



**REPUBLIC OF UGANDA
National Forestry Authority
Uganda Wildlife Authority**

**SECURING UGANDA'S NATURAL RESOURCE
BASE IN PROTECTED AREAS
Project (P174337)**

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

April 3, 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Uganda will implement the Securing Uganda's Natural Resource Base in Protected Areas Project (the **Project**), with the involvement of the Ministry of Finance, Planning and Economic Development (**MOFPED**) and the following agencies: National Forestry Authority (**NFA**) and Uganda Wildlife Authority (**UWA**). The International Development Association (the **Association**) has agreed to provide financing for the Project.
 2. The Republic of Uganda shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
 3. The Republic of Uganda shall also comply with the provisions of any other environmental and social (E&S) documents required under the ESF and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMP), and the Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
 4. The Republic of Uganda is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
 5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Republic of Uganda as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
 6. As agreed by the Association and the Republic of Uganda, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Republic of Uganda, through MOFPED, will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Republic of Uganda, through MOFPED. The Republic of Uganda shall promptly disclose the updated ESCP.
 7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Republic of Uganda shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts.
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	Quarterly throughout Project implementation.	NFA and UWA
B	<p>INCIDENTS AND ACCIDENTS NOTIFICATION</p> <p>In case of occurrence of an incident or accident related or having an impact on the Project which has, or are likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, the NFA and UWA shall:</p> <p>(a) as soon as reasonably practicable, but no later than five (5) calendar days after become aware of the occurrence of such incident or accident, inform the Association by any electronic means of its nature and circumstance as well as any effect or impact resulting or likely to result therefrom;</p> <p>(b) as soon as reasonably practicable, but no later than twenty (20) days after such incident or accident, provide the Association with a summary report that includes a description of the incident or accident, and the measures, if any, that the Republic of Uganda is taking or plans to take to address it and to prevent any future similar event; and</p> <p>(c) keep the Association informed of the on-going implementation of the said measures and plans.</p>	<p>(a) As soon as reasonable and practical but no later than 5 days after learning of the incident or accident.</p> <p>(b) Report due as soon as reasonably practicable, but no later than 20 days after incident or accident.</p> <p>(c) throughout Project implementation.</p>	NFA and UWA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain the established organizational structure with qualified staff and resources to support management of E&S throughout Project implementation, through assignment of E&S focal points at the NFA and UWA.</p> <p>Two E&S focal points have been appointed in each the National Forestry Authority (NFA) and Uganda Wildlife Authority (UWA). These focal points shall be responsible for the day to day implementation of E&S measures and generally ensuring that the Project is being implemented in accordance with the ESCP.</p>	Throughout project implementation	NFA and UWA
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Implement Project activities in accordance with ESSs and Environmental and Social Management Framework (ESMF) for the Project consistent with the ESSs and to the satisfaction of the Association, in a manner acceptable to the Association.</p>	ESMF to be implemented throughout the Project implementation.	NFA and UWA
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Screen any proposed Project activity in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, draft, adopt, and implement the activity Environmental and Social Management Plan (ESMP), as required, in a manner acceptable to the Association.</p>	<p>Before commencement of specific activities.</p> <p>Once approved, the ESMPs shall be carried out throughout Project implementation.</p>	NFA and UWA
1.4	<p>TECHNICAL ASSISTANCE ACTIVITIES</p> <p>Ensure that all Terms of Reference (TOR) for Technical Assistance give due consideration to the E&S implications of proposed activities. The TORs shall be consistent with the ESF and cleared by the Association prior to their finalization.</p>	TORs have been adopted as part of the ESMF specified in 1.2.	NFA and UWA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	<p>MANAGEMENT OF CONTRACTORS:</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<p>Prior to the preparation of procurement documents.</p> <p>Supervise contractors throughout Project implementation.</p>	UWA
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.</p> <p>Government agencies staff shall be employed subject to Public Service Standing Orders and the applicable provisions of ESS2, including on occupational health and safety and prohibitions on forced and child labor.</p> <p>Workers employed/contracted by NGOs and Private Companies shall be subject to ESS2, and these NGOs and Private Companies' policies shall be assessed for consistency with ESS2 and the Project Labor Management Procedures and national Labour laws prior to entering implementation contract or agreements.</p>	Throughout Project implementation	NFA and UWA
2.2	<p>WORKERS CODE OF CONDUCT</p> <p>Ensure that all workers under the Project sign and abide by Workers Code of Conduct included in the LMP developed for the Project</p>	Prior to start of employment, throughout Project implementation	NFA and UWA and their contractors
2.3	<p>TRAINING FOR WORKERS</p> <p>Provide induction training to workers on Sexual Exploitation and Abuse (SEA) / Gender-Based Violence (GBV) prevention, safety procedures, COVID-19 procedures and repeat as needed.</p>	At the start of employment, with periodic refreshers, throughout Project implementation	NFA and UWA and their contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.4	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism shall be operational prior engaging Project workers and maintained throughout Project implementation	NFA and UWA
2.5	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Consistent with ESS2 and Uganda legislation, implement occupational, health and safety (OHS) measures specified in the ESMF, specific ESMP, and the LMP.</p>	Throughout Project implementation and same timeframe as for the implementation of the ESMPs	NFA and UWA
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>(a) In accordance with ESS3 and in a manner satisfactory to the Association, include in all contractor contracts requirements for proper disposal of all liquid and solid waste (including plastic trash) and construction waste, sanitation management, including management of any associated dust emission, and management of potential pollution of water sources and air, noise impacts during construction and operation.</p> <p>(b) Thereafter, ensure contractor compliance with these provisions and ESS3.</p>	<p>(a) Prior to signing contractor contracts</p> <p>—</p> <p>(b) throughout Project implementation</p>	NFA and UWA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including but not limited to noise, accident risk, and other disturbances due to civil works. Include these measures and actions in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.</p>	General requirements shall be included in the ESMF on the timeframe specified in 1.2, and specific measures adopted and implemented in ESMPs on timeframe specified in 1.3, throughout Project implementation.	NFA and UWA

4.2	<p>TRAINING FOR THE COMMUNITY:</p> <p>Conduct activities for the communities designed to heighten awareness of risks and to mitigate impacts specified in this ESCP.</p>	Throughout Project implementation	NFA and UWA
4.3	<p>GBV AND SEA RISKS:</p> <p>(a) The Project shall ensure diverse and respectful workplaces, free of sexual exploitation, abuse, or harassment. Awareness raising on GBV and SEA / H shall be included in general engagements with local communities.</p> <p>(b) In addition, measures and actions to prevent and address the risks of GBV and SEA/SH shall be included in the ESMF and ESMPs in accordance with ESS₄ and in a manner satisfactory to the Association.</p>	<p>(a) Throughout Project implementation</p> <p>(b) on timeframes specified in 1.2. and 1.3.</p>	NFA and UWA

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT
 Not applicable to the Project

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>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 ESS6.</p> <p>Integrate in ESMPs measures to avoid and mitigation potential harm to natural habitats in accordance with ESS6 and in manner satisfactory to the Association.</p> <p>Before any Project activity with significant risks and adverse impacts on biodiversity may proceed, a Biodiversity Management Plan shall be prepared and adopted to the satisfaction of the Association.</p>	Prior to start of activities and implement required mitigation measures throughout Project implementation	NFA and UWA
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ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES

Not currently relevant to the Project			
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS: Consistent with ESS8, prepare, adopt and Implement the chance finds procedures described in the ESMF developed for the Project. Include a chance finds procedure in all contractor contracts.	Throughout Project implementation Prior to signing of the contracts	UWA
8.2	CULTURAL HERITAGE: Ensure that activities avoid locations with known tangible cultural heritage and give due consideration to intangible cultural heritage consistent with the project ESMF and ESS8.	Throughout Project implementation	NFA and UWA
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant to the Project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Implement Stakeholder Engagement Plan (SEP).	Throughout Project implementation	NFA and UWA
10.2	PROJECT GRIEVANCE MECHANISM: Prepare, adopt maintain and operate a grievance mechanism, as described in the SEP.	Throughout Project implementation	NFA and UWA
CAPACITY SUPPORT (TRAINING)			
	Type of training / Targeted Groups	Timeframe for Delivery	Trainers
CS1	Deliver training on screening of Project activities and key provisions of the Project ESMF and SEP / Staff leading implementation of Project supported activities in targets areas – Park Wardens (UWA), senior rangers (UWA), Sector Managers and rangers (NFA), project focal points	At Project start, upon new staff hire, and periodically thereafter throughout Project implementation	NFA and UWA, with support from the Association

CS2	Information on World Bank's Safeguards Incidents Reporting Tool (SIRT) provided to all implementing agencies / All implementing agencies' staff involved in project activities	At Project start	Staff of the Association
CS3	Use of Personal Protective Equipment (PPE) / All workers and Project staff.	At induction and continuous	UWA and NFA responsible staff
CS4	Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. / All workers and Project staff.	At induction and continuous	UWA and NFA responsible staff
CS5	Environmental Awareness / All workers and Project staff.	Continuous	UWA and NFA responsible staff