviews and audits
-

Accordingly, for the ESMF to be effectively operationalized, capacity building at all levels i.e., district, sub-county and community will be undertaken to ensure that the personnel are exposed to rapid training in the management of environmental and social issues. Capacity building will enhance the subprojects' ESMF management capacity by allowing real application of the critical practices such as the following:

- Basic practices: screening impacts, scoping assessments, planning mitigation options, public consultation to assess feasibility and acceptability options;
- Environment: site selection and route alignment to minimize environmental impacts and social disruption; restoration of drainage patterns, land use etc; including mitigation measures in contracts; management of impacts during construction; monitoring of effectiveness of measures;

9.3 Training needs

Training programs will be coordinated and anchored within the TST at national level and District at local government level. Individuals experienced in environmental and social aspects of subprojects will be called upon through a competitive process to develop and conduct short term trainings on various aspects of implementing the ESMF guidelines.

The objectives of the training under the ESMF are to:

- support representatives and leaders of community groups to prioritize their needs, and to identify, prepare, and implement environmental and social aspects of their subprojects;

- ③ ensure that local government officials have the capacity to analyze potentially adverse environmental impacts, to prescribe mitigation approaches and measures, and to prepare and supervise the implementation of management plans and to assist communities in preparing subproject proposals, and to appraise, approve and supervise the implementation of subprojects; and
- ③ Strengthen local NGOs/CBOs and other stakeholders which may be involved in the public participation in preparing and implementation of subprojects.

Different groups involved in NUSAF 2 subprojects' implementation have different training needs in terms of raised awareness, sensitization to the issues, and detailed technical training:

- ③ **Awareness-raising** for participants so that they are able to appreciate the significance or relevance of environmental and social issues;
- ③ **Sensitization for participants** to be familiar enough with environmental and social issues that they can make informed and specific requests for technical support; and
- ③ **Detailed technical training** for participants who will need to analyze potentially adverse environmental and social impacts, to prescribe mitigation approaches and measures, and to prepare and supervise the implementation of management plans.

The training program for various role players will include

(i) Orientation program on the ESMF,
(ii) Environmental Assessment Processes,
(iii) Participatory Methodologies
(iv) Project Management
(v) Environmental analysis;
(vi) Using the ER checklist and assignment of environmental categories
(vii) Design of appropriate mitigation measures.
(viii) Integrating environmental and social management aspects into the implementation of sub-projects
(ix) Reporting;
(x) Subproject supervision and monitoring.

Training Modules

Module1.

a. Introduction to Basic concepts on environment and social issues
b. Their relevance and significance in project implementation
c. Overview of national and World Bank Environment and social regulations

Module 2

a. Environmental and social considerations in project implementation
b. Environmental and social concerns in typical NUSAF 2 projects
c. Good environmental and social practices in project implementation

Module 3

a. Environmental and social assessment processes
b. Project site selection
c. Use of checklists (ESMF & LGDP)
d. Filling ER forms
e. Writing project brief
f. EIA process

Module 4

a. Monitoring and supervision
b. Environmental and social indicators
c. Reporting- format & content
d. Project management

Module 5

a. Roles and responsibilities

- TST
- DEC
- DTPC
- SEC
- STPC
- Community

Proposed areas of training and desired outcomes for appraisal teams and communities in environmental management in C category subprojects are shown in table 11 which will also inform the development of training modules at all levels.

Table 10 Capacity requirements for Sub projects under NUSAF 2

Target participants	Training needed	Desired outcome	Resource person
DTPC	Orientation on the ESMF, Environmental and social assessment processes, integrating environmental and social standards into planning and implementation into subproject contracts	Appraisal teams have the capacity to analyze potentially adverse environmental and social impacts, to prescribe mitigation approaches and measures, and to prepare and supervise the implementation of management plans and to assist communities in preparing subproject proposals, and to appraise, approve, monitor and supervise the implementation subprojects.	Trainers or consultants constituted by TST

	Effective monitoring of actual mitigation results	Sensitive monitoring systems & specific indicators developed to ensure mitigation measures have been implemented and actual results.	Trainers/ consultants constituted by TST
DTPC	Reporting	District and Sub county staff have report writing skills and are able to generate quality reports including an annual ESMF report.	Trainers/ consultants constituted by TST
STPC	Orientation on the ESMF, Environmental and social assessment processes, and integrating environmental and social standards for planning and implementation into subproject contracts Effective monitoring of actual mitigation results	Appraisal teams have the capacity to analyze potentially adverse environmental and social impacts, to prescribe mitigation approaches and measures, and to prepare and supervise the implementation of management plans and to assist communities in preparing subproject proposals Appraisal teams with skills to effectively monitor and supervise the implementation subprojects	Trained DTPC teams
STPC	Reporting	District and Sub county staff have report writing skills and are able to generate quality reports including an annual ESMF report.	Trainers/ consultants constituted by TST
communities, subproject committee members and other concerned citizens	Awareness on environmental and social issues and the need to mitigate against them.	Community groups appreciate the significance and relevance of environmental issues and are able to identify and prioritize environmental and social aspects of their subprojects and identify possible local knowledge and practices to mitigate them.	Trained STPC teams
Sub county resource teams	Participatory planning and implementation and inclusion of the poor in project benefits	resource teams acquire participatory skills to facilitate community consultative processes	Trained DTPC
	Effective accountability to citizens.	Formal endorsement by the community through public hearings and documented periodic reporting of proponents performance to citizens;	Trained DTPC

As part of the institutional capacity building for the project as a whole, the TST, DTPC and STPC will form the District and Sub county appraisal and monitoring teams (comprising of professionals of relevant line departments agencies and NGO/CBO representatives, selected councilors from relevant committees and opinion leaders) and these will be trained in different aspects of the project, including interpretation and implementation of environmental and social impact management guidelines. Training will be done by a team of consultants/experts put together by the TST for this purpose. The trained sub county level STPC teams will be utilized to create awareness, mobilize and sensitize the communities, subproject committee members and other concerned citizens and assist them in identifying environmental and social issues in their projects.

9.4 Training plans

Based on the training needs, a training plan will be developed by the DEO together with TST as presented in the table below. Described in table 11 is an overview of the training plan for the first year of project implementation. However a detailed agenda and specification of resource needs (venue, trainers, materials, etc.) for each type of training activity will be worked out at the time of actual implementation.

Table 11 Different Training Activities and their Costs

Target Group	**Participants**	**Venue**	**Resource persons**	**Duration**	**Frequency**	**Budget** '000
District officials	District appraisal and monitoring teams - Officials from district level Govt. Departments/ Line Ministries and selected councilors from relevant committees, NGO representatives,	District level -1 per district	Experts/ Consultants	2- day workshop	Pre project cycle (40 workshops1 per district)	464,800
	Sub-county Resource Teams and NGO workers,	Sub County level)	Trained DTPC Resource persons	2-day workshop	Pre- project cycle (1 per sub county)	1,878,400
Community Leaders/ Workers	Subproject management committees, community	Sub county (level)	Trained Sub county resource persons	1-day workshop	Pre project cycle – (1 per sub county)	913,600

/members	members and other citizens					
	ESMF review	District level	consultant	3 days per district	Annually	140,600

Detailed budget notes are attached as Annex 6.
Total budget for training for **one year** is Shs. 3,339,740,000 ($1,788,106)
Exchange rate as of March 2009 $1=Ug Shs. 1900

9.5 Monitoring

The objective for monitoring is two fold:

- To provide timely information about the effectiveness of the environmental and social management screening process as outlined in the ESMF. Information generated will inform continuous improvement to the process,

- To establish the progress in implementation of the mitigation measures, the extent to which they are effective in maintaining environmental and social integrity and if any changes are required to improve the ESMF implementation.

- Monitoring provides in a timely manner identify and correct lapses or inadequacies be these administrative, financial or technical, in the execution of project environmental and social safeguards.

Monitoring is done on the basis of agreed upon indicators. Examples of typical environmental indicators include;

(i) Evidence of anti soil erosion measures such as terraces,
(ii) Re-planted vegetation,
(iii) Constructed drainage channels,
(iv) Gazetted places for waste disposal and mechanisms for waste disposal in place,
(v) No large scale clearance of forests and drainage of wetlands,
(vi) Filled up burrow pits, etc

Social indicators include;

(i) Representation on the community management committee
(ii) Equitable sharing of benefits from the project intervention
(iii) Numbers of members attending project planning and implementation meetings
(iv) Effect of program implementation on local household economies.

