

**APPENDIX U OF VOLUME II OF THE MATANDA ESIA  
REPORT**

**MINISTRY OF WATER AND ENVIRONMENT**

**IRRIGATION FOR CLIMATE RESILIENCE PROJECT**

**VULNERABLE AND MARGINALIZED GROUPS FRAMEWORK FOR  
MATANDA IRRIGATION SCHEME**

**February 4, 2025**

## **A. VULNERABLE AND MARGINALIZED GROUPS FRAMEWORK**

**OP 4.10** requires that a process of free, prior, and informed consultation, with the affected vulnerable and marginalized communities, of the potential adverse and positive effects of the project be designed and subject to consultation. If it is likely that some of the proposed investments will result in significant adverse impacts for vulnerable and marginalized communities, the VMGs shall be informed and consulted during the project design and prior to implementation of the respective activities. The Vulnerable and Marginalized Groups Framework (VMGF) sets out:

- The potential positive and adverse effects of Matanda irrigation scheme on VMGs;
- A plan for carrying out the social assessment for Matanda irrigation scheme;
- A framework for ensuring free, prior, and informed consent with the affected VMGs' communities at each stage of project preparation and implementation.
- Institutional arrangements including capacity building where necessary for screening project-supported activities, evaluating their effects on vulnerable and marginalized groups, preparing VGMPs, and addressing any grievances;
- Monitoring and reporting arrangements, including mechanisms and benchmarks appropriate to the project; and
- Disclosure arrangements to the VMGs determined under the VMGF.

It should be noted that a framework for management of marginalized groups for Matanda is already in place and can easily be accessed on the Ministry website. The implementor of the irrigation scheme shall thus benchmark on this framework to have a sustainable vulnerable management plan that shall be followed by the implementers of the project: all parties involved, including the ministries, contractors, subcontractors, suppliers, and other interested parties. The purpose of this plan is to ensure that the irrigation scheme development process fully respects the dignity, human rights, economies and the culture of VMGs and that the project has a broad community support from the affected VMGs. The VMGP will also provide a procedure to ensure that the impacts are mitigated and that the VMG benefit from the project.

### **Basis of the VMGP**

The VMGP has been developed in this ESIA based on the experience from past projects of similar nature but also in consideration of the project area historical background in terms of culture of the marginalized groups, namely the Batwa. It is also based on the primary data from the social baseline assessment of the project and the vulnerable framework already in place.

It is recommended that prior to start of the project the plan is fine tuned to ensure that all necessary measures are in place to protect vulnerable groups. The plan has been developed based on the initial stakeholder engagements, risk assessments and the environmental and social baseline studies.

## Indigenous Peoples and other VMGs Screening and Impact Categorisation

Table below shall be used in the screening:

| Name of District: |  | Subproject title: |     |    |  |
|-------------------|--|-------------------|-----|----|--|
|                   | Impact on VMGs   | Not known         | Yes | No | Remarks or identified problems, if any |
| 1                 | Are there VMGs in the project locations?   |                   |     |    |  |
| 2                 | Do they maintain distinctive customs or economic activities that may make them vulnerable to hardship?   |                   |     |    |  |
| 3                 | Are there any of the following vulnerable groups in the project area: Orphans and Vulnerable Children (OVCs), Child Mothers, Widows, Persons with Disabilities (PWDs), Elderly?                              |                   |     |    |  |
| 4                 | Will the project restrict their economic and social activity and make them particularly vulnerable in the context of the project?  |                   |     |    |  |
| 5                 | Will the project change their socioeconomic and/or cultural integrity?   |                   |     |    |  |
| 6                 | Will the project disrupt their community life?   |                   |     |    |  |
| 7                 | Will the project positively affect their health, education, livelihood or social security status?  |                   |     |    |  |
| 8                 | Will the project increase conflict between VMGs and other communities?   |                   |     |    |  |
| 9                 | Will the project alter or undermine the recognition of their knowledge, preclude customary behaviours or undermine customary institutions?   |                   |     |    |  |
| 10                | In case of no disruption of indigenous community life as a whole, will there be loss of housing, strip of land, crops, trees and other fixed assets owned or controlled by individual indigenous households? |                   |     |    |  |

The responses to the issues outlined in (a) and (b) above will form the basis for determining whether the project is in category A, B or C as indicated in the table below. Tick only the appropriate one.

