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THE REPUBLIC OF UGANDA

MINISTRY OF GENDER, LABOUR AND SOCIAL DEVELOPMENT (MGLSD)

GENERATING GROWTH OPPORTUNITIES AND PRODUCTIVITY FOR WOMEN ENTERPRISES IN (GROW) UGANDA - P176747

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

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Acronyms

BMGF	Bill and Melinda Gates Foundation
BTVET	Business Technical Vocational Education and Training
CDOs	Community development officers
CPF	Country Partnership Framework
DRDIP	Development Response to Displacement Impacts Project
GBV	Gender-based violence
GDP	Gross domestic product
GLOW	Generating Livelihoods and Opportunities for Women
GoU	Government of Uganda
ICT	Information and communication technology
IE	Impact evaluation
IDA	International Development Association
INVITE	Investment For Industrial Transformation and Employment Project
LED	Local economic development
LMP	Labor Management Plan
M&E	Monitoring and evaluation
MOFPED	Ministry of Finance, Planning, and Economic Development
MGLSD	Ministry of Gender, Labor, and Social Development
MLG	Ministry of Local Government
MSMEs	Micro, small, and medium enterprises
M2S	Micro to small
MUBS	Makerere University Business School
NDP	National Development Plan
NEMA	National Environmental Management Authority
NEA	National Environment Act
NUSAF	Northern Uganda Social Action Fund
OPM	Office of the Prime Minister
PACR	Project Advisory Committee for Refugees
PBCs	Performance-based Conditions
POM	Program Operations Manual
PIT	Project Implementation Team
PST	Project Support Team
PPDA	Public Procurement and Disposal of Public Assets
PSC	Project Steering Committee
PSFU	Private Sector Foundation Uganda
PTC	Project Technical Committee
RHD	Refugee-hosting district
S2M	Small to medium
SOPs	Standard Operating Procedures
SORT	Systematic Operations Risk-rating Tool
UBOS	Uganda Bureau of Statistics
UGGDS	Uganda Green Growth Development Strategy
UIA	Uganda Investment Authority
UNHCR	United Nations High Commissioner for Refugees
UNHS	Uganda National Household Survey
UWEP	Uganda Women Entrepreneurship Programme

VSLAs	Village Savings and Loans Associations
WEE	Women's economic empowerment
WHR	Window for Host Communities and Refugees
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment

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EXECUTIVE SUMMARY

Project Background

The Government of Uganda, through the Ministry of Gender, Labour and Social Development (MGLSD) hopes to deliver the proposed Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project which will support the country's efforts to provide increased access to finance for women's enterprises; build business and digital skills; enhance women's social networking, provide opportunities for relevant exposure and mentorship. Furthermore, the project will address social norms and negative cultural practices that constrain women's economic empowerment.

The project will primarily focus on increasing access to services that enable female entrepreneurs to increase the social and economic impact of their enterprises in targeted locations, including host and refugee communities. This will support interventions that address the constraints to women's economic empowerment with particular focus on women entrepreneurship, thereby enhancing women's income, productivity and both the economic and social support systems that enable their success as entrepreneurs and leaders in their communities. In addition, the project will support the Government of Uganda's gender-inclusive recovery from COVID19 and the gender targets under the Uganda Green Growth Development Strategy (UGGDS) (2017/18 – 2030/31). The project aims to create an enabling environment for women entrepreneurship with (a) increase in access to finance through provision of strategic investment funds and linkages to financial institutions; this will allow women to invest in expansion of their businesses, thereby increasing their revenues and profits; (b) human capital development through provision of technical skills, socio-emotional skills, and digital skills that will enhance their productivity; (c) building social capital through creation of platforms that increase quality and size of women's professional and business networks and provide access to new information and market opportunities to expand and successfully manage their businesses; (d) tackling social norms that hinder women's economic participation and productivity through sessions on GBV, engagement with men, and gradual individual and community level norm change etc.; and (e) access to economic and social infrastructure through provision of common-user facilities for women businesses, childcare, and other infrastructure that contributes to an enabling environment for women owners/managers of growth-oriented businesses. The project interventions will support women entrepreneurs to generate more income, more profit and potentially expand the business to employ other women, thereby, creating jobs for women.