These indicators must be reviewed in conjunction with environmental guidelines for Contractors, Pesticides use, Waste management, Maintenance of Facilities (education and health infrastructure, roads, water and sanitation facilities.

In order to assess the efficiency/functionality of the LG Environmental and Natural Resources Sector, MOLG prepared an Assessment Manual specifying monitoring indicators designed to assess compliance to sound environment management principles in the execution of LG programs/projects. These include;

a. District/Municipal development plan reflects sound analysis of environment opportunities and constraints.
b. Evidence of environmental submission (ER forms, appraisal reports)
c. Budget allocations for environmental issues in project budgets
d. Evidence that environment screening and EIAs, where appropriate are carried out for activities, projects and plans and mitigation measures are planned and budgeted for.
e. Evidence that mitigation measures are being implemented.
f. Special capacity enhancement strategies for district/municipal environment committees and DTPCs.
g. Environmental awareness training planned for and carried out during the previous financial year.

These and the MOLG environment and social checklists for parish, Sub County and Municipal projects should be used by monitoring teams as checklists. Monitoring will be part and parcel of the routine monitoring by the DTPC and STPC; therefore the associated costs will be included in the consolidated monitoring budget.

9.6 Reporting

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

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

The report shall include the following key information:

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

- Challenges encountered
- Lessons learnt
- Emerging issues
- Recommendations for improvement
- Conclusion

Table 12 below is example of a report format and how this can be filled is indicated below.

Table 12 Format for Annual report (ESMF)

ESMF management actions/measures	Progress to date	Challenges encountered/	Lessons learnt/ Emerging issues	recommendations for improvement
Summarize ESMF mitigation measures taken during reporting period e.g training, monitoring, field appraisals, etc	progress made including any adjustments made e.g training on orientation of ESMF for DTPC/STPC was completed	challenges may include Delays in implementation, Cost higher than planned, Limited Capacity at community and cases of non compliance.	observations, concerns observed during implementation e.g There is need to undertake more than 1 training to strengthen capacity for environmental review	Integrate an additional training for s/c appraisal teams in environmental review

Annex 1: Detailed Description of the Steps of an EIA process Uganda

Preparation of Project Brief

A concise project brief shall be prepared by the developer for submission to NEMA. This shall provide essential project information to guide NEMA on the screening criteria to which the proposed project should be subjected. The report shall include the following key information:

- Contact details of developer;
- Characteristics of project;
- Project description;
- Reasons for project;
- Background to the project;
- Project site;
- Baseline data;
- Physical form of the development;
- Construction practices;
- Operations;
- Preliminary analysis of alternatives;
- Other large projects within the area of influence of the proposed project;
- Characteristics of the potential impacts;
- Nature extent and magnitude of impacts;
- Probability of impacts;
- Duration frequency and reversibility of impacts;
- Mitigations measures proposed; and
- Transboundary nature of the impacts.
- In the case of UPPET, preparation of these briefs will the responsibility of MoES,
- District Local governments and the School Authorities, specifically, the District
- Environmental Officers will coordinate these efforts and where necessary guided by an
- EIA practitioner certified by NEMA.

In the case of NUSAF 2, preparation of project briefs will be the responsibility of the community development officer together with the extension team and later submitted to the district environment officer for review and where necessary guided by an EIA practitioner certified by NEMA

Environmental Screening

The objective of screening is to determine the extent to which a project is likely to affect the environment and therefore, be able to determine the level of assessment required. Screening is generally guided by the following criteria:

- Size or location of project;
- Type of project; and
- Potential impacts compared against set thresholds and standards.

There are three screening stages:

Screen I: The first screening decides on the projects that do not require an EIA.
Screen II: Projects that require mandatory EIA are directly subjected to a detailed EIS.
Screen III: Projects that do not fall under any of the above two categories do not require a mandatory EIA though they are associated with some adverse impacts. If adequate mitigation measures are already prescribed for a project, it can be approved directly, and if not, then an Environmental Impact Review (EIR) is required. Depending on the results of the EIR, the project can be approved or subjected to a detailed EIS.

If a decision is made at the screening stage to exempt a project, or to approve its environmental aspects on the basis of identified adequate mitigation measures, such a decision shall be contained in a Certificate of Approval of the EIA issued by NEMA.

Environmental Impact Study

According to the EIA Regulations 1998, EIS refers to the detailed study conducted to determine the possible environmental impacts of a proposed project and measures to mitigate their effects. The EIS process contains the following key stages:

- Scoping and ToR;
- Preparation of the EIS;
- Review of EIS and Decision on project; and
- Environmental Monitoring.

Scoping and ToR

Scoping is the initial step in the EIS. 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 field work. 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 ToR for the EIS and submit a copy to NEMA that shall in turn be forwarded to Lead Agencies for comments, in this case including the District Local Government or District Environment Officer.

Preparation of the EIS

In preparing an EIS, 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 EIS documents the findings and is submitted to NEMA by the developer.

Review of EIS and Decision on Project

The Developer is required to submit ten (10) copies of the EIS to NEMA for review and approval. NEMA then forwards a copy to the Lead Agencies for comments. NEMA in consultation with the Lead Agencies (in this case including the District Local Governments) shall review the contents of the EIS, 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 EIS process. In this review, the level to which the ToR set out for the study is addressed shall be considered. In making a decision about the adequacy of the EIS, 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 monitoring

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 EIS.

The purpose of monitoring is to:

- Provide information that the predicted impacts from a project are within the engineering and environmental acceptable limits;
- Provide early warning information for unacceptable environmental conditions;
- Ensure that the mitigation measures proposed in the environmental management plans are implemented satisfactorily; and
- Assist in identifying additional mitigation efforts needed or where alteration to the adopted management approach may be required.

To assist in the implementation of identified mitigation and monitoring strategies, an environmental monitoring plan will be developed. It will describe the various environmental management strategies and programmes to be implemented. It will also identify the management roles and responsibilities for ensuring that monitoring is undertaken, results are analyzed and any necessary amendments to practices are identified and implemented in a timely manner. The monitoring plan shall provide for monitoring of both project implementation and environmental quality. It shall contain a schedule for inspecting and reporting upon the implementation of the project and associated mitigation measures identified in the EIS. The monitoring plan shall also identify the key indicators of environmental impact. Further, the plan shall provide a

schedule for monitoring each indicator and for reporting the monitoring results to NEMA or the Local Authority.

Environmental Evaluation

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 EIA 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. In the case of NUSAF subprojects, meetings will be held at the Local Council level involving leaders, Technical Personnel, and the communities where the new site is to be located.

NEMA prepared EIA Public Hearing Guidelines (1999) providing methodological guidelines on public consultation. 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 EIA process require different levels of public consultation and involvement. The key stages are:
- Public consultation before the commissioning of the EIS;
- Public consultation during the EIS; and
- Public consultation during EIS review.

Public Consultation before Commissioning of the EIS.

On submission of the project brief to NEMA, it might be decided that the views and comments of the public on the project shall be 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 EIS begins. Such a plan should consider:

- ③ The stakeholders to be involved;
- ③ Matching of stakeholders with approaches and techniques of involvement;
- ③ Traditional authority structures and political decision-making processes;
- ③ Programming of the implementation, in time and space, of the different approaches and techniques for stakeholder involvement;
- ③ Mechanisms to collect, synthesize, analyze and, most importantly, present the results to the EIS team and key decision-makers;
- ③ Measures to ensure timely and adequate feedback to the stakeholders;
- ③ Budgetary / time opportunities and constraints; and
- ③ Public Consultations during the EIS.

Pubic consultation during the EIS

During the EIS, 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.

