

REPUBLIC OF UGANDA

WORLD BANK

PROGRAM-FOR-RESULTS FINANCING

UGANDA INTERGOVERNMENTAL FISCAL TRANSFER PROGRAM

ADDITIONAL FINANCING

(UgIFT-AF)

(P172868)

**ENVIRONMENT AND SOCIAL SYSTEMS ASSESSMENT
(ESSA) - UPDATE**

FINAL REPORT

Prepared by the World Bank

June 22, 2020

Table of Contents

List of Acronyms	3
Executive Summary.....	4
SECTION 1: Introduction	7
1.1 Background.....	7
1.2 Description of the UgIFT-AF Program	9
1.3 Objectives of the ESSA Update.....	9
1.4 Methodology.....	10
1.5 ESSA Core Principles.....	10
SECTION 2: Overview of Key Investments, Benefits, Risks and Mitigation Measures	12
2.1 Overview of key investments under the program.....	12
2.2 Environmental and Social benefits	13
2.3 Environmental and Social Risks and Impacts	13
SECTION 3: Assessment of the Country Environmental and Social Management System	27
3.1 Assessment of the Country System as Written (Regulatory and Institutional Framework)	27
3.1.1 Additional Policies and Laws relevant to UgIFT-AF and Regulatory Assessment	27
3.1.2 Assessment of the Institutional Framework	29
3.2 Assessment of System Performance -Implementation challenges	32
SECTION 4: Consistency of Country system with Core principles.....	37
SECTION 5: Recommended Remedial Measures to Strengthen Systems Performance.....	48
5.1 Enhancing the implementation of Environmental and Social requirements in the current UgIFT program.....	48
5.2 Legal terms and conditions.....	49
5.3 DLIs and their credible verification protocols.....	49
5.4 The PforR Program Action Plan includes activities to be completed prior effectiveness and during implementation	50
Tables	
Table 2-1 Overview of Key Risks, Mitigation Measures, Action Matrix and Performance Assessment	15
Table 4-1 Consistency of country systems with ESSA Core principles.....	37
Table 5-1 D LIs and verification protocols.....	49
Table 5-2 Proposed Program Action Plan (PAP) relating to E&S Considerations	52
Annexes	
Annex 1: Stakeholder Consultations – Issues, Concerns and Disclosure.....	54
Annex 2: List of Participants Consulted at Local Government for the ESSA-Update.....	58
Annex 3: UgIFT ESSA Consultative Meeting Minutes with Ministries and Central Agencies.....	60
Annex 4: UgIFT ESSA Virtual Stakeholder Feedback/Validation.....	64

List of Acronyms

AF	Additional Financing
CDO	Community Development Officer
CPF	Country Partnership Framework
CSO	Civil Society Organization
DEO	District Environment Officer
DLG	District Local Government
DLIs	Disbursement-linked Indicators
E&S	Environment and Social
ESHS	Environment, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Mitigation Plan
ESSA	Environmental and Social Management System Assessment
GDP	Gross Domestic Product
GoU	Government of Uganda
IDP	Internally Displaced Person
IPF	Investment Project Financing
LG	Local Government
MC	Municipal Council
MEO	Municipal Environmental Officer
MOGLSD	Ministry of Gender, Labour and Social Development
MOLHUD	Ministry of Land, Housing and Urban Development
MOLG	Ministry of Local Government
MTP	Medium Term Plan
NEMA	National Environmental Management Agency
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAP	Program Action Plan
PDO	Program Development Objective
PforR	Program for Results
PIP	Program Improvement Plan
POM	Program Operational Manual
PSC	Program Steering Committee
SBD	Standard Bidding Documents
TC	Town Clerk

ToR
VACiS

Terms of Reference
Violence Against Children in School

Executive Summary

Introduction:

The Uganda Intergovernmental Fiscal Transfers (UgIFT) Program for Results (PforR) supports the GoU's Intergovernmental Fiscal Transfers Reforms Program (IFTRP), enhancing the adequacy and equity of fiscal transfers and improving fiscal management of resources for service delivery by Local Governments (LGs). The original UGIFT program supports local government infrastructural development and service delivery in health and education in 121 district local governments and 41 Municipal councils. Overall, the performance of the program between June 2019 when it became effective and January 2020 has been moderately satisfactory, however, in terms of Environmental and Social safeguards, the performance has been unsatisfactory for the said period. The Unsatisfactory safeguards performance is due to: failure integrate ESHS requirements into designs; B.O.Qs, bidding and contract documents; civil works proceeding without ESMPs in some cases; delayed screening of project sites; weak monitoring and supervision of projects during construction; no clear functional grievance redress mechanism, and delays in land acquisition for project sites impacting on program implementation.

The proposed UgIFT Additional Financing (AF) will continue to support construction of secondary schools and health centers III while broadening the scope to include rural water infrastructure; micro irrigation systems and integrate services in refugee settlements into the LG system. The update of the Environment and Social System (ESSA), therefore, aimed at assessing the current national system of government for managing Environment and Social (E&S) risks and impacts against the Bank's core principles for PforR programs, in the context of the new scope of the UgIFT-AF program; and propose measures for strengthening identified gaps in the system.

Methodology

The ESSA update was informed by the findings from relevant literature reviews including the original ESSA done in 2017, WB Country system assessment for management E&S risks throughout project cycle of 2019, updated national legislations, annual performance assessments among others. The team also carried out consultation with both the key central government institutions and 12 selected sample local governments. At the LGs interviews and discussions were held with technical officers including: The Chief Administrative Officers, District Environment Officers, District Natural Resource Officers, District Water Officers, District Agricultural Officers and Community Development Officers among others. The LGs sampled were: Wakiso, Kasanda & Mityana for Central; Ntungamo, Kanungu & Kazo – for Western; Kiryandongo, Nwoya & Madi Okollo in Northern region; and Kapchorwa, Sironko & Bukedea for Eastern region. In addition to the consultative meetings at the districts, a couple of civil works sites under the current UgIFT were inspected in Wakiso and Kapchorwa Districts. The central government agencies consulted include: Ministry of Water and Environment (MWE), Ministry of Agriculture, Animal Industry and Fisheries (MAAIF), Ministry of Education and Sport (MoES), Ministry of Health (MoH), Ministry of Gender, Labour and Social Development (MGLSD), Ministry of Local Government (MLG), Ministry of Finance, Planning and Economic Development (MoFPED), Office of the Prime Minister (OPM) and National Environment Management Authority (NEMA).

Findings from literature review and face to face consultative meetings were compiled in a draft ESSA that informed a stakeholder validation/consultation with various participants from the relevant line ministries and agencies, Non-Governmental Organizations, and Civil Society Organizations. Specifically :

- MoFPED,
- MoGLSD,
- MoES,
- MoLG,
- MWE,
- NEMA,
- Bank Information Centre (BIC),
- Center for Domestic Violence Prevention (CEDOVIP),
- World Vision Uganda (WVU),
- Joy for Children (JFC),
- BRAC and,
- The World Bank

The meeting was scheduled for early April 2020 but because of the COVID-19 government-imposed restrictions, it was cancelled and instead, the stakeholders were sent an electronic version of the draft ESSA report and asked to provide feedback via email. The team compiled the various inputs which ranged from small reports, emails, and tracked changes into the original report. Relevant and pertinent comments/suggestions were incorporated into this report and comment -response matrix prepared.

Risks/Impacts

The risks and impacts that will arise for implementing the program activities are generally considered moderate, predictable and can be mitigated at design stages or during implementation phases of the subproject's activities. The potential Environmental risks and impacts are those commonly associated with civil works including vegetation clearance, degradation of natural habitats if poorly sited, land degradation due to excavation, soil erosion, poor management of general waste and health care waste, high demands for biomass energy for use in schools; for micro irrigation and rural water facilities may lead to competing demand for water, logging from irrigation, pollution of water sources from poor use of agrochemicals, poor management of agrochemical waste containers, health and safety of workers and communities.

The likely social risks and impacts identified include land acquisition and resettlement related risks and impacts; Violence Against Children (VAC) including child labour, defilement, teenage pregnancies, child marriage, school drop outs, increase in sex work and child abandonment; Gender-Based Violence (GBV) and domestic violence,(more prevalent in the refugee hosting and post conflict Districts); contraction and spread of STD/STIs including HIV/AIDS due to labour influx; poor workers' management including underpayment, non-payment, delayed payment of workers and lack of documentation (contracts/appointment letters/daily duty roster sign in and out of casual labour) for employment; gender related risks i.e. inconsideration of working mothers' interests and needs such as sanitation and provision of shelters for protecting, and facilities for breast feeding their babies. From the governance perspective and rights-based approach to development, there is non-participatory project monitoring. Monitoring checklist including bills of quantities are never shared with the institutional in-charges including head teachers and health facility -in charges. When it comes to supervision of the contractor on site, in particular schools and health facilities, the head teachers or the health facility in-charge are not able to monitor construction works from an informed/empowered basis. Thereby providing an opportunity for the contractor to carry out shoddy work.

Finding and remedial measures

The ESSA Update screened the proposed program activities for likely Environmental and Social effects and associated risks; analyzed the borrower's system as written and the system performance; made comparison with the core principles to determine any gaps and in turn informed the acceptability analysis. The ESSA

identified strengths, gaps, opportunities and risks in Uganda's environmental and social management system with respect to effectively addressing the environmental and social risks associated with the Program. Whereas the national system is generally acceptable in terms of having institutions with well-enough defined mandates and adequate enabling legislation, the weaknesses in the system performance is recognized by all stakeholders. Some of the observations that led to the unsatisfactory system performance include: under-resourced institutions and departments responsible of E&S, noncompliance legislative provisions for E&S risk management; weak coordination amongst implementing institutions on E&S; Weak monitoring and supervision of projects during construction ; no clear functional grievance redress mechanism, delays in land acquisition for project sites impacting on program implementation; limited technical knowledge in E&S risks/impacts management and the unsatisfactory safeguards performance in the current UgIFT program amongst others. Thus, the recommended remedial measures to strengthen systems performance in UgIFT-AF was considered at four levels namely:

- (i) Enhancing the implementation of Environmental and Social requirements in the current UgIFT program;
- (ii) Legal terms and conditions that will require government to maintain compliance to E&S requirements throughout the program;
- (iii) The design of UgIFT-AF at preparation has integrated the Environmental and Social requirements in the DLIs and its verification protocols.
- (iv) The PforR Program Action Plan which includes activities to be completed prior effectiveness and during implementation.

SECTION 1: Introduction

1. The original Uganda Intergovernmental Fiscal Transfers (UgIFT) Program for Results (P160250) was approved by the Board on June 27, 2017 with an amount of USD200 million and declared effective on May 29, 2019, in support of the GoU's Intergovernmental Fiscal Transfers Reforms Program (IFTRP). The original Program has a closing date of December 31, 2023 and has disbursed 49 percent (49%) as of mid-February, 2020. Despite late effectiveness, the Government of Uganda (GoU) has been implementing the Program since Board approval, which has enabled disbursement in line with met DLIs soon after the Program became effective. As of the last Implementation Support Mission of December, 2019, the safeguards performance of the original Program was rated Unsatisfactory.
2. An additional funding USD 250 million is now being proposed to continually enhance the adequacy and equity of fiscal transfers to Local Governments (LGs) and improving fiscal management of resources for service delivery by LGs in water and environment services and micro scale irrigation system in addition to education and health sectors covered in the original scope. The integration of services provided to refugees and host communities into the LG system component has also been proposed for addition to the program. The proposal additionally extends the timeframe of the Program to June 2024. This will involve extending the program results by a single financial year from the year ending June 2022 to the year ending June 2023 and subsequently allowing for the verification of those results.

1.1 Background

3. The 1995 Constitution, amended in 2005 and 1997 Local Government Act provide a framework for a highly politically, administratively and fiscally decentralized system and stipulate the local governments' responsibility to deliver basic services. District and Municipal Local Governments are, inter alia, responsible for delivering basic healthcare services, primary and secondary education, skills development, rural water and sanitation and productive services, such as micro scale irrigation. From the outset, most services were financed via earmarked conditional grants rather than unconditional grants, and the value of these transfers increased rapidly in the late 1990s and early 2000s underpinned by debt relief and development partner budget support.
4. In the mid-2000s, transfers began to decline in real per capita terms, because of changing government priorities that shifted toward infrastructure spending. By 2015/16, non-wage recurrent transfers declined by 51 percent per capita in primary education and 65 percent in health from their peaks in the 2000s. Allocations to Rural Water and Sanitation have declined for longer, and by 2018/19 had fallen by 80 percent since their peak in 2000. Meanwhile some local government mandates have remained unfunded. This includes micro scale irrigation, notwithstanding national policies which increasingly stress the impact of climate change in terms of higher rainfall variability which puts at risk the traditional rain-fed agricultural model, with implications for the poorest segment of the population as well as for the country food security.
5. The 1995 Constitution of Uganda (amended in 2005) is a gender sensitive one, it prohibits discrimination on the basis of gender and recognizes the significant role played by women in society. The Constitution laid a basis for formulation and approval of a number of gender sensitive laws. These include¹:
 - The 1997 Local Government Act (amended 2001), which stipulates that at least one third of the membership of all local councils at all levels must be women; and reserves positions for women in strategic local government bodies such as the executive, contracts committee, land board and the district service commission.

¹ Nite Tanzarn, Support to Implementation of Government of Uganda's Gender Equality Policy Commitments in the Road Sub-Sector, 2013

- The *1998 Land Act* provides for the protection of women's land rights. The amended Act [2006] introduced the requirement for spousal consent to dispose of land on which they subsist.
- The *Employment Act [2006]* (i) outlaws discrimination in employment on the basis of, amongst other things, sex; (ii) defines sexual harassment and outlines measures to seek redress; (iii) requires that an employer who employs more than twenty five employees to have in place measures to prevent sexual harassment occurring at their workplace; (iv) provides for 60 working days of fully paid maternity leave and job security associated to role/function; and (v) provides for 4 working days of paternity leave.
- The National Equal Opportunities Policy codified into the Equal Opportunities Commission Act [2007] is intended to facilitate the implementation and enforcement of the affirmative action provision in the Constitution.

Other laws that were put in place to redress laws, cultures, customs, or traditions, which were against the dignity, welfare or interest of women or which undermined their status and were prohibited by the Constitution include: The Domestic Violence Act 2010 and its regulations 2011, The Prohibition of Female Genital Mutilation Act 2010, The Prevention of Trafficking in Persons Act 2010, The Penal Code Act, Cap 120, The Children Act Cap 59 and The International Criminal Court Act 2010.

The Public Financial Management Act 2015 stipulates that the Minister of Finance in consultation with the Equals Opportunity Commission shall issue a certificate certifying that the budget framework paper is: (a) gender and equity responsive; and (b) specifying measures taken to equalize opportunities for women, men, persons with disabilities and other marginalized groups. The Act is a game changer in gender budgeting in Uganda, which has contributed to institutionalizing it.

6. **The inadequacy and inequity of transfers to LGs impacted service delivery and was further amplified by institutional deficiencies.** About one third of positions in local governments are vacant, and the share of vacancies varies significantly across LGs. On the administrative and political side, local councils are elected and exercise a certain degree of authority over local civil service staff. However, districts' chief administrative officers are appointed by the central government. Furthermore, the number of LGs has increased significantly over the past decade, with the number of districts and municipalities rising from 45 in 1997 to 133 in 2014 and to over 170 in 2019. This has led to an acceleration in the cost of administering local service delivery and has adversely affected institutional capacity to deliver such services.
7. **The refugee influx in recent years has aggravated the deficiencies in service delivery in thirteen² districts, which are among the poorest and most vulnerable in the country.** Uganda is the largest refugee hosting country in Africa and the third-largest host in the world with 1.3 million refugees and asylum seekers. The country saw a dramatic increase in refugee numbers in July 2016 following the influx of refugees from South Sudan, followed by an additional influx from the Democratic Republic of Congo (DRC) in early 2018. New refugee inflows have put enormous pressure on service delivery provided to the local host community and put strains on natural resources and the environment.
8. **The Uganda Intergovernmental Fiscal Transfer Program (UgIFT) has a strategic relevance because it addresses the binding constraint of low and inequitable levels of funding for health and education at the local level.** The UgIFT Program is based on a premise that improved local

2 Yumbe, Adjumani, Arua, Isingiro, Obongi, Kyegegwa, Kikuube, Kamwenge, Kiryandondo, Lamwo, Koboko, Hoima, Kampala

government financing of education and health services is a necessary condition for improved health and education outcomes, but that it needs to be complemented with sustained policy improvements and investment in these two sectors.

9. As the additional financing will be used for health, education, water infrastructure development, Irrigation and non-wage recurrent expenditures at the local government level in Uganda, in this instance, it is necessary to further assess the capacity of the central government to ensure that the districts sustainably and effectively administer the funds provided. The initial Environmental and Social Systems Assessment was undertaken in May 2017 but is now being updated to cover the new areas of water infrastructure and micro irrigation systems and areas of improvement given the unsatisfactory findings.

1.2 Description of the UgIFT-AF Program

10. The GoU is in the process of revising the IFTRP to address the challenges to service delivery across sectors and is updating the associated Medium-Term Plan (MTP) for financing local service delivery based on the sector costing exercise planned in the original IFTRP. The Additional Finance will support these changes. The updated IFTRP will also include a new area focusing on central government oversight of local service delivery.
11. The success of the Program has led the GoU to request a deepening and broadening of the scope of the Program. Additional financing from UgIFT can also provide fiscal space to support sustainable allocations to wage, non-wage recurrent and development inputs across an increased share of sectors based on the costing exercise in the updated MTP. UgIFT is also well placed to support GoU in meeting the challenge of ensuring the reforms have an impact on service delivery and integrating services provided in refugee settlements to refugees and the local hosting community into the LG system. There are three key rationales for additional financing.
12. First, increasing the scope of services will broaden the reforms within IFTRP. Whilst the IFTRP covers all decentralized services, the original UgIFT only covers the two largest decentralized sectors (Education and Health), while other sectors remain severely underfunded. With the original UgIFT recognized as an effective framework to support sectoral services, the scope can be extended to other decentralized sectors within the IFTRP to also improve adequacy and equity.
 - a) **Water and Environment.** Funding of Rural Water Supply and Sanitation has been declining in real per-capita terms since the beginning of the millennium. Meanwhile, the financing of environmental management functions at the local government level have been discontinued. The rural water and sanitation sector have strengthened the design of fiscal transfers and the sector has been part of the LGPA supported by UgIFT from the outset.
 - b) **Micro Irrigation.** Irrigation is a function of LGs, which remains unfunded. The 2017 National Irrigation Policy recently elaborated their role in the development of irrigation infrastructure, management and the provision of auxiliary extension services. Micro irrigation is becoming increasingly important in making agriculture more resilient to climate change, as well as allow for intensification and diversification of production. Despite the availability of water resources and the increasing need for irrigation given recent droughts, irrigation in Uganda has not expanded. LGs can have a pivotal role in the creation of the enabling environment for the development of micro irrigation among smallholder farmers and thereby contribute to poverty reduction

1.3 Objectives of the ESSA Update

13. The objective was to assess the overall National Environmental and Social Systems for managing risks and impacts against the Bank's core principles for PforR programs, in the context of the new

scope of the UgIFT-AF program; and propose measures for strengthening identified gaps in the system.

1.4 Methodology

14. The update of the ESSA was informed by the findings from relevant document reviews including the original ESSA, subsequent reports of World Bank's implementation support missions, Implementation Status and results Report (ISR), the updated/amended laws, regulations, policies and guidelines relevant to the sectors of concern in this PforR AF operation, as well as consultations with key central government agencies such as; Ministry of Water and Environment (MWE), Ministry of Agriculture, Animal Industry and Fisheries (MAAIF), Ministry of Education and Sport (MoES), Ministry of Health (MoH), Ministry of Gender, Labour and Social Development (MGLSD), Ministry of Local Government (MLG), Ministry of Finance, Planning and Economic Development (MoFPED), Office of the Prime Minister (OPM) and selected Government institutions such as National Environment Management Authority (NEMA).

Twelve (12) District Local Government (DLG) were sampled for the operational level performance assessment of the planning and implementation of social and environmental measures. The following were selected to include (i) an even geographical spread across regions, (ii) newly established Districts (ii) more established districts, (iii) some with ongoing activities under the parent operation, and (iii) refugee hosting Districts; Wakiso, Kasanda & Mityana – **Central**; Ntungamo, Kanungu & Kazo - **Western**; Kiryandongo, Nwoya & Madi Okollo – **Northern**; and Kapchorwa, Sironko & Bukedea - **Eastern**. Meetings and Key Informant Interviews were held with relevant district technical officers including Chief Accounting Officer, District Environment Officers, District Natural Resource Officers, District Water Officers, District Agricultural Officers and Community Development Officers among others. A couple of civil works sites under UgIFT were inspected in Wakiso and Kapchorwa Districts.

15. Findings from literature review and face to face consultative meetings were compiled in a draft ESSA that informed a stakeholder validation/consultation with various participants from the relevant line ministries and agencies, Non-Governmental Organizations, and Civil Society Organizations. Specifically: MoFPED, MoGLSD, MoES, MoLG, MWE, NEMA, Bank Information Centre (BIC), Center for Domestic Violence Prevention (CEDOVIP), World Vision Uganda (WVU), Joy for Children (JFC) and BRAC

The meeting was scheduled for early April 2020 but because of the COVID-19 government-imposed restrictions, it was cancelled and instead, the stakeholders were sent an electronic version of the draft ESSA report and asked to provide feedback via email. The team compiled the various inputs which ranged from small reports, emails, and tracked changes into the original report. Relevant and pertinent comments/suggestions were incorporated into this report and a comment/response matrix prepared (See Annex 4 for details). In addition, the findings from the monitoring of UGIFT I forms part of the basis for the analysis and report for AF ESSA.