| Tick | Category | Decision or Action Required   |
|------|----------|---|
|      | A        | Projects categorized as A require preparation of a VMGP.  |
|      | B        | Projects categorized as B require at least a specific action favorable to VMGs, addressed through a specific provision in relevant plans, e.g., Resettlement Action Plan or a general Social Action Plan. |
|      | C        | Projects categorized as C require no VMGP or a specific action to be taken.   |

### **i) Social Assessment/Rapid Appraisal**

Whereas sufficient baseline surveys have been conducted during the development of the ESIA, prior to project implementation, an appraisal shall be undertaken to document key (silent) needs of the Batwa and other VMs. Key informant discussion shall be conducted with the Batwa together with the association currently managing their concerns, as well as with district leaders, among others. Discussions will focus on potential positive and negative impacts of the project activities; measures to enhance positive impacts and strategies/options to minimize and/or mitigate negative impacts.

The social assessment includes the following elements, as needed:

- A review of institutional framework applicable to vulnerable and marginalized groups.
- Gathering of baseline information on the demographics, social, cultural and political characteristics of the affected vulnerable and marginalized groups' communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
- Taking the review and baseline information into account, the identification of key stakeholders and the elaboration of a culturally appropriate process for consulting with VMGs at each stage of project preparation and implementation.
- An assessment, based on informed consultation with the affected VMG communities, of the risks and potential adverse and positive effects of the project relative to their access to land and natural resources as well as their lack of access to opportunities relative to their social groups in the communities, regions, or national societies in which they live.
- The identification and evaluation, based on free, prior, and informed consent with the VMGs communities, of measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that VMGs receive culturally appropriate benefits under the project.
- A customized Vulnerable and Marginalized Group Risk Management (VMGRM).
- Assessment and development of at least one project implementation mechanism to promote participation of VMGs in the project implementation cycle. Such mechanism will include deliberate appointment of VMGs representatives to project structures such as GRCs, Site Meetings, and in offering labour during the construction phase of Matanda Irrigation Scheme.

### **ii) Institutional and Implementation Arrangements**

The project financial and other resources will be managed through the existing financial management arrangements in MWE under Water for Production (WfP) Department as established under the Directorate of Finance and Administration. During project execution MWE shall coordinate project implementation and manage: (a) project monitoring, reporting and evaluation; (b) contractual relationships with the World Bank; (c) procurement and (d) financial management and record keeping, accounts and disbursements.

This section will focus on the institutional as well as implementation arrangements specific to this VMGF including an assessment of capacities for effective VMGF/VMGP implementation.

### **iii) Roles and Responsibilities of Implementation Stakeholders**

**MWE**: The ministry will take the overall responsibility of implementing the scheme including in ensuring the effective execution of the VMGF. Coordination of all social issues including on VMGs under the project will lie with the Commissioner, Water for Production (WfP) Department supported by the Project Coordination Unit (PCU) which will be headed by a Project Coordinator (PC). This will be done in manner similar to how it is done for other projects under the ministry. The Environment and Social Safeguard Specialists (ESSS) and the Social Development Specialist (SDS) in the ministry/PCU will oversee the preparation and implementation of the VMGP. Other roles of the ministry will include:

- Prepare the VMGP at the inception stage of project implementation and ensure that measures to address adverse impacts where they cannot be avoided are spelled out. A VGMP was prepared before the project started. Prior to the commencement of works, MWE will prepare a VGMP after consultations with stakeholders at different levels;
- Consult on the VMGP with stakeholders, paying special attention to including affected VMGs and relevant government agencies to ensure that VMGs fully benefit in culturally appropriate ways;
- Ensure that a budget for implementing the VMGF and preparing and implementing the VMGP is integrated in the project implementation plans;
- Provide technical assistance and facilitation to LGs/VMFG's to implement the VMGP;
- Implement the monitoring and reporting activities of the VMGP, including arranging and paying for any independent monitoring that might be deemed necessary;
- Notify the World Bank of any substantial change in the course of the VMGP implementation;
- Build capacity of the relevant LG staff, VMGs and other vulnerable groups; and
- Report both to affected VMGs and the WB on project progress and any unexpected and unintended events affecting VMGs and vulnerable groups.