Pubic consultation during the EIS review

During the EIS review, the public is given additional opportunity for ensuring that their views and concerns have been adequately addressed in the EIS. Any earlier omissions or oversight about the project effects can be raised at this stage. To achieve this objective, the EIS and related documents become public after submission to NEMA. An official review appointment will be announced, where the reviewing authority has to answer questions and remarks from the public. These questions have to be handed in writing prior to the meeting

Annex 2: Typical Subproject Environmental Impacts and their Mitigation

Sector	Subproject type	Potential negative environmental and social impacts	Mitigation measures
Transportation	Improvement of community roads	1. Dumping of construction debris in wetlands resulting in blockage of water flow and wetland loosing its ecosystem services 2. Dust pollution 3. Loss of vegetation cover 4. Stagnant pools of water – may be breeding areas for mosquitoes 5. Roads will be destroyed by soil erosion during rainy season/floods.	• Construct proper drainage channels • Construct earth humps to reduce speed • Drench road surface in water at least twice a day to reduce dust • No dumping in wetlands • Roadside plantation of suitable plants which are known to be highly effective in covering soil. • Install culverts to allow for continued water flow ③ Design to provide adequate drainage and to minimize changes in flows. • Provide sufficient number of cross drains • Unpaved roads should be water sprayed regularly to reduce on dust • Employees will be provided with dust masks during work.
	Bridges and culverts	1. Loss of vegetation cover 2. Dust pollution 3. Soil erosion that may result in siltation of down stream water surfaces 4. Flooding resulting from changes in water flows.	③ Design to provide adequate drainage and to minimize changes in flows. ③ Provision of sufficient number of cross drains. ③ Do not fill/dump in wetlands ③ Open/construct drainage channels

Water	Deep boreholes	1. Lowering of water table 2. Vegetation clearing during construction	• Abstraction limits for mechanical pumps and limits to number of boreholes should be limited • Plant vegetation preferably grass around the water points to reduce speed of surface water flow
	Valley tanks	1. contamination of water source through siltation & poor sanitation, 2. Clearing of vegetation during construction 3. Contamination by seepage from stagnant pools, latrines, municipal waste, agricultural areas or from leakage	• Pit latrines will be excavated avoiding high water table areas and use appropriate technologies such as lining. • Plant vegetation preferably grass around the water points to reduce speed of surface water flow. • Where pit latrines are used, they should be located more than 10m from any water source. • Local/ public health officials should monitor the siting of pit latrines. • Treat drinking water either by boiling or use water
	Rainwater harvesting	None	None.
	Spring well protection	1. Vegetation destruction 2. Contamination by seepage from stagnant pools, latrines, municipal waste, agricultural areas or from leakage 3. Contamination of water source through siltation & poor sanitation,	• Plant vegetation preferably grass around the water points to reduce speed of surface water flow • Where pit latrines are used, they should be located more than 10m from any water source • Treat drinking water either by boiling or use water
	Earth Dams	1. loss of vegetation cover 2. erosion from excavated soil especially during rainy season 3. Tampering with life cycle of water fauna	• Plant vegetation preferably grass around the dam to reduce speed of surface water flow • Leave some channels to allow for continued flow

			downstream
Agriculture	Animal Health Facilities (Vaccination yards, Tick dips, cattle crushes etc	1. improper use of chemicals 2. which are a danger to human and animal health 3. vegetation clearing and soil excavation during construction	• Apply integrated pest management principles • use best local practices for control of vectors • extension officers to train farmers and herders in safe use and disposal of chemicals
	Poultry/egg production	1. Spread of diseases 2. destruction of gardens/crops in case of free range 3. waste management	③ treat birds using local knowledge and recommended drugs ③ restricted "free range" ③ use waste from chicken houses for manure
	Piggery	1. waste management and disposal 2. bad ordour 3. Noise	• collect waste from pig sty and use it for composting • construction design of pig sty should take into consideration central collection point for waste • Pig sty should be a distance 5-10m from homesteads.
	Improved goats	1. overstocking leading to overgrazing and rangeland degradation 2. spread of diseases through mating 3. burning of vegetation to allow for re-growth of pasture	• grow Napier grass and legumes to supplement feeding • male goats for mating should be treated for any sexually transmitted diseases • Veterinary officers to establish carrying capacity of rangeland and this should not be exceeded.
	Agro-processing facilities e.g solar driers	1. contamination of processed products with dust 2. poor disposal of package material	③ Processing facilities should be well secured from dust and possible contaminants.

	Apiary	1. bees pose danger to human health during harvesting 2. contamination of honey will soil/sand, etc	• Bee keepers will be well trained in bee keeping and management. • Use air tight buckets to store honey.
	Crop husbandry-High value crops	1. Loss of soil fertility 2. soil erosion 3. loss of indigenous varieties of crops 4. Soil and water contamination from agrochemicals (fertilizers and pesticides) and some agro processing projects. 5. Agrochemical toxicity to humans	③ Integrated pest management principles will be applied. ③ sub-county agriculture extension workers to deliver appropriate extension services on practices that enhance soil fertility, ③ soil and water conservation practices ③ Soil erosion control practices. ③ Crop rotation ③ proper disposal of non-biodegradable waste such as Kavera ③ anti-burning and anti-overstocking campaigns ③ plant indigenous as well as improved varieties
Health	Establishment/rehabilitation of Health facilities (Dispensaries, Maternity clinics, etc)	Disease caused by inadequate collection and disposal of: Medical and other wastes Vegetation destruction and soil excavation during construction disposal from debris from construction sites-may be dumped in wetlands	③ Promote separate collection and disposal system for medical or hazardous wastes. ③ Arrange for final disposal site. ③ provide incinerators to destroy medical waste ③ develop a medical waste management plan ③ Undertake appropriate landscaping after construction ③ Re-plant vegetation around construction sites using appropriate plants

			③ Identify appropriate sites for waste disposal
Sanitation and Waste Management	Public toilets/pit latrines		③ Where pit latrines are to be located more than 10m from any water source. The base should be lined and separated from the ground water table.
	Sewerage facilities	1. Contamination of groundwater 2. over flowing and contaminating surface waters, contaminating wells holes and springs. 3. Disposal field overflowing 4. Bad Odour 5. Destruction of vegetation causing loss of habitat (home) for animals. 6. Loss	③ Ensure that facilities are situated an adequate distance from wells, boreholes and springs ③ Re-plant vegetation
	Waste disposal facilities	1. Waste scattered by wind. 2. Animals and flies feeding on garbage and carrying disease to human population. 3. Runoff from disposal site draining into and polluting local water sources. 4. Leachate from waste polluting the ground water or surface water. 5. Volume of waste accumulating too quickly and necessitating opening of new waste disposal site	• Cover waste as soon as possible after dumping. • Prevent general runoff from flowing across disposal site. • Clear debris from drain around perimeter of disposal site so that runoff water is led to the treatment pond. • Fence around the disposal pit should be maintained to keep out animals.
Energy	Biogas plants	None	none

	Photovoltaic cells based power supplies for emergency and public facilities	none	none
Natural Resources Management	Afforestation Community Based projects on public land)	species used may not be suitable for habitat	• plant both exotic and indigenous trees
	Community tree nurseries	disposal of plastic potting materials	• establish collection points for the plastic potting waste
	Agro-forestry	disposal of plastic potting materials	•
	Apiary	none	• none
	Fruit tree growing	disposal of plastic potting materials	• establish collection points for the plastic potting waste
	Eco-tourism and hunting areas	degrading sites from too many visitors	• numbers of visitors per day will be restricted as the visitor numbers increase
Education	Construction/rehabilitation of classrooms and Teacher housing	vegetation clearing disposal of construction debris	③ Management of construction period to ensure health and safety especially for school children. ③ Removal and proper disposal of construction debris. ③ Replant vegetation after construction.

Annex 3. Northern Uganda Social Action Fund Environmental and Social Review (ER) Form

(This form filled with appropriate information is to be attached to each subproject document)
District: _____ sub-county: _____ Parish: _____

Subproject In-charge: _____

Subproject Name: _____

Subproject Objectives_____

_____

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
(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 (eg water supply, sanitation facilities, health centres, 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 local employment opportunities including women and youth Yes [ ] No [ ]

EVALUATION

1. Produce significant amount of pollutants: Yes [ ] No [ ]
2. Type of pollutants (if yes in 1): Air [ ] Water [ ] Soil [ ]
3. Quantity of pollutants (per month): _____
_____
4. Probable cumulative impacts Yes [ ] No [ ]
5. Means of disposal available: Yes [ ] No [ ] In part [ ]
6. Fate of pollutants: _____
_____
7. Remedial measures and any other issues/ Comments: _____
_____
_____

Environmental Category[1] C[+] [ ] C [ ] B [ ] A [ ]

Needs further Evaluation Yes [ ] No [ ]

Needs LEA Yes [ ] No [ ]

Prepared by (Name): _____ SIGNATURE: _____

DATE: _____

Annex 4. Projects that will not be funded under NUSAF 2 (negative list)

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

Annex 5. General Environmental Management Conditions for Construction Contracts

General

In addition to these general conditions, the Contractor shall comply with any specific Environmental Management Plan (EMP) or Environmental and Social Management Plan (ESMP) for the works he is responsible for. The Contractor shall inform himself about such an EMP, and prepare his work strategy and plan to fully take into account relevant provisions of that EMP. If the Contractor fails to implement the approved EMP after written instruction by the Supervising Engineer (SE) to fulfill his obligation within the requested time, the Owner reserves the right to arrange through the SE for execution of the missing action by a third party on account of the Contractor.