1.5 ESSA Core Principles

16. The ESSA Update considered the strength and gaps in the system with respect to the “six core principles” of the World Bank Policy for Program-for-Results Financing. These principles establish the policy and planning elements that are necessary to achieve outcomes consistent with PforR objectives. They are intended to guide the assessment of the country's systems and its capacity to plan and implement effective measures for environmental and social risk management. The six core principles are as follows:

- a) Promote environmental and social sustainability in the Program design; avoid, minimize, or mitigate adverse impacts, and promote informed decision-making relating to the Program's environmental and social impacts
 - b) Avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program
 - c) Protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the Program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards
 - d) Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at the minimum restoring, their livelihoods and living standards.
 - e) Give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of the Indigenous Peoples and to the needs or concerns of vulnerable groups.
 - f) Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.
17. While the ESSA Update is a product of the World Bank³, the input and support of national and LG stakeholders has been invaluable and is sincerely appreciated.
18. On the basis of the findings of the analysis, the ESSA Update proposes recommendations for consideration as relevant to the overall Program Action Plan, Disbursement Linked Indicators, and elements of the revised Program Operations Manual. These actions will strengthen existing national and LG systems, substantially contributing to achieving the program's desired results.

³ The World Bank team responsible for this ESSA Update consisted of: Christine Kasedde (Environmental Specialist), Boyenge Isasi Dieng (Senior Social Development Specialist), Naomi Obbo and Hanifah Lubega Nassaka (Environment Consultants), Constance Nekessa Ouma and Georgina Angela Manyuru (Social Development Consultants).

SECTION 2: Overview of Key Investments, Benefits, Risks and Mitigation Measures

2.1 Overview of key investments under the program

19. UgIFT additional financing will involve continually enhancing the adequacy and equity of fiscal transfers to Local Governments (LGs) and improving fiscal management of resources for service delivery by LGs in water and environment services and micro scale irrigation schemes in addition to education and health sectors covered in the original UgIFT scope. The integration of services provided to refugees and host communities into the LG system component has also been proposed for addition to the program as elaborated hereafter.
20. **Education sector:** The UgIFT AF Program through the development grant will continue to support 30 LGs in construction of new classrooms blocks, latrines, laboratories and teachers' housing. Additionally, the grant will be used to rehabilitate secondary schools in sub-counties with dilapidated structures tandem with construction of new seed Secondary schools in sub-counties which do not have a Government secondary school. A total of approximately 117 schools are planned to be constructed under the additional finance.
21. **Health sector:** UgIFT AF Program will support 245 Health centers through the (i) upgrading of HC-II to HC-III in approximately 40 districts/LG which have sub-counties without a HC-III. This will include the rehabilitation, expansion and equipping of the existing health facilities (ii) construction of new HC IIIs in sub-counties with no health facilities at all in sub-counties with populations greater than 10,000 and (iii) In large and highly populated sub counties, additional new HC IIIs shall be constructed to attain a 5km walking distance to a health facility. Under the Additional Financing AF, the program will support the operationalization of the 62 health facilities which are currently being upgraded from health center-IIs to health center-IIIs, and construction of approximately 132 new Health centers. The upgrade of and construction of new HCs will focus on meeting the minimum service delivery standards in the health sector.
22. The **water and environment sector** will be supported through the development grants for rural water. The support to rural water supply is aimed at 1) reducing the number of sub-counties with safe water coverage below the agreed level and 2) increasing the functionality of the existing potable water supply sources. The development grant will support, among others, the supply of rural water using the existing facilities (e.g. boreholes) and extension of small water piping systems to at least 100 households per system. The support will also strengthen the environment and natural resources management function which includes the development and implementation of water source protection plans and environment and natural resources management plans (including wetlands and forest conservation and restoration). At the level of service delivery, actions will focus on strengthening water supply at the sub county level. Resources will also target improving the functionality of existing rural water facilities countrywide.
23. **Micro-scale irrigation:** UgIFT AF Program will support approximately 250 smallholder farmers in 40 selected LGs in the first pilot phase, to have access to improved micro scale irrigation equipment. Investment in micro scale irrigation systems will help to mitigate challenges related to water shortages mainly as a result of prolonged droughts. Under the National Policy for Irrigation, micro-scale irrigation is categorized as irrigation systems less than 5 hectares of irrigated land. Under AF, the support to irrigation development will be capped at 1 hectare per farmer, and thus it is expected to be of interest mainly for smallholder, mostly subsistence, farmers with potential to transform to more commercial agriculture. Approved farmers will benefit from a partial subsidy (through a matching grant scheme managed at the LG level) for the purchase of the irrigation equipment i.e. sprinkler, drip or hose irrigation equipment. Among the farmer eligibility requirements is the proximity to the water

source (less than 500m) which could be natural surface water (wetlands, streams etc.) and manmade sources (boreholes, valley tanks, etc.), availability of land.

24. UgIFT AF Program will also support the **integration of the delivery of services to refugees and their host communities into the local government system** and support the transition from services provision by humanitarian actors to local governments.

2.2 Environmental and Social benefits

25. The UgIFT Additional Financing (AF) is **expected to have several environmental and social benefits** most of which *are already mentioned in the original UgIFT ESSA*.
- i) Under AF, the program is expected to address climate change risks associated with each of the sectors through the introduction of appropriate adaptation and mitigation measures across the infrastructural investments as interventions towards institutional strengthening. For example, under agriculture, the program will support the acquisition of pro-climate irrigation equipment by prioritizing the use of solar pumps, additionally, among the farmer eligibility requirements is the proximity to the water source (less than 500m), which will lower energy requirements needed to irrigate.
 - ii) Irrigation will among others help smallholder farmers to have increased crop yields, include diversification of production, and production over the dry season when market prices are higher.
 - iii) The health sector will be supported to improve on the management of health care waste in the respective HCIIIs and IVs. This intervention will not only help to reduce the risks of worker and community exposure to diseases but also help to minimize the pollution of the environment resulting from poor disposal (including open burning of hospital waste).
 - iv) There will be several social benefits to the LGs and communities in sub counties within which new schools are constructed this will include an increase in the enrollment of children to school, who will have opportunity to access to education.
 - v) Improved access to clean water will enhance the hygiene and sanitation conditions of communities and hence improved productivity and wellbeing while at the same time minimizing misuse or contamination of the surface water sources.

2.3 Environmental and Social Risks and Impacts

26. Investments supported under the UgIFT AF – including the rehabilitation and construction of additional primary/secondary schools, upgrade of HCIIIs to HC-III and introduction of two new sectors i.e. micro irrigation and rural water supply typically pose modest risk that can readily be mitigated through adherence to established procedures for screening, contracting, and supervision during implementation. The AF is putting additional measures in place to ensure that challenges to their adherence (lack of financial and human resources) are adequately addressed
27. **Key environmental risks and impacts identified** include: Poor solid waste management, health care waste from some health centers are openly burned or end up in municipal waste; High demands for biomass energy for use in schools, potential encroachment on wetlands and other conservation areas, lack of landscaping and restoration of sites of extraction of marram and sands used for construction. Other challenges that may be arise from investments in rural water and micro scale irrigation may include: competing demand for water, pollution of water, increased use of agrochemicals leading generation of agrochemical waste containers.
28. **Common Social, Safety and Health risks and impacts identified** were Land acquisition and resettlement related risks and impacts; Violence Against Children (VAC) including child labour,

defilement, teenage pregnancies and child abandonment; Gender-Based Violence (GBV) and domestic violence, (more prevalent in the refugee hosting and post conflict districts/ in refugee settlements); contraction and spread of STD/STIs including HIV/AIDS due to labour influx; poor workers' management including underpayment, non-payment, delayed payment of workers and lack of documentation (contracts/appointment letters/daily duty roster sign in and out of casual labour) for employment; gender related risks i.e. inconsideration of working mothers' interests and needs such as sanitation and provision of shelters for protecting, and facilities for breast feeding their babies. The assessment also identified risks and impacts related to health and safety of workers and communities, which are related to lack of competent safety and health officer on the project, limited safety and health training, poor machine and equipment safety, lack of adequate and appropriate Personal Protective Equipment in respect of risk, lack of first aid services, limited hazardous management system, lack of pre-employment and routine medical examination to ensure early detection of occupational diseases, lack of appropriate and adequate health and welfare facilities (toilets, washing facilities, change rooms that are separate for male and female, sensitive to People With Disability needs). In addition, there were no clear guidance on how the project would handle both grievances and stakeholder engagement at District levels.

29. It is, however, proposed that the project could use some lessons learned from the Global Partnership for Education (GPE)/World Bank Uganda Teacher Effectiveness Project (UTSEP), in which the Gender unit of Ministry of Education and Sports (MoES) developed a Grievance Redress Mechanism (GRM) policy document as well as an Ethical Code of Conduct. These documents have been provided to primary schools and district authorities. The GRM policy document provides a grievance mechanism for the education sector covering all stakeholders – schools, district authorities, implementing partners, etc. MoES has been encouraged to share samples of the aforementioned documents, which are available with the Project Implementation Unit of the UTSEP. The Ethical Code of Conduct would be relevant to construction of secondary schools since it was developed for the construction of primary schools; as well as be adopted to health, water and agriculture projects.

30. The Table 2.1 below summarized the key environmental and social risks and impacts associated with implementation of the program, mitigation measures have been proposed and efforts to have these measures integrated into the design of the program are also proposed.

Table 2-1 Overview of Key Risks, Mitigation Measures, Action Matrix and Performance Assessment

Risks and Impacts	Rating	Recommended Mitigation measures	Integration in design	
			Action Matrix (DLI 3)	Performance Assessment (DLIs 4, 5, 6)
Environment and social risks				
<p>Risks associated with poor site selection /siting of the proposed infrastructure e.g. schools constructed on flood prone areas, steep slopes, etc. this could not only impact on the integrity of the physical infrastructure but also pose a health and safety threat to school-going children. Similarly, poor siting of schools may cause children to walk long distances and expose them to the risks of absenteeism, dropping out of school, sexual exploitation among others.</p> <p>Additional risks relating to poor siting of infrastructure include lack of review of architectural plans and drawings by Occupational Safety and Health/MoGLSD, before approval, to ensure inclusion of safety and health aspects at design stage, lack of geotechnical</p>	Moderate	<p>a) E & S screening and assessment will be carried out (prior to civil works), to inform site selection, planning and design of all sub-projects under UgIFT AF.</p> <p>b) Early engagement of key stakeholders will be undertaken to inform site selection where necessary for new schools under UgIFT AF.</p> <p>c) Ensure site geo-technical studies are undertaken where required, and site plans are approved by the relevant Government authorities (MoGLSD/OHS Department)</p> <p>d) Site specific ESMPs will be prepared that provide the following mitigation measures, among others:</p> <ul style="list-style-type: none"> - Ensure proper landscaping and vegetation restoration after construction to reduce on the possibility of soil erosion; - Revegetate sites with indigenous plant species or other appropriate species, that will control erosion; - Waste generated during construction 	<p>Environmental and social requirements (<i>PPDA standard bidding documents for works incorporating environmental and social risk requirements has been adopted by all LGs under UgIFT AF</i>).</p> <p>MWE, NEMA and MoGLSD to develop E & S screening and monitoring tools</p> <p>LG Public Investment Management in place which</p> <ul style="list-style-type: none"> - <i>includes safeguards mainstreaming checklist to guide LGs during planning, design, budgeting, bidding, contracting and implementation</i> <p>Enhanced and revised DDEG guidelines providing for eligible investments in environment, climate change mitigation and adaptation and social risk management</p>	<p>DLI 4</p> <p>DLI 4 and DLI 5 (<i>LGs to undertake the E & S screening, ESMP preparation and implementation</i>).</p>

<p>investigation to determine level of ground water, which increases the risk of ground water contamination from VIP latrines constructed at schools, lack of site hoarding increases the risk of falls into excavations which could be fatal or cause major injuries etc.</p>		<p>will be disposed to designated/gazetted dumping sites/landfills by a registered waste management company;</p> <ul style="list-style-type: none"> - Contractors will be required to conduct health and safety training for all workers, hold regular toolbox meetings and provide personal protective equipment (PPE) and enforce its use. - Post safety signage on the construction sites (including hoarding of sites) to restrict unauthorized access to the construction sites. <p>e) Involvement of District Environment Officer, Labour Officer and Community Development officer, head teachers, representative of the School Management Committee (SMC) and representative of Parents Teacher Association (PTA), in-charge of health facilities, in routine monitoring of ESMP implementation and compliance to related E &S requirements.</p> <p>f) Include provisions for Environment Officer to sign off the Environmental and Social Compliance certificate prior to payment of contractor invoices and following site inspection to ascertain E & S compliance.</p>	<p>(MoFPED, MWE and NEMA) in addition to routine monitoring.</p> <p>Undertake functional review of E & S skill needs assessment (<i>update budgeting guidelines to require allocations to E&S requirements must be at least 0.5% of the value of capital investments, each</i>).</p>	<p>DLI 4DLI 4, DLI 5</p>
<p>Localized environmental risks/impacts (vegetation clearance, excavated sites, wastes, etc), community and worker’s health and safety risks associated with construction</p>				

<p>Safety risks/ impacts relating to adherence to safe systems and safe equipment of work. The inadequacy in safety systems presents a risky working environment that may result in fatal and non-fatal accidents to workers and communities</p>	<p>Moderate</p>	<ul style="list-style-type: none"> a) contractor should develop and implement a health and safety management plan, b) civil works contractors should have in place competent ESHS personnel to ensure compliance with national laws. c) secure site hoarding to eliminate interaction between site works and community activities ensure electrical safety d) provision of well-maintained tools and equipment, appropriate safety signage and training for workers e) provision of efficient emergency response system 	<p>Environmental and social requirements (<i>PPDA standard bidding documents for works incorporating environmental and social risk requirements has been adopted by all LGs under UgIFT AF</i>).</p>	<p>DLI4</p>
<p>Occupational and community health risks/ impacts” relating to the protection and prevention of diseases or ill health resulting from work activities or operations. If protection and prevention issues are not instituted, then workers and community could develop occupational diseases or work related diseases or communicable disease which may sometimes be compensable or cause a public health concern.</p>	<p>Moderate.</p>	<ul style="list-style-type: none"> a) Contractor will be required to comply with contractual requirements including provision of safe and clean drinking water, gender sensitive sanitation facilities, first aid etc. b) institute an occupational health surveillance program (to include pre-employment medical examination, routine medical examination and post-employment medical examination), c) prevent and control exposure to hazardous substance, exposure to noise, vibration, heat, radiation, gases, particulate matter above the Permissible levels, d) issue a permit to work (PTW) in highly risky tasks 	<p>Environmental and social requirements (<i>PPDA standard bidding documents for works incorporating environmental and social risk requirements has been adopted by all LGs under UgIFT AF</i>).</p>	<p>DLI4</p>

<p>Natural Resources Degradation Natural habitats could be altered as a result creation of borrow pits for aggregate materials. If not properly managed, borrow pits for construction materials pose perhaps the greatest potential negative impacts on natural habitats and land degradation if abandoned without proper reclamation/restoration.</p>	Moderate	Contractors will be required to ensure proper and progressive restoration of the Borrow area site after gravel extraction through remediation of borrow pits, landscaping, and grass planting where appropriate. The restoration process should not be limited to only time of closure, but should be carried out at various stages and at all locations where the contractor will have extracted murram.	<p>Environmental and social requirements (PPDA standard bidding documents for works incorporating environmental and social risk requirements has been adopted by all LGs under UgIFT AF).</p>	DLI 4 & DLI 5
<p>Effects due to unsustainable use of biomass fuel: the construction of additional schools under AF is expected to result in a significant increased enrollment of children. an indirect environmental impact, may lead to an increase in the consumption of biomass fuel wood for cooking at the schools. This could subsequently lead to an increase in deforestation.</p>	substantial	support LGs through planting of wood lots on at least 2 acres, utilize cleaner burning biomass-fueled cook stoves that have the potential to lower exposure to air pollution as well as reduce fuelwood demand and/or construction of a biogas digester (where possible). This however, should be included in the planning and design of the school infrastructure under AF.		
<p>Climate change related risks: The combination of high vulnerability to climate change (14th most vulnerable country) and low readiness to improve resilience (48th least ready country)⁴</p>	moderate	<p>a. Under micro irrigation: the matching grant will support farmers’ capacity, by funding them to acquire pro-climate irrigation equipment so as to enable them cope with climate risks and reduce their vulnerability to floods and droughts;</p>	Climate change to be integrated into the ESHS screening forms, and in planning and design of the UgIFT-AF Infrastructure	DLI 4 & 5

4 The ND-GAIN Country Index summarizes a country's vulnerability to climate change and other global challenges in combination with its readiness to improve resilience. It aims to help governments, businesses and communities better prioritize investments for a more efficient response to the immediate global challenges ahead. Free and open source, the Country Index uses 20 years of data to rank 180 countries annually (<https://environmentalchange.nd.edu/resources/nd-gain/>).

		<p>b. Water and Environment. In terms of mitigation measures, the AF will provide finances to encourage technological change with efficient pumping from boreholes and development of small networks that will increase efficiency in water production;</p> <p>c. Health sector - the design of health infrastructure will incorporate energy efficiency measures such as use of renewable energy, energy efficient technologies and building designs and materials. In terms of adaptation measures, the design of the buildings will construct climate resilient health infrastructure in areas prone to landslides and flood waters and provisions for rain water harvesting, among other measures.</p> <p>d. Strengthen the capacity of LGs to undertake gender responsive climate-resilient infrastructure investments, implement climate change adaptation and mitigation measures.</p>		
<p>Risks related to inadequate management of healthcare waste include:</p> <p>- some HCs segregate medical waste from the general waste, however, the medical waste is eventually disposed at regular landfills along with municipal</p>	Substantial	<p>a) MoH will be supported to develop health care waste management guidelines to ensure disposal of healthcare waste in an environmentally safe manner;</p> <p>b) The design and functionality and of the HCs should consider among others, the inclusion of adequate</p>	<p><u>Actions in Health</u></p> <p>Strengthening processes and tools for the District/Municipal Health Team to manage staff, infrastructure and service delivery (c) the oversight and management of construction including the environmental, social</p>	<p>DLI 4 (<i>MoH oversight roles in developing Health Care Waste Management Guidelines</i>)</p>

<p>waste, other HCs practice open burning of waste or use inefficient incinerators that results in emission of dioxins, furans, and particulate matter posing a risk to human health due to air pollution.</p> <p>- Poor management of healthcare waste exposes workers and the community to the risks such as infections, injuries etc.</p> <p>- potential for surface and groundwater contamination from effluents from healthcare facilities flowing into drains and run-off from soil during rains following dumping of infectious and chemical wastes. The potential for groundwater contamination from buried infectious wastes, sharps and body parts is also significant.</p>		<p>disinfection/sterilization facilities, ventilation systems to ensure isolation and protection from airborne infections, provision of hazardous material and waste storage and handling areas, medical waste pit, placenta pits etc.</p> <p>c) HC-IIIs & IVs need to be supported to establish, operate and maintain a health care waste management system that is adequate for the scale, and type of activities, identified hazards and that promotes waste segregation, proper on-site handling, collection, transportation and storage based on good international industry practice.</p> <p>d) explore support for the establishment of a centralized facility (perhaps at national/regional level) where infectious medical waste (from HC II, III and IV) is incinerated.</p>	<p><i>and fiduciary considerations and (d) the management and maintenance of infrastructure and equipment including health care waste management systems).</i></p>	<p>DLI 5 (<i>assessment on evidence of dissemination of Health Care waste management guidelines to HCs</i>)</p> <p>DLI 6 (<i>under continuous quality improvement -HCs assessed on functionality of infection prevention, and control including health care waste management</i>)</p>
<p>Impacts from investing in rural water supply and sanitation:</p> <p>- Pollution of point sources may arise from latrines, animals, as well as handling of drinking water source to the point of consumption.</p> <p>-Additionally, poor hygiene habits may lead to contamination of potable water (due to safe</p>	<p>moderate</p>	<p>a) E & S screening/ESIA will be conducted, costed ESMPs prepared and integrated into BoQs, bidding and contract documents, for all sub-projects, prior to commencement of civil works.</p> <p>b) sub-project investments in rural water supply and sanitation will be designed, constructed and operated to mitigate negative environmental effects by ensuring proper drainage of wastewater, preventing water stagnation and avoiding the risk of groundwater</p>	<p><u>Actions in Water</u></p> <ul style="list-style-type: none"> - MWE in collaboration with MoGLSD prepare revised and strengthened LG technical guidance which includes environment and social assessment - Structures that allows for the inclusion of water into the natural resources department approved and central and local 	<p>DLI 4 (<i>MWE oversight role</i>)</p>

<p>water chain from source to mouth not being maintained) and the hygienic condition of latrines is generally poor or non-existent, contributing to high incidence of water-borne and sanitation related diseases</p>		<p>contamination and development of breeding grounds for mosquitoes, etc.</p> <p>c) develop and implement water source protection and environment and natural resource management plans on the land management activities that contribute to soil erosion and loss of water storage in the catchment.</p> <p>d) support the establishment and functionality of gender responsive (with 33-50% women membership) Water User Management Committees at all levels and ensure they are trained/sensitized on safeguard requirements (e.g. protection of water sources from point source pollution etc.)</p> <p>e) support to LG to budget for and acquire simple portable water quality monitoring kits in their development plans. The kits will be utilized for testing samples from selected water points as part of routine water quality and quantity monitoring of source point water supplies.</p> <p>f) Gender responsive and inclusive Community Sensitization should be undertaken to raise local communities' awareness on environmental health hazards associated with water infection and poor drainage and the need to maintain good hygiene at point water sources. The sensitization should be carried out at a time when women are able to attend since they usually fetch</p>	<p>government positions agreed with MoPS.</p> <p><u>Environment and Natural Resource Management-</u></p> <ul style="list-style-type: none"> - MWE to prepare and implement water source protection plans and environment and natural resource management plans 	<p>DLI 5</p> <p>DLI 4 (<i>MWE oversight role</i>)</p> <p>DLI 5</p> <p>DLI 6(<i>S/C service Delivery Performance on functionality of Water user management committees</i>)</p>
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		water from water points compared to men.		
<p>Impacts from investing in irrigation include potential for:</p> <ul style="list-style-type: none"> - increased erosion, pollution of surface and groundwater due to use agrochemicals, deterioration of water quality. - waterlogging (due to over irrigation) and salinization of soils. <p>-Diversion of water through irrigation further reduces the water supply for downstream users, hence potential to exacerbate water conflicts.</p> <p>-Poor water quality below an irrigation project may render the water unfit for other users and impacts of the use of groundwater for irrigation may also arise from over-extraction (withdrawing water in excess of the recharge rate). This can result in the lowering of the water table, land subsidence and decreased water quality.</p>	Moderate	<ul style="list-style-type: none"> a) AF will support <u>only micro irrigation</u> (i.e. individually-owned irrigation systems) rather than small/large-scale schemes, hence, the scale of anticipated environmental and social impacts will be minimized with application of appropriate mitigation measures. b) E & S screening and assessment will be carried for all potential sites, ESMPs prepared, costed and integrated into Bills of Quantities, bidding and contract documents. c) Where possible, use sprinkler irrigation and other micro-irrigation technologies to decrease the risk of waterlogging, erosion and inefficient water use; d) Waterlogging will be minimized, by using micro-irrigation which applies water more precisely and limit quantities to meet crop needs. MAAIF to develop technical guidelines to include among others, the safe use, storage and disposal of agro chemicals. e) MAAIF through LG extension workers, will train the LGs and the selected farmers on occupational health risks, the safe storage, use and disposal of agrochemicals and associated waste. f) As much as possible, MoUs signed between the farmers and LGs will include the clauses to adhere with requirements for proper storage, use, 	<p><u>Actions in micro irrigation</u></p> <ul style="list-style-type: none"> - <u>MAAIF gender responsive Technical guidelines for LG staff for irrigation developed</u> (in close collaboration with <u>MAAIF & MoGLSD</u>) and <u>disseminated (including safeguard requirements)</u> - <u>Sub-county Irrigation Performance Assessment tool/manual jointly developed</u> (by relevant stakeholders and agencies) which includes among others requirements for E & S screening/ESMP preparation and implementation 	<p>DLI 4</p> <p>DLI 5 and 6</p>

		transportation and disposal of agro-chemicals.		
Construction activities related to rehabilitation, expansion or establishment of new infrastructure could adversely affect physical cultural resources.	moderate	<p>a) Procedure on how to handle chance finds of physical cultural resources should be included in all civil works contracts.</p> <p>b) If the Contractor discovers any physical cultural resources, such as archaeological sites, historical sites, remains and objects, including graveyards and/or individual graves during excavation or construction, the Contractor shall:</p> <ul style="list-style-type: none"> - Stop the construction activities in the area of the chance find; - Delineate the discovered site or area; - Secure the site to prevent any damage or loss of removable objects until the responsible local authorities or the Department of Museums and Monuments of the Ministry of Tourism, Wildlife and Antiquities take over; - Notify the supervisory Project Engineer who in turn will notify the responsible local authorities and the Department of Museums and Monuments of the Ministry of Tourism, Wildlife and Antiquities immediately. 	<p>Environmental and social requirements (PPDA standard bidding documents for works incorporating environmental and social risk requirements has been adopted by all LGs under UgIFT AF).</p> <p><i>E&S screening/ESIAs to include physical cultural aspects (as required)</i></p>	DLI 4
Land acquisition and resettlement related risks and impacts	substantial	<p>a) E & S screening and assessment undertaken to identify potential land conflicts.</p>	<p><u>Actions in Crosscutting (Social and environment)</u></p> <p>LG avails land with proof of ownership, access and availability</p>	DLI 5

		<ul style="list-style-type: none"> b) LG to avail land with proof of ownership, access and availability (e.g. land title, land agreement, formal consent, MoU etc.) and without encumbrance - particularly economic displacement. c) Risk and impact assessment of land acquisition and resettlement to consider gender responsiveness 	(e.g. land title, land agreement, formal consent, MoU including community witnessing evidence, etc.) following an E&S screening to confirm absence of economic displacement.	
<p>Child Abuse and Gender Based Violence: Construction activities and establishment of construction camps are likely to lead to sexual harassment and sexual abuse in certain cases on children by construction employees.</p>	Substantial	<ul style="list-style-type: none"> a) E & S screening and assessment undertaken, costed ESMPs developed (<i>including child protection plans and GBV prevention and response plans, and HIV/AIDS prevention plans where required</i>) b) Support LG to develop necessary social action plans such as child protection plans, GBV prevention and response plans and ethical code of conduct for contractor site workers. It was proposed to adapt UTSEP project Ethical Code of Conduct developed for UgIFT-AF c) Awareness raising will be carried out for the contract workers and communities. 	<p><u>Crosscutting (environmental and social)</u></p> <p>MoGLSD, Uganda AIDS Commission and NEMA in consultation with the oversight bodies and implementing agencies to prepare ESHS screening and monitoring checklists (which will also include guidance on child protection, GBV prevention and response, and HIV/AIDS prevention).</p>	<p>DLI 4 (<i>oversight</i>),</p> <p>DLIs 5& 6 (<i>planning and implementation</i>)</p>
<p>Labour management including influx contracted workers: Labour related concerns e.g. violation of workers’ rights, under payment; health and safety issues, sexual harassment, unfair dismissal; non-payment for excessive overtime, etc. Additionally, non-payment or</p>	Substantial	<ul style="list-style-type: none"> a) LGs to ensure that contractors prepare labour management plans and ethical code of conduct for contractor site workers among others. b) Institute workers’ grievance redress at respective project sites. c) LGs to institute grievance redress mechanisms in communities surrounding the sites. 	<p><u>Crosscutting (environmental and social)</u></p> <p>MoGLSD in consultation with the oversight bodies and implementing agencies to prepare social ESHS screening and monitoring checklists (which will also include guidance on child protection and GBV</p>	<p>DLIs 5 & 6 (<i>planning and implementation</i>)</p>

<p>compensation of community owners for construction materials will result in conflicts</p>		<p>d) Ls to ensure contractors sign and adhere to terms and conditions for stipulated in the agreement with community owner (s)in liaison with LC1.</p>	<p>prevention and response, and HIV/AIDS prevention).</p>	
<p>Inadequate engagement of relevant stakeholders throughout the project cycle. GoU defines requirements for engaging stakeholders and communities laid down in the National Environment Act, 2019</p> <p>DCDOs aren't being utilized to be focal points for this community engagement, there is no clear channel for involvement of the DCDO in the project management cycle. MGLSD has a responsibility to provide guidelines on engagement of communities</p>	<p>Substantial</p>	<p>a) LGs to have in place stakeholder engagement plan to ensure meaningful and inclusive stakeholder engagement.</p> <p>b) LGs need to delegate staff at District level (utilize DCDOs) to lead and be responsible for continuous inclusive and gender responsive stakeholders' engagement on identified project risk, impacts and mitigation measures throughout the project cycle</p> <p>c) LGs need to delegate staff at District Level to be responsible for coordinating the establishment of Grievance Redress Committee at respective LG levels and at construction sites and in communities surrounding the sites (with optional co-option of relevant departmental heads/staff as found relevant);</p> <p>d) Promote Participatory monitoring of activities and community feedback using facility management committees. UgIFT could share experiences from CSOs such as World Vision Uganda</p> <p>e) LGs should establish a centralized complaints log with clear information and reference for onward action (a clear complaints referral path);</p>	<p><u>Cross cutting</u></p> <p>Stakeholder engagement and establishment of functional Grievance redress mechanism</p>	<p>DLI 5 and DLI 6</p>

		<ul style="list-style-type: none"> f) publicize the grievances address mechanisms so that aggrieved parties know where to report and get redress. g) GRCs need to be facilitated with simple stationary materials and trained on guidelines to manage their mandates. h) MoGLSD to provide guidelines on engagement of communities and stakeholders 		
High inflow of Refugees: District Local Governments hosting refugees already experience environmental and social challenges that are exacerbated by the presence of refugee. These include impacts relating to increased pressure on land resources (for farming and settlement), loss of natural vegetation cover, increased demand for firewood and thatching/roofing material. This has potential to increase tension between refugees and host communities, hence, disrupting social cohesion between refugees and host communities.	Substantial	<p>Strengthen existing coordination arrangements among the development partners operating in the refugee hosting districts and between refugee funding development partners and LGs/CBSD.</p> <p>OPM to offer guidance to all MDAs and the respective refugee-hosting Local Governments, accompanied with integrated plans including refugees communities</p>	<p><u>Key actions- refugee hosting LGs</u></p> <p>Gender responsive Guidelines for Integrated LG Planning for the Refugee Response and Transition prepared and disseminated, <i>including E & S safeguard requirements for program interventions in 13 refugee hosting LGs.</i></p> <p>Refugee hosting LGs have prepared costed and integrated refugee response and transition plans (<i>including ESMP as well as child protection and GBV prevention and response plans, and HIV/AIDS prevention plans</i>).</p>	DLI 4 & DLI 5
Weak Oversight and coordination amongst implementing institutions	High	<ul style="list-style-type: none"> a) Establish a coordination unit housed in MoFED (with an Environmental and a Social Development Specialists recruited) that will be responsible for ensuring safeguards due diligence is carried out throughout the project cycle. 	MWE, MoGLSD, and NEMA to update and harmonize tools for environmental and social screening and monitoring of implementation of requirements	DLI 4

		<ul style="list-style-type: none"> b) Develop integrated reporting forms/checklists for joint monitoring at the local governments and central government c) Conducting joint quarterly monitoring of construction: involvement of central line ministries and agencies (NEMA, MoGLSD) together with relevant district local government staff (DEOs, DCO). 	<p>MoFPED to recruit an Environmental Specialist and a Social Development Specialist to support the project monitoring, technical strengthening and E&S coordination in the coordination Unit.</p> <p>Note: Actions affected by COVID-19 restrictions and to be concluded immediately after lifting of restrictions.</p>	
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SECTION 3: Assessment of the Country Environmental and Social Management System

31. The Environmental and Social Management System (EMS) assessment for UgIFT-AF was based on; a) the provisions of the Ugandan legal and regulatory framework for the new sectors under the program and amended legislation since the first ESSA, b) the strengths and weakness of the institutional set up and c) the implementation challenges experienced by the Local Governments (LGs) in applying the environmental and social management measures associated with the program's environmental and social effects.

3.1 Assessment of the Country System as Written (Regulatory and Institutional Framework)

32. The Original ESSA adequately assessed the relevant and applicable Policies, Laws and Regulations that govern the Environment and Social Management Systems in Uganda. The detailed descriptions and applicability is explicitly made in the original UgiFT ESSA to which the update is made, which can be accessed at:

<http://documents.worldbank.org/curated/en/496211492746527320/Environmental-and-social-systems-assessment>.

3.1.1 Additional Policies and Laws relevant to UgIFT-AF and Regulatory Assessment

Below is a succinct overview of the additional applicable legal and policy framework covering the additional sectors and amended laws.

34. ***The Environment And Social Safeguards Policy(2018)***; The Ministry of Water and Environment (MWE) prepared the Environmental and Social Safeguards (ESS) Policy, to ensure that, in implementing development programs, positive social impacts are maximized while negative ones are minimized or avoided. The framework is aimed at ensuring integration of environmental and social concerns in all stages of project development and all levels including national, district and local levels, with full participation of the people as means of minimizing environmental and social impacts. It also aims to ensure that risks are screened against the 15 principles as well as specification of appropriate roles and responsibilities, and outlining the necessary reporting procedures, for managing and monitoring environmental and social concerns including compliance; grievance mechanism, and establishment of institutional capacity building requirements to successfully implement the ESS as well as monitoring to ensure compliance.

The policy goes ahead to mention that at project formulation stage, each development project must highlight key environmental and social impacts both negative and positive impacts. For positive impacts enhancement measures are suggested whereas for negative impacts mitigation measures must be suggested to minimize these negative impacts on the environment and the communities in which the project is to be implemented.

35. ***The National Water Policy (1999)***; This policy's objective is the management and development of the water resources of Uganda in an integrated and sustainable manner. The policy requires EIA for all water related projects and integration of water and hydrological cycle concerns in all development programs. It covers water quality, water use, discharge of effluents and international cooperation on trans-boundary water resources. This policy is vital for the water supply investment proposed under UgIFT-AF.

36. ***The National Irrigation Policy (2017)***; This policy serves as the overarching instrument for regulation of irrigation development in the country. Its aims at creating an enabling framework for a

clearer system with streamlined services and processes for promotion of irrigation; improving technical information sharing and simplifying decision making in this regard. One of the objectives of this policy is to ensure that irrigation planning and development is technically feasible, economically viable, socially desirable and environmentally sustainable. Its environmental principle says that Government shall ensure that key natural resources including water resources, air, wetlands, land/soils and environment are sustainably protected, used and managed to support irrigation and other uses. The Act will for part of the guide for implementation of the Micro irrigation systems being proposed under UgIFT-AF.

37. **The National Environment Act No.5 of 2019.** Since the compilation to the first UgIFT ESSA report, the National Environment Act 1994 has been repealed and replaced by the National Environment Act of 2019. The law provides for continuation of the National Environmental Management Authority (NEMA) as a body responsible for environmental management in the country as per the previous Act.
38. The law provides for Environmental Management by Urban and District councils where Urban Council/Districts are mandated to ensure management of the environment and natural resources and also make ordinances and bylaws to regulate various aspects of the environment and natural resources within their jurisdiction. The law further provides for formation of District environment and natural resource committees whose main function is to coordinate the activities of the District relating to management of environment and natural resources.
39. Section 29 of the NEA, 2019 provides for a Natural resources conditional grant, stipulating that Parliament shall each financial year, appropriate funds for the purpose of financing environment and natural resources programmes in the district, city, municipal, town councils and sub counties. It also goes ahead to guide under section 30, that there shall be environment officers appointed in all lead agencies with the role of advising the ministry, department or agency of local government on all matters relating to environment management. The Act further puts in existence the Environmental Protection Force mandated to enforce the provisions of the Act.
40. Section 45(3) states that an urban or district council shall prepare an urban or district environment action plan every 5years.
41. Further still, the 2019 Act under schedule 4 and 5, lists projects for which Project Briefs and full ESIA's are mandatory respectively. Some of the projects under the UgIFT-AF programme may fall in either of these categories for example; construction and expansion of health centers is mentioned under part II of schedule 4, which also makes mention of the construction of public facilities including schools and functional adult centers. Irrigation schemes of an area between 5-20 hectares and utilization of water resources and water supply are also mentioned under schedule 4 or 5 depending on the project capacity/size. It is imperative that a screening is undertaken to establish whether additional studies (Project Brief of ESIA) are required.
42. **The Water Act, Cap 152;** provides for the management of water resources and the protection of the water supply. The act regulates public and private activities that may influence the quality and quantity of water available for use and establishes the Water Policy Committee to maintain an action plan for water management and administration. It gives general rights to use water for domestic purposes, fire-fighting or irrigating a subsistence garden. A permit is required to use water for constructing or operating any works and to discharge wastewater. Pertinent regulations issued to implement the Water Act include The Water (Water Resources) Regulations (1998) that describe the water permit system; and The Water (Waste Discharge) Regulations (1998) that regulate effluent and

waste water discharges, and require discharge permits to be acquired. The act is relevant for the additional activities to the UgIFT programme, that is, water infrastructure and irrigation.

43. **Occupational Safety and Health Act, 2006**; Addresses the duty of the employers to safeguard the health and safety of employees and the public in the workplace. Section 13 of the Act states that: “it is the duty of an employer to take, as far as is reasonably practicable, all measures for the protection of his or her workers and the general public from the dangerous aspects of the employer’s undertaking at his or her own cost.” Section 18 of the Act tries to safeguard the environment by requiring employers to monitor and control the release of dangerous substances into the environment when handling chemicals or any dangerous substance that is liable to be airborne or to be released into rivers, lakes or soil and that is are a danger to animal and plant life. This will be vital during the construction of schools and health centres, excavations for water supply pipework installations and the application of Agrochemicals by farmers.
44. **Pest Control Products Act**; The Control of Agricultural Chemicals Statute 8/1989 was established to control the manufacture, storage, regulate the trade in use importation, exportation and distribution of agricultural chemicals through labelling, advertising, classification and licensing. The National Drug Authority (NDA) is the body responsible for registering all insecticides in Uganda. This involves ensuring the pesticides to be used complies with all safety requirements through appropriate transportation, labeling, packaging, use and disposal.
45. **The country’s policy and legal framework in place is comprehensively designed and largely adequate as written.** The challenge established during the assessment however is that there is limited compliance to the provisions regarding environmental and social management/protection. This has been largely due to lack of access to information, as most of the LGs lack basic equipment like computers and internet services. Additionally, there is a draft Land Acquisition policy, which is before parliament will guide land acquisition and resettlement in development projects and emergency/disaster requirements to avoid and minimize related social risks and impacts.

3.1.2 Assessment of the Institutional Framework

Uganda has well established institutional structures for Environmental and Social Management. Although there are several institutions that are responsible for the management of a segment of the environment under their jurisdiction, the primary responsibility for the environment falls under the Ministry of Water and Environment (MoWE). The National Environment Management Authority (NEMA) (established under the National Environment Act) is mandated as coordinating, monitoring, regulatory and supervisory body for all activities relating to environment as emphasized in the new Act. Aspects of labour, gender (inclusive of Gender Based Violence -GBV) and occupational health and safety fall under the mandate of Ministry of Gender, Labour and Social Development (MoGLSD). In addition to the above, the social management system is being enhanced by the Ministry of Lands, Housing and Urban Development (MoLHUD) which is in the process of developing a National Land Acquisition, Resettlement and Rehabilitation Policy to govern Land acquisition in the country. In the new NEMA Act, management of social risks and impacts have been integrated to promote coordinated and integrated attention to E&S aspects.

The additional institutions with key responsibilities for environmental and social management relevant to UgIFT AF are as follows:

46. **The National Environment Management Authority (NEMA)** The National Environment Act of 2019 states among the functions of NEMA that, they shall support the mainstreaming and integration of environmental and social concerns in national and sectoral plans through coordination and collaboration with lead agencies. As a means to enhance visibility on ground, NEMA decentralized and opened regional offices in the East (Mbale), West (Mbarara), North (Lira) and Masindi. The offices have started functioning and currently undertake joint reviews and inspection of selected facilities with the district local government officers.
47. **The Ministry of Education and Sports (MoES)** The Ministry of Education and Sports is implementing the National Strategic Plan on Violence against Children in School (VACiS) 2015 – 2020 and the 2014 Reporting, Tracking, Referral and Response (RTRR) Guidelines on VACiS. The RTRR Guidelines were developed to improve on the reporting and referral pathway to enable Ugandan children stay, learn and complete school.
48. **Directorate of Water Resources Management (DWRM)**. Under the Ministry of Water and Environment (MOWE), it has the mandate to “promote and ensure rational and sustainable utilization, effective management and safeguard of water for social and economic welfare and development as well as for regional and international peace”. The mandate is supported with gender mainstreaming policy on the Ministry of Water and Environment, which are operationalized in all its projects. It is responsible for managing, monitoring and regulating water resources through issuing water use, water abstraction and wastewater discharge permits. The UgiFT additional programs may involve water abstraction for supply to communities and/or irrigation purposes which under the guidance of the Directorate, may require abstraction permits. All projects will therefore ensure gender responsiveness anchored in the ministry gender policy. This applies to the operationalization of the MWE policies and projects as mandated below.
49. **Ministry of Water and Environment;** The Ministry of Water and Environment (MoWE) is the line ministry responsible for the formulation and implementation of water and environment-related policies, laws and regulations in Uganda with oversight on NEMA, NFA and DWRM. Its main functions include:
- a. Mobilization of resources required to run and implement environmental related projects and related issues;
 - b. Overall responsibility for environmental policy formulation and implementation; introduction of new draft laws and regulations to Parliament and draft amendments of existing laws and regulations; and
 - c. Coordination with local governments on environment and water related issues.
 - d. In addition, MWE will be responsible for the coordination of program financing and implementation of sub-components on rural water and will also coordinate with MAAIF in the implementation of micro-irrigation system under UgiFT project.
50. **Ministry of Agriculture Animal Industry and Fisheries;** derives its mandate and functions from the Constitution of the Republic of Uganda, the Local Governments Act (1997) and the Public Service Reform Programme (PSRP). It is a line ministry mandated to "formulate, review and implement national policies, plans, strategies, regulations and standards and enforce laws, regulations and standards along the value chain of crops, livestock and fisheries". MAAIF will be responsible for implementation of micro irrigation. MAAIF has social personnel particularly on gender who could support the program. For inclusion, the program will target farmers at a level expected to sustain irrigation as a business

venture aimed at transforming agriculture from subsistence to commercial. Women with access to land and meeting the project criteria would qualify for the program. However, it was observed that a few women in Uganda have access to land, by default they will be left out. Therefore, it is imperative for the Ministry to spell out the criteria that will enable women qualify to participate in this project ahead of the beneficiary selection.