**District Local Governments (LGs)**: Beneficiary LGs will support MWE in collaboration with the district to identify land for the establishment of irrigated agricultural demonstration sites for the VMGs. The LGs should devise measures during identification, to ensure that sub counties inhabited by VMG communities are selected to benefit from the project and the respective budget is reserved. This will to a greater extent serve the interests of the 1995 Ugandan Constitution and other relevant legal and policy frameworks. During Matanda irrigation scheme implementation, the District Community Development Officers (DCDOs) with guidance from the ESSS and SDS at MWE will:

- Undertake social screening of subprojects to confirm the presence of and enhance the participation of VMG communities as well as other VMGs in the district;
- Implement the VMGP in their respective districts;
- Mobilize the relevant VMGs' communities and create awareness about the project;
- Monitor mitigation measures intended to enhance the participation of VMGs' communities and vulnerable groups in the scheme; and
- Monitor the implementation of the VMGP on the ground and produce progress reports.

**VMFGs:** After undergoing capacity enhancement and training, beneficiary Vulnerable and Marginalized Farmers Groups will be part of the actual implementers of the project. Among their roles will be:

- Attend and make contributions during stakeholder meetings;
- Participate in project implementation on the ground;
- Participate in the monitoring of the VMGP implementation; and
- Safeguard and maintain project infrastructure as applicable.

**Local/Community Organisations:** If deemed necessary, active local organisations such as BPD, BMCT, and UOBDU operating in the affected VMGs' communities may be called upon to support the DCDO, ESSS and SDS in not only mobilising VMGs to actively participate and benefit from the project but also in sharing their experiences and knowledge of working with VMGs.

#### **iv) A Situational Analysis and Enhancement of Capacities for VMGP implementers**

MWE has adequate institutional capacity to implement this VMGF and the forthcoming VMGP. MWE has in the past implemented World Bank supported projects involving implementation of social safeguards measures. Therefore, the Ministry has accumulated considerable capacities in management of vulnerable and marginalized groups. Nonetheless, the capacity to plan and implement the measures outlined in this VMGF requires continuous strengthening for a robust vulnerable and marginalized people management. The Environment and Social Safeguard Specialists in the Ministry PIU will oversee the preparation and implementation of the VMGP.

The Environmental Specialist (ES) and Social Development Specialist (SDS) are already in place and will oversee the implementation of the VMGP for Matanda irrigation scheme. This will be augmented by undertaking relevant training in implementation of the Indigenous Peoples Plan and orientation training on the new World Bank Environment and Social Framework (ESF) for further capacity building.

The relevant officers in the LGs and target sub counties, parishes and cells to be trained will include DCDO, CDOs, and the VMGs' chairperson. They shall be trained on social safeguards including all social issues in addition to being facilitated accordingly by MWE to help implement and monitor the VMGPs on the ground. The VMGF provides the guidelines for the preparation of the VMGP. Specific areas of training will include screening, development of district specific VMGP, managing social issues, and monitoring and reporting. The SDS will be the responsible focal person for all social matters including safeguards related to the project. The SDS in close collaboration with the respective districts (DCDO) will:

- Identify VMG communities within the project areas;
- Identify and explain the rights of VMGs as enshrined in Uganda's legal framework;
- Design appropriate tools to undertake free, prior and informed consultations with the VMGs;
- Disseminate the draft VMGP prepared collaboratively by the district, local NGOs already operating within the project area, and the ministry implementing team, including SDS, to the VMGs for their consent and input;

- Conduct and participate in training matters related to the identification, communication and provision of services to VMGs;
- Ensure that appropriate channels are used to communicate with VMG communities; and
- Train safeguards personnel at the district levels on project implementation and monitoring.

At VMGs' project area community level, the project intends to encourage creation and strengthening of VMFGs' support and capacity building. Training of these groups will focus on improving VMGs' agricultural practices and productivity.

## **B. VULNERABLE AND MARGINALIZED GROUPS' PLAN (VMGP)**

Based on the social assessment, the project will develop appropriate mitigation measures and livelihood enhancement activities for vulnerable and marginalized groups. The plan will be informed by the already existing framework for Matanda irrigation project. A VMGP addresses the (i) aspirations, needs, and preferred options of the effected VMGs, (ii) local social organization, cultural beliefs, ancestral territory, and resource use patterns among the affected VMGs; (iii) potential positive and negative impacts on VMGs; (iv) measures to avoid, mitigate, or compensate for adverse project effects; (v) measures to ensure project benefits will accrue to VMGs; (vi) measures to strengthen the capacity of local authority and relevant government departments to address VMGs issues; (vii) the possibility of involving local organizations and non-governmental organizations with expertise in VMGs issues; (viii) budget allocations; and (ix) monitoring. MWE, the implementing agency, will submit the VMGP to the World Bank for review and approval prior to commencement of project works. The VGMP shall primarily cover the scheme command area and shall be put in place prior to the implementation so that concerns during preparatory stages are covered before the project implementation phase. The plan developed will only cover specifically the project villages (Matanda irrigation scheme and should be in place early enough to cover aspects related to the vulnerable groups well enough before construction works. Whereas the ESIA Report has given a basis of VMGs management, Ministry has instituted the development of a full VMGP to be followed during the project implementation.

The Vulnerable and Marginalized Groups Plan is prepared in a flexible and pragmatic manner, and its level of detail varies depending on specific project activities and the nature of effects to be addressed. The VMGP includes the following elements, as needed:

- A summary of the social assessment.
- A summary of results of the informed consent with the affected VMGs' communities that was carried out during project preparation and that led to broad community support for the project.
- A framework for ensuring free, prior, and informed consent with affected VMG communities during project implementation.
- An action plan of measures to ensure that VMGs receive social and economic benefits that are culturally appropriate, including, if necessary to enhance the capacity of the project implementing agency.
- When potential adverse effects on VMGs are identified, an appropriate action plan which includes measures to avoid, minimize, mitigate, or compensate for these adverse effects.
- The cost estimates and financing plan for VMGP.

- Accessible procedures appropriate to the project to address grievances by the affected VMGs' communities arising from project implementation. When designing the grievance procedures, the borrower (GoU) through MWE will take into account the availability of judicial recourse and customary dispute settlement mechanisms among the VMGs.
- Mechanisms and benchmarks appropriate to the subproject for monitoring and evaluating, and reporting on the implementation of the VMGs. The monitoring and evaluating mechanisms should include arrangements for the free, prior, and informed consultation with the affected VMGs.

**v) Framework for free, prior, and informed consent (FPIC)**

Obtaining FPIC implies a process of good faith engagement whereby the parties establish a dialogue allowing them to find appropriate solutions in an atmosphere of mutual respect with full and equitable participation. The outcome of the social assessment and measures for VMGs will be presented in community meetings. The Ministry's Social Development Specialist will coordinate with the District Community Development Officer (DCDO) in the of process of free, prior and informed consultation with the affected VMGs' communities during project preparation to inform them about the project, to fully identify their views, to obtain their broad community support to the project, and to develop project design and safeguard instruments. In most cases, this process is best done as part of the SA although consultations are likely to continue after its completion. Given the social setup of the identified VMGs, consultation will definitely require time and an effective system of communication amongst interested parties to ensure that it adequately deals with their needs, priorities, and preferences. Accordingly, the project plans, including VMGP, will be prepared in consultation with VMGs. There is also a need for guidelines for consultations to be inclusive of all groups and gender. Where the consultations are with VMG representatives, ensure inclusion of gender youth and others. There also need to be guidelines to ensure that all consultations are documented with locations, times, number of participants (gender disaggregated) issues raised and responses provided and details can be in the annex. The VMGs will be provided with relevant project information in language(s) and manner suitable to them. VMGs should be able to:

- Participate either directly or through their own freely chosen representatives and/or customary or other institutions; and
- Specify which of these is entitled to express consent (or lack of) on their behalf.

Free, prior and informed consent, in relation to activities taking place on VMGs lands, refers to a process whereby affected vulnerable and marginalized communities, freely have the choice, based on sufficient information concerning the benefits and disadvantages of the Project, of whether and how these activities occur, according to their systems of customary decision making. A free, prior and informed consent means:

Free, Prior and Informed Consultation

| Free             | Prior                                      | Informed                           | Consent  |
|------------------|--|------------------------------------|--|
| No manipulation. | None of the following should be undertaken | Information to be provided should: | Form may vary for different communities: so may be oral or |



|                  |  |   |  |
|------------------|--|---|--|
|                  | before consent has been obtained:  | <ul style="list-style-type: none"> <li>• be accurate</li> <li>• be in an appropriate language</li> <li>• include information, when available, on social, economic, environmental and cultural impacts and reasons for proposed activities, duration, affected locality, proposed benefits sharing and legal arrangements and people likely to be involved</li> <li>• be in a form that is understandable and that takes into account traditions of the community</li> </ul> | written but will always involve consultation and participation.  |
| No coercion.     | <ul style="list-style-type: none"> <li>• Authorization or</li> <li>• Commencement of activities</li> <li>• Land acquisition</li> <li>• Finalization of development plans.</li> </ul> |   | The process should be participatory.   |
| No incentives.   | Specific time requirements of the consultation/ consensus process.   |   | Decision-making should not exclude or marginalize individuals due to gender, ethnicity or other factors. |
| No intimidation. |  |   |  |

The consultations and participation of VMGs will be ensured in the formulation of the VMGP to ensure that it adequately deals with needs, priorities, and preferences. Information will be provided prior to consultations to enable VMG participation to understand issues and provide informed feedback. VMGs will be provided with relevant project information in languages and manner suitable to them. Separate focus group discussions will be carried out to assess the subproject impacts and benefits to these groups. The outcome of social assessment and VMGP will be presented in community workshops/meetings.

The lead Agency, MWE prepared a VGMP, already disclosed on the website, and will prepare and make available the following documents to the project affected VMGs and disclose them to the public:

- A draft Vulnerable and Marginalized Groups Plan before respective consultation;
- A final Vulnerable and Marginalized Groups Plan after completion of such consultation; and
- Any revised/updated Vulnerable and Marginalized Groups Plan, following any project change deemed necessary during implementation.

### C. GRIEVANCE MECHANISM

According to Article 40 of the UN Declaration on the Rights of VMGs, *“Indigenous peoples have the right to access to and prompt decision through just and fair procedures for the resolution of conflicts and disputes with States or other parties, as well as to effective remedies for all infringements of their individual and collective rights. Such a decision shall give due consideration to the customs, traditions, rules and legal systems of the indigenous peoples concerned and international human rights.”*

Vulnerable Marginalized Groups may encounter a grievance or a complaint against the project, its staff or contractors during project implementation. To address or resolve the grievance, a mechanism describing procedures, roles and responsibilities in grievance management process is given below. To be effective, the mechanism shall utilize existing local administrative and community structures. All

grievances concerning non-fulfillment of contracts, levels of compensation, exclusion from subproject benefits, or seizure of assets without compensation shall be addressed to the Local council 1 Chairperson.

MWE's Social Development Specialist shall work with community leaders in the project area to set up an LC1 Grievance Committee to be the first point where grievances shall be addressed. The LC1 Grievance Committee shall be composed of;

- ✓ A Local Council 1 (LC1) Chairperson
- ✓ Local Council 1 (LC1) Secretary
- ✓ VMGs' Chairperson
- ✓ Two VMG representatives from each camp (One representing women and the other, the youth)

All attempts shall be made to settle grievances amicably before resorting to courts of law.

Entities seeking redress and wishing to record grievances will do so by notifying their Local Leader (LC 1 Chairperson) who will chair a Local Grievance Committee at LC 1 level set up with guidance of MWE's Social Development Specialist. The Local Leader will inform and consult with the district administration to determine validity of claims. If valid, the Local Leader will convene a meeting of the LC1 Grievance Committee to resolve the grievance and notify the complainant of the outcome. If the complainant's claim is rejected, the matter shall be brought before the subcounty or district local government for settlement.

Any objections or grievances related to exclusion/marginalization shall be made in writing, in the language that the VMGs understand and are familiar with, to the Local Leader. Copies of the complaint shall be sent to MWE, within 20 days after the public notice. Channeling complaints through the Local Council Grievance Committee is aimed at addressing the problem of distance and cost the VMGs may have to face.

The Local Leaders (trained by MWE's Social Development Specialist) shall maintain records of grievances and complaints, including minutes of discussions, recommendations and resolutions made. The procedure for handling grievances should be as follows:

- a) The affected person should file his/her grievance in writing, to the Local Leader. The grievance note should be signed and dated by the aggrieved person. Where the affected person is unable to write, s/he should obtain assistance to write the note and emboss the letter with his/her thumbprint. A sample grievance form is provided in Appendix 4.
- b) The Local Leader should respond within 14 days during which any meetings and discussions to be held with the aggrieved person should be conducted. If the grievance relates to valuation of assets, a valuer may need to revalue the assets. In this case, the aggrieved person must be notified by the Local Leader that his/her complaint is being considered.
- c) If the aggrieved person does not receive a response or is not satisfied with the outcome within the agreed time (s)/he can lodge his grievance to the Local Administration (District).
- d) The Local Administration will then attempt to resolve the problem (through dialogue and negotiation) within 14 days of the complaint being lodged. If no agreement is reached at this stage, then the

complaint is taken to MWE's Grievance Committee comprising the following entities:

- (i). A Grievance Officer (MWE Staff)
- (ii). A Local Council 1 (LC1) Chairperson
- (iii). District Representative (e.g. CDO or Member of District Land Board)
- (iv). A community representative in project area (e.g. religious leader)
- (v). VMGs' Chairperson

Note that persons in (ii) - (iv) will be location specific. If the complainant is still dissatisfied with the handling of his/her complaint, then he/she can take up the complaint through the court system.

A flow process of grievance mechanism is illustrated in figure below.

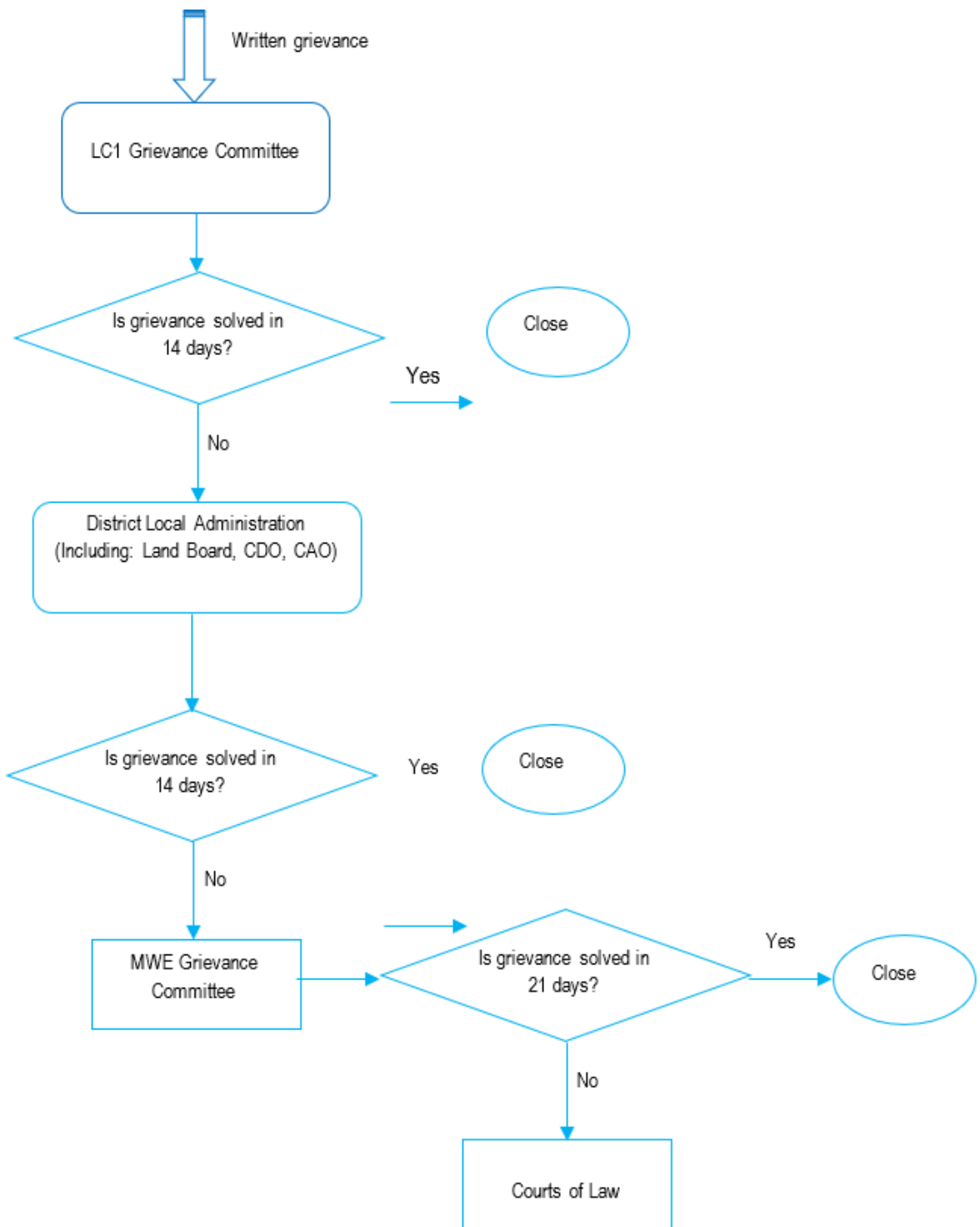


Figure: Illustration of the grievance settling/ handling process

#### D. MONITORING AND EVALUATION

The PCU at MWE in collaboration with the Monitoring and Evaluation (M&E) department of the ministry will establish a simple monitoring system for the implementation of the VMGF. The M&E system will facilitate the collection and analysis of the required data during project implementation. Actual project achievements will be compared against planned activity targets, project outputs and outcomes. The system will aim at improving efficiency and effectiveness of project implementation. The information to be collected and analysed will be based on set targets and planned activities under the project. This process shall be part of the on-going M&E activities of the Ministry. The basic M&E shall provide tangible and verifiable information on change achieved among the VMGs against the baseline situation before the project. For example, has there been allocation of fertile land to the VMGs, are they involved in project activities, are their views considered, do they participate in stakeholder engagement, among other aspects.

Baseline data collection on the socio-economic status and cultural practices of VMGs carried out during the ESIA study will be the basis for monitoring of project impacts on VMGs. The respective VMGPs will also specify systems of data collection and monitoring of the anticipated changes and will include Terms of Reference (ToR) for the monitoring agency/consultant. The Ministry's PCU will submit monitoring reports to the World Bank for its review. Key indicators for both benefits and VMGs' participation will include:

- Monthly consultation meetings conducted with VMGs at all stages of project implementation covering the entire Batwa community;
- Number of irrigation networks (pipes or canals per ha) established in VMGs' communities compared to what has been established in non VMG areas;
- Access to irrigation water (distance and ease of access)
- Number of irrigated agricultural demonstration established for VMGs' communities;
- Quantity of produces from VMGs' gardens;
- Number of VMFGs' established in VMGs' communities;
- Acreage of cultivated land by the VMGs';
- Number of VMGs on both the local project committee and Grievance Committee; and
- Mobilization of VMGs to manage the established infrastructure.

Indicators for negative impacts on VMGs will include:

- Number of VMG households and individuals physically or economically displaced by the project;
- Number of VMGs in the project area that have not benefited from the project;
- Number of VMGs that have been exposed to GBV and VAC in relation to the project;
- Number of project related grievances registered from VMGs;
- Number of VMG representatives that have lost their job due to the project;
- Number of disintegrated vulnerable or marginalized families due to the project; and
- Number of VMGs exposed to sexually transmitted diseases in relation to the project.

Monitoring indicators for VMGs will include gender and vulnerability specific indicators, and monitoring reports will present data disaggregated by gender and vulnerability. To effectively monitor project impacts

on VMGs, the baseline data for the project will include data on representative VMGs' households. The socioeconomic baseline indicators will be used for measuring the outcomes and impacts on vulnerable communities. The M&E mechanisms adopted for the project will ensure that in addition to process and outcome indicators, appropriate impact indicators are defined related specifically to impacts on vulnerable groups and their livelihoods. These will include: how many vulnerable people participated actively and benefitted from project activities and documentation of their opinions on project impacts and if any of their specific concerns were addressed during implementation. In measuring the extent and quality of participation, it will be important to understand and capture how gender differences will affect the participation of girls and women in scheme activities. Gender analysis will therefore be an integral part of monitoring and evaluation of scheme activities.

The monitoring and evaluation mechanisms adopted for the project will ensure that in addition to process and outcome indicators appropriate impact indicators are defined related to specifically to impacts on vulnerable groups and their livelihoods. It is recommended that an impact evaluation be undertaken about 6 months before project completion to assess the changes in the overall living standards compared to the former living status or standards of living for these groups.

#### **E. DISCLOSURE ARRANGEMENTS FOR VMGPs TO BE PREPARED UNDER THE VMGF**

Prior to the disclosure of VMGP, arrangements will be made to ensure that communities and all stakeholders are prepared to facilitate the dissemination process. Key prefinalization arrangements for disclosure will include

- Stakeholder profiling for disclosure purposes. These will include representative of the vulnerable groups impacted by the proposed irrigation scheme
- Disclosure plan. The plan will outline the information to be shared, the timing and the method of disclosure
- Development of information materials. Need to prepare clear, concise and accessible information materials including brochures, fact sheets etc.
- Language and format ensure that disclosure materials are available in local languages understood by the vulnerable groups
- Establish multiple disclosure channels such as community, public notices, and is possible online platforms to reach different stakeholder groups,

It is also important that a prefinalization review is also conducted before the disclosures including review disclosure arrangements, verification of stakeholder engagement and checking of compliance of the information to the relevant laws, regulations and standards,

The final draft of this VMGF will be submitted by MWE to the World Bank for review and clearance prior to implementation of the Matanda irrigation scheme. Once cleared, it will be disclosed in-country, in the appropriate form, manner and in the official language (English) in print media. Upon clearance from the World Bank, MWE will share the draft VGMP with stakeholders at the district level, Batwa Community Leaders, and NGOs and CBOs representing their interests. Preparation and development of Information,

Education and Communication materials (IEC) translated in local languages for use in the Batwa communities during training and sensitization sessions will be undertaken. Due to potential levels of their high level of illiteracy, visual aids, including charts, video and documentaries, music, and drama shall be used as necessary. Later on, the information from the documents specified above (particularly the VMGP) will be made available to affected persons summarized in form of brochure or leaflets translated in the appropriate language. The VMGF and VMGP will be translated into a language that VMGs understand and disclosed in a culturally appropriate manner. After submitting the VMGP to the World Bank for review and clearance, MWE shall disclose the above documents on its website (<https://www.MWE.go.ug/>), and the World Bank at its external website. In case of changes made to the VMGF and VMGP, the same clearance and disclosure protocols will be followed. During implementation, MWE will prepare social monitoring reports including safeguard issues, make them available to affected VMGs, post them on its website, and submit to the World Bank for review.

**F. INDIGENOUS PEOPLES (VMGs) ELIGIBILITY CRITERIA**

Based on the social baseline studies more specially through stakeholder engagements and household surveys, it was established that not every household within the project is classified as vulnerable or marginalized. Therefore, strict criterion shall be used as a basis for special compensation, benefit sharing, allocation of land and water, among other project benefits targeted for VMGs. Key eligibility criteria shall include the following:

**Eligibility criteria for project related compensation**

- Must be an owner of the affected asset
- Must be a user of the affected asset
- Proven evidence of economic/Employment loss
- Proven loss of access to natural resources such as medicinal plants, drinking water sources, grazing land and cropping/farming land.

**Eligibility criteria for representatives of VMGs**

- Must be a member of the United Organization for Batwa Development as a VMG member
- Must be nominated by the United Organization for Batwa Development
- Must be a known resident of the Batwa settlement area
- Must be actively participating in Batwa development initiatives
- Must be actively involved in advocating for the rights of the VMGs

Date: .....

**Reviewed by:** .....  
**Project Coordinator**

Date: .....

**Approved by:** .....  
**Head of Department, MWE**

Date: .....



## G. A STANDARD OUTLINE FOR A VMGP

The size and level of detail of a VMGP varies depending on the specific project and nature of impacts to be addressed. A typical VMGP includes the elements below:

- ✓ A summary of the legal and institutional framework of Uganda applicable to VMGs and a brief description of the demographic, social, cultural, and political characteristics of the affected VMGs' communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
- ✓ A summary of the social assessment.
- ✓ A summary of results of the free, prior, and informed consultation with the affected VMGs' communities that was carried out during project preparation and whether it led to community support or rejection of the project.
- ✓ A framework for ensuring free, prior, and informed consultation with the affected VMGs' communities during project implementation.
- ✓ Formal agreements reached during the free, prior, and informed consultation during project preparation.
- ✓ A Grievance Mechanism taking into account local dispute resolution practices.
- ✓ An action plan of measures to ensure that the VMGs receive social and economic benefits that are culturally appropriate, including, if necessary, measures to enhance the capacity of MWE.
- ✓ When potential adverse effects on Indigenous Peoples are identified, appropriate action plans with measures to avoid, minimize, mitigate, or compensate for these adverse effects.
- ✓ Special measures for the recognition and support of customary rights to land and natural resources may be necessary.
- ✓ Special measures concerning women and marginalized generational groups may be necessary to ensure inclusive development activities.
- ✓ Capacity building activities for the indigenous communities to enhance their participation in project activities.
- ✓ The cost estimates and financing plan for the VMGP.
- ✓ Procedures appropriate to the project to address grievances by the affected VMGs' communities arising from project implementation. When designing the grievance procedures, the consultant/MWE will take into account the availability of judicial recourse and customary dispute settlement mechanisms among the VMGs.
- ✓ Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the VMGP. The monitoring and evaluation mechanisms should include arrangements for the free, prior, and informed consultation with the affected Indigenous Peoples' communities.