2. Notwithstanding the Contractor's obligation under the above clause, the Contractor shall implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental performance requirements specified in an EMP. In general these measures shall include but not be limited to:

(a) Minimize the effect of dust on the surrounding environment resulting from earth mixing sites, asphalt mixing sites, dispersing coal ashes, vibrating equipment, temporary access roads, etc. to ensure safety, health and the protection of workers and communities living in the vicinity dust producing activities.

(b) Ensure that noise levels emanating from machinery, vehicles and noisy construction activities (e.g. excavation, blasting) are kept at a minimum for the safety, health and protection of workers within the vicinity of high noise levels and nearby communities.

(c) Ensure that existing water flow regimes in rivers, streams, wetlands and other natural or irrigation channels is maintained and/or re-established where they are disrupted due to works being carried out.

(d) Prevent bitumen, oils, lubricants and waste water used or produced during the execution of works from entering into rivers, streams and other natural water bodies/reservoirs, and also ensure that stagnant water in uncovered borrow pits is treated in the best way to avoid creating possible breeding grounds for mosquitoes.

(e) Prevent and minimize the impacts of quarrying, earth borrowing, piling and building of temporary construction camps and access roads on the biophysical environment including protected areas and arable lands; local communities and their settlements. In as much as possible restore/rehabilitate all sites to acceptable standards.

(f) Upon discovery of ancient heritage, relics or anything that might or believed to be of archeological or historical importance during the execution of works, immediately report such findings to the SE so that the appropriate authorities may be expeditiously contacted for fulfillment of the measures aimed at protecting such historical or archaeological resources.

(g) Discourage construction workers from engaging in the exploitation of natural resources such as hunting, fishing, collection of forest products or any other activity that might have a negative impact on the social and economic welfare of the local communities.

(h) Implement soil erosion control measures in order to avoid surface run off and prevents siltation, etc.

(i) Ensure that garbage, sanitation and drinking water facilities are provided in construction workers camps.

(j) Ensure that, in as much as possible, local materials are used to avoid importation of foreign material and long distance transportation.

(k) Ensure public safety, and meet traffic safety requirements for the operation of work to avoid accidents.

3. The Contractor shall indicate the period within which he/she shall maintain status on site after completion of civil works to ensure that significant adverse impacts arising from such works have been appropriately addressed.

4. The Contractor shall adhere to the proposed activity implementation schedule and the monitoring plan / strategy to ensure effective feedback of monitoring information to project management so that impact management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.

5. Besides the regular inspection of the sites by the SE for adherence to the contract conditions and specifications, the Owner may appoint an Inspector to oversee the compliance with these environmental conditions and any proposed mitigation measures. State environmental authorities may carry out similar inspection duties. In all cases, as directed by the SE, the Contractor shall comply with directives from such inspectors to implement measures required to ensure the adequacy rehabilitation measures carried out on the bio-physical environment and compensation for socio-economic disruption resulting from implementation of any works.

Worksite/Campsite Waste Management

6. All vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be bunded in order to contain spillage. All waste containers, litter and any other waste generated during the construction shall be collected and disposed off at designated disposal sites in line with applicable government waste management regulations.

7. All drainage and effluent from storage areas, workshops and camp sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations.

8. Used oil from maintenance shall be collected and disposed off appropriately at designated sites or be re-used or sold for re-use locally.

9. Entry of runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution.

10. Construction waste shall not be left in stockpiles along the road, but removed and reused or disposed of on a daily basis.

11. If disposal sites for clean spoil are necessary, they shall be located in areas, approved by the SE, of low land use value and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low-lying areas and should be compacted and planted with species indigenous to the locality.

Material Excavation and Deposit

12. The Contractor shall obtain appropriate licenses/permits from relevant authorities to operate quarries or borrow areas.

13. The location of quarries and borrow areas shall be subject to approval by relevant local and national authorities, including traditional authorities if the land on which the quarry or borrow areas fall in traditional land.

14. New extraction sites:

a) Shall not be located in the vicinity of settlement areas, cultural sites, wetlands or any other valued ecosystem component, or on on high or steep ground or in areas of high scenic value, and shall not be located less than 1km from such areas.

b) Shall not be located adjacent to stream channels wherever possible to avoid siltation of river channels. Where they are located near water sources, borrow pits and perimeter drains shall surround quarry sites.

c) Shall not be located in archaeological areas. Excavations in the vicinity of such areas shall proceed with great care and shall be done in the presence of government authorities having a mandate for their protection.

d) Shall not be located in forest reserves. However, where there are no other alternatives, permission shall be obtained from the appropriate authorities and an environmental impact study shall be conducted.

e) Shall be easily rehabilitated. Areas with minimal vegetation cover such as flat and bare ground, or areas covered with grass only or covered with shrubs less than 1.5m in height, are preferred.

f) Shall have clearly demarcated and marked boundaries to minimize vegetation clearing.

15. Vegetation clearing shall be restricted to the area required for safe operation of construction work. Vegetation clearing shall not be done more than two months in advance of operations.

16. Stockpile areas shall be located in areas where trees can act as buffers to prevent dust pollution. Perimeter drains shall be built around stockpile areas. Sediment and other pollutant traps shall be located at drainage exits from workings.

17. The Contractor shall deposit any excess material in accordance with the principles of these general conditions, and any applicable EMP, in areas approved by local authorities and/or the SE.

18. Areas for depositing hazardous materials such as contaminated liquid and solid materials shall be approved by the SE and appropriate local and/or national authorities before the commencement of work. Use of existing, approved sites shall be preferred over the establishment of new sites.

Rehabilitation and Soil Erosion Prevention

19. To the extent practicable, the Contractor shall rehabilitate the site progressively so that the rate of rehabilitation is similar to the rate of construction.

20. Always remove and retain topsoil for subsequent rehabilitation. Soils shall not be stripped when they are wet as this can lead to soil compaction and loss of structure.

21. Topsoil shall not be stored in large heaps. Low mounds of no more than 1 to 2m high are recommended.

22. Re-vegetate stockpiles to protect the soil from erosion, discourage weeds and maintain an active population of beneficial soil microbes.

23. Locate stockpiles where they will not be disturbed by future construction activities.

24. To the extent practicable, reinstate natural drainage patterns where they have been altered or impaired.

25. Remove toxic materials and dispose of them in designated sites. Backfill excavated areas with soils or overburden that is free of foreign material that could pollute groundwater and soil.

26. Identify potentially toxic overburden and screen with suitable material to prevent mobilization of toxins.

27. Ensure reshaped land is formed so as to be inherently stable, adequately drained and suitable for the desired long-term land use, and allow natural regeneration of vegetation.

28. Minimize the long-term visual impact by creating landforms that are compatible with the adjacent landscape.

29. Minimize erosion by wind and water both during and after the process of reinstatement.

30. Compacted surfaces shall be deep ripped to relieve compaction unless subsurface conditions dictate otherwise.

31. Revegetate with plant species that will control erosion, provide vegetative diversity and, through succession, contribute to a resilient ecosystem. The choice of plant species for rehabilitation shall be done in consultation with local research institutions, forest department and the local people.

Water Resources Management

32. The Contractor shall at all costs avoid conflicting with water demands of local communities.

33. Abstraction of both surface and underground water shall only be done with the consultation of the local community and after obtaining a permit from the relevant Water Authority.

34. Abstraction of water from wetlands shall be avoided. Where necessary, authority has to be obtained from relevant authorities.

35. Temporary damming of streams and rivers shall be done in such a way avoids disrupting water supplies to communities down stream, and maintains the ecological balance of the river system.

36. No construction water containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural water drainage courses.

37. Wash water from washing out of equipment shall not be discharged into water courses or road drains.

38. Site spoils and temporary stockpiles shall be located away from the drainage system, and surface run off shall be directed away from stockpiles to prevent erosion.

Traffic Management

39. Location of access roads/detours shall be done in consultation with the local community especially in important or sensitive environments. Access roads shall not traverse wetland areas.

40. Upon the completion of civil works, all access roads shall be ripped and rehabilitated.

41. Access roads shall be sprinkled with water at least five times a day in settled areas, and three times in unsettled areas, to suppress dust emissions.

Blasting

42. Blasting activities shall not take place less than 2km from settlement areas, cultural sites, or wetlands without the permission of the SE.

43. Blasting activities shall be done during working hours, and local communities shall be consulted on the proposed blasting times.

44. Noise levels reaching the communities from blasting activities shall not exceed 90 decibels.

Disposal of Unusable Elements

45. Unusable materials and construction elements such as electro-mechanical equipment, pipes, accessories and demolished structures will be disposed of in a manner approved by the SE. The Contractor has to agree with the SE which elements are to be surrendered to the Client's premises, which will be recycled or reused, and which will be disposed of at approved landfill sites.

46. As far as possible, abandoned pipelines shall remain in place. Where for any reason no alternative alignment for the new pipeline is possible, the old pipes shall be safely removed and stored at a safe place to be agreed upon with the SE and the local authorities concerned.

47. AC-pipes as well as broken parts thereof have to be treated as hazardous material and disposed of as specified above.

48. Unsuitable and demolished elements shall be dismantled to a size fitting on ordinary trucks for transport.

Health and Safety

49. In advance of the construction work, the Contractor shall mount an awareness and hygiene campaign. Workers and local residents shall be sensitized on health risks particularly of AIDS.

50. Adequate road signs to warn pedestrians and motorists of construction activities, diversions, etc. shall be provided at appropriate points.

51. Construction vehicles shall not exceed maximum speed limit of 40km per hour.

Repair of Private Property

52. Should the Contractor, deliberately or accidentally, damage private property, he shall repair the property to the owner's satisfaction and at his own cost. For each repair, the Contractor shall obtain from the owner a certificate that the damage has been made good satisfactorily in order to indemnify the Client from subsequent claims.

53. In cases where compensation for inconveniences, damage of crops etc. are claimed by the owner, the Client has to be informed by the Contractor through the SE. This compensation is in general settled under the responsibility of the Client before signing the Contract. In unforeseeable cases, the respective administrative entities of the Client will take care of compensation.

Contractor's Health, Safety and Environment Management Plan (HSE-MP)

54. Within 6 weeks of signing the Contract, the Contractor shall prepare an EHS-MP to ensure the adequate management of the health, safety, environmental and social aspects of the works, including implementation of the requirements of these general conditions and any specific requirements of an EMP for the works. The Contractor's EHS-MP will serve two main purposes:

For the Contractor, for internal purposes, to ensure that all measures are in place for adequate HSE management, and as an operational manual for his staff.
For the Client, supported where necessary by a SE, to ensure that the Contractor is fully prepared for the adequate management of the HSE aspects of the project, and as a basis for monitoring of the Contractor's HSE performance.

55. The Contractor's EHS-MP shall provide at least:
a description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in an EMP;
a description of specific mitigation measures that will be implemented in order to minimize adverse impacts;
a description of all planned monitoring activities (e.g. sediment discharges from borrow areas) and the reporting thereof; and
the internal organizational, management and reporting mechanisms put in place for such.

56. The Contractor's EHS-MP will be reviewed and approved by the Client before start of the works. This review should demonstrate if the Contractor's EHS-MP covers all of the identified impacts, and has defined appropriate measures to counteract any potential impacts.

HSE Reporting

57. The Contractor shall prepare bi-weekly progress reports to the SE on compliance with these general conditions, the project EMP if any, and his own EHS-MP. An example format for a Contractor HSE report is given below. It is expected that the Contractor's reports will include information on:
HSE management actions/measures taken, including approvals sought from local or national authorities;
Problems encountered in relation to HSE aspects (incidents, including delays, cost consequences, etc. as a result thereof);
Lack of compliance with contract requirements on the part of the Contractor;
Changes of assumptions, conditions, measures, designs and actual works in relation to HSE aspects; and
Observations, concerns raised and/or decisions taken with regard to HSE management during site meetings.

58. It is advisable that reporting of significant HSE incidents be done "as soon as practicable". Such incident reporting shall therefore be done individually. Also, it is advisable that the Contractor keep his own records on health, safety and welfare of persons, and damage to property. It is advisable to include such records, as well as copies of incident reports, as appendixes to the bi-weekly reports. Example formats for an incident notification and detailed report are given below. Details of HSE performance will be reported to the Client through the SE's reports to the Client.

Training of Contractor's Personnel

59. The Contractor shall provide sufficient training to his own personnel to ensure that they are all aware of the relevant aspects of these general conditions, any project EMP, and his own EHS-MP, and are able to fulfil their expected roles and functions. Specific training should be provided to those employees that have particular responsibilities associated with the implementation of the EHS-MP. General topics should be:

HSE in general (working procedures);

emergency procedures; and

social and cultural aspects (awareness raising on social issues).

Cost of Compliance

60. It is expected that compliance with these conditions is already part of standard good workmanship and state of art as generally required under this Contract. The item "Compliance with Environmental Management Conditions" in the Bill of Quantities covers these costs. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable HSE impact.

Example Format: HSE Report
Contract:
Period of reporting:
HSE management actions/measures:
Summarize HSE management actions/measures taken during period of reporting, including planning and management activities (e.g. risk and impact assessments), HSE training, specific design and work measures taken, etc.

HSE incidents:
Report on any problems encountered in relation to HSE aspects, including its consequences (delays, costs) and corrective measures taken. Include relevant incident reports.

HSE compliance:
Report on compliance with Contract HSE conditions, including any cases of non-compliance.

Changes:
Report on any changes of assumptions, conditions, measures, designs and actual works in relation to HSE aspects.

Concerns and observations:
Report on any observations, concerns raised and/or decisions taken with regard to HSE management during site meetings and visits.

Signature (Name, Title Date):
Contractor Representative

Annex 6. Budget Notes for Training Costs

Strengthening capacity of district stakeholders in ESMF implementation
District level workshop for 50 people for 2 days at district level

Activity	Item	Item detail	Cost	Total
Training district stakeholders on ESMF safeguards 2-day workshop	2 experts-professional fees	600,000 x 2 x 2	2,400,000	
	Expert accommodation	150,000 x2 x 2	600,000	
	Driver	55,000 x 2	110,000	
	DSA& fuel refund	50,000 x2 x50	5,000,000	
	lunch	10,000x 2x 55	1,100,000	
	Teas	10,000 x 2 x 55	1,100,000	
	Venue	200,000 x 2	400,000	
	stationery	300,000	300,000	
	water	2000 x55	110,000	
	Fuel (k'la to upcountry	Lumpsum	500,000	
		Cost of 1 district		**11,620,000**
		40 districts		**464,800,000**

Strengthening capacity of sub county stakeholders in ESMF implementation
Sub county level workshop for 40 people for 2 days

Activity	Item	Item detail	Cost	Total
Training sub county stakeholders on ESMF safeguards 2-day workshop	Facilitator allowance for 2 district facilitators	200,000 x 2 x 2	800,000	
	DSA& fuel refund	45,000 x2 x40	3,600,000	
	Driver -DSA	15,000 x 2	30,000	
	lunch	5,000x 2x 40	400,000	
	Teas	5,000 x 2 x 40	400,000	
	Venue	100,000 x 2	200,000	
	stationery	300,000	300,000	
	water	1000 x 40	40,000	
	Fuel	Lump sum	100,000	
		Cost of 1 sub county		**5,870,000**
		40 districts with at least average of 8 sub counties		**1,878,400,000**

*****If we take an average of 8 sub counties per district (8*40)=320 sub counties**

Strengthening capacity of community stakeholders in ESMF implementation
Community seminar for 100 people for 1 day at sub county level

Activity	Item	Item detail	Cost	Total
sensitizing community stakeholders on ESMF safeguards 1-day seminar at sub county level	Facilitator allowance for 2 district facilitators	200,000 x 2	400,000	
	transport refund	10,000x100	1,000,000	
	driver	15,000	15,000	
	lunch	5,000x 2x 40	400,000	
	Teas	5,000 x 2 x 40	400,000	
	Venue	100,000 x 2	200,000	
	stationery	300,000	300,000	
	water	1000 x 40	40,000	
	Fuel	Lump sum	100,000	
		Cost of 1 sub county		**2,855,000**
		40 districts with at least average of 8 sub counties		**913,600,000**

ESMF annual reviews and revision

Activity	Item	Item detail	Cost	Total
ESMF annual reviews and revision	Consultant – professional fees	800,000x3	2, 400,000	
	driver	55,000x3	165,000	
	Per diem - consultant	150,000x3	450,000	
	Fuel	500,000	500,000	
		Cost of 1 district		**3,515,000**
		40 districts with at least average of 8 sub counties		**140, 600, 000**

Annex 7. Summary of Selected World Bank Operational Policies and how the project will comply with them

OP 4.01 Environmental assessment	The objective of the policy is to ensure the projects financed by the Bank are sound and sustainable, and decision making be improved through an appropriate analysis of actions and of their potential environmental impacts. This policy is triggered if a project is likely to have environmental risks and impacts (adverse) on its area of influence. OP 4.01 covers the environmental impacts (nature air, water and land); human health and security; physical cultural resources; as well as trans-boundary and global environmental problems.	Depending on the project, and nature of impacts a range of instruments can be used: EIA, environmental audit, hazard or risk assessment and environmental management plan (EMP).When a project is likely to have sectoral or regional impacts, sectoral or regional EA is required. In the framework of the NUSAF 2, an Environmental and Social Management Framework (ESMF) has been prepared. The ESMF will help assess the impacts of future activities if necessary and orient implementation.
OP 4.04 Natural Habitats	This policy recognizes that the conservation of natural habitats is essential for long-term sustainable development. The Bank, therefore, supports the protection, maintenance, and rehabilitation of natural habitats in its project financing, as well as policy dialogue and analytical work. The Bank supports, and expects the Borrowers to apply, a precautionary approach to natural resource management to ensure opportunities for environmentally sustainable development.	This policy is triggered by any type of project (including any sub-project under sectoral investment regime or intermediary funding) that have the potential to cause some important conversion (loss) or degradation of natural habitats, whether directly (by the construction) or indirectly (by human activities triggered by the project). NUSAF 2 activities that could have adverse impacts on natural habitats will not be funded.
OP 4.36 Forests	The objective of this policy is to help borrowers exploit the potential of forests in order to curb poverty in a sustainable manner, efficiently integrate forests in sustainable economic development and protect vital local and global environmental services and forest values. Where forest restoration and plantations are needed in order to achieve these objectives, the Bank helps borrowers in forest restoration activities in order to maintain or develop biodiversity and the operation of ecosystems. The Bank helps borrowers in the creation of forest plantations appropriate from the environmental	This policy is triggered each time an investment project financed by the Bank: (i) has the potential to cause health impacts and the quality of forests or the rights and the well being of the people and their dependency level with the interaction with forests; or (ii) aims at bringing some change in the uses of natural forests or plantations. NUSAF 2 activities that will adversely affect the quality of the forests or bring in some change in the management will not be financed.

	viewpoint and socially beneficial and economically sound in order to help meet the growing forests' needs and services	
OP 4.09 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. The procurement of pesticides in a Bank-financed project is contingent on an assessment of the nature and degree of associated risk, taking into account the proposed use and the intended user.	The policy is triggered if procurement of pesticides is envisaged (either directly through the project or indirectly through on-lending); if the project may affect pest management in a way that harm could be done, even though the project is not envisaged to procure pesticides. This includes projects that may lead to substantially increased pesticide use and subsequent increase in health and environmental risks; and projects that may maintain or expand present pest management practices that are unsustainable. NUSAF 2 activities requiring the use of approved pesticides (agricultural activities and livestock projects) could be financed. That is why a Pest and Pesticides Management Plan will be required.
OP 4.11 Cultural property	The objective of this policy is the help countries avoid or reduce the adverse impacts of development projects on physical cultural resources. In order to implement such policy, the word "physical cultural resources" means movable and unmovable objects, sites, structures, natural's aspects of landscapes that have an importance form the archeological, paleontoligic, historic, architectural, religious, aesthetic or other. Physical cultural resources could be found in urban or rural areas, as well as both in the open air, under the ground and in the sea also.	This policy applies to all projects included in category C and B of the Environmental assessment scheduled in OP4.01. NUSAF 2 activities that are likely to have adverse impacts on cultural property will not be financed.
OP 4.12 Involuntary Resettlement	The objective of this policy is to avoid or minimize involuntary resettlement where feasible, exploring all viable alternative project designs. Furthermore, it intends to assist displaced persons in improving their former living standards; it encourages community participation in planning and implementing resettlement; and to provide assistance to affected people, regardless of the legality of title of land.	This policy is triggered not only if physical relocation occurs, but also by any loss of land resulting in: relocation or loss of shelter; loss of assets or access to assets; loss of income sources or means of livelihood, whether or not the affected people must move to another location. NUSAF 2 will avoid resettlement. In such cases the second best alternative sub project will be financed.

OP 4.10 Indigenous people	The objective of the policy is (i): ensure that the development process encourages full respect of dignity, human rights and cultural features of indigenous people; (ii) ensure they do not suffer from the detrimental effects during the development process; and ensure indigenous people reap economic and social advantages compatible with their culture.	The policy is triggered when the project affects indigenous people (with the characteristics described in OP 4.10) in the area covered by the project. The rights of indigenous peoples will be upheld during NUSAF 2 implementation.

Annex 8. Sub Project Cycle

Pre-subproject cycle

The pre-subproject cycle has the following stages:

(i) Central Government Consultation and Guidance

At the beginning and through out the implementation of the Project, the Technical Support Team (TST) will consult with and receive guidance from the sector line ministries in the following areas:

- Policy matters
- Sector priorities, standards and norms.
- Enterprise selection
- Sensitisation , mobilization, monitoring and supervision of Project activities

(ii) Mobilization and Sensitization

At this stage, NUSAF Technical Support Team (TST), District Authorities and Sub-county Authorities will undertake awareness creation among the key stakeholders of the Project at national, district, sub-county and community levels, with the aim of:

- Creating a good understanding of the Project objectives, access criteria and implementation modalities.
- Inspiring and bringing determination and self confidence among the target population.
- Encouraging stakeholder participation at the various levels of Project implementation

The awareness creation will be done through the electronic, print and traditional media, workshops, seminars and community meetings. The sensitization and mobilization campaigns are expected to initially stimulate community interest in the project support which they will present in the form of subproject interest forms (SPIFs) at the Sub-county level, while at the same time promoting effective stakeholder participation, transparency and accountability in Project implementation through out the subproject cycle

Sub-project cycle

(i). Subproject Identification and Preparation

At the identification and preparation stage, the Sub-county technical staff under the coordination of the Community Development Officer (CDO), supported by other sector experts will facilitate Extended Participatory Rural Appraisal (EPRA) processes in the communities that will have expressed interest. The EPRA will enable the communities:

- Develop a mind-set to do a self –assessment and participate in shaping the future of their community.

- Generate baseline data on the socio-economic situation of their communities
- Identify, prioritize and plan for their needs.
- Identify locally available resources and determine their community contribution to their priority development initiative
- Establish the resource gaps within the community and identify potential sources of support
- Prepare a community action plans (CAP)
- Elect their Community Project Management Committee
- Prepare sub-project proposals or applications

The community will submit the subproject proposal to the Sub-county Technical Planning Committee (STPC) through the CDO.

(ii) Desk appraisal

On receipt of the subproject proposals, the STPC with the guidance of the CDO will constitute subproject appraisal teams, comprised of members with relevant knowledge in the various subprojects received. The appraisal teams will begin the appraisal process with the Desk appraisal which involves review of the subproject documents submitted to ascertain:

- Completeness of the subproject application forms/ proposals
- Conformity with sectoral standards and norms
- Conformity with project guidelines
- Appropriateness of the subproject budget

(iii) Field appraisal

After the desk appraisal, the appraisal teams will undertake field appraisal of each subproject at the respective subproject sites. During the field appraisal, the appraisal team will:

- Verify the information provided in the application form/subproject proposal
- Establish whether or not the group members participated in the preparation of the proposal
- Establish whether or not the beneficiaries are the right target
- Review the subproject proposals and appraisal reports for viability and profitability
- Assess the ability of the subproject to bring about improvement in the lives of the people
- Establish the capacity of the community to implement and manage the subproject
- Establish the availability of relevant support systems (eg technical advisory services) and linkages with other programmes in the community
- Assess the compliance of the subproject with environmental and social safeguards provisions
- Confirm the availability of community contribution to subproject implementation
- Assess the ability and readiness of the community to sustain the subproject beyond the Project life.
- Assess gender responsiveness and equity sensitivity of the subproject

After the desk and field appraisals, the Sub-county Chief will forward all the subprojects that will have been recommended for funding to the Chief Administrative Officer (CAO) to initiate the process of approval by the District Technical Planning Committee (DTPC) and the District Executive Committee (DEC).

(iv) Approval

Subproject approval will be done by the DTPC and DEC successively. During the approval process the DTPC reviews all the subproject proposals recommended by the STPC with a view to confirming the following:

- Accuracy and completeness of subproject documentation
- Compliance with subproject guidelines and procedures
- Compliance with sector norms and standards
- Appropriateness of the subproject budget (should be within the set ceilings)
- Viability and sustainability (operations and maintenance arrangements) of the subproject
- Gender responsiveness and equity sensitivity
- Compliance with environmental and social safeguards guidelines

All the subprojects recommended for funding by the DTPC will be submitted to the DEC for review and endorsement before submission to TST/OPM.

All subprojects not recommended for funding should be deferred to the Sub-county with clear reasons and guidelines for refinement at community level.

The District Executive Committees will approve Livelihood Investment Support (LIS) sub-projects and Community Infrastructure Rehabilitation (CIR) subprojects not exceeding US$ 10,000 (UGX. 18 million) and US$ 30,000 (UGX. 54 million) respectively. All subprojects whose budgets exceed the set component thresholds will be recommended by DEC to the PRDP-TWG through the TST for approval, subject to an absolute cap of US$ 50,000 (UGX. 90 million).

(v) Fund disbursement

The fund disbursement process involves:

- Review of subproject proposals submitted for funding by Technical Support Team
- Endorsement of the subproject funding schedule by the PRDP-TWG
- Transfer of subproject funds to the District Project Accounts for onward disbursement to the respective community subproject accounts.
- Prior to the disbursement of funds to the community subproject accounts, TST will give feedback to the Districts on the subprojects funding decision to allow the Districts to:
    - ③ Sign subproject financing agreements between the Local Authorities and the communities
    - ③ Facilitate the communities to open subproject bank accounts
    - ③ Re-ascertain availability of community contribution

③ Provide basic training to the Community Project Management Committees

- Disbursements will be in single tranches for subprojects whose values do not exceed US$ 10,000 (UGX. 18 million) and two equal tranches for those whose values are above US$ 10,000 (UGX. 18 million) but not exceeding US$ 50,000 (UGX. 90 million).
- The first tranche release will be based on the subproject funding approval while the second tranche disbursements will be made on production of financial reports (with at least 70% level of accountability for subproject funds disbursed) and progress reports.

(vii) Implementation

Sub project implementation entails:

- Subproject launch by the Local Authorities at the respective subproject sites to emphasize the obligations, roles and responsibilities of the various stakeholders.
- Implementation of approved subproject activities by the communities or Local Authorities
- Provision of technical support to communities by the sector specialists
- Community subprojects will be implemented by communities themselves through the elected Community Project Management Committees (CPMCs) and supported by District/Sub-county sector experts, extension officers, NGOs/CSOs operating in the community.
- Multi-community subprojects for which the community may not have the capacity to implement will be implemented by the District, Sub-county or Line Ministry on behalf of the communities.
- The implementation of each subproject is expected to be completed within twelve (12) months from receipt of the first tranche.

(viii) Monitoring and supervision

Monitoring and supervision will involve:

- Field visits to subproject sites
- Providing technical support and guidance to the implementers
- Review of sub-project implementation reports
- Review of progress in implementation of recommendations of previous monitoring reports
- Documentation and reporting of progress in implementation and making recommendations for future actions.
- Community level tracking of subprojects for feasibility, viability and functionality

Monitoring and supervision of subprojects will be done at two (2) levels i.e national and local level:

- At the local level, monitoring and supervision will done by the communities themselves, Parish Development Committees (PDCs), Sub-county Council (LC III), Sub-county Technical Planning Committee (STPC), District Technical

Planning Committee (DTPC), District Council (LC V), Resident District Commissioners (RDCs) and the NGOs/CSOs operating in the Project area.

- The national level monitoring and supervision will done by the PRDP-TWG, Line Ministries, OPM (TST, US-P/D, PS, MSNUR & PM), President's Office and IGG.
- Monitoring by the national stakeholders will adopt a "mission-like" approach for effective information sharing on emerging issues and consensus building on the implementation of recommendations made by the various monitoring teams.

(ix) Commissioning

Upon completion, each subproject will be commissioned by the Local Authorities. The commissioning ceremony will be marked by:

- Receipt of subproject completion report by the Sub-county/District Authorities from the CPMC
- Issuing of sub-project completion certificate to the CMPC by the Sub-county/District Authorities
- Handover of sub project assets to beneficiaries by the Sub-county/District Authorities
- Inauguration of the subproject operation and maintenance committee (where applicable)

2.1.3 Post-subproject cycle

This stage marks the life of the subproject after Project support. Post-subproject activities can broadly be categorized as:

(a) Post-completion activities for sustainability

These include but not limited to:

- Operations and maintenance of subprojects/community assets by the communities supported by the Sub-county /District Local Governments.
- Advisory services and capacity enhancement support under the overall Local Government planning
- Provision of market information and other existing opportunities for investment growth and performance improvement
- Linking communities to relevant financial and specialized institutions

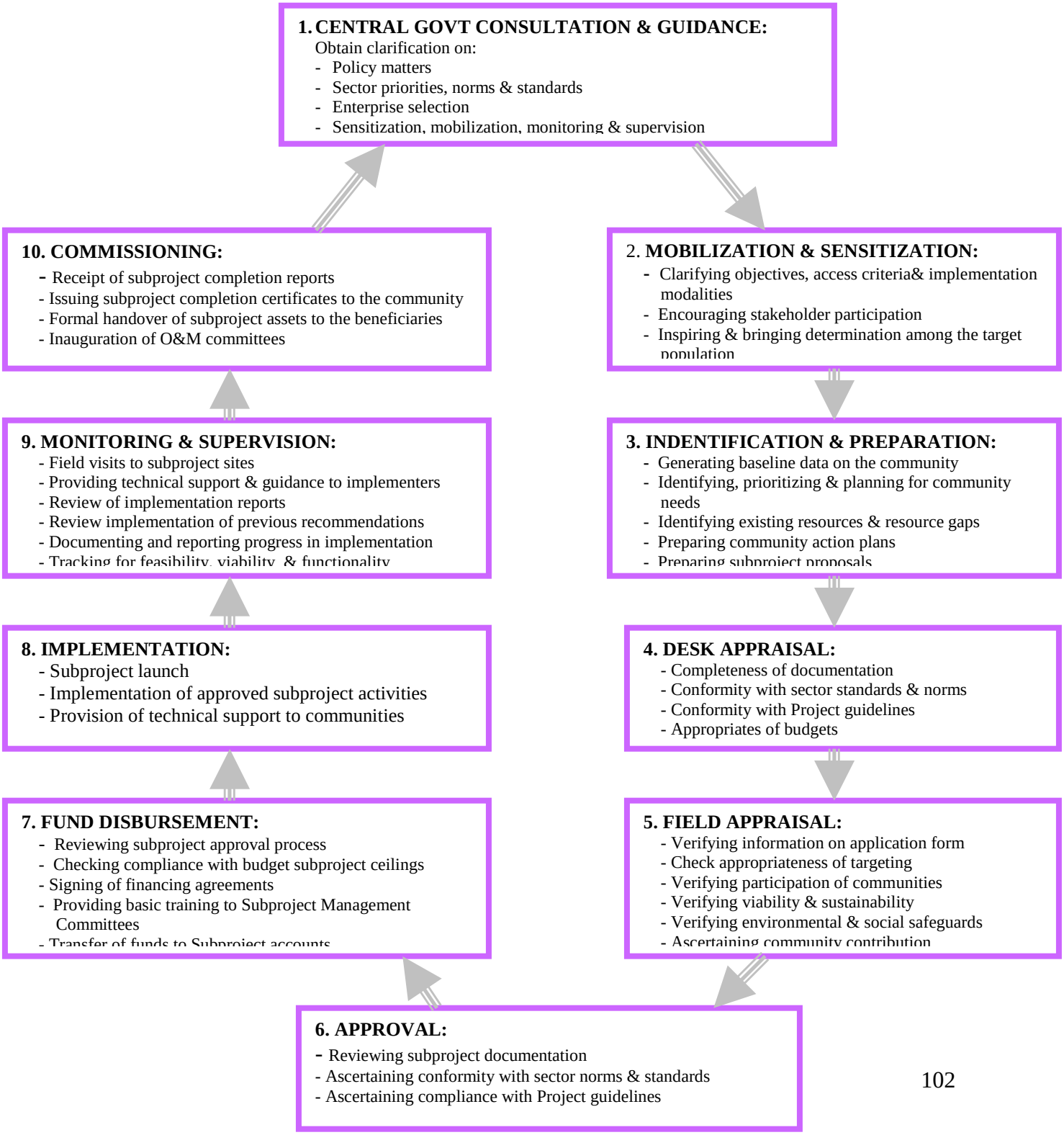
(b) Evaluation to assess progress towards meeting the Project Development Objective.

Approximately six months after the commissioning a subproject, the District and OPM will organize Sector experts or Consultants to evaluate the completed subproject. The sub-project evaluation will focus on:

- Technical performance
- Resource utilization
- Participation of beneficiaries
- Fulfillment of community obligations

- Fulfillment of Local Governments and co-operating agencies obligations
- The impact/intermediate outcomes
- Project sustainability

NUSAF 2 Subproject Cycle (Note: All the sub project cycle stages summarized below take into consideration environmental and social Management Concerns



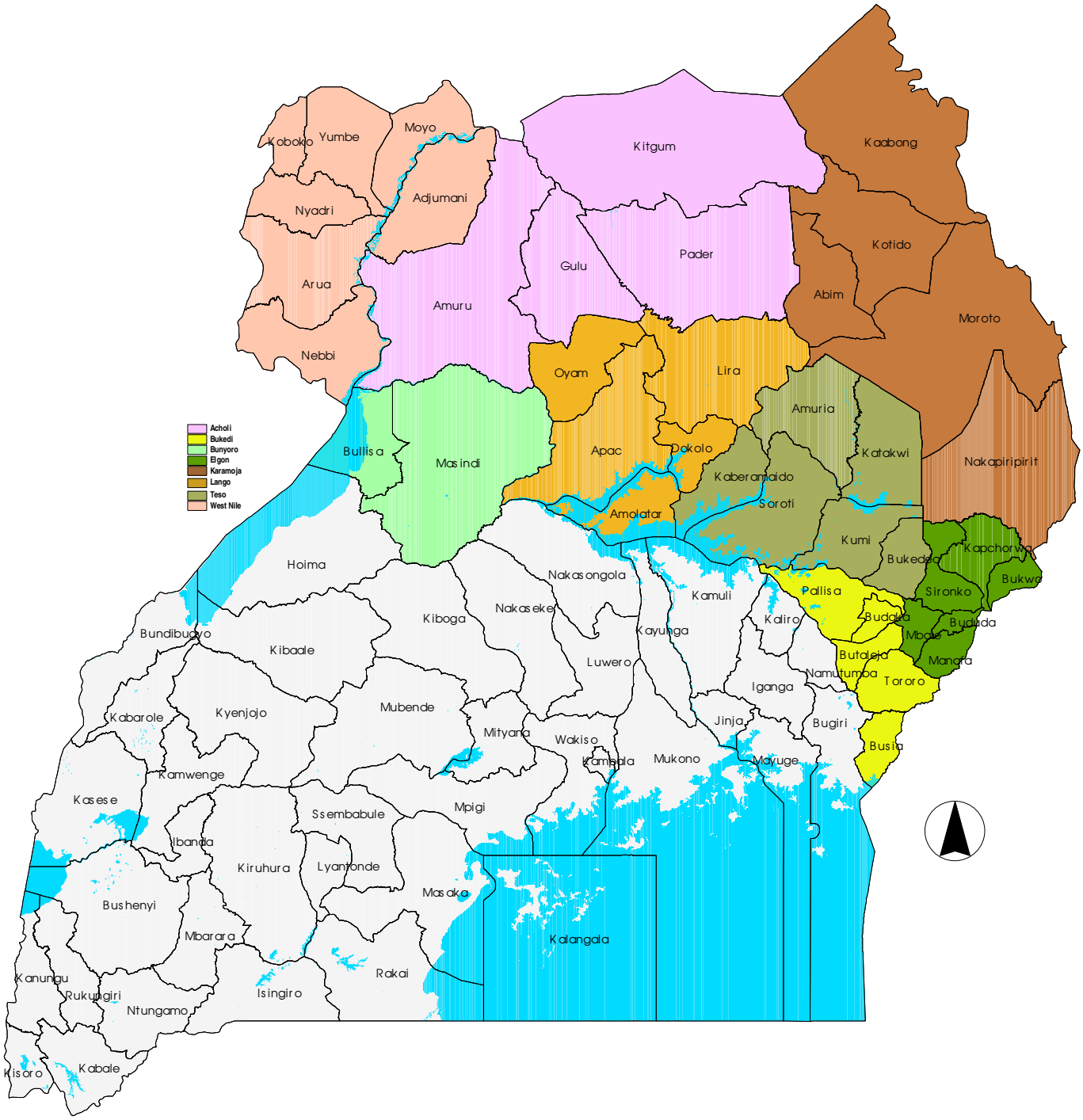
2.1.5 Delivery Benchmarks

The management of the subproject cycle will be guided by benchmarks that stipulate the maximum number of days to be spent at each stage of the subproject cycle. The M&E system will have an inbuilt mechanism of tracking the subproject development process through registers at community, sub-county, district and national levels. This will help monitor the performance of the each Local Government in terms of management of the subproject cycle with a view to providing technical supervision and capacity enhancement support to improve performance at the various levels of Project implementation.

Benchmarks for the 12-months sub-project cycle

Stage	Responsibility Centre	Maximum duration (days)
1. Central Government Guidance	♦ Sector Line Ministries ♦ Central Government	Ongoing
2. Sensitisation & Mobilisation	♦ District Chairperson ♦ CAO ♦ Subcounty Chairperson ♦ Sub-county Chief ♦ RDC	Ongoing
3. Sub-project Identification & Preparation (EPRA)	♦ Sub-county Chief ♦ Community Dev't Officer ♦ Sector Specialists ♦ CSOs/CBOs	14 days
4. Desk Appraisal	♦ Sub-county Technical staff ♦ District Technical staff	7 days
5. Field Appraisal	♦ Sub-county Technical staff ♦ District Technical staff	7 days
6. Sub-project Approval	♦ District Technical staff ♦ District Executive Committee	7 days
7. Fund Disbursement	♦ OPM ♦ District Local Governments	14 days
8. Implementation	♦ Community Project Management Committee ♦ Local Government ♦ Local service providers (CSOs/NGOs)	270 days
9. Monitoring & Supervision	♦ Communities ♦ Local Government Staff ♦ Sector Line Ministries	Ongoing
10. Commissioning	♦ Community Project Management Committee ♦ Local Government Staff	7 days
11. Post-subproject cycle (a) Operation & maintenance	♦ Community ♦ Local Governments ♦ Sector Line Ministries	Ongoing
(b) Subproject evaluation	♦ Community ♦ Local Governments ♦ Sector Line Ministries ♦ Uganda Bureau of Statistics ♦ NGOs/CSOs	Ongoing

Annex 9. Map of Uganda Showing NUSAF 2 Districts



Annex 9. Local Government Social and Environment checklist for possible Parish, Sub County and Municipal projects

The checklists are contained in separate volumes and are available from NUSAF 2 at OPM.