51. ***The Public Procurement and Disposal of Public Assets Authority (PPDA)*** was set up as the principal regulatory body for public procurement and disposal of public assets in Uganda. **PPDA released an enhanced Standard Bidding Document (SBD) in September 2019 with the aim of strengthening the management of E&S aspects in the procurement process.** This is expected to address the challenges experienced with the first procurements under UgIFT prior to September 2019.
52. The enhanced SBD for the procurement of works provide enough room for District S&E personnel to tailor and input ESHS aspects. This requires specialized expertise from the CBSD and DEO to prepare more comprehensive SBD on S&E risks and impacts plus mitigation measures but is most times taken up by the program implementing departments (DHO and DEO). It was noted that the SBD was developed to guide central Ministries but the same was to be tentatively adopted by the LGs through a directive to the Chief Administrative Officers as had been the case under the original UgIFT.
53. **The central institutions play an oversight role to the local governments and are a vital component towards improving service delivery at the LG level.** Their role in strengthening Environmental and social safeguards however is impeded by the fact that there are no personnel to advise ministries on environmental matters in most of sectors/Agencies other than NEMA. The NEA, 2019 under section 30 states that a lead agency shall appoint environment officers and among the functions is to advise the ministry, department, agency of government or local government with a responsibility of managing a segment of the environment on all matters related to environment.
54. The center is responsible for putting in place appropriate guidelines and disseminating them to local governments who then implement the measures during development. The Assessment has noted that much as the guidelines may present some environmental and social safeguard provisions in line with the Bank's Core Principles; these are barely known to the local governments and hence not adequately adhered to.
55. **At Local Government (LG), the environment and social functions fall under the Natural Resources Department (NRD) and the Community Based Services Department (CBSD) respectively.** The NRD is headed by the Natural Resources Officer and other positions in the department include: Environment officer, Forestry officer, Wetlands officer, Physical planner, Land and Surveys. A fully established CBSD at a DLG is expected to have 7 staff including: District Community Development Officer (DCDO), A Senior Community Development Officer (SCDO), Senior Probation Officer (SPO), Senior Labour Officer (SLO), Labor Officer (LO), Probation Officer (PO), and Community Development Officer (CDO).
56. Although the management of the environment was decentralized under the Local Government Act Cap 243, still, some of the DLGs remain under staffed with substantial positions unfilled for instance Kasanda District which is a relatively new district created in July 2019. It was noted that the District Natural Resources Department has one technical officer doubling as the Ag. DNRO/Ag. DAO. Also, Bukedea District in Eastern Uganda had one officer taking up mandates of Ag. DNRO, Senior Environment Officer, Wetlands officer and Forestry Officer.
57. A few districts had relatively adequate social staff for effective operational performance in meeting social risks management requirements, especially at the sub-county levels. Most LGs did not have full capacity of the required departmental E&S staff. On average, the districts visited had only 2-4 vacancies in CBSD filled, and some in acting positions. This was more evident in the recently established Districts (e.g. Kazo,

Kassanda and Madi Okollo), which did not have substantive staff but were in the process of recruitment. The staffing gaps are more felt at the sub county level due to the multiplicity of roles and responsibilities assigned to the Community Development Officers (CDOs). The EOs are only stationed at the District HQs. The CDOs are assigned to support EOs at the sub-county level. Therefore, for improved service delivery and to address concerns of staff productivity and time at task, UgiFT will need to dress this risk more effectively.

3.2 Assessment of System Performance -Implementation challenges

58. The identified challenges in Environmental and Social Management at Local government level, which was the implementing body, are highlighted below;

i. Inadequacy of Environmental and Social Assessments process

a. **Late screening.** From the consultation with the local governments, screening of likely ESHS risks/impacts of the subprojects are often conducted after subprojects have commenced, leading to environmental and social considerations not being integrated relevant processes. In some districts, the DNROs/SEOs and CDOs indicated that they only get to know about upcoming sub-projects through the District Technical Planning Committee (TPC), yet the TPCs in some districts are not held monthly as stipulated under the law.

b. **Absence of ESMPs.** Most Districts do not go beyond screening and prepare ESIA/Project briefs/ESMPs for their subprojects. The few ESMPs prepared are not costed nor included in the BoQs. The National Environment Act of 2019 under schedule 4 and 5, lists projects for which Project Briefs and full ESIA/ESMPs are mandatory respectively. Majority of the sub-projects under the UgiFT programme (Although the scale/scope may vary) fall in either of these categories for example; construction and expansion of health centers is mentioned under part II of schedule 4, which also makes mention of the construction of public facilities including schools and functional adult centers. Irrigation system and utilization of water resources and water supply are also mentioned under schedule 4 or 5 depending on the project scale/size.

c. There are screening tools available, but these are different across the various DLGs. The responsibility for E&S screening for risks and impacts, assessment and planning of the district's projects is left to the District Environment Office (DEO) by default. Some of the screening forms used by the DEO include aspects of social risks and impacts but are not comprehensive. Participation of the CDO is limited to a few projects that may facilitate monitoring visits. The Screening tools need to be harmonized across local governments and updated to include identification of climate disaster and climate risks screening for sub-projects, where required.

ii. Failure to integrate ESHS requirements into designs, BoQs, bidding and contract documents.

All E&S Departments across the Districts visited indicated that they were not aware of the requirement for their input in the preparation of bidding and contract documents, Bills of Quantities (BoQs) and designs to ensure that social aspects (including inclusion and social conflict issues) are considered. As a result of the non-inclusion and non-consultation of the EOs and CDOs, E&S risks and impacts are neglected resulting in sub-optimal locations of projects and inadequate budgeting and BoQs. An example is Buteza Seed School in Buteza sub-county Sironko District where the Ag. DNRO was not consulted and hence no consideration was made for likely E&S risks and impacts of construction the school at the identified location. From the consultations, the Ag. DNRO indicated that the selected site is traversed by natural drainage channels, but aspects of construction of proper drainage channels, culverts to ease access and a retaining wall were not considered within the budget and hence not implemented.

iii. PPDA released an enhanced Standard Bidding Document (SBD) in September 2019 with the aim of

strengthening the management of S&E aspects in the procurement process. This was expected to address the challenges experienced with the first procurements under UgIFT prior to September 2019. However, there seems to be non-compliance even when guidelines or instructions are issued. For example, a circular was issued by PPDA on July 24, 2019 to all accounting officers of DLG and MLG on the implementation of procurements under UgIFT clearly informing them of the use of enhanced SBD (procurement documents) that incorporate Environmental, Social, Health and Safety (ESHS) aspects; including a website where a copy can be downloaded. It further instructed the CAOs and Town Clerks (TC) to appoint a Contract Management Committee (CMC) to include the DCDO and DEO among other members. The circular clearly outlined several responsibilities of the CMC including routine monitoring of progress, monthly reporting of progress to the CAO and ascertaining that the contractor performs the contract in accordance with the terms and conditions specified in the contract. While the PPDA guidance was expected to position well the CBSD and DEO to effectively play their roles in the management of S&E risks and impacts under the project, findings from sampled districts reveal the reverse.

- iv. **Limited finances for recurrent activities like monitoring and supervisions, awareness and environmental and social literacy/ education etc.** All the DLGs highlighted the limitations in support supervision and monitoring due to inadequate resources. Additionally, there are no funds available to enable purchase of basic field equipment/tools like GPS, Cameras, Noise meters, water quality testing kits, motorcycles among others which support environmental monitoring activities; Environment and Natural resources has no development grant allocation for investment activities such as restoration of degraded ecosystems and waste management infrastructure. According to the DLG planning guidelines, 5% of the total budget for project activities is supposed to be allocated to M&E including Social and Environmental (S&E) aspects. However, this service cost is inadequate and, in some cases, used entirely for M&E. Findings from the Ministries including MoFPED also confirmed the same constraint.

The Environment and social departments in all the 12 Districts had inadequate transport in terms of vehicles and motorcycles. Only Wakiso District (CBSD and DEO) had a vehicle each, which were far beyond their disposal period – these had been donations from NGOs. Only seven (7) CBSD out of 12 Districts visited had some computers while the majority including Environment officers, had none or used personal laptops. Lack of space equipment and transports was more evident in the new districts. However, plans are reportedly underway for constructing District offices in all the new districts visited (Kazo, Kassanda and Madi-Okolo).

- v. **Limited technical knowledge in environmental, Health and Safety (ESH) risks/impacts management:** Majority of DEOs and CDOs consulted had the required minimum qualifications – both in acting and substantive positions apart from a few districts. They were also found to have reasonable comprehension of the common and basic social and environmental risks and impacts (knowledge and skills) including mitigation measures. The teams also had some experience in the management of environment and social risks due to their involvement in other World Bank financed projects. A number of staff in the local governments however, have not undertaken refresher training in environmental and social assessments in the last five years in addition to other professional trainings in their respective field. While some staff demonstrated reasonable capacity, in general, the staff at Local government require overall safeguards capacity strengthening and targeted trainings in specific equipment and tools for environmental monitoring.
- vi. **Limited awareness and understanding of the UgIFT Program Operational Manual (POM) and Annex Sector guidelines.** Most of the technical officers (DNRO, SEO, Eos and CDOs) with whom

discussions were held did not have a sufficient understanding of the POM and in some cases unaware of the documents, yet the safeguard implementation requirements are provided for in the POM and Annex Guidelines.

- vii. **Weak monitoring and supervision of projects during implementation:** Due to lack or limited financial resources and transport, the EOs and the CDOs do not usually participate in the monitoring and supervision of projects during implementation/construction. Even where Environmental and Social Management Plans (ESMPs) were prepared, implementation of the mitigation measures is minimal. Equally, the EOs and CDOs have very limited participation in verifying E&S compliance at completion of works. In some cases, EOs have signed of certification of environmental compliance prior to the contractor's payment without having carried out supervision visits. For Example, in Wakiso an inspection visit to the construction site by the assessment team revealed non-compliance to all E&S safeguards requirements. The District's social and environment staff had not visited the site at all.
- viii. **Weak coordination amongst implementing institutions:** The poor coordination and collaboration were serious challenge; which runs across all levels of institutions responsible for the implementation of the project and E&S risks and impacts. Weak collaboration was identified amongst the MDAs responsible for the management of E&S risks (NEMA, MoLG, MoGLSD, and MWE); as well as between the respective implementing ministries and LGs. This has resulted in limited support supervision and strengthening of appropriate capacity and skills for the management of E&S risks and impacts at operational level.

At the central level this has started to be addressed with the inclusion of MoGLSD and NEMA into the IFTRP coordination structures, which have both participated in the first round of joint monitoring exercises. This exercise is now meant to be carried out on a yearly basis.

At the DLG, the Departments of Water and Natural Resources, which belong to MWE at central government, are separated administratively. Water Department is under Engineering (Transport and Works) Department; and Natural Resources, is on its own. This disjointedness at LG affects the potential synergies and shared utilization of a budget from the same ministry. This leaves the Environment Department without adequate financing. Equally, although E&S are interrelated, and should be treated so, the EOs and CDOs in all the DLGs do not work together.

Although NEMA has established regional offices, functionality and coordination with the respective LGs remains a challenge. Some DLGs indicated lack of consultation prior to ASIA certifications and that Districts lacked records and documentation of the same. In some cases, strict staff are by-passed when monitoring is carried out by NEMA's regional offices without communication and information to the districts and municipalities. There are a few good experiences such as a one case of Kanungu, in which NEMA regional office conducted a joint inspection with Kanungu Environment Office (SEO) only in 2018.

- ix. **Inadequate Stakeholder engagement including a fragmented grievance Management system:** Implementation of projects is faced with inadequate engagement of relevant stakeholders throughout the project cycle. Stakeholder engagement is a backbone of any successful implementation of projects, which failure affects ownership and sustainability. GoU defines requirements for engaging stakeholders and communities laid down in the National Environment Management Authority (NEMA) and LG Acts. The stakeholders identified at the DLG include the District Technical Planning Committee (DTPC), District Council, and implementing partners including CSOs/NGOs. Stakeholder engagement was observed to be undertaken more at the project identification and

planning phases than at implementation. At central level, all institutions identified under the institutional framework are key stakeholders in the implementation of this project. It was also noted that engagement with grassroots communities rarely takes place in most DLG due to budgetary constraints. Occasionally DLGs do hold periodical Barazas for social accountability. Therefore, communities rarely get full information on project related social risks and impacts and their associated mitigation measures in a systematic manner. Weak stakeholder engagement also implies that the management of program related grievances is done haphazardly.

- x. **There is no clear, one-size and functional grievance redress mechanism.** A few DLG have a regular and centralized process of receiving and managing complaints through the office of the CAO, which are also challenged by irregular staff to handle the desk/logs. However, the common complaints handling system in all DLGs visited is fragmented across the Districts. For example, some grievances are handled by mandated departments in the Districts such as: Probation and Welfare offices of the CBSD and the Family and Child protection Unit of the Uganda Police handle child protection, women and family issues; the Local Councils (LC1-5), District Land Board, District Lands Office, Resident District Commissioner's (RDC) office handle land matters; Police handles grievances of a criminal nature. The LCs also handle any other grievance reported to them if it is not of a criminal nature. In some Districts, extension workers at sub-county level have been empowered to resolve social conflict. All social conflicts are managed by the CBSD in close collaboration with the affected respective sector departments. Important to note is that the resources for managing grievances are either inadequate or not available. Moreover, most of the personnel involved lack the required skills to handle some of the grievances such as those involving GBV and VAC.

- xi. **Delays in land acquisition for project sites significantly delaying project implementation.** Given that the DLG have to provide land without any encumbrances, the process has impacted on the project start up in some districts. There are scenarios of inadequate minimum land for some projects such as Seed Schools – which require a minimum of 5 acres for its establishment. This resulted in change of site at implementation time. There is also a scenario for delays in acquiring the appropriate documentation such as a title, which took so long in acquiring from the Catholic Church. Such as these two scenarios were found to be affecting the current project implementation, with examples from Kapchorwa and Wakiso respectively. In all scenarios, implementation was delayed, and inspection visit to the site in Wakiso revealed

With regard to micro-irrigation systems activities, the project will implement micro (0-5 hectares) irrigation system targeting individual farmers with up to 1 hectare (2.47 acres) of investments and are in the proximity of a water source. This will not require an involuntary land acquisition. The criteria require all beneficiary farmers to voluntarily apply. There will be an engagement and clearance of any social conflict prior to implementation given the required individual project specific E&S screening.

- xii. **Labour management:** Although not widespread, there was evidence of weak management of the contract and labour resulting into non-payment of local labourers by the contractors, which emerged as a serious risk. These workers almost rioted and were only calmed down by the local leaders. As of the time of the assessment, these workers had not yet been paid. While was not widespread

- xiii. **Refugee hosting communities stretching the CBSD's in the management of social risks and impacts.** Refugees and internally displaced persons' hosting Districts (Madi Okollo and Nwoya respectively) expressed overwhelming demands on their staff given the large numbers and their dependence nature. The communities were noted to experience high levels of social conflict and GBV as well as VAC. Community development workers in the districts indicated spending more time attending to social risks and impacts associated with post conflict situations.

Refugee hosting districts and communities continue to face widespread environmental degradation due to excessive pressure on the natural resources use, continuously destroying biodiversity without appropriate mitigation measures. This is due the fact that the refugees do not have/feel ownership of the settlements and are usually not involved in the environmental planning.

SECTION 4: Consistency of Country system with Core principles

58. The analysis presented an assessment of the systems in place against each of the six Core Principles of the Bank Policy and Directive for Program-for-Results Financing. It synthesizes the main findings using the SWOT (Strengths-Weaknesses-Opportunities-Threats) approach, which is adapted and applied to the PforR context in the following way:

- **Strengths** of the system, or where it functions effectively and efficiently and is consistent with Bank Policy and Directive for Program-for-Results Financing;
- Inconsistencies and **gaps** (“weaknesses”) between the principles espoused in Bank Policy and Directive for Program-for-Results Financing and capacity constraints
- **Actions and opportunities** to strengthen the existing system.
- **Risks** (“threats”) to the proposed actions designed to strengthen the system

The analysis and findings in this section are used to inform the recommendations for action which follow this section (Section 5).

Table 4-1: Consistency of country systems with ESSA Core principles

Core Principle 1: General Principle of Environmental and Social Management

<p><i>Bank Policy for Program-for-Results Financing:</i> Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in Program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision-making relating to a program’s environmental and social effects.</p>
<p><i>Bank Directive: Program-for-Results Financing</i> (BP 9.00): Program procedures will:</p> <ul style="list-style-type: none"> ▪ Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level. ▪ Incorporate recognized elements of environmental and social assessment good practice, including (a) early screening of potential effects; (b) consideration of strategic, technical, and site alternatives (including the “no action” alternative); (c) explicit assessment of potential induced, cumulative, and trans-boundary impacts; (d) identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized; (e) clear articulation of institutional responsibilities and resources to support implementation of plans; and (f) responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures.
<p><i>Applicability:</i> Applicable.</p> <p>The activities under UgIFT AF involve construction of schools, upgrade and/construction of health centers, construction of water supply facilities and establishment of small-scale irrigation schemes. These activities could have potential adverse impacts on the environment and social economic wellbeing of the communities as discussed in earlier sections. Given the magnitude of the projects under UgIFT AF however, evaluation of alternatives and cumulative and trans-boundary impact assessments are out of scope of the program</p>

<p>System Strengths</p> <ul style="list-style-type: none"> • The National Environment Act, 2019 provides for projects mandated to undertake Environmental and Social assessments in form of Project Briefs (PB) PB or full ESIA under schedules 4 and 5 respectively. • At the local government level, screening of projects is provided for using an existing Environmental and Social Screening Form (ESSF) and is a key task of the Environmental Officers (EO) and Community Development Officer • A screening tool is available at Local governments 	<p>Gaps</p> <ul style="list-style-type: none"> • The New Act has not been well disseminated to local governments and hence the classification of projects for which ESIA or PB is not well known by most of the responsible officers • There is limited capacity by the Officers in charge to undertake comprehensive screening • Developing ESMPs has not been a common practice at the LG • Delays in commencement of screening process was commonly reported due to inadequate communication from the sector department
<p>Actions and Opportunities</p> <ul style="list-style-type: none"> • NEMA to Revise and standardize the tools for screening and inspection and disseminate them to LGs • Sector guidelines to be disseminated to LG • Capacity building of staff responsible for Environment and Social to be undertaken • Appropriate budgets for Screening, development of ESMPs and Inspection to be provided 	<p>Risks</p> <ul style="list-style-type: none"> • Potential risk of Environmental degradation

Core Principle 2: Natural Habitats and Physical Cultural Resources

Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to avoid, minimize and mitigate against adverse effects on natural habitats and physical cultural resources resulting from program.

Bank Directive: Program-for-Results Financing: As relevant, the program to be supported:

- Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas.
- Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities.

- Takes into account potential adverse effects on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects.

Applicability: Applicable

The program activities under UgIFT-AF with physical footprint focuses on rehabilitation and construction of schools' infrastructure, upgrade of HC-IIs to HC-IIIs, construction of new HC IIIs, rural water supply and micro irrigation, which are unlikely to cause adverse impacts on natural habitats. However, depending on the environmental sensitivities of the sites selected for new construction under AF, it could cause adverse impacts on natural habitat such as wetlands and physical cultural resources.

System Strengths

- Uganda has several legal, policy and administrative frameworks for protection of natural habitats such as the National Environment Act, 2019 (with strengthened provisions for E&S management and compliance) and Forestry and Tree Planting Act as well as the required institutions in place (NEMA and NFA). These institutions have a mandate of conserving natural habitats and ensuring that natural habitats are not degraded or significantly converted. The country also has a National Cultural Policy, 2006.
- The EIA regulations require ESIS for all projects to predict impacts on biophysical environment. Under Regulation 5, ESIA is mandatory for all activities in wetlands that could have an adverse impact.
- The National Environment (Wetlands, River Banks and Lake Shores Management) Regulations, 2000 which declaration of certain wetlands as fully protected wetlands because of national/ international importance, ecological functions etc. and it regulates activities in such

Gaps

- Despite an enabling policy and legal framework, the implementation capacity of the mandated institutions is limited and constrained by staffing and resources.
- Whereas the LGs have an E & S screening tool, most of the proposed sites for infrastructure are not screened early/DEO is involved in site selection/screening hence land identified for new construction in some cases is located in wetlands,
- Weak emphasis and focus on enforcement of regulations both at a procedural level and at an implementation level.

wetlands.	
<p><i>Actions and Opportunities</i></p> <ul style="list-style-type: none"> • NEMA coopted to the steering committee, hence can play an oversight role in strengthening capacity of the EOs; • update of the E & S screening tool to inform site selection (including potential areas prone to climate disaster risks such as flooding etc.), • Under AF, opportunities for active involvement of the EOs in site selection, screening, ESMP preparation and implementation may help to avoid siting of new infrastructure (e.g. schools) in wetlands or other environmentally sensitive areas. • Development and implementation of water source protection plans and environment and natural resource management plans under the water sector (i.e. to protect and restore forests and wetlands) • Recruitment of technical assistants to provide safeguards support to the program under AF. • For all UgIFT investments, minimum requirement to undertaking E & S screening and ESMP preparation (costed and implemented). These should cover natural and cultural heritages issues both at the procedural and implementation levels. 	<p><i>Risks</i></p> <ul style="list-style-type: none"> • Expanded investments in rural water supply, sanitation and agriculture (micro irrigation) under UgIFT-AF could exacerbate weaknesses if further guidance is not provided. • Given the overall emphasis on economic & financial aspects of the program, cultural and natural heritage tend to given less importance. Therefore, there are risks that may escape attention during E&S screening, ESMP preparation and implementation.

Core Principle 3: Public and Worker Safety

Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.

Bank Directive: Program-for-Results Financing:

- promote adequate community, individual, and worker health, safety, and security, through the safe design, construction, operation, and maintenance of Program activities; or, in carrying out activities that may be dependent on existing infrastructure, incorporate safety measures, inspections, or remedial works as appropriate; promote measures to address child and forced labor.
- Promotes use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; and promotes use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions.
- Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.
-

Applicability: Applicable

The civil works focuses on upgrade and construction of schools and health centers, which could expose the public and workers to work-related injuries, noise and air pollution, water contamination, solid waste and toxic or hazardous materials at site among others.

System Strengths

- Enabling legal framework is in place i.e. Occupational Health and Safety Act, 2006. There are occupational health and safety guidelines, which are applicable across sectors.
- The Ministry of Gender, Labour and Social Development (MGLSD) is the focal ministry on occupational health and safety issues. OSH Department in the Directorate of Labour, Ministry of Gender, Labour & Social Development is the Custodian of OSH issues in the country
- Under AF, MoGLSD has been co-opted to the

Gaps

- Though the organization structure exists, the attention given to safety issues at the LG level is low. The district-level labour officer/inspector has a range of issues to deal with and is stretched to find specific support on safety issues to the LG.
- Also the capacity at the LG level to deal with worker and community safety issues is low.
- Majority of the Districts have no Labour Officer to handle safety related concerns
- There is limited supervision by the LG to better manage health and safety risks

<p>UgIFT steering committee hence better placed to play its oversight role and function</p> <ul style="list-style-type: none"> • The Labour officer at the LG level provide support to the Districts in handling labour related issues.. • Various MDAs and DLGs are implementing Work Place HIV/AIDS policies • Uganda has a Pest Control Act 8/1989 ensures the control manufacture, storage, regulate the trade in use importation, exportation and distribution of chemicals. • The water Act, Cap 52 provides for and regulates supply of water to the public. Under Section 34, any person who pollutes or causes risk of pollution by any foul liquid gas or other noxious matter to enter into a waterworks shall be liable on conviction. 	
<p><i>Actions and Opportunities</i></p> <ul style="list-style-type: none"> • The updating of the E & S screening tool also include health and safety aspects. ESMPs/ESIAs to be prepared and ESHS aspects to be included in standards bidding and contract documents under AF • For all UgIFT investments ESMPs/ESIAs will be prepared and should include health and safety aspects and mitigation measures for protection of worker and community health and safety. • training by MGLSD to LGs to strengthen overall capacity in safeguards management, health and safety at work sites • Contractors and supervision consultants contracted will be required to prepare OHS 	<p><i>Risks</i></p> <ul style="list-style-type: none"> • The low capability at the LG level prevents thorough attention to the prevention of community and worker injuries & fatalities.

plans as per contractual requirements under the enhanced SBDs..	
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Core Principle 4: Land Acquisition

Bank Policy for Program-for-Results Financing: Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.

- Bank Directive: Program-for-Results Financing:** As relevant, the program to be supported:
- Avoids or minimizes land acquisition and related adverse impacts;
 - Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy;
 - Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access;
 - Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and
 - Restores or replaces public infrastructure and community services that may be adversely affected.
 - And includes measures in order for land acquisition and related activities to be planned and implemented with appropriate disclosure of information, consultation, and the informed participation of those affected;

Applicability: Applicable

The projects supported under UgIFT AF will involve upgrade of existing facilities and construction of new ones. These may require additional land or new areas for establishment of the facilities and where the District does not own the land, acquisition will be required. The water supply networks however are likely to use existing road reserves or obtain land through acquiring consent for access.

<p>System Strengths</p> <ul style="list-style-type: none"> • The Constitution of Uganda and its Land Act explicitly provides requirement of compulsory land acquisition, and it also provides for an institutional framework unto the Lower Local Government levels. This is well assessed and 	<p>Gaps</p> <ul style="list-style-type: none"> • Despite the guiding legal and policy framework, the DLGs are limited by the availability of land and the resources to finance the required compensation that follows the required appropriation.
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<p>documented in the original UgiFT ESSA. Ref: Link above – in applicability:</p>	<ul style="list-style-type: none"> • Enforcement of laws and regulations is averagely weak in the country and more so at the DLGs. • The CBSD units, District Land Boards and tribunals are usually missed out in the processes on project conception, planning, and design phases • Community engaged and information disclosure continues to be so weak and inconsistent throughout the project cycle • Inadequate documentation and/or commitment especially in regard to land donations
<p><i>Actions and Opportunities</i></p> <ul style="list-style-type: none"> • The project plans to have construction of health centers, schools and rural water with a criterion of LGs availing land without encumbrances with evidence of land title, formal consent, agreement and MoU. The micro-irrigation system will be implemented on land for individual farmers, with evidence of no conflict. • Construction/upgrades of health centers is usually on existing compounds/institutions • The program intends to institutionalize and strengthen a continuous and meaningful stakeholder engagement and a functional GRM. • The project sets criteria of LG availing land for projects without encumbrances ensuring that the land for construction has either a Title, or Formal Consent or Agreement or MoU. Formats of land donation consent forms including required formal witnesses are in place, which could be updated as appropriate. 	<p><i>Risks</i></p> <ul style="list-style-type: none"> • Delayed and inadequate screening and assessment of projects may not inform the potential land risks ahead of civil works and recommend viable mitigation • Inadequate documentation of community donated land for projects and delays in acquisition of appropriate ownership documentation such as Title deeds, MoUs, Consent forms and agreement for some projects may affect the project schedule and increase the vulnerability of the project; • Potential conflict related to community/family disagreement on the land donations and direct sale arrangements • There is a fragmented GRM in the DLGs which may affect the progress of the projects

<ul style="list-style-type: none"> • DLGs to Institutionalize GRM including a central committee and grievance log books with clear reference path to next action • DLG in the major implementing agency with consideration to involve all key institutions such as the District Land Board and District Tribunals in the required land to be acquired for the projects in Health, water and Education. 	
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Core Principle 5: Indigenous Peoples and Vulnerable Groups

Bank Policy for Program-for-Results Financing: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

Bank Directive: Program-for-Results Financing:

- Undertakes free, prior, and informed consultations if Indigenous Peoples are potentially affected (positively or negatively) to determine whether there is broad community support for the program.
- Ensures that Indigenous Peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples.
- Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits.

Applicability: Applicable

- Some components of the project are being implemented across the country and therefore may affect some **Indigenous communities** (Ethnic Minorities) in the program area identifiable under the World Bank Policy.
- **Gender-based violence:** Although the project will focus on small and micro civil works in Health education, Rural Water and micro education, the activities will attract a limited number of temporary influx of workers unto the project sites and areas. Bank experience shows that such labor influx could have potentially significant impact on the vulnerable groups of the host community, including gender-based violence, as well as the spread of STD/STIs and HIV.

<ul style="list-style-type: none"> • Potential risk of exclusion of the poor and vulnerable groups: The project is expected to improve the service delivery and consequently socio-economic status and access to public services including improving agricultural production through micro irrigation. However, the various projects should consider appropriate social inclusion including gender disability and the poor for shared program benefits. 	
<p>System Strengths</p> <ul style="list-style-type: none"> • Equal opportunities are strongly supported by the Constitutions and associated policies and legal frameworks started in the original ESSA – Refer to link above. 	<p>Gaps</p> <p>No New gaps. Refer to link above for reference to original ESSA - Refer to link above.</p>
<p>Actions and Opportunities</p> <ul style="list-style-type: none"> • EOC and the MoGLSD provides for equal opportunities for the vulnerable groups and persons. • Need to institutionalize and tag E&S screening to the project phases, • Facilitate the involvement of the EOs and CDOs/ Gender Officers in project planning, screening and implementation • CDOs/Gender Officer will be fully involved in the E&S assessments to support social inclusion and GBV • Special attention has been given in this project to support refugee hosting Districts and capacity gaps have been identified and mitigations defined to manage E&S risks and impacts • MoES has developed an Ethical Code of Conduct and Grievance Redress Mechanism Policy documents that can be used during the construction of the secondary schools and adopted to the construction of Health Centers. 	<p>Risks</p> <p>There are no envisage risks of exclusion because the project will be covering the entire country and the EOC Act and the MoGLSD provides for equal opportunities for the vulnerable groups, persons and regions.</p> <ul style="list-style-type: none"> • Violence Against Children (VAC) including child labour, defilement, teenage pregnancies and child abandonment; Gender-Based Violence (GBV) and domestic violence, spread of STD/STIs and HIV (more prevalent in the refugee hosting and post conflict Districts); • However, there is a risk of inadequate and untimely social screening and assessments to assess the impacts including identifying the potential vulnerable persons and group and defining appropriate mitigation measures

Core Principle 6: Social Conflict

Bank Policy for Program-for-Results Financing: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.	
Bank Directive: Program-for-Results Financing: Considers conflict risks, including distributional equity and cultural sensitivities.	
Applicability: Not applicable	
<p>System Strengths</p> <ul style="list-style-type: none"> • UGiFT envisages to strengthen GRMs and Ethical Codes of Conduct in DLGs and for specific projects to ease social relation. • Uganda has no boundary conflicts at the time of the AF assessments. 	<p>Gaps</p> <p>There are no conflicts or territorial disputes in the Uganda. The UgiFT will not cause social conflict in fragile states, post-conflict areas, or areas subject to territorial disputes, or impact distributional equity or associated cultural sensitivities. Particularly in Refugee Hosting Districts where subprojects will ensure equity between refugees and host communities</p> <p>Distributional equity and cultural sensitivities are covered under the analysis of system with respect to the main considerations of Core Principle 5.</p>
<p>Actions and Opportunities</p> <ul style="list-style-type: none"> • The Project is supporting refugee host DLGs to manage pressure on services and mitigate any potential conflicts 	<p>Risks</p>

SECTION 5: Recommended Remedial Measures to Strengthen Systems Performance

58. **The ESSA Update screened the proposed program activities for likely Environmental and Social effects and associated risks; analyzed the borrower's system as written and the system performance; made comparison with the core principles to determine any gaps and in turn informed the acceptability analysis.** The ESSA identified strengths, gaps, opportunities and risks in Uganda's environmental and social management system with respect to effectively addressing the environmental and social risks associated with the Program. Whereas the national system is generally acceptable in terms of having institutions with well-enough defined mandates and adequate enabling legislation, the weaknesses in the system performance is recognized by all stakeholders. The symptoms of inadequate prioritization of environmental and social aspects in the development arena are under-resourced institutions, noncompliance legislative provisions and the unsatisfactory safeguards performance in the current UgIFT program. Thus, the recommended remedial measures to strengthen systems performance in UgIFT-AF has been considered at four levels.

5.1 Enhancing the implementation of Environmental and Social requirements in the current UgIFT program

59. There were a set of agreed actions from the last implementation support mission held in December 2019, the government is implementing the Program Improvement Plan (PIP). The agreed short-term actions to be completed before negotiation of UgIFT-AF are:

- i) Development of thematic performance improvement plan to address contract management and safeguards issues;
- ii) Organize joint monitoring visits to all local governments and disseminate the Program Operation Manual (POM) and accompanying specific guidelines on environment and social requirements;
- iii) The Ministry of Finance invites the National Environment Management Authority (NEMA) and Ministry of Gender, Labor and Social Development (MoGLSD), Gender Unit of the Ministry of Education and Sports (MoES) to join the UgIFT technical committee and have them participate in the quarterly monitoring missions led by Ministry of Works and Transport;
- iv) Recruitment of two experts to support the implementation of UgIFT related environment and social requirements and provide broader capacity development in the Local Governments (LGs);
- v) Issue Circular from MOFPED to the LGs to clarify contract management roles, including application of safeguards requirements.

In addition, prior to submission of the operation to the World Bank Board

- i) The agreement of performance measures which include minimum conditions and performance criteria related environment and social safeguards which are consistent across sectors and are elaborated in the performance assessment manual. This will include that LGs:
 - a. have in place critical staff (Environment officer and Community development officer) or requested for secondment from the centre;
 - b. carry out screening for environmental (including climate and disaster risks), Social, health and Safety risks /impacts and develop a costed Environmental Social management plans (ESMP) and
 - c. Allocate at least 5% of the total budget allocations to capital development in a LG to the joint oversight and management of construction under the LG administration department, and specify the activities that are required to be carried out using the funding, including those

by the Environmental and Community Development Officers and specify performance indicators.

5.2 Legal terms and conditions.

60. The legal covenant for the UgIFT-AF will require government:

- i. To establish, communicate and disseminate minimum conditions in the annual performance assessment related to staffing by effectiveness and to apply minimum conditions (a) and (b) above in the performance assessment from 2020 onwards and (c) from 2021 onwards and ensure the incentives are applied to grant allocations.
- ii. To maintain compliance to Environmental and Social requirements throughout the program.

5.3 DLIs and their credible verification protocols

61. The design of UgIFT-AF at preparation has integrated the Environmental and Social requirements in the DLIs and its verification protocols. The Disbursement Linked Indicators (DLIs) with specific provisions for Environment and Social considerations are summarized in the table below. Criteria within the Disbursement-linked Indicators (DLI) of the program highlight environmental and social aspects, and combined it is important that these incentivize change. DLIs 1 and 3 provide DLIs 4, 5 and 6, are based on the results of the performance assessment. The combination of minimum conditions and weightings related to performance criteria, which will be set out in the assessment manual, will be designed in such a way to ensure there is a significant and clear opportunity cost for non-compliance with environmental and social requirements at the central, local and service delivery levels.

Table 5-1 D LIs and verification protocols

DLIs	Verification protocols with Environment and Social considerations
Result Area 1: Improving the adequacy and equity of Financing of LG services	
DLI 1 - Adequacy and Equity of Wage and Non-Wage Recurrent Financing of Local Service Delivery Improves in line with the Medium-Term Plan for Financing Local Government Service Delivery.	<p>DLR1.1. Wage allocations, Recruitment and Releases</p> <ul style="list-style-type: none"> ▪ Funding available for Staffing for cross-sectoral positions in higher local government departments include the Environment officer and Community development officer. DLI value \$7m <p>DLR1.2. Non -wage Recurrent allocations and Releases</p> <ul style="list-style-type: none"> ▪ Non-wage recurrent allocations for Environment and Natural Resources increase in line with the MTP from UGX0.8bn annually to 3.5bn annually. DLI Value: \$4m
DLI 2 -The Adequacy and Targeting of Development Financing for Service Delivery Infrastructure and Equipment improves and is linked to Performance	Formula Based Windows for Development Grants Allocations must be linked to the results of the annual performance assessment, which include minimum conditions relating to environmental and social screening and scores in the assessment, which include performance measures relating to social and environmental safeguards (See DLIs 5 and 6 below).
Result Area 2: Improving performance in the oversight, management and delivery of LG services	

DLI 3 - Systems, processes and capacity for improved service delivery within and across sectors are strengthened.	At least 10 cross sectoral key actions from the Service Delivery Improvement Matrix that are implemented by central government will be directly related to strengthening safeguards systems and capacity, with a value of at least \$7.5m.
DLI 4 - Central Government core functions in oversight, guidance, performance assessment and improvement, monitoring and technical support to LG service delivery take place	<p>Central Ministries, Departments and Agencies (MDAs) carry out their core functions in the oversight delivery in specified sectors/areas. This includes:</p> <ul style="list-style-type: none"> ▪ The preparation and dissemination of essential guidance for LGs (including grant, budgeting and facility/LLG level guidelines). MWE & MoGLSD to prepare guidelines for the management of Environment and Social Safeguards should be prepared and updated annually; and for purposes of harmony, the guidelines issued should include the respective tools and will be disseminated by the National Resource Pool and joint monitoring teams. Sectors have integrated Environmental and Social aspects as detailed in Program Action Plan in section 5D. ▪ Routine oversight, performance information, monitoring of service delivery and construction and <i>safeguards</i> requirements in crosscutting; Education; Health; Water and Environment; Irrigation.
Result Area 3: Improving LG Management of Service delivery	
DLI 5 - The Management of Service Delivery is strengthened in LGs overall and in the weakest performers.	The performance assessment scores in the annual performance assessment of the LG management of services and delivery of infrastructure, which includes Environmental and Social aspects at LG level e.g. evidence of E&S screening, development of costed ESMPs etc.
Results Area 4: Improving the Delivery of Services at the Local Level	
DLI6 - Service Delivery performance improves overall, and in the weakest performing facilities and subcounties	Service delivery performance in facilities (school/health facility) and Lower LG areas (water, Irrigation). The assessment of the facilities and the lower local governments provides for key Environmental and Social issues e.g. availability and access to land free of encumbrances; medical waste management; use and management of agrochemicals and safe disposal associated waste; water source and catchment management; 'green' schools (talking environment, waste management, energy conservation).

5.4 The PforR Program Action Plan includes activities to be completed prior effectiveness and during implementation

62. The analysis has identified the following key areas for action to ensure that the Program interventions continue to be aligned with the Core Principles of Bank Policy for Program-for-Results Financing. The summary table below indicates the actions to be included in the Program Action Plan (PAP) with indicative timeline, responsibility for implementation and indicators for measuring the completion of such actions. These actions also either form part of form part of the service delivery improvement matrix (DLI3) or represent routine actions to be

carried out annually (DLI4). These actions also form part of the service delivery improvement matrix (DLI3). These actions may be further refined and adjusted during the consultation process and the implementation of the Program, as required.

Table 5-2: Proposed Program Action Plan (PAP) relating to E&S Considerations

Action Description	Due Date	Responsible Party	Completion Measurement
Action 1: Strengthen tools for enhancing integration of E&S issues into LGs plans, budgets, procurement and monitoring	June 2020/Before Effectiveness	MWE, NEMA, MoGLSD, PPDA	<p>1. Strengthen and issue tools for environmental and social screening and monitoring of implementation of requirements include:</p> <ul style="list-style-type: none"> - Preparation of guidelines (by MWE & MoGLSD) for the management of Environment and Social Safeguards by LGs; E&S guidelines including the respective tools and disseminated by the National Resource Pool and Joint Monitoring Teams; - Sectoral E&S screening checklists integrate climate and disaster risk screening, Violence and Abuse of Children (VAC), GBV prevention and response plans, HIV prevention plans, and temporary labour influx screening. - ESMPs templates - ESHS provisions including (i) Use of PPDA standard bidding documents for works, (ii) Bidding evaluation considers E&S criteria and (iii) interim payment certificates shall be approved by the Engineer only where a) the Clerk of Works has cleared b) the Environment Officer has approved - Monitoring and reporting checklists - Mainstreaming checklist for planning, design, budgeting, bidding, contracting, implementation and monitoring <p>2. PPDA coordinate with MoLG to issue a follow-up circular to all accounting officers of LGs to actualize the guidance provided (on use of the enhanced Standard Bidding documents - SBDs) for the next procurements and institute penalties for LGs not complying.</p>
Action 2: Guidelines for unified system of grievance redress and community engagement planning in Local governments issued.	July 2020/Before Effectiveness	MoFPED, MoLG	<p>Guidance for establishment and functioning of grievance redress in LGs including:</p> <ul style="list-style-type: none"> - A grievance handling system - Grievance Redress committees to handle grievances and disputes at each LG and at implementing agencies (MoES, MoH, MAAIF and MWE and co-opting MoFPED, PPDA, MoPS and MoGLSD as may be required) in line with Public Service Negotiating, Consultative, and Dispute Settlement Machinery. - Functional Grievance Redress Committees in place and communities aware of the GRM mechanisms. - Establishing a complaints log with clear information and reference for onward action (a clear complaints referral path); in addition, all contractors will be required to a workers' complaints mechanism at the Site; - Establishing an Ethical Code of Conduct that should be available at each site. - Each implementing agency developing a stakeholder engagement plan in collaboration with respective LGs
Action 3: Updated sectoral budget and implementation guidelines and technical guidelines, and annual performance assessment manual to cover sector specific environmental and social aspects and integrate of standard guidance and tools	July 2020/Before Effectiveness	MoFPED, OPM, MAAIF, MWE, MoH and MoES	<p>Updated Sectoral guidelines include:</p> <ul style="list-style-type: none"> - Medical waste management guidelines for HCII, HC III, HCIV and GHs - Rural water technical guidelines to provide for access to land (without encumbrance), source and catchment protection. - Micro- irrigation guidelines to provide for proper siting, land access (without encumbrance), proper use of agrochemicals and safe disposal of its waste. - Education guidelines to provide for access to land (without encumbrance), proper siting of schools, 'green' schools and energy conservation.

			<ul style="list-style-type: none"> - All sector guidelines provide guidance for investment servicing costs to include E&S. <p>Annual Performance Assessment Manual Updated to include strengthened performance measures and minimum conditions for E&S reflecting implementation of strengthened systems.</p>
Action 4: Dissemination of and training on Updated Sector and Cross-sectoral Guidelines and Tools, including safeguards aspects.	Annually, starting Dec 2020; with dissemination of safeguards tools taking place prior to effectiveness	PIU at MoFPED; NEMA; MoGLSD, MoLG	<ul style="list-style-type: none"> - First Dissemination of updated E&S tools and guidelines from MWE/NEMA and GLSD takes place before effectiveness. - Dissemination of sector guidelines, including E&S requirements, takes place before the end of December 2020. - Evidence of dissemination of guidelines directly to LG departments and facilities / schools / Lower LGs - Evidence of organized E&S Awareness / trainings activities for stakeholders at central government institutions and LGs including political and technical officers
Action 5: Quarterly Joint monitoring visits to local governments take place, covering safeguards as well as contract management and procurement.	Quarterly	NEMA, MGLSD	<ul style="list-style-type: none"> - NEMA and MGLSD participate as part of the national resource pool in quarterly joint monitoring and contribute to reports on compliance with requirements and follow up action taken
Action 6: Technical support teams support LGs to implementation Performance Improvement Plans and Recommendations of joint monitoring visits.	Ongoing, from Q1 2020/21	MoLG, NEMA, MGLSD	<ul style="list-style-type: none"> - - Technical support teams, which include environment and social safeguards expertise, provide targeted support to LGs to help them implementation of follow up recommendations
Action 7: Undertake environmental functional review and social skill needs assessment and agree proposals related to strengthening social risk management at the LG level including, GBV and VAC, HIV prevention, and strengthening structures, investments	By December 2020	Public service; OPM; MoLGs, MWE MoGLSD	<p>A functional review has taken place and provisions updated, including</p> <ul style="list-style-type: none"> - Staffing structures and requirements and roles and local and national level - Specification of sector investments and functions in sector and DDEG guidelines strengthened to include environment, climate change mitigation (<i>green infrastructures, waste management equipment and infrastructures</i>) and adaptation and social risk management. - Environment and Social Safeguards requirements identifiable in revised LG budget structure and reporting formats for Social Development and Natural Resources departments via outputs and performance indicators for inclusion in the PBS aligned with results from the functional review.
Action 8: Enhanced Budgeting and Reporting Systems, including for E&S activities operational	June 2022	MoFPED; OPM; MoLGs, MWE NEMA; MoGLSD	<ul style="list-style-type: none"> - Strengthened LG joint monitoring of contract management, construction management issues as well as compliance to E&S risks and impacts – Guidelines in place. - Automated Quarterly and Annual reports generated on Environment and Climate change integration in annual work plans and budgets. - Strengthened budgeting and reporting system functionality for PBS functionality for tracking and reporting on environmental (including Climate Change) and Social performance.
Action 9: Integrated Refugee Response planning and implementation (including E & S safeguard requirements for program interventions in 13 refugee hosting LGs) – Coordinated by OPM	By September 2020	MoFPED, MoLG, OPM, MoH MoES, MWE MAAIF NEMA, MoGLSD	<ul style="list-style-type: none"> - OPM guidance to all MDAs and the respective refugee-hosting Local Governments, accompanied with integrated plans including refugees' communities - Integrated Guidelines for LG Planning for the Refugee response and transition prepared and disseminated, including E & S safeguard requirements for program interventions in 13 refugee hosting LGs. - costed and integrated refugee response and transition plans (including ESMP as well as child protection and GBV prevention plans)

Annex 1: Stakeholder Consultations – Issues, Concerns and Disclosure

UgIFT ESSA Consultations with District Local Governments

The following District Local Governments were sampled as part of the preparation of the ESSA for UgIFT Additional Finance. Mityana, Kazo, Kassanda, Kanungu, Ntungamo, Kiryandongo, Nwoya, Madi Okollo, Wakiso, Kapchorwa, Sironko and Bukedea. Field work was undertaken from January 31 to February 25, and March 10-13, 2020.

Key highlights of discussions with the District Local Governments

1. Environmental and social risks: The following were identified:

- **Key environmental risks and impacts identified** include: common risks associated with civil works (noise and dust pollution, occupational health and safety, etc.), inadequate solid waste management, poor management of health care waste, some HCs openly burn their medical waste. Under irrigation, key issues identified included: competing demand for water, pollution of water, increased use of chemicals and potential impact on water sources, lack of provisions for water storage for use during dry seasons, among others.
- **Common Social risks and impacts identified** were Violence Against Children (VAC) including child labour, defilement, teenage pregnancies and child abandonment; Gender-Based Violence (GBV) and domestic violence; contraction and spread of STD/STIs including HIV/AIDS due to labour influx; underpayment, non-payment and delayed payment of workers and lack of formal documentation (contracts/appointment letters) for employment; gender related risks i.e. inconsideration of working mothers' interests and needs such as sanitation and provision of shelters for protecting, and facilities for breast feeding their babies.

2. E & S management processes

- E&S team is not involved at the design and initial stages of projects.
- While some DLGs undertake environmental and social screening for some projects, this is most often done during sub-project implementation, and in some cases the DNROs/SEOs indicated that they only get to know about upcoming sub-projects through the District Technical Planning Committee (TPC), yet the TPCs in some districts are not held monthly as stipulated under the law. In other cases, the EOs were merely 'rubber stamping' the E & S screening forms without carrying out a site inspection or at the end of construction (prior to payment of contractor invoices). The DCDOs are not involved in project screening in all the districts sampled.
- Additionally, most Districts do not go beyond screening to prepare ESIA/Project briefs/ESMPs for their subprojects.
- The few ESMPs prepared are not costed and the EO and DCDO do not participate in the Bidding and Bid evaluation processes. It was only in the case of Nwoya LG, where the SEO is involved in the evaluation of bids as the chairperson of the Contracts Committee. Most of the time the BoQs and bidding documents are not shared with the DNR Dept. for their input, hence, at the time of contracting opportunities are already missed out for including ESHS provisions in the bidding and contracting documents, subsequently during construction supervision, environmental aspects

are not monitored. The example cited here is the Buteza Seed School in Buteza subcounty Sironko District where the Ag.DNRO was not involved in screening and consultations showed that the site is traversed by natural drainage channels but aspects of construction of proper drainage channels, culverts to ease access and a retaining wall were not considered within the budget.

- **Inexperience in managing environmental and social risks and impacts related to development projects in some districts.** Almost all of the Environment officers in the districts visited had qualifications and knowledge on environmental matters but require training and skills development in screening and development of ESMPs. The CBSD was not involved in screening of any of the projects. All social staff of the DLGs assessed had the required minimum qualifications except the DCDO of Kanungu District; were found to have reasonable comprehension of the common social risks and impacts (knowledge and skills) including the required mitigation measures; and had experience in the management of social risks due to their involvement in World Bank financed projects. However, four districts (Wakiso, Kapchorwa, Bukedea and Kanungu) lacked the required experience in addressing social risks in investment projects.
- A few sampled LGs prepare ESMPs, however, this is mainly limited to the Environment and Natural Resources Dept. (Community Social Services Dept. is not involved in ESMP preparation). Furthermore, there is very limited follow up on ESMP implementation and E & S monitoring of projects is still very weak. This is majorly due to a lack of funds to undertake monitoring (i.e. no dedicated budgets for E & S monitoring in the districts). It is not uncommon to find DNRO/SEO among others, having to share transport with CAO/ other departments in order to undertake monitoring and supervision. Almost all sampled DLGs did not have the bare minimum of a motorcycle to facilitate their monitoring.
- A few of the DEOs are able to sign off an Environmental and Social Compliance certificate, however, in most cases the DEOs and CDOs were not involved in the screening of the sub-projects as well as monitoring of the contractor during works execution.

3. **Staffing levels in the District Natural Resources and Community Based Services Departments in some DLGs**

- Most of the DLGs sampled remain under staffed with substantial positions unfilled. This was evident in the newly established districts (e.g. Madi Okollo, Kazo, Kassanda and others like Bukedea). In Kasanda District created in July 2019, DNR Dept. has one technical officer doubling as the Ag. DNRO/Ag. DAO, DCDO (also acting as Labour and Gender Officer). Bukedea District had one officer taking up mandates of Ag. DNRO, SEO, Wetlands officer and Forestry Officer. Several other Districts had one officer in charge of Environment. Whereas, the new districts had staff shortages, the recruitment process for substantive staff is underway.
- On the other hand, Wakiso District LG had *99% staffing filled* - DCDO, Sr. Labour Officer, Sr. Probation and Welfare Officer, DNRO, SEO, EO, Forestry Officer, Wetlands Officer, Office Attendant, Driver (District); 7/9 Town Councils have CDOs; all 6 Sub counties have CDOS; and 3/4 MCs, have Principal CDOs with each a CDO; with requisite entry requirements.

4. **Funding for monitoring, Transport and Equipment:**

- The budget for the Environment and Natural Resources Dept. and Community Based Services Dept. in all the Districts sampled, has persistently remained insufficient for effective operations of the departments. The unreliability of the releases from local revenue affects E & S assessment and monitoring of projects at LG levels. According to the DLGs planning guidelines, 5% of the total budget for project activities is supposed to be allocated to M&E including Social and Environmental (S&E) aspects. However, this service cost is inadequate and, in some cases, used entirely for M&E leaving out environment and social activities of the CBSD.
- Most of the Depts. sampled do not have office desktops (majority use personal laptops), and also lack transport (no motorcycle) for environmental and social monitoring. In Wakiso District, the Community Based Services Dept. has office space but without adequate equipment and transport. i.e. 1 vehicle (out of service) and 2 motorcycles.
- In line with the above, the DLGs generally do not possess the necessary equipment to undertake basic environmental monitoring e.g. GPS, noise meters, cameras, water quality testing kits, etc.

5. Coordination between DLGs and the center (NEMA, Ministries)

- Several Districts raise concerns about the poor communication and information flow from the central ministries and the poor involvement during the procurement process. This according to the districts led to late deliveries and poor performance. Majority of the LGs for example intimated that the details of the POM and sector Guidelines for UgIFT program were not well known to them
- Whereas NEMA has now established regional offices, however, there functionality and coordination with the respective DLGs remains a challenge. Some DLGs indicated that they are not consulted on before ESIA certificates are issued to developers in their areas of jurisdiction, neither, do they records of the issued ESIA certificates, additionally, monitoring may sometimes be carried out by the NEMA regional officer without involvement of the respective SEO/DEO. In Kanungu, it was mentioned that the NEMA regional officer conducted a joint inspection with the Kanungu SEO in 2018.

6. Stakeholder Engagement and Grievance Management

- No consisted and structured consultation of communities but with extensive process during annual district planning and design which usually leaving out ES and CBSDs. Limited consultation at implementation due to budgets
- GRM is fragmented, relying on existing system, and handled by different offices or structures in the LG; such as Labour issues – by the Labour office; Family/Children issues – by the Probation office; Theft/Crime – by the Police; and Land grabbing – by the RDC and other partners. There is no training programme for the relevant staff on GBV and VAC.
- There is no inclusion of arrangements for responsive communication during implementation because the department is not involved during implementation of the projects/investments.

Recommendations

- i. The DLGs should fill all the staffing gaps at the at LG and sub county levels to improve the effectiveness of environment and social risks management.

- i. The E & S screening should be carried out for each project, forms need to be updated and harmonised to include identification of climate disaster and climate risk screening, where required.
- ii. Capacity building on environmental and social risk management and equipping, tooling and training on use of equipment
- iii. Involve both the EOs and CDOs in project planning, design, ESMP preparation and implementation/joint monitoring and include provisions for both to sign off the E & S certification form prior to payment of contractors' invoices.
- iv. Develop E & S tools and train LG staff on environmental and social risk management including integration of climate change aspects into project design, application of E & S screening tools, preparation of ESMPs and integration of ESHS provisions in bidding and contracting, where required Gender Based Violence (GBV) and Violence Against Children (VAC) risks, impacts and mitigation.
- v. Increase and allocate a separate budget for the effective management of social risks by the CBSD.
- vi. The Project should provide at least two motorcycles for CDOs at sub county level since this is where actual implementation takes place.

Annex 2: List of Participants Consulted at Local Government for the ESSA-Update

No.	Date	Name	Designation	Contact Tel/Email
KASSANDA DISTRICT				
1	31.01.2020	Lutima Arnold	Engineer	0775040275/ 0705339070
2		Kaweesa Ronald	Ag. D/Engineer (C. Engineer)	0786154002/0705677817
3		Ssebulime Gozaga	DCDO	0772621524
MITYANA DISTRICT				
4		Muzira Daniel	DCDO	0782431941
5		Seremba Daniel	DPO	0772575953
6		Ssonko James	Water Office	077444670
7		Kisakye Ivan	Commercial Officer	0752586715
KAZO DISTRICT				
8	04.02.2020	Bingi Francis	Ag. DE	0774804873
9		Muzoora Isaac	CFO	0772439920
10		Abarinda Vianny	AG DNRO	0782343090
11		Ssesanga Vincent	DWO	0782446192
KANUNGU DISTRICT				
12	05.02.2020	Turyahamwe Joseph	HRO	0782170800
13		Saturday Jackson	S/Planner	0772563737
14		Namara Jackson	DCDO	0772514850
15		Tumusiime Dabilience	SLO	0782434367
NTUNGAMO DISTRICT				
16	06.02.2020	Kiiza Fidelis	PAS	0772634228
17		Aturaire Abraham	Trainee	0777674691
18		Tumwebaze Dinah	SEO	0772643221
19		Byaharuhanga David	D/Planner	0772667420
KIRYANDONGO DISTRICT				
20	11.02.2020	Dancan Denis	PA/CAO	0782339114
21		Muhumuza Samuel	Ag. D/Engineer	0772845618
22		Dabanja Geoffrey	DCDO	0772 355182 gdabanja@yahoo.com
23		Dr. Mutyaba Imam	DHO	0773556505
NWOYA DISTRICT				
24	12.02.2020	Lakony Lino	S. Planner	0772527150
25		Komakech Joseph	SCDO	0775081000
26		Acca Evelyn	SEO	0777482657
27		Tabu Justine	Senior Agricultural Engineer	0772623221
MADI OKOLLO DISTRICT				
28	12.02.2020	Pacoryema Lilly	Ag. DCDO	0782833084

29		Maisha Godfrey	Ag. Planner	0784146668
30		Byaruhanga	CAO	
WAKISO				
31	17.02.2020	Lukoda L. Luke	CAO	0772498824
32		Mpoza Esawo	SEO	0782688709
33		Kyejjusa John	DCDO	
SIRONKO				
34		Mafabi Rasgid	Ag DNRO/DEO	0772435518
35		Gidudu Alex	DWO	0782638838
KAPCHORWA DISTRICT				
36	17.02.2020	Musobo Joseph B	Ag. DE	0700472273
37		Chamangei Awadh	DNRO	0772 645 591
38		Odongo Benjamin	SAA	0772 208 708
39		Langat Franco	SIA	0772 885 353
40		Aseko Harriet	DCDO	0772 660 768
41		Cheptoca Mike	DEO	0772 631 306
42		Cheptoris Dinah	SPO	0782 077 + 975
43		Olal David	DWO	0752 520 789
44		Mwanga Patrick	DHRO	0782 252 395
45		Chebutek Jonathan	For CFO	0772 957 196
46		Muthai Ritah	For D. Planner	0702 718 471
47		Robert Abia Owilli	D/CAO	0392 944 462
48		Chesang David	A/CAO	0701 620 917
49		Musobo Joseph	D/Engineer	0700472273
BUKEDEA DISTRICT				
50	18.02.2020	Loyce I Amoit	PHRO	0782 797 196
51		Opolot Michael	DAO	0772 991 699
52		Ongeleo R. Francis	DPO	0772 614 199
53		Opuru Michael	DCO	0772 928 462
54		Egwayu Stephen	SPO	0782 843 152
55		Akwap Marion	DCDO	0772 556 048
56		Ikodet Stephen	DHO	0772 535 688
57		Oluka David Okwo	SEO	0772 856 475
58		Dramuna Dominic	For CFO	0774 387 826
59		Ochom Joseph	Ag. PAS	0777 543 126

Annex 3: UgIFT ESSA Consultative Meeting Minutes with Ministries and Central Agencies

Minutes of Meeting held with MoFPED/REAP on 20 th February 2020			
Members Present	Name	Designation	Contact/Email
	Kagaba Patrick	Programme Procurement Specialist	
	Paul Akunda	Programme Finance Specialist	
	Johnson Mutesigensi	Coordinator	
	Mr. Samuel Opio	Project Coordinator	
	Georgina Manyuru	SD Consultant - WB	0772 588 190
	Hasoho William	Procurement Consultant - WB	0772 736 008
	Balikuddembe J. K	Finance Consultant WB	0772 467 288
	Martin Lwanga	Governance Consultant - WB	0772 401 774
Highlights of the discussions	<ul style="list-style-type: none"> MoFPED recognized poor performance in meeting the Social safeguards requirements under UgIFT, which was attributed to: (i) constraints in procurement process whereby potential E&S risks and impacts as well as mitigation measures were not considered in the bidding documents; (ii) a limited service cost of 5% of the total program budget which is insufficient and discretionary, and yet overburdened by several needs including M&E and E&S aspects; (iii) stakeholders unaware of E&S safeguards requirements, no dedicated E&S personnel as well as no coordination; and (iv) inadequate coordination and information sharing within and across district departments - e.g. guidelines are shared but sometimes remain with the Chief Administrative Officer (CAO), District Health Office (DHO) and District Education Office (DEO). It was recommended to consider social safeguards requirements in the 5% service cost only prioritized 'deserving' activities by the DLG, since these not one of them. The following was proposed: i) CBSD and EOs be involved in review of enhanced Standard Bidding Documents (SBD) to the CBSD and DEO before they can be used for bidding; and ii) Establish an E&S coordination unit in the Resource Enhancement and Accountability Program (REAP) to be operated by two E&S Specialist (one Environmental and one Social Specialist; with a dedicated budget allocation for implementing E&S safeguards activities under UgIFT. REAP was seen as a viable opportunity in overseeing the implementation of S&E requirements under UgIFT in the LGs, to promote partnership between the GoU and Development Partners (DPs). It would support the tracking of E&S performance since it is well-equipped M&E Unit, responsible for planning, monitoring and evaluation undertaken periodically. REAP Strategy also addresses S&E aspects including gender with budget allocations. 		
Minutes of Meeting held with PPDA on 24 th February 2020			
Members Present	Brenda Atuhairwe	Ag. Manager Procurement	0752 486 166
	Sophia N. Masagazi	Audit MAS	smasagazi@ppda.go.ug
	Georgina Manyuru	SD Consultant - WB	0772 588 190
	Hasoho William	Procurement Consultant - WB	0772 736 008
Highlights of the discussions	<ul style="list-style-type: none"> The Public Procurement and Disposal of Public Assets Authority (PPDA) highlighted a release of enhanced SBD in September 2019 with the aim of strengthening the management of S&E aspects in the procurement process. The enhanced SBD was intended to address the challenges experienced with the first procurements under UgIFT prior to September 2019. It was noted that non-compliance continues even after the issuance of guidelines or instructions. For example, a circular was issued by PPDA on July 24, 2019 to all accounting 		

	<p>officers of DLG and MLG on the implementation of procurements under UgIFT clearly informing them of the use of enhanced SBD (procurement documents) that incorporate Environmental, Social, Health and Safety (ESHS) aspects; including a website where a copy can be downloaded. The circular clearly outlined several responsibilities of the CMC including routine monitoring of progress, monthly reporting of progress to the CAO and ascertaining that the contractor performs the contract in accordance with the terms and conditions specified in the contract.</p> <ul style="list-style-type: none"> • The enhanced SBD for the procurement of works provide enough room for District S&E personnel to tailor and input ESHS aspects, requiring specialized expertise from the CBSD and DEO to prepare more comprehensive SBD on S&E risks and impacts plus mitigation measures. • PPDA also noted that the line ministries (MoES and MoH) were supposed to prepare bidding documents together with the LG but this was not the case. • The following was proposed: i) PPDA to coordinate with MoLG to issue a follow-up circular to all accounting officers of DLGs and MLGs to actualize the guidance provided especially for the next procurements and penalize LGs that do not comply; ii) The E&S Specialists to be based at REAP in liaison with MoLG should coordinate the participation of LGs in bids preparation with the respective line ministries: MoH, MoES, MAAIF, and MoWE. 		
Minutes of Meeting held with MAAIF on 25th February and 11th March, 2020 at their Headquarters in Entebbe			
Attendance	Eng. Ronald Kato Kayinzi	Ag. Commissioner A/MWAP	0772 423 820
25.02.2020	Freddie Kasangi	Assistant Commissioner-SWC	kasangifred@hotmail.com 0704160410
	Ollando Allan	Engineer	ollandoallan@yahoo.com 0706573692
	Katto Andrew	Senior Engineer	bkatto@gmail.com 0772182029
	Okwang Reagan Yoweri	Engineer	okwangareagan92@gmail.com 0704475232/0781187157
11.03.2020	Freddie Kasangi	Assistant Commissioner-SWC	kasangifred@hotmail.com 0704160410
	Ollando Allan	Engineer	ollandoallan@yahoo.com 0706573692
	Katto Andrew	Senior Engineer	bkatto@gmail.com 0772182029
	Okwang Reagan Yoweri	Engineer	okwangareagan92@gmail.com 0704475232/0781187157
	Christine Kasedde	Environment Specialist	ckasedde@worldbank.org
	Hanifah Lubega	Environment Consultant	hanilubega@gmail.com
	Naomi Obbo	Environment Consultant	noobo@worldbank.org
Highlights of the discussions	<ul style="list-style-type: none"> • The micro irrigation component under MAAIF will be implemented in 40 districts divided into 4 clusters. The Micro irrigation component will involve support to small holder farmers to enable them transition from subsistence to commercial agriculture. • The project will be targeting individual farmers with up to 1 hectare (2.47 acres) of investments and are in the proximity of a water source. The crops targeted are Robusta coffee and horticulture, specially fruits and vegetables. 		

	<ul style="list-style-type: none"> • 250 farmers will be selected through an expression of interest and supported in the first year of the program. MAAIF provide technical backstopping and through the extension workers will provide support to the farmers to gain access to micro irrigation through a subsidy. • Grant guidelines and technical guidelines to be developed for the micro irrigation component under the program. 3 different types of irrigation will be promoted i.e. drip, sprinkler and hose irrigation. • Both natural and man-made sources of water will be explored as potential sources to provide water for irrigation. • Issues raised included: impacts on water quality that may arise from use of chemicals, solid waste disposal (i.e. disposal of chemical waste containers- MAAIF indicated that in some cases, these containers are being used by some as domestic utensils for collecting water which poses a risk etc.). Additional issues cited include water in balance in case of over abstraction of water to meet irrigation need and competing demands on waters, this may affect the quantity and quality of water left for other uses and if not handled, exacerbate water related conflicts. • The Ministry noted a shortage of extension workers in most LGs but also highlighted that their social personnel (Gender Officer) could support the program if facilitated under the program to ensure that women with access to land benefit from the program. • The Ministry also observed inadequate funding for E&S safeguards aspects and the need to strengthen the CBSD to ensure their effective involvement in mobilization and support of the selection for individual farmers. • On inclusion matters, the program will target farmers at a level expected to sustain irrigation as a business venture aimed at transforming agriculture from subsistence to commercial. Women with access to land and meeting other criteria would qualify for the program if they applied for support. • It was proposed that MAAIF Gender Officers would establish or/and share existing systems in the Ministry that would support the participation of qualified women in the program. • MAAIF plans to put in place grievance redress mechanisms at the LG level to handle any issues/grievances that may occur during project implementation.
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Minutes of Meeting held with OPM on 25th February 2020

	Mayanja Gonzaga	C/M&E (LG) - OPM	0772 484 330
	Georgina Manyuru	SD Consultant - WB	0772 588 190
	Hasoho William	Procurement Consultant - WB	0772 736 008
	Balikuddembe J. K	Finance Consultant WB	0772 467 288
	Martin Lwanga	Governance Consultant - WB	0772 401 774

Highlights of the discussions

Minutes of Meeting held with MWE on 10th March, 2020 at their Headquarters in Luzira

Members Present	Collins Amanyana	Principal Economist	collins.amanya@gmail.com
	Aporu George	Economist	oprugeoarge@gmail.com
	Irene Nanyondo	Forestry Officer	ninene47@gmail.com
	Christine Kasedde	Environment Specialist	ckasedde@worldbank.org
	Hanifah Lubega	Environment Consultant	hanilubega@gmail.com
	Naomi Obbo	Environment Consultant	noobo@worldbank.org

Highlights of the discussions

- MWE has decentralised offices for rural water with the necessary staff (including filled in positions for Environment Officers) to provide technical support to the rural water and sanitation sub-sector in the respective LGs. The Environment Officers in the regional offices

	<p>work closely with the district Water Officers in LG during implementation of water infrastructural projects.</p> <ul style="list-style-type: none"> • MWE has developed several guidelines for water supply including the Water Source Protection Guidelines, Design Guidelines for the Water Supply Infrastructure, the EIA Guidelines for Water related projects, Environment and Social Safeguards Policy, among others. Hence, these will be useful references during project implementation. • Under UgIFT AF, MWE intends to utilise existing ground and surface water sources and point sources and to extend small piped water network to approximately 100 households per network. • Limited funds have affected the frequency of monitoring of the on-going activities in rural water supply and sanitation. • Lower Local Government (LLG) levels have limited control over the management of environment and natural resources at the sub—county level, this has left implementation challenges for projects related to natural resources management. • Rural Water Supply will work closely with DESS under UgIFT AF. However, the Forestry component (under environment and natural resources) will be brought on board in the following year, partly because the data on forestry is not yet readily available. DESS is already reporting on emissions from the country to the UNFCCC. • With regard to siting of water sources and point sources, LG will take the lead in site selection, while MWE will provide technical back stopping under the program. • MWE highlighted the need for capacity building of LGs in the areas of safeguards, among others. • The meeting was also informed that up to 3% of project costs will be set aside for Operations and maintenance (O&M), including catchment and water source protection. • The meeting was informed that discussions are on-gong on the operationalization of environment and development conditional grant. • The need for MWE to involve NEMA not only on reviews of ESMPs/ESIA for sub-projects, but also undertake joint monitoring and integration of environment and climate change interventions in the annual work plans and budgets of sectoral ministries. • MWE has already developed general environment and climate change mainstreaming guidelines for the different sectors. However, these guidelines are yet to be disseminated to respective MDAs. Additionally, the Climate Change Department was involved in review of LGAPA and have come up with climate change indicators for each sector. 		
Minutes of Meeting held with MoH on 10th March, 2020 at their Headquarters in Kampala			
Members Present	Eng. George Otim	Ag. Commissioner Health Infrastructure	otimodongo@gmail.com 0772459779
	Eng. Jacob Nsubuga	Project Engineer	yebuga@gmail.com 0772389715
	Doreen Kakyu Mpugu	Project Engineer	kakyodoreen@gmail.com 0775389728
	Eng. Paul Kalanzi	Project Engineer	Pkm.mne@gmail.com
	Christine Kasedde	Environment Specialist	ckasedde@worldbank.org
	Hanifah Lubega	Environment Consultant	hanilubega@gmail.com
	Naomi Obbo	Environment Consultant	noobo@worldbank.org
Highlights of the discussions	<ul style="list-style-type: none"> • The Ministry of Health (MoH) is upgrading a substantial number of HCs from HC IIs to HC IIIs under the UgIFT program requiring close attention paid to S&E safeguards requirements. Mis-communication between DLGs and MoH was observed. MoH committed to timely communication to promote ownership and DLG involvement. • MoH aimed at eliminating human element or political interference in selection so that deserving sub counties benefited and ensure good quality Health Units at a reasonable cost. 		

	<ul style="list-style-type: none"> The ministry confirmed the central management of the procurement process including preparation of SBD and advertising for the bids. MoH confirmed the lack of participation of CBSD or even being aware that S&E aspects were incorporated in the SBD, Contracts and BoGs. There was also recognition that 3% of the total contract meant for supervision, M&E, and E&S operations at the LGs was abstract and inadequate. The following were proposed i) The MoH should share the draft SBD with LGs for their input on E&S aspects with the full participation of the CBSD and DEO; and ii) Split the 3% allocation equally among the deserving LG departments under UgIFT AF and issue a guideline to this effect. This will enable the CBSD and DEO departments access their allocation to facilitate them monitor the implementation of E&S risks' mitigation measures outlined in the SBD. 		
Minutes of Meeting held with NEMA on 11th March, 2020 at their Offices at NEMA House Kampala			
Members Present	Herbert Nabaasa	Senior District Support Officer	herbert.nabaasa@nema.go.ug
	Timothy Izimba	Environment Assessment Officer	timothy.izimba@nema.go.ug
	Wilbert Ikilai	Senior Environment Education Officer	wilbert.ikilai@nema.go.ug
	Doreen Komukama Mugenzi	Environment Assessment Officer	doreenkomukama@nema.go.ug
	Harriet Namara	Senior Environment Assessment Officer	harrietnamara@nema.go.ug
	Anita Ainomugisha	Environment Assessment Officer	anitaainomugisha@nema.go.ug
	Richard Mugambwa	Environment Inspector	richardmugambwa@nema.go.ug
	Connie Nekesa Ouma	Consultant-Social Development	connienekessaouma@gmail.com
	Christine Kasedde	Environment Specialist	ckasedde@worldbank.org
	Hanifah Lubega	Environment Consultant	hanilubega@gmail.com
	Naomi Obbo	Environment consultant	nobbo@worldbank.org
Highlights of the discussions	<ul style="list-style-type: none"> NEMA has revised its National Environment Act (NEA), 2019 that incorporates in climate change and social risk management (to some extent). However, NEMA is yet to sensitize LGs on the new E & S provisions in the NEA 2019. NEMA has in lace draft environment mainstreaming guidelines and matrix in which the sectoral ministries are expected to be report on environment and climate change interventions. However, the mainstreaming draft is yet to be finalised and disseminated to key stakeholders NEMA has 4 regional offices that have been established, however, not fully operationalised. While the regional offices have staff, they share/rent offices e.g. the NEMA eastern regional office is housed at the MWE Mbale regional with MWE (i.e. the eastern office in Mbale). The NEMA regional office undertakes joint monitoring of projects (specifically water related projects) together with the MWE regional office, and the Environment Protection Police (for enforcement activities). Most LGs have E & S screening forms that are used for screening E & S risks of sub-projects , however, these need to be updated and harmonised across LGs. In the meeting NEMA was guided to explore opportunities or working with MoGLSD to prepare and update the E&S mainstreaming and monitoring tools. NEMA also highlighted the need to customise the E&S screening tools tailored to the respective sectors under UgIFT AF (Health, Education, Irrigation, rural water and sanitation). Additionally, NEMA will provide support to LGs to develop ESMPs that will be site specific for respective sub-projects. Suggestions were also made that provisions be made for the Environment Officer to sign off on the environmental and social compliance certificate prior to the payment of contractors' invoices. 		

	<ul style="list-style-type: none"> • Among key issues noted were limited funds, lack of reporting on environmental interventions and climate change by the central Ministries, Departments and Agencies. At LG level, DEOs do not submit reports to NEMA, even though this is provided for in the National Environment Act 2019. • It was also highlighted that MWE/NEMA should strengthen collaboration and coordination with other government agencies such as MoLHUD, MoGLSD and MoLG to promote synergies and integrated management of E&S risks and impacts. • In addition, in updating the E&S management protocols and tools, social aspects should be strengthened based on the new NEA 2018. 		
Minutes of Meeting held with MoES on 13th March, 2020 at their Offices at Embassy House Kampala			
Members Present	Mr. Derrick Namisi	Senior Economist (Budget) – Project Coordinator	0779 034746 derricknamisi@gmail.com dnamisi@education.go.ug
	Christine Kasedde	Environment Specialist	ckasedde@worldbank.org
	Naomi Obbo	Environment consultant	nobbo@worldbank.org
Highlights of the discussions	<ul style="list-style-type: none"> • The MoES representative noted that there is a general lack of understanding/knowledge on environmental and social issues among the Ministry staff, hence, a challenge on the implementation of safeguard requirements under the Education component of the program. • The MoES has a social and gender focal point person (however not in the Ministry structure and with limited budgeted from the Ministry). The current structure does not provide for an Environmental officer/focal point. • I The four key issues identified include: (i) land availability, (ii) limited facilitation for the desk officer (gender and social), as well as at LG level (limited funding for Environment and community development officers (iii) assumption that technical staff have knowledge of environment and social safeguard requirements (v) technical challenge (capacity gaps at LG level i.e. Environment Officer and Community Development Officer (v) political challenges in selection of sub-counties in which to construct/rehabilitate schools under the program. • However, there are opportunities for improved facilitation of Gender Unit supported by UNICEF and the unit has had previous engagement in the E&S risk management, which can be tapped under UgiFT. • The meetings also highlighted the challenge of the mandate of secondary education, which is not decentralized, and is outside the mandate of DLGs. DLGs cannot oversee or monitor activities in secondary schools that directly report to the central government (MoES). Therefore, the MoES plans to address the issue by providing a circular to all DLGs and MLGs requesting them to facilitate their CBSD and DEO so that they get more involved in the management of S&E risks and impacts under UgiFT. It was proposed that Environment Departments and CBSDs receive a budget to facilitate support the management of E&S risks and impacts including Education projects. • MoES team were encouraged to explore opportunities for integration of environment and climate change interventions, for e.g. planting of woodlots, use of institutional clean energy saving stoves, and bio digester. r. The team guided the need for consultation with top management and design engineers on the possibility of incorporating one or all of the proposed interventions into project design. • The meeting also discussed possibility of including tree planting and talking compounds, rainwater harvesting tanks for water conservation, energy efficiency measures such as use of solar lighting to reduce on the incurrent costs of electricity, as well as waste management 		

Annex 4: UgIFT ESSA Virtual Stakeholder Feedback/Validation

Page No.	Issue	Comment	Action taken to address the comment
Ministry of Water and Environment (MWE)			
Section 2: Overview of Key Investments, Benefits, Risks and Mitigation Measures			
Pg.10	2.1 Water & Environment sector; 21(2) Extension of small water piping systems to at least 100 persons per system	The target is at least 100 households, refer to discussion with MWE during the consultation meeting	Corrected in para. 22 and Table 2.1 (2)
Pg.13	Table 2.1: Impact from investing in water and sanitation. only on hygiene and sanitation.	The risks are only on hygiene and sanitation Risks not matching mitigation measures, in relation to source protection & catchment	The sentences there in have been rephrased. Additionally, the measures on water source protection have been included not as a mitigation against identified risk but rather as enhancement measures for investments in rural water supply and sanitation.
Pg.17	MWE to prepare & implement SPPs & Environment and natural resources management plans.	Implementation of all the SPPs in all the districts doesn't sound realistic. This should be done by the districts?	MWE to support the implementation of source protection plans (SPPs) by LGs under UgIFT-AF.
Pg.17	d) Support establishment and functionality of WSC at sub-county level	Support establishment and functionality of water management structures at all levels	Addressed in Table 2.1
Pg.17	e) DLGs to be provided with water quality & quantity testing kits.	Who will provide?? Usually the LGs take samples to the labs or some LGs budget for the kits in their development budgets	This is noted and has been rephrased to state that LGs should be supported to budget for water quality monitoring kits, in their development budgets.
Pg.20	Land acquisition and resettlement: b) LG to avail land with proof of ownership.	A big challenge to LGs, it's not as in schools & health centers that own land. This is more complex especially if all the conditions under WB's core principle 4 are to be satisfied e.g. on supplemental livelihood improvement and restoration and others. In Water sector the risk should be rated as substantial not moderate.	Addressed in Table 2.1 under 'land acquisition and resettlement risks'.

Page No.	Issue	Comment	Action taken to address the comment
Pg.20	Labour management, giving sexual harassment as an example	In order for sexual harassment not to be trivialized, should be transferred the category that include VAC, GBV & SEA	Noted and addressed in Table 2.1. under labour management.
Pg.21	Stakeholder engagement; LGs to delegate staff	Are LGs delegating or seconding staff to projects?	Minimum access condition under UgIFT-AF is for LGs to have in place/recruit substantive staff including Environment Officer and District Community development Officer
Section 5	Recommended Remedial Measures: Numbering of tables:	Table 2.1 then one under section 5 numbered as table 1; Table on page 41 not numbered	Noted and addressed in sections 4 and 5
Pg. 42-43	Proposed Action plan 2: Guidelines for GRM and community engagement planning by July 2020	Measurement; Functional GRC in place and communities aware of GRM – this will be during implementation the SEP/ Community engagement plan has been developed. Moreover, DLGs are not included in the responsible party.	Noted DLGs are included by default since each GRM will be established at LG level.
Pg.54	Highlights of the meeting with MWE: 3% of the project cost to be set aside for O&M and catchment & water source protection	The allocation for Operation and Maintenance / rehabilitation is up to 15% of the Development grant. The 3% is what is meant to be used for environment related activities	Noted. This was captured in meeting minutes with MWE during ESSA consultation.
Ministry of Local Government (MoLG)			
Item No. 22	Micro-Scale Irrigation – prohibition in selection	The Document talks of eligibility of the farmer to be in proximity of 500m to water sources. This looks to be very prohibitive/Discriminative to most small scale farmers who do not have access to water sources. I thought the programme should benefit small scale farmers who depend on rain and who have no access to water to enable them improve their yields. I propose that an option of drilling a borehole for a deserving farmer who is based far from an existing water source be considered.	This is an eligibility requirement and also based on expression of interest by the smallholder farmer. The component is additionally supported through a match grant to which selected farmers are expected to make a contribution.

Page No.	Issue	Comment	Action taken to address the comment
Pg. 22	Weak Oversight and Coordination to ensure implementation of safeguards	The doc proposes that a Coordination Unit to ensure due diligence will be set up in MoFPED. I don't think MoFPED would be the ideal home for this Unit. I propose that this Coordination Unit should be housed in MoGLSD.	Safeguards implementation is a cross-cutting issue in UglIFT-AF sub sectors even though MOFPED is the responsible for providing oversight and policy guidance for design and implementation of UglIFT AF. Additionally, MoGLSD and NEMA have been coopted to the UglIFT steering committee and hence play an oversight role in safeguards management at the central level.
Pg. 27, Item 55	How will UglIFTR address the issue of EOs at the SC Level?	I hope we are not trying to say that Eos should be recruited at the SC level. I propose that having a fully staffed and well-funded NRD at the District Level is adequate to cater for the Environmental Requirements at the SC level. After all, some DLGs have very few Sub Counties.	Agreed, Eos will not be recruited at SC level. As minimum conditions recommended to be embedded in the program design of UglIFT-AF are the requirements for a LG to have in place staff (Environment officer and Community development officer),
Pg. 30, Item viii	Weak Coordination amongst Implementing Institutions.	I propose that the MoLG be tasked to coordinate all Implementing institutions	The oversight structures are already provided for in UglIFT POM. MoLG is on the UglIFT Steering committee and coordinates the LG performance assessment and LG Performance Improvement Plan (PIP)
Pg. 42 Action 2	Grievance Handling, Responsibility Parties.	Can add PPDA, MoPS and MoGLSD	Added, these institutions will be co-opted as and when required.
Pg. 43, Action 3	Annual Performance Assessment	Consider to add OPM on the Responsible Parties because of the Annual Assessment Manual	OPM added to responsible parties.
Pg. 44 Action 4	Dissemination of updated and cross-sectoral guidelines	Consider to add MoLG	MoLG added to responsible parties.
Pg. 49 Action 7:	Integrated refugee response planning	Consider to add MoLG, because MoLG is co-chair of the Refugee Response Framework (RRF) . In addition, Refugees are impacting greatly on LG service delivery arrangements.	Noted and MoLG added

Page No.	Issue	Comment	Action taken to address the comment
Ministry of Gender, Labour and Social Development			
Pg. 14 Sec 2.3(27)	Safety and Health risks and impacts to workers and communities are monitored by the Department of Occupational safety and health in the Ministry of Gender, Labour and Social Development.	To enable effective reporting and coordination of activities, we propose that Safety and Health is merged with the social safe guards to read as Social, Safety and Health Safeguards. It should be removed from section 2.3 (26) Environment risks and impacts that has a major inclination to environmental management .Safety and Health risks and impacts are related to lack of competent safety and health officer on the project, limited safety and health training, poor machine and equipment safety, lack of adequate and appropriate Personal Protective Equipment in respect of risk, lack of first aid services, limited hazardous management system, lack of pre-employment and routine medical examination to ensure early detection of occupational diseases, lack of appropriate and adequate health and welfare facilities (toilets, washing facilities, change rooms that are separate for male and female, sensitive to People With Disability needs)	Addressed in para. 28
Page 15 Table 2.1	overview of key risks, mitigation measures, action matrix and performance assessment	Findings of the March 2020 joint monitoring and supervision identified other Risks associated with poor site selection /siting of the proposed infrastructure as lack of reviewing architectural plans and drawings by Commissioner Occupational Safety and Health before approval, to ensure inclusion of safety and health aspects at design stage, lack of geotechnical investigation to determine level of ground water increases the risk of ground water contamination from VIP latrines constructed at schools, contamination from hazardous waste that lack dilution system on wash sinks provided in laboratory , Lack of site hoarding made of secure materials increases the risk of falls into excavations which generated from science laboratories	Included in Table 2.1, pg. 15 under 'environment and social risks'

Page No.	Issue	Comment	Action taken to address the comment
		could be fatal or cause major injuries, compromises security of materials	
Table 2.1. column 4	Integration in design; Action Matrix (DLI 3)- involvement of MoGLSD	MWE and NEMA to develop E & S screening and monitoring tools” should be rephrased to include “MGLSD as a key agency in development of E&S screening and monitoring tools”	MoGLSD included to develop E and S screening tools in collaboration with MWE and NEMA.
Page 16 Table 2.1. Column 3	ESMP implementation	(c) Involvement of Environment Officer in routine monitoring of ESMP implementation and compliance to related E&S requirements, it is proposed that the Labour Officer and Community Development Officer should be included to conduct routine monitoring of ESMP implementation and compliance to related E & S requirements.	Labour Officer and CDO included in ESMP implementation.
Table 2.1	Proposed new addition Safety risks/ impacts” relating to adherence to safe systems and safe equipment of work. The inadequacy in safety systems presents a risky working environment that may result in fatal and non-fatal accidents to workers and communities	Proposed recommendations f) contractor should document and implement a safety and health management plan, g) should designate a competent safety and health officer, h) ensure electrical safety (proper electrical wiring, well earthed and grounded tools and equipment), i) secure site hoarding to eliminate interaction between site works and community activities, j) provision of well-maintained and right tools and equipment, k) provision of appropriate safety signage l) provision of efficient emergency response system m) conduct safety and health training of workers	Included in Table 2.1, although some of the suggestions are already covered in Section 2

Page No.	Issue	Comment	Action taken to address the comment
	Safety risks/ impacts" relating to adherence to safe systems and safe equipment of work. The inadequacy in safety systems presents a risky working environment that may result in fatal and non-fatal accidents to workers and communities	<ul style="list-style-type: none"> a) contractor should document and implement a safety and health management plan, b) should designate a competent safety and health officer, c) ensure electrical safety (proper electrical wiring, well earthed and grounded tools and equipment), d) secure site hoarding to eliminate interaction between site works and community activities, e) provision of well-maintained and right tools and equipment, f) provision of appropriate safety signage g) provision of efficient emergency response system h) conduct safety and health training of workers 	
Table 2.1 Column 1	Risks and Impacts; Natural resource Degradation	it is proposed to include as a risk, "Non-payment or compensation of community owners for construction materials will result in conflicts." It was discovered during the March 2020 field visits that there is acquisition of large chunks of land from the community as "donation" without compensation and resettlement whatsoever which is exploitative. The Proposed/Recommended Mitigation measures; contractor should sign and adhere to terms and conditions stipulated in the agreement with community owner in liaison with LC1.	This issue has been addressed under labour impacts (page 25) that includes risks such as issues of non-payment of workers or construction source material providers etc.
Page 18 Table 2.1	Risks and Impacts: effects due to unsustainable use of biomass fuel;	new addition to Recommended Mitigation measures; Contractor should work closely with the District Forestry Officer and Community Development Officer to ensure community participation in selection of trees	This may be outside the scope of the project. We recommend support to LGs to plant trees, it may not be prudent to rely on contractors solely to do tree planting, proposal is that this is embedded into

Page No.	Issue	Comment	Action taken to address the comment
Under column 1		to be planted (e.g. fruit trees or medicinal trees that could serve as Income Generating Activity or promote the preservation of indigenous medical or culture within the community. This will enable the community to monitor the proper growth and preserve the trees.	project design particularly for the UgIFT education sector (i.e. UgIFT supported schools).
Page 20 Under column 1	<i>Risks and Impacts</i> ; Risks related to inadequate management of healthcare waste care professionals include cleaners, security personnel, or any other worker within the health facility.	second point on “Poor management of healthcare waste exposes “ <u>healthcare</u> ” workers and the community to the risks such as infections, injuries etc.” should be rephrased to read as “Poor management of healthcare waste exposes workers and the community to the risks such as infections, injuries etc.”. The word “ <u>healthcare</u> ” should be deleted for it doesn’t include other workers such as non-health care professionals who are at risk of being harmed. The non-health	Term ‘healthcare workers’ removed and replaced with workers.
Page 23, column 3;	Impacts from investing in irrigation include potential for; Recommended Mitigation measures	Proposed phrasing is (e) MAAIF through LG extension workers, will train the LGs and the selected farmers in the safe storage, use, disposal, “associated occupational health risks, emergency response in case of exposure and proper record keeping of affected persons to”.	This is already addressed.
Page 23, Table 2.1	Impacts on physical cultural resources	replace Ministry of Trade, Wildlife and Heritage with Ministry of Tourism, Wildlife and Antiquities.	Corrected
Page 25 Table 2.1, column 3	Inadequate engagement of relevant stakeholders throughout the project cycle.	It should be added that the DCDOs aren’t being utilized to be focal points for this community engagement, there is no clear channel for involvement of the DCDO in the project management cycle. The lead agency on this is MGLSD and not NEMA for providing guidelines on engagement of communities.	included in Table 2.1, page 25

Page No.	Issue	Comment	Action taken to address the comment
Page 10 Sec 1.4	Methodology	indicate that the findings from the monitoring of UGIFT I forms part of the basis for the analysis.	Included under sec 1.4, page 10
	General comment	As a general recommendation, upon award of each contract, an Environment Health Safety and Social Safeguards Management training workshop can be conducted for the LGs, awarded contractor (s), and other relevant supervising stakeholders, after which the EHSS code of conduct should then be signed by the contractor.	This is already catered for in the thematic performance improvement plans for safeguards management and also captured in the ESSA addendum.
Page 21	Risk/Impact of High inflow of refugees, the LGs have been given lead over developing Refugee response plans.	It's important to note that the Government of Uganda in collaboration with local and international development partners in the refugee management sector established and launched the Comprehensive Refugee Response Framework - CRRF for Uganda in 2017 managed by a steering group and a Secretariat that operationalize the desires of the framework. The Social Development Sector (SDS), led by Ministry of Gender, Labour and Social Development (MGLSD) was assigned to take lead and coordinate the design, development and implementation of the Jobs and Livelihood Integrated Response Plan (JLIRP) with other Sectors namely; Ministry of East African Community Affairs (MEACA, Uganda Business and Technical Examinations Board (UBTEB)), Ministry of Education and Sports (MoES), Ministry of Agriculture Animal Industry and Fisheries (MAAIF) and Ministry of Trade, Industry and Cooperatives (MTIC). MGLSD would ideally be lead on this action to coordinate LGs to ensure their plans are aligned with the national one.	UgIFT is supporting the integration of delivery of services to refugees and hosting communities in the LG system, hence it is vital that LGs take lead in coordination with OPM and implementing agencies (MoES, MAAIF, MoH).
Ministry of Finance and Economic Development			

Page No.	Issue	Comment	Action taken to address the comment
Page 45, 47 and 48	Issuance of guidelines for Environment and Social Safeguards:	<p>As is the case in other Sectors, guidelines are prepared by Sector line Ministries, and as such, guidelines for the management of Environment and Social Safeguards should be prepared by the Ministry of Water and Environment, and the Ministry of Gender, Labour and Social Development respectively.</p> <p>Proposal: This should be done annually before the National Budget Framework Paper is submitted to Parliament. For purposes of harmony, the guidelines issued should inform the respective tools and will be disseminated by the joint monitoring teams;</p>	Addressed in Table 5-1: Proposed Program Action Plan (PAP) relating to E&S Considerations
Page 49	Budgeting for E&S	<p>Proposal to allocate 0.5% of the value of capital investment costs to address Environmental and Social Safeguard requirements: In our letter Ref. BPD '140/'172/0'1 dated 17'h April 2020, we informed Local Governments to put emphasis on Environment and Social Safeguards as well as engage in joint monitoring of contract management, construction management issues as well as compliance to Environment and Social Safeguards. This collective approach is better than tagging resources for these activities;</p>	Input in Action plan - Table 5-2: Proposed Program Action Plan (PAP) relating to E&S Considerations
Page 25 & 49	Integrated planning for refugee response and stakeholder engagement:	We note that this action has not been assigned to any institution, we propose that the Office of the Prime Minister should take this up and guide all MDAs and the respective refugee-hosting Local Governments to integrate planning for refugees.	Input - Table 2-3 & Table 5-4: – action 7

Page No.	Issue	Comment	Action taken to address the comment
Page 26 and 45	Recruitment of Environmental and Social Development Specialists in MoFPED	We had planned to recruit an Environmental and Social Specialists under the UgIFT programme in March 2020, to support the respective sectors to support the dissemination and monitoring of compliance with Environment and Social Safeguards. This proposal was halted due to the current to <i>COVIC – 19 restrictions</i> . However, immediately the restrictions ns are lifted, this process will be finalized	Input made - refer to Table 2.1 under Weak Coordination risk & Table 5 - 5 D LIs and verification protocols (Clean copy)
NEMA			
	Contractors should have qualified persons in charge of environmental and social issues who should coordinate with the District and Natural Resource officers to guide on effective implementation of Environment and Social mitigation measures;		Please refer to Table 2.1 under mitigation measures for ESHS risks
	Contractors should be required to implement the Environment and Social mitigation measures identified in the ESMPs. Specific restoration plans and budgets should be strictly adhered to, as integrated in the Standard bidding documents and Bills of Quantities.		Please refer to Table 2.1 under ‘environmental and social requirements’
	District Environment officers in coordination with other key sector staff such as the District Engineer should undertake routine monitoring and inspections of ongoing projects to ensure compliance with Environmental and Social mitigation measure. The District Environment officer should sign on the payment certificates before payments are fully sanctioned by the accounting officers.		Please refer to Table 2.1 under mitigation measures for localized environment risks.
	Tools and guidelines for environment and Social risk management such as screening forms, monitoring matrix, Local Government environment mainstreaming guidelines should be developed. Local government capacity building should be enhanced to effectively use the different tools for sustainability purposes.		Please refer to Table 2.1 under mitigation measures for localized environmental risks.
	A proper waste handling procedures should be instituted across all the projects taking into consideration proper storage, transportation and disposal. Licensed waste management operators must be used and regulated to comply with the National Environment (Waste Management) Regulations, 1999.		Please refer to Table 2.1 under mitigation measures for risks relating to inadequate health care waste management
	Proper plans for integration of Environment and Social safeguards in refugee operations in the hosting Local governments and effectively implement environment and social management interventions aimed at restoring the impacts arising from refugee activities.		Please refer to Table 2.1 under key actions for refugee hosting Local Governments.

Page No.	Issue	Comment	Action taken to address the comment
	There is need for proper hydrological surveys and mapping of irrigation water sources to avoid impacting on the quality and quantity of water and also considering other user requirements for sustainability aspects. At farm level, strict adherence should be observed during the chemical application to minimize environmental pollution. Chemical applied should be in conformity with the International agreements like the Stockholm convention.		Please refer to Table 2.1 under mitigation measures for risks under the rural water and sanitation sub-sector. MWE will be supported to prepare and implement water source protection plans & natural resource management plans Agrochemicals management is addressed in Table 2.1 under mitigation measures for micro-irrigation.
	For water and sanitation projects, there is need to develop catchment and point source protection plans for implementation to enhance effective protection of water sources. Where necessary, water abstraction permits and wetland user permits should be obtained from the relevant Authorities as required by the law.		Please refer to Table 2.1. under mitigation measures or rural water supply and sanitation sub-sector
	For all the planned projects, proper screening and Environment and Social Impact assessment should be undertaken and strict compliance with approval conditions. For clarity, all ESIA's should be undertaken by registered and certified Environmental practitioners.		Please refer to Table 2.1 under mitigation measures for environmental and social risks. Agreed ESIA's will be conducted by certified Environmental Practitioners.
	To ensure effective monitoring of all the projects at Local government and lower Local governments, there is a need to operationalize the Local Environment Committees (LECs) to support the environment management interventions		This is vital but beyond project scope. NEMA is better equipped to support the operationalization of the LECs within its mandate in the National Environment Act 2019.
	District Environment officers in coordination with other key sector staff such as the District Engineer should undertake routine monitoring and inspections of ongoing projects to ensure compliance with Environmental and Social mitigation measure. The District Environment officer should sign on the payment certificates before payments are fully sanctioned by the accounting officers.		Please refer to Table 2.1. under mitigation measures for environment and social risks.
	Tools and guidelines for environment and Social risk management such as screening forms, monitoring matrix, Local Government environment mainstreaming guidelines should be developed. Local government capacity building should be enhanced to effectively use the different tools for sustainability purposes.		Please refer to Table 2.1. MWE, NEMA and MoGLSD to take the lead in developing E & S screening tools for use by respective LGs.

Page No.	Issue	Comment	Action taken to address the comment
Civil Society Organizations and Non-Government Organizations⁵ (Advocacy and Action for Children (AAC), Bank Information Centre (BIC), Center for Domestic Violence Prevention (CEDOVIP), World Vision Uganda (WVU), Joy for Children (JFC), and BRAC.			
Across the report	Data Disaggregation	There is a need to have disaggregated data to show the impact of the projects on different groups of people including but not limited to women, men, PWDs, girls, boys, elderly, refugees etc.	Noted and reports will consider the data disaggregation.
	Risk Rating	Land acquisitions & resettlement related risks & impact - Rating should be High. Given the land battles and fights we have in Uganda and drawing from past project lessons, this needs to be better managed to ensure all land is properly acquired, paid for timely and where resettlement needs to happen, the people should be better off than before.	Given the criteria of availability of land without encumbrances, and the limitations for PfoR - we think the current rating is appropriate – Not changed
	Implementation details	Child Abuse and gender-based violence - rating should be High. Most of these projects are being implemented in communities that are already facing GBV and child abuse. If not properly managed, project implementation makes the situation worse. From a human rights perspective, even though its only one case reported, it's still a human rights abuse. - The contracted company should sign an MOU with the LGs to respond to case of child abuse and GBV	Noted and sections on VAC/GBV have been improved taking into account other related comments.

⁵ Not all contacted NGOs were able to provide timely feedback

Page No.	Issue	Comment	Action taken to address the comment
		<p>-Hire CSOs to support the LGs and sensitize the communities on issues of child abuse, GBV, HIV, child labour etc the CSOs will be able to create community referral pathways that can link into the GRMs at LGs.</p> <p>-Plan to have ICE materials in local languages communicating the project, presence of the GRM, as well as information on HIV/AIDs, child labour, child abuse and GBV</p> <p>-The ICE material should include the Sauti toll free line of 611 to encourage communities to report cases of abuse in confidentiality.</p> <p>-Create safe spaces at the districts and health centres where victims of abuse can be assured of confidential treatment. Districts and Health centers should as well have log in forms to record all cases of abuse.</p> <p>-Put some resources aside to support the police and the judiciary to follow up cases of child abuse and GBV</p> <p>-Plan to have talk shows on local radios in local languages talking about the projects, benefits, impacts, GBV, child abuse etc</p>	<p>This will be included in the proposed code of conduct and is considered in procurement process embedded.</p> <p>Noted and Appropriateness cannot be defined now unless found relevant at assessment</p> <p>Noted and implementation details will be defined as per the site assessments</p>

Page No.	Issue	Comment	Action taken to address the comment
			Budget aspects considered in the ESSA for all E&S risk management
	Inclusion	All communities have PWDs who are left out in project benefits. Ensure that all project designs, GRMs and district representations include interests of PWDs.	Inclusiveness has been recommended to be considered in the ESSA
	Risk rating	<p>Labour management including influx of contracted workers - rating should be High</p> <p>All workers should sign contracts that they have read and understood. Consideration should be given to women who might require maternity leave or are pregnant but need to work.</p>	The proposed projects are small and may not attract huge external workers and we sustain the current rating – therefore not changed

Page No.	Issue	Comment	Action taken to address the comment
	Stakeholder Engagement	<p>Inadequate engagement of relevant stakeholders through the project cycle. Great that the rating is High. On many occasions, engagement ends at district levels without community participation, this needs to change. During engagements consider issues such as gender disparities, schools, PWDs etc. Ensure project information is simplified and timely circulated with an effort to incorporate community views.</p> <p>- Should communities prefer to set up their own GRMs, they should be supported.</p>	<p>Noted and SE aspects improved</p> <p>This is part of the inclusive on the GRM recommendation in the report and will be dealt when it arises/is required as will be assessed</p>
Pg. 5	The common social risks identified for this project Under the executive summary - Risks / Impact	Social risks may also include child marriage, school drop outs, raise in prostitution, accidents in construction works and irrigation where chemicals are used	Please refer to the Executive summary - Included but living out accidents in construction because nothing of tis was raised regarding children. The rest are associated to child sex/abuse.
General comment	The terms Gender based violence, domestic violence and gender have been used interchangeably.	Therefore, there is lack of clarity and consistence in the use of these terminologies. Recommendation; have operation definition of these terms.	The terms are specific to children (VAC), General use (GBV) and specifically domestic (Domestic Violence). It is left as written in original version.
Pg. 13	Risk associated with poor site selection / sitting for schools (Page 13)	In addition to what has been mentioned, we realized that this may result into children walking long distances or construction of schools (if they are new) near distractions such as markets, bars and other entertainment places further exposing children to the risk of dropping out of school, absenteeism, sexual abuse and exploitation and other forms of Violence	Included in Table 2.1 under environment and social risks.

Page No.	Issue	Comment	Action taken to address the comment
	Limited Consultations of key relevant stakeholders:	<p>against children. Mitigation; Engage in consultations with community (stakeholders) on the choice of the site for schools in the proposed project in line with ESS 10 of Stakeholders Engagement and information disclosure.</p> <p>There is a risk of limited consultation of key relevant stakeholders including parents, children, persons with disabilities or caretakers and local leadership at village, parish and sub county levels. We note that this may increase the risk of Gender based violence and violence against children (physical violence, sexual violence, emotional violence and psychological violence). Mitigation; Community awareness creation and response for on cases of violence against children and gender based violence.</p>	Requirement included in Table 2.1 for LGs to have meaningful and inclusive stakeholder engagement plan.
	In construction works, there is a risk of accidents for the construction workers and the community including children.	Mitigation: Construction sites for should be ring fenced and the workers given adequate protective gears to minimize the impact. Children should not be allowed at the site and all open pits should be covered and marked with a tape. Regular monitoring of sites to ensure compliance	Please refer to Table 2.1 under mitigation measures for occupational health and safety risks.
	Use of child labour and forced child labour	directly or indirectly through assisting their parents or caregivers) on construction sites or agriculture related activities where children are used as potters to fetch water, watch gardens, spray, weed, harvest, carry bricks and sand on the site. Mitigation; Ensuring that children below the minimum required working age should not be employed / engaged in project works that deemed hazardous or are likely to interfere with child's education among others.	Please refer to Table 2.1 under Child Abuse and Gender Based Violence- mitigation measures include support to LGs to develop child protection plans and ethical code of conduct for all contractors. MoES already has this in place and addressed issues of child labour etc.
	Impacts from Investing in rural water supply and sanitation	additional risks include; children walking long distance to access clean water exposing them to the risk of abuse and exploitation along the way if unaccompanied by adults; # child labour, sexual abuse and exploitation during construction works. There is a risk of child labour	Please refer to Table 2.1 under Child Abuse and Gender Based Violence- mitigation measures include support to LGs to develop child protection plans

Page No.	Issue	Comment	Action taken to address the comment
		<p>during the construction of the water sources and the exclusion of poor and vulnerable population.</p> <p>There could also be a risk of poor quality and unpredictable, intermittent quantity of water resulting into negative impact on the intended beneficiaries. Mitigations: There should be meaningful community participation in the choice of sites for water points to minimize risks, conflict and create ownership of the project. There should also be community sensitization initiatives on the likely impact of the project and mitigation measures in place.</p>	<p>Please refer to Table 2.1 under mitigation measures for inadequate stakeholder engagement. LGs to be supported to develop comprehensive stakeholder engagement plans to ensure meaningful and inclusive stakeholder engagement in the design and implementation of UgIFT sub-projects.</p>
	Impact from investing in irrigation	<p>There is a potential risk of employing or using child labour in the farm activities such as planting, spraying, weeding, watching gardens against pests, harvesting or taking the agriculture produce to the market especially during school hours. The same irrigation can also exacerbate domestic violence / Intimate Partner Violence (IPV) where couples fail to agree on how work is shared or how to use the proceeds of the investment. <u>Mitigation:</u> Ensuring that children below the minimum required working age should not be employed engaged in project works that deemed hazardous or are likely to interfere with child's education or be harmful to the child's health, physical, mental, spiritual, moral and social development.</p>	<p>Please refer to Table 2.1 under mitigation measures for Child abuse and GBV. <i>Child protection plans and GBV prevention and response plan will be prepared and implemented by LGs</i></p>
	Land acquisition and resettlement related risks and impact	<p>These may include, under revaluation of land, forced eviction, social and economic impact- loss of livelihoods and separation from family and friends, delayed compensation. All these have bearing on children's education, health and general wellbeing. Lack of acquisition and resettlement can also lead / exacerbate IPV / domestic violence as a result of compensation. Issues where both a man and woman are not jointly involved. <u>Mitigation</u> Timely response to community needs, fair / reasonable pay meaningful stakeholders'</p>	<p>Please refer to Table 2.1 – mitigation measures for Land acquisition and resettlement related risks and impacts</p>

Page No.	Issue	Comment	Action taken to address the comment
		<p>engagement. The consultations should process should ensure that women’s perspectives are obtained and other interests factored in all aspects of resettlement planning and implementation</p>	
	<p>Child abuse and Gender based violence</p>	<p>Violence against children and women, sometimes men are common in communities with already pre-existing cases violence. Identifying and understanding the risk to women and children, as well as to other vulnerable populations, of SEA and GBV is challenging yet critical.</p> <p>Development projects, depending on their scope, can exacerbate existing risks or create new ones. Project-related risk factors include the size and scale of a project; the scale of labor influx; the extent to which a community “has capacity to absorb labor influx or requires separate camp facilities; the inflow of income to workers, which can exacerbate already existing inequities between workers and community members; and the geographic location of project activities”. Report of Gender Based Violence Task Force, World Bank. The report further gives the following <u>recommendations</u>; Identifying and mitigating SEA and GBV risks in World Bank projects requires development of a robust risk assessment methodology, with a rating of “<u>High Risk</u>” of SEA/GBV triggering actions in project design and supervision. It will be critical in High Risk environments to educate and raise awareness of women, adolescents and children about risks of SEA and their legal rights. Service providers for survivors of SEA should be identified in accordance with international standards that articulate a minimum basic package of services, ideally including case management support, health services, psychosocial support, police support and security, access to legal services, and shelter, if needed</p>	<p>Please refer to Table 2.1 under mitigation measures to address risks of child abuse and GBV – very robust mitigation measures are provided including ensuring LGs are supported to develop and implement necessary social action plans such as child protection plans, GBV prevention and response plans and ethical code of conduct for contractor site workers. These measures are embedded into project design, planning and implementation, hence, the risk rating is ‘substantial’. Also note that projects with ‘high rating’ cannot be funded under the PforR modality.</p>

Page No.	Issue	Comment	Action taken to address the comment
	Inadequate engagement of relevant stakeholders throughout the project cycle	There is need for stakeholder's identification and analysis for engagement during the project preparation. There should be plan or efforts to identify different stakeholders - project affected persons and other interested parties like opinion leaders, Civil Society Organizations among others. There should also a Stakeholders Engagement Plan to guide the process and ensuring that project related information is available to key stakeholder throughout the project life. We can also bench mark the provisions of ESS 10 of the World Bank Environment and Social Framework on Stakeholders Engagement.	Stakeholder engagement works have been on-going throughout project preparation for UgIFT AF, including consultation of NGOs and other key stakeholders through various fora. Requirement to develop a meaningful and inclusive stakeholder engagement plan are provided for in the ESSA.