



The Republic of Uganda

Ministry of Water and Environment

**Additional Financing
Investing in Forests and Protected Areas for
Climate Smart Investments (P180604)**

**Updated
ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

May 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Uganda (the Borrower) is implementing the Investing in Forests and Protected Areas for Climate Smart Development Project (the Project), with the involvement of the Ministry of Water and Environment, the Uganda Wildlife Authority and the National Forestry Authority, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide the original financing (P170466) and additional financing (P180604) for the Project (under a separate Grant Agreement), as set out in the referred agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement and Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Borrower's Permanent Secretary of the Ministry of Finance, Planning and Economic Development (MOFPED). The Borrower shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>1, The Ministry of Water and Environment (MWE), which is the main Coordinating Agency will maintain a Project Coordination Unit (PCU) with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project, including an Environmental Risk management specialist and a Social Risk management specialist, as dedicated qualified staff that meet the Terms of reference (ToR) for each position.</p> <p>2. The project has an E&S coordinator based at MWE and an Environmental Risk Management Specialist and a Social Risk Management Specialist have been recruited, both based at MWE. In addition, E&S focal points have been designated at Uganda Wildlife Authority (UWA) and the National Forestry Authority (NFA). These focal points are responsible for the day-to-day implementation of the E&S instruments at their agencies.</p> <p>3. For Management of the toll freelines and grievance management each agency MWE, NFA and UWA shall second or recruit qualified officers in charge of the toll freelines and general grievance management. Currently all agencies have officers incharge of grievrances.</p>	<p>Maintain full time the Environmental Risk management specialist and Social Risk management specialist on the PCU throughout project implementation.</p> <p>Maintain on full-time basis E&S Focal points at MWE, UWA and NFA throughout project implementation</p>	<p>MWE</p> <p>MWE, NFA, UWA</p>
B	CAPACITY BUILDING PLAN/MEASURES		

<p>1. Under the parent project training has been conducted for the Project team at MWE, NFA and UWA on (i) the World Bank Environment and Social Incident Reporting Toolkit, (ii) Stakeholder Engagement training sessions have been held twice, (iii) training on GRM and management of project grievances and (iv) a training on project screening including the development of a screening template currently being used for screening of project sub- projects. ESF capacity training provided to the E&S management team at the central level will be cascaded to the project teams on the ground which in turn will strengthen the capacities of the team at local government level.</p> <p>Building on the above, further training of E&S staff at the MWE – PCU, UWA and NFA with focus on the following areas that relate to their duties:</p> <ul style="list-style-type: none"> • World Bank Environmental and Social Standards • Implementation of Stakeholder Engagement Plan (SEP) including stakeholder mapping, and monitoring and evaluation • Implementation of Labor Management Procedures (LMP) including child labor • Implementation of Grievance Redress Mechanisms (GRM) • Occupational health and safety management, including Environment and Social Incident reporting procedures (ESIRT) under the project • Emergency preparedness and response procedures • Implementation of Environmental and Social risks management practices identified by Project actors during Project implementation. • SEA/SH and GBV • Implementation of the VMGF and VMGPs throughout project <p>2. Additionally, the Recipient shall support the Enhanced Implementation Support and Monitoring (EISM) to ensure:</p> <ul style="list-style-type: none"> • Training of government staff and private sector consultants/clients, workers, and contractors on non-discrimination under the Project, including by identifying individuals and venues, as well as providing other logistical support. • Training Project level GRM on non-discrimination under the Project, including by developing training materials, identifying venues, and providing trainers. • Preparation of training modules for call center operators, data management personnel, and community outreach personnel on appropriate handling of sensitive information. 	<p>1. Submit capacity assessment report within three months after Project Effective Date and submit a capacity building plan within six months after the Project Effective Date and thereafter implement it during Project implementation.</p> <p>Train periodically throughout implementation.</p> <p>2. Complete training within three months of Project Effective Date and support the EISM throughout implementation.</p>	<p>MWE, NFA, UWA, Relevant District Officers, Sub County Relevant Officers</p>
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	3. Training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. Ensure that such training includes VHTs, Community Project Management Committees (CPMCs), District Environment Officers (DEO), Community Development Officers (CDOs) and Community Facilitators.	4. As above B1) and on a regular basis throughout the project implementation period	MWE, NFA, UWA
MONITORING AND REPORTING			
C	REGULAR REPORTING <ol style="list-style-type: none"> 1. Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to: <ul style="list-style-type: none"> • The implementation of the ESCP. • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • Complaints received through the EISM, and progress made in addressing them • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under Section E below. 	<ol style="list-style-type: none"> 2. Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period. 	Ministry of Water and Environment (MWE), PCU
D	CONTRACTORS' MONTHLY REPORTS <ol style="list-style-type: none"> 1. Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association. 	<ol style="list-style-type: none"> 1. Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action C above. 	MWE

	<p>INCIDENTS AND ACCIDENTS</p> <ol style="list-style-type: none"> 1. Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury; and any incidents, accidents or complaints related to the discrimination of vulnerable or marginalized individuals or groups. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. The Parties shall ensure the establishment and operation of a unified system of incident recording and reporting, including a standard template for such reports, a repository for all reports and well-described procedures communicated to all relevant staff. 2. Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence. 3. Provide available details of the incident or accident to the Association upon request. 4. Arrange for an appropriate review of the incident or accident (or complaint) to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident, accident, or complaint and prevent its recurrence. 5. Establish and maintain a functional incident notification/reporting system in line with the Incident Reporting Protocol in Annex 2 of the project Environmental and Social Management Framework. 	<ol style="list-style-type: none"> 1. Notify the World Bank no later than 48 hours after learning of the incident or accident. 2. Provide subsequent report to the Association within a timeframe acceptable to the Association. 3. Provide details available within 5 working days upon request 4. Provide a review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association. Also reflect these incidents, accidents and complaints in the quarterly reports to the Association referred to in Row C above. 5. Notification/reporting system shall be in place throughout Project implementation. 	<p>MWE & PCU, UWA, NFA, CFM/CRM, Relevant District Officers, Sub County Relevant Officers</p>
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>			

1.1	<p style="text-align: center;">ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <ol style="list-style-type: none"> 1. Adopt and implement the sub-project Environmental and Social Impact Assessment (ESIAs) and / or corresponding Environmental and Social Management Plan (ESMPs) consistent with the relevant ESSs. 2. Adopt and implement the updated Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. 3. Cause UWA and the NFA to adopt and implement the subproject site-specific ESIAs and / or ESMPs, as set out in the ESMF. 4. Implement the Stakeholder Engagement Plan, the Labor Management Procedures (LMP), the Process Framework, the Vulnerable and Marginalized Groups Framework (VMGF) and the site-specific Vulnerable and Marginalized Groups Plans (VMGP). The revised Process Framework will follow the guidance provided in the Interim Guidance Note (IGN) on managing the risks of projects involving Protected Areas which applies to all IPF projects that involve Bank support to improve the management of Protected Areas. 5. Continue to implement the key recommendations of the Social and Conflict Analysis. 6. Ensure social inclusion and non-discrimination, and implementation of measures to mitigate the risks of discrimination against or exclusion of any vulnerable or marginalized individuals or groups and include measures for this purpose in the ESA and SEP and subsequently, ensure they are reflected in ESIAs, ESMPs, the Project implementation manual (PIM) and implemented throughout the life of the Project. 7. Finalize the UWA and NFA institutional assessments. 8. EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project. Reflect this exclusion list in the ESA. 	<ol style="list-style-type: none"> 1. Adopt the sub-project ESIA and / or ESMP prior to commencement of works and thereafter implement the ESIA and / or ESMP throughout Project implementation. 2. Adopt the updated ESMF prior to project appraisal and thereafter implement the ESMF throughout Project implementation. 3. Adopt the ESMP before launching the bidding process for the respective subproject activity prior to the carrying out of subproject activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation. <p>4 and 5. Throughout project implementation.</p> <ol style="list-style-type: none"> 6. Throughout Project implementation 7. Provide institutional assessments to the Association within a timeframe acceptable to the Association. 8. Throughout Project implementation as part of the screening process under ESMF/ESIA 	MWE, PCU
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	<ul style="list-style-type: none"> i. Sub-Projects involving significant conversion or degradation of critical natural habitats. ii. Activities with potential adverse impacts on natural habitats iii. Any activity that involves introduction of alien species or poses significant risks to biodiversity, land conversion or legally protected natural resources iv. Sub-Projects involving the use of unsustainably harvested timber or fuelwood. v. Sub-Projects supporting commercial logging in forested areas. vi. Sub-Projects requiring the use of pesticides that are not on the approved list of agro-chemicals, as shall be described in the ESMF. vii. Activities that require conducting of Risk Hazard Assessment (RHA) viii. Drainage of traditional wetlands. ix. Sub-Projects that will lead to surface and groundwater pollution, pest resistance, habitat degradation and soil disturbance leading to the introduction of alien and invasive plant species. x. Large-scale infrastructure sub-Projects and any sub-Projects that could have adverse impacts on ecologically sensitive areas and known cultural heritage sites. xi. Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict. xii. Any activity that might physically relocate VMGs or adversely affect their lands, natural resources or cultural heritage or that would require Free Prior Informed Consent (FPIC) under ESS7. xiii. Activities that may involve involuntary resettlement or land acquisition (other than voluntary land donation) or lead to physical displacement of individuals or communities or require compensation for loss/replacement costs. xiv. Any activity that leads to loss of or adversely impacts on known cultural heritage sites. xv. Sub-Projects that may involve exclusion and discrimination of people especially the vulnerable and marginalized groups as well as the disadvantaged groups. xvi. Activities that may lead to physical or economic displacement and loss of known cultural heritage sites. 		

1.2	<p>MANAGEMENT OF CONTRACTORS</p> <ol style="list-style-type: none"> 1. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the LMP, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. 2. Identify and engage the suitably experienced firms to augment the capacity of contractors and District safeguards team in managing E&S risks and impacts including risks associated with exclusion or discrimination of vulnerable individuals and groups. <u>The World Bank (and International Finance Corporation (IFC)) have contracted an international firm SREO Consulting Ltd. (SREO) to to augment the capacity of implementing teams in supporting the implementation of the mitigation measures</u> 3. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. 4. Provide copies of contracts with contractors/subcontractors and supervision firms to the Association. 5. Incorporate the Project Environment and Social teams are part of the Project procurement and contracting process 	<ol style="list-style-type: none"> 1. As part of the preparation of procurement documents and respective contracts. 2. Prior to start of works and throughout Project implementation 3. Supervise contractors throughout Project implementation. 4. Copies of relevant contracts provided to the Association upon request. 5. Throughout Project Implementation 	MWE, UWA, NFA and relevant District officers
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, ESIA's, Audits, construction supervision if applicable), capacity building, training, and any other technical assistance activities under the Project acceptable to the Association, that are consistent with the ESSs. Thereafter, prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p>a) Throughout Project implementation</p>	MWE PCU, Relevant District Officers, Sub County Relevant Officers
ESS 2: LABOR AND WORKING CONDITIONS			

2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>1. Adopt and implement LMP for the Project. The LMP includes, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. The LMP will going forward consider potential risks associated exclusion and discrimination of vulnerable and marginalized individuals and groups that may be excluded based on jobs and other employment opportunities.</p> <p>2. Activities to be implemented by Government agencies/Districts will apply Public Service Standing Orders. Workers employed/contracted by NGOs and Private Companies will apply their own policies. These policies will be assessed for their consistency and adequacy with the Project LMP and national Labor laws prior to entering implementation contracts or agreements. Project Consultants /contracted staff will be managed in accordance with Contract terms and conditions. Contract terms and conditions will be assessed for their compliance with the project LMP.</p>	<p>Implement the LMP throughout Project implementation]. Revise LMP as necessary throughout Project implementation. -Contractors shall adopt and implement LMP prior to engaging Project, community and other Project professional workers.</p>	MWE
2.1.1	<p>COMMUNITY WORKERS</p> <p>b) The Project shall ensure that community workers hired under Components 1 and 2 including social and economic and services infrastructure and integrated natural resource management activities are recruited in line with the targeting criteria and are provided with labor and working conditions that meet the requirements of the ESS2 including, inter alia, occupational health and safety, working conditions, non-discrimination as per the LMP to be prepared.</p>	b) Contractors adopt and implement LMP prior to engaging Project, community and other Project professional workers.	MWE PCU
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>1. The Project shall adopt and implement a Health and Safety Management Plan (HSMP) with adequate occupational health and safety measures for workers (including emergency preparedness and response measures) in line with the ESA and World Bank Group (WBG) Environment, Health and Safety (EHS) Guidelines proportional to the different activities under Component 1 and 2 and 3</p>	<p>1. Adopt the HSMP prior to disbursement of funds for components 1, 2 and 3, and thereafter execute the Plan throughout Project implementation</p> <p>2. Revise HSMP as necessary throughout Project implementation.</p>	MWE, NFA, UWA, Relevant District Officers, Sub County Relevant Officers

2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <ol style="list-style-type: none"> 1. The Project shall establish, maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2; and assign focal points within UWA and NFA to address the grievances. 2. Strengthen the Project GRM through the EISM (with the World Bank support) to ensure that the grievance mechanism includes an effective, safe, ethical, and confidential mechanism to receive, manage, refer, and monitor grievances related to exclusion and discrimination. <p>PROJECT WORKERS TRAINING:</p> <ol style="list-style-type: none"> 3. Implement training of Project Workers designed to heighten awareness of E&S risks and to mitigate impacts on local communities. This shall include worker training and sensitization on the obligations of Project participants to ensure non-discrimination of individuals or groups who are vulnerable or marginalized, including the following measures: <ul style="list-style-type: none"> • Enhance existing Project-level grievance redress mechanisms to safely, ethically, and confidentially receive cases related to discrimination under the Project and refer them to an appropriate grievance handling mechanism. • Design and operate a mechanism for receiving grievances related to discrimination under the Project (including from Project level grievance mechanisms noted above). • Establish a hotline or an alternative complaint mechanism, for individuals to lodge complaints of discrimination on Projects financed by the Association or voice their concerns without fear of reprisal. 4. The Project shall use the EISM GRM, which is an alternative to lodging complaints through a GOU-led Project-level GRM, for complaints related to discrimination of vulnerable or marginalized individuals or groups. <p>A hotline (0800 333125) has been established, hosted and operated by a local NGO on behalf of the EISM firm for vulnerable or marginalized individuals or groups to lodge their complaints of discrimination. The guidelines on how the hotline will be used and cases managed are provided in the Project E&S documents.</p>	<ol style="list-style-type: none"> 1. Establish grievance mechanism prior to engaging Project workers and to start of works; and thereafter maintain and operate it throughout Project implementation. <p>EISM GRM established prior to disbursement of funds for Components 1,2, 3 & 4 respectively and implemented throughout the Project</p>	<p>MWE, NFA, UWA, Relevant District Officers, Sub County Relevant Officers</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

3.1	WASTE MANAGEMENT PLAN 1. Adopt and implement a Waste Management Plan (WMP) for works, as part of ESIs/ESMPs prepared for the sub-projects, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Adopt the WMP prior to commencement of works and thereafter implement the WMP throughout Project implementation.	MWE, NFA, UWA; Relevant District Officers, Sub County Relevant Officers
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT 1. Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the adoption and implementation of the ESIs/ESMPs.	MWE, NFA, UWA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY 1. Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above. 2. The Recipient shall implement measures and actions to assess and manage traffic and road safety risks to workers and the community resulting from movement of Project vehicles or activities which may present safety risks on public roads, etc. The measures shall be incorporated into the activity ESMP.	1. Adopt traffic and road safety measures as spelt out in the site specific ESMPs and in accordance with the ESMF. Thereafter, implement these plans throughout Project implementation. Same timeframe as for the adoption and implementation of the ESMPs. 2. During preparation of ESMPs for Component 1,2 and 3 subprojects and throughout Project implementation	MWE PCU, NFA, UWA, Relevant District Officers, Sub County Relevant Officers
4.2	COMMUNITY HEALTH AND SAFETY 1. Adopt and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx such as the spread of HIV/AIDS, Ebola and other communicable diseases; response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association. 2. The Health and Safety Management Plan to be adopted in section 2.2 above shall include measures to assess and manage health and safety risks and impacts to the community arising from Project activities and include these measures in the ESMP to be prepared in accordance with the ESMF, in a manner acceptable to the Association.	1. Same timeframe as for the adoption and implementation of the ESMPs. 2. b) Prior to disbursement of funds for Components 1, 2 & 3 respectively and throughout Project implementation.	MWE PCU, NFA, UWA, Relevant District Officers, Sub County Relevant Officers
4.3	SEA AND SH RISKS 1. Adopt and implement an SEA/SH Action Plan, to assess and manage the risks of SEA and SH. Implement measures and actions to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) as outlined in the ESMF including the establishment of a response mechanism to handle potential cases, i.e. referral to medical and psychosocial support.	2. Same timeframe as for the adoption and implementation of the ESMPs.	MWE, NFA, UWA

4.4	<p>SECURITY MANAGEMENT/INVOLVEMENT OF THE MILITARY</p> <ol style="list-style-type: none"> 1. Use and handling of weapons by the UWA rangers is guided by UWA's standard operating procedures, which prescribe use of weapons only by trained personnel; adequate response levels; tracking of gun use, etc., which are consistent with the Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel. 2. NFA utilizes the services of military personnel in forest patrols and law enforcement on a case-by-case basis. NFA may request such support of manpower if a threat assessment indicates high level of risk to safety of the NFA staff. While they are attached to the NFA, the military personnel are subjected to NFA policies and guidelines / Standard Forestry Practices. The NFA staff lead all the patrols, and the military provides the necessary support and back up. The project will not support hiring/recruitment or arming of these forces but will support provision of monitoring equipment (such as GPS, Communications equipment) and training of the NFA staff. Nevertheless, an assessment of the risks posed by involving the military has been carried out, and appropriate mitigation measures will be developed and implemented guided by principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel. Mitigation measures will be included as an annex to the updated PIM and reflected in an updated MOU to be signed by NFA and the UPDF which will set out the arrangements for the engagement of the military in the Project. The MoU will be reviewed by all involved parties including the World Bank to ensure consistency with ESS4. The MOU will commit the UPDF to the project's Code of Conduct, proportional use of force, and other requirements similar to those that would be covered in a contract with private security providers, including disciplinary measures, incident follow-up and the need for regularly updating of the documentation. Significant changes in the project's security situation should be reported immediately to the Bank, which will allow for necessary changes to this ESCP. 3. To ensure compliance with ESS4 and good international practice, UWA and NFA will - as elaborated in the above-mentioned institutional assessments - take the following steps: i) Ensure the adequacy of the Standard Operating Procedures (SOPs) and Codes of Conduct governing the use of force in connection with project activities, ii) Build strong collaborative management systems, iii) Provide appropriate training with focus on management of disputes and grievances, iv) Strengthen existing vetting procedures, and v) Enhance M&E for community engagement activities. 	<ol style="list-style-type: none"> 1. Mitigation measures/code of conduct to be implemented throughout project implementation. 2. Notify the Association if grievances are received involving the military. 3. Update the existing MOU as required to ensure consistency with ESS4. Preparation of MoU prior to MTR mission. To be implemented throughout project implementation. 	<p>MWE, UWA</p> <p>MWE, NFA</p> <p>MWE, NFA</p>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

5.1	<p>PROCESS FRAMEWORK (PF)</p> <ol style="list-style-type: none"> 1. Implement livelihood activities in communities that experience restriction of access to protected areas as a result of the project, consistent with the Process Framework. Livelihood restoration activities in response to access restriction will be included in Collaborative Forest Management agreements and Collaborative Resource Use Memoranda of Understanding entered into by NFA and UWA respectively with communities adjacent to protected areas. Funding for the implementation of these activities is included in the project budget. 2. As indicated in the Interim Guidance Note referred to above, the Process Framework is the primary mechanism for the project to manage interactions between PA law enforcement personnel and adjacent communities. Required PF updates will include among others include: i) explicit attention to the role of collaborating institutions (UPDF and UPF), ii) use of force standards acceptable to the Bank, iii) strategies for the de-escalation of potential conflicts and iv) the development of appropriate mitigation measures. 	1. Throughout project implementation	MWE, NFA, UWA.
5.2	<p>MONITORING AND REPORTING</p> <ol style="list-style-type: none"> 1. Ensure that monitoring and reporting on the implementation of the Process Framework is conducted as part of regular reporting 	1. Throughout project implementation.	MWE, NFA, and UWA.
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	<p>BIODIVERSITY RISKS AND IMPACTS</p> <ol style="list-style-type: none"> 1. Screen project activities (including civil works) to avoid any significant loss or degradation of natural habitats and to avoid damaging any protected areas or critical habitats, in accordance with the project ESMF, and consistent with ESS6. 	1. Throughout project implementation.	MWE, NFA, UWA.
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	<p>VULNERABLE AND MARGINALIZED GROUPS FRAMEWORK (VMGF)</p> <ol style="list-style-type: none"> 1. A VMGF has been prepared spelling out overall ESS7 objectives and policies of relevance to the project. Based on this framework, four site-specific plans have been developed (see below). 2. The Recipient shall ensure that these communities are appropriately informed, share the Project benefits and opportunities in an inclusive and culturally appropriate manner, and appropriate grievance and complaints management mechanisms are provided for and included in the Stakeholder Engagement Plan (SEP). 	1. Prior to project appraisal. VMGF principles and objectives will continue to be applied throughout project implementation as reflected in site-specific VMGPs (see below).	MWE, NFA, UWA, Relevant District Officers, Sub County Relevant Officers

	VULNERABLE AND MARGINALIZED GROUPS PLANS (VMGPs) 1. VMGPs have been developed for the following areas where the Batwa are present and have collective attachment to: i) Bwindi Impenetrable National Park, ii) Mgahinga Gorilla National Park, iii) Semuliki National Park and iv) Echuya Central Forest Reserve. 2. The Recipient shall ensure that these communities are appropriately informed, share the Project benefits and opportunities in an inclusive and culturally appropriate manner, and appropriate grievance and complaints management mechanisms are provided for and included in the Stakeholder Engagement Plan (SEP).	1. Before initiating activities in the four named protected areas. The VMGPs are being implemented as an integral part of project activities in the four areas where the Batwa are present. and VMGP implementation will continue throughout the life of the project. 2. Implement the SEP throughout Project implementation	NFA and UWA
ESS 8: CULTURAL HERITAGE			
	CULTURAL HERITAGE RISKS AND IMPACTS 1. Ensure that consideration of ESS8 requirements is included in ESMPs if and as required in accordance with ESMF. Identify cultural heritage sites for exclusion from implementation of Project activities to the extent possible. Where exclusions cannot be made, include measures to address risks and impacts on cultural heritage and include them in the sub-Project ESMP.	1. Prior to signing contractor contracts and thereafter implement them throughout the Project implementation period.	UWA and NFA, Relevant District Officers, Sub County Relevant Officers
	CHANCE FINDS 1. Describe and implement the chance finds procedures in the ESMF and ESMP of the Project. Implement a Chance Finds Procedure consistent with ESS8 as part of the ESMF and in each Contractor's ESMP. The Borrower shall implement and monitor the chance finds procedure described in the ESMF developed for the Project. Include chance finds procedures in all contractor contracts	1. Implement the Chance Find procedures included in the ESMF throughout Project implementation.	UWA and NFA, Relevant District Officers, Sub County Relevant Officers
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION 1. Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. 2. Disclose all key relevant information.	1. The SEP shall be adopted and disclosed prior to appraisal or start of implementation and thereafter implement and update the SEP throughout Project implementation b) Throughout Project implementation.	MWE, NFA, UWA, Relevant District Officers, Sub County Relevant Officers
	PROJECT GRIEVANCE MECHANISM		

	<p>2. Prepare, adopt, maintain and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism will be proportionate to the potential risks and impacts of the project, including SEA/SH, Exclusion and discrimination risks.</p> <p>3. The GRM receives and facilitates resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>4. The project grievance mechanism is equipped to receive, register, and facilitate the resolution of various stakeholder complaints. This would also include cases where the military is involved as well as SEA/SH complaints, with referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> <p>5. Address claims received through the EISM.</p>	<p>1. Establish the grievance mechanism prior to project implementation and thereafter maintain and operate the mechanism throughout Project implementation</p> <p>2. Throughout Project implementation.</p> <p>3. Throughout Project implementation.</p> <p>4. Throughout Project implementation.</p>	<p>MWE, NFA, UWA, Relevant District Officers, Sub County Relevant Officers</p>
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <p>A.1 Maintain full time Environmental Risk management specialist and Social Risk management specialist on the PCU throughout project implementation.</p> <p>Maintain on full-time basis E&S Focal points at MWE, UWA and NFA throughout project implementation</p>			