The Environmental and Social Risk Classification for GROW Project is "Substantial" due to the current low capacity of the MGLSD to manage environmental risk and the wide range of possible subproject.

The Ministry of Gender, Labour and Social Development (MGLSD) shall disclose the ESMF to the various stakeholders, after it has been cleared by the World Bank. It will be officially disclosed on the World Bank's External Website and by Government of Uganda to the different national stakeholders. The ESMF will be consulted upon and disclosed by the project appraisal.

The ESMF, developed alongside a Resettlement Policy Framework (RPF), Stakeholder Engagement Framework (SEF), and the Vulnerable and Marginalized Group's Framework (VMGF) are a set of due - diligence instruments to address and manage the environmental and social risks and impacts associated with the GROW Project. The frameworks are intended to meet the Government of Uganda's and the

World Bank's Environmental and Social Risk Management requirements. MGLSD, Private Sector Foundation Uganda (PSFU), Makerere University Business School (MUBS) and the various Service Providers will be responsible for implementing the provisions and recommendations outlined in the ESMF.

ESMF Objectives

The major objectives of the ESMF are to: Provide guidance to project stakeholders for integration of social and environmental aspects throughout the project life; Enhance the positive environmental and social aspects of the project whilst avoiding, minimizing, managing and compensating for any potentially adverse aspects/impacts; Clearly define the roles and responsibilities of the key actors, for the management of environmental and social issues on the project; Ensure that the necessary framework for monitoring environmental and social aspects is in place and ideally based on a proactive approach; Enhance capacity building, knowledge and awareness in environmental and social risk management for all project stakeholders

Project Development Objective and Project Components

The Project Development Objective (PDO) is to increase access to services that enable female entrepreneurs to increase the social and economic impact of their enterprises in targeted locations, including host and refugee communities

The GROW Project has four components. Component 1 will provide enterprise development services for women through training (technical, life-skills, digital), business advisory services, and enhanced networks for women through platforms that facilitate market linkages and value chain development. In addition, this component will seek to change negative social norms through sessions on preventing and responding to GBV, engaging with men and community leaders, and the like. Component 2 will support creation of revolving funds that provide credit to women entrepreneurs. Component 3 will support investments in enabling infrastructure and facilities including common-user facilities and child-care centers to ensure that women have access to economic and social infrastructure. Component 4 will support project management, policy innovations aimed at facilitating WEE, and evidence generation.

Project Location

The GROW Project will be implemented nationwide in various districts in all regions of the country, however, the specific sub project locations are yet to be identified (at the time of project appraisal).

Potential Environmental and Social Risks and Impacts of the GROW Project

The proposed Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project is likely to result in both positive and adverse E&S impacts.

Potential Positive Impacts

The GROW Project is expected to have significant positive impacts that are largely of a socio-economic nature. The expected general positive impacts of the project include the following:

a) The project is expected to contribute to several tangible and positive economic impacts including business development services for women entrepreneurs, access to finance for women entrepreneurs, and access to infrastructure that address time and production constraints of women entrepreneurs and their enterprises;

b) The project is likely to have greater multiplier effects given that it will be implemented as a package;
c) It is also expected to contribute to greater agency of participants as evidenced by higher participation in household decision making and autonomy over use of income, as well as increased participation in groups (such as self-help groups and other community groups);
d) Enterprise development services are conducted through training. The training is expected to improve women's business management skills and shift their mindsets towards entrepreneurship;
e) The creation of revolving funds that provide credit to women entrepreneurs, will meet their financing need and enable them to expand their businesses;
f) Access to infrastructure such as childcare centers that improves women entrepreneurs time and production constraints, will increase their general participation in the labor market as entrepreneurs, since there is reduced time use on care giving activities.

Potential Negative Impacts/Risks and Mitigation measures

Negative impacts/risks (general) at the planning and implementation stage
Impact: Likelihood of excluding certain categories of potential beneficiaries during selection like women with disability and poorer women, or other vulnerable and disadvantaged individuals or groups. Component 1 of the project aims at supporting access to finance through the creation of and linkages to financial services for women. Failure to have clear screening and selection criteria could lead to exclusion of other categories of potential beneficiaries in the process; like women with disability and poorer women or other vulnerable and disadvantaged PAPs.

Impact mitigation: The PITs should develop criteria for screening and selection of beneficiaries for financing that are clear, inclusive and acceptable by key stakeholders. Regional balance should be considered during the selection of beneficiaries including intensive publicity of the project through accessible channels to ensure full participation of the target group. Service providers will also be recruited to provide capacity building on social inclusion to all relevant stakeholders.

Impact: Likelihood of excluding certain categories of potential beneficiaries (women) with low literacy levels. Component 2, aims at supporting the human capital and social capital development through provision of skills development (technical, life-skills, digital), business advisory services, platforms that facilitate market linkages, and value chain development. However, failure to take into account the general low literacy levels among women could lead to a number of women potential beneficiaries being excluded.

Impact mitigation: The PIT will ensure that appropriate programs and a detailed inclusive selection criteria are put in place will ensure no one is excluded in the process.

Construction phase impacts/risks for component 2 and component 3
The project will support activities under Components 2 and 3 that are likely to generate environmental health and safety risks and impacts. Component 2 will provide funds to women to transition from micro to small enterprises, and from small to medium enterprises, which could result in small-scale civil works, while Component 3 will finance demand driven enabling infrastructure and facilities including childcare facilities, common production facilities (e.g. milling, pasteurization, storage, cooling, printing, and packaging), upgraded input and craft markets and trading centers as well as water, electricity, and digital access points. Key risks and impacts associated with these activities, that will largely occur during the construction phase, include the following;

Impact: Construction noise and vibrations. Construction noise and vibrations may result from exposure to construction and transport vehicles. This will affect the workers and the nearby communities. Given the sacle of the activities, these impacts are expected to be minimal.

Impact mitigation: The PIT will ensure that the contractors and service providers adopt best practices in line with General EHSGs;

The PIT should esnure that a risk hazard analysis and mitigation plan, proportionate to the risks identified, is developed and included in the subproject ESMPs.

Impact: Dust emission. Dust generated/emitted by connstruction and transport vehicles and from materials storage areas is likely to affect the communities and construction workers.

Impact mitigation: The PIT should ensure that contractors water construction areas to suppress dust;

Regular vehicle and truck maintenance should be emphasized (by the PIT) to control dust;

Travel speeds past roadside markets should be safely low to avoid dust plumes;

The PIT should ensure that construction workers are provided with appropriate PPEs;

Ensure proper storage and management of materials on site.

Impact: Solid waste accumulation. Activities at the construction and/or rehabilitation sites under component 2 and 3 are likely to result into accumulation of waste which could present nuisance conditions and cause pollution of the nearby areas. Due to the nature and relatively low scale of the activities, the risks and impacts related to waste accumulation and pollution will however, be minor, temporary, and confined to the area immediately surrounding the construction.

Impact mitigation: The MGLSD and PSFU PITs should develop a WMP as part of the site-specific ESMPs, for each subproject;

PIT should ensure that measures and actions to manage waste and hazardous materials, are developed and implemented;

PIT should ensure adequate training and provision of waste management procedures are incorporated into the subproject ESMPs;

PIT should ensure that the sub-projects submit statements of compliance with Environmental and Social Standards, including management of waste and hazardous materials, if any.

Impact: Occupational health and safety risks (OHS). The project presents occupational health and safety risks that may arise from the construction and equipping of public facilities. These may include Injuries resulting from cuts, falls, etc., electrocution, dust, noise and body vibration from machinery/equipment.

Impact mitigation: The PIT should ensure that Health, Safety, and Environmental (HSE) plans are developed as part of the subproject ESMPs, in line with World Bank Group General Environment, Health, and Safety (EHS) Guidelines;

PIT should ensure that all workers are provided with requisite protective gear i.e. gloves, gumboots, overalls, muffs.

Impact: Poor Labour and working conditions. The project will involve direct workers, contracted workers, and primary supply workers. These are likely to be subjected to poor labour and working conditions including; lack of employment contracts, summary dismissals, lack of proper gender-sensitive sanitary facilities, lack of meals and drinking water and, child labour, sexual exploitation and abuse/sexual harassment (SEA/SH), and exclusion of vulnerable and disadvantaged individuals or groups from employment opportunities.

Impact mitigation: PIT should ensure that the project will adheres to Uganda's Labor Laws and the Bank's standards concerning labor conditions and Occupational Health and Safety (OHS), including child labor;

Prepare, adopt and implement the Labor Management Procedures (LMP) for the Project, including, 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), non-discrimination, forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. The PIT will ensure that contractors adopt and implement LMP prior to engaging project workers;

The project LMP will also outline a workers' GRM.

The standards explained in the LMP will also be included in site-specific ESMPs. These plans will include procedures on investigation and reporting of incidences and non-conformances, emergency preparedness and response procedures, and continuous training and awareness to workers;

Project Consultants/contracted staff shall be managed in accordance with Contract terms and conditions. Contract terms and conditions shall be assessed for their compliance with the project labor management procedures;

PIT will ensure that all contractors for civil works prepare Labor Management Plans acceptable to the Client and the Bank prior to carrying out any civil works or other project activities.

Impact: Community health and safety. During the construction phase, the communities may be exposed to construction and transport vehicles, dust emissions, noise, and potential construction site and material handling-related accidents. Adverse social impacts such as gender-based violence (GBV), sexual exploitation, and the transmission of communicable diseases such as HIV/AIDS on affected communities may also occur because of project activities. The country has been hit by the COVID-19 pandemic which is affecting the entire country and spread to both urban and rural communities. This might affect project activities, which requires the project activities to apply the relevant disease preventive measures provided for by Ministry of Health (MoH) and World Health Organization (WHO).

Impact mitigation: The MGLSD and PSFU PITs should prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project, including but not limited to, behavior of Project workers, potential risks of labor influx, including the transmission of HIV/AIDS, COVID-19 and other communicable diseases, response to emergency situations, and include these measures in the ESMPs to be prepared in accordance with ESMF, in a manner acceptable to the Bank;

PIT should ensure that GBV and SEA/SH mitigation measures are reflected in relevant ESMPs before the preparation of the procurement documents. These measures will include but not be limited to, signing of enforceable Codes of Conduct by workers, establishment of referral pathways with support from the MGLSD's/PSFU GBV Specialist, sensitization activities for workers/communities by relevant Service providers and consultant staff, etc.

PIT should develop Traffic and road safety measures and actions in accordance with the Public Service Standing Orders on Fleet Management, PIU Policies and the Traffic and Road Safety Act prior to effectiveness of project sub-component works;

PIT should ensure that measures to manage traffic and road safety risks are incorporated in site-specific ESMPs.

Impact: Physical and/ or economic resettlement Significant physical and economic displacement is not anticipated under the project since the public facilities to be constructed under Component 3 will be located on local government/district land. However, some activities under Component 3 especially those associated with last mile and household level gaps may require land to be acquired or restrictions on land use which may result in loss of crops, trees or structures on a temporary or permanent basis.

Impact Mitigation: In the event that any land will be required outside of government lands a Resettlement Policy Framework (RPF) has been developed to clarify resettlement principles, organizational arrangements and compensation which will be provided to affected PAPs. Resettlement Action Plans proportionate to potential risks and impacts will be developed for subproject. Project activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and approved by the Bank. Special attention during the development of the RAPs should be paid to the current national social-economic dynamics (Vulnerable population – women, Indigenous People, Persons with Disability (PWDs). ***Impact:*** **Destruction of critical or sensitive natural habitats. Given the nature and scope of the project activities, there is minimal impact envisaged on the biodiversity, since the proposed projects are likely to be undertaken in the urban settings where the habitats may already be altered or destroyed.**

Impact mitigation: This ESMF provides guidance on screening and mitigation measures to ensure that project activities do not alter or cause the destruction of any critical or sensitive natural habitats;

For any facilities to be established in virgin areas, however, potential impacts on biodiversity (flora and Fauna) will be assessed, and proposed mitigation measures included in the ESMPs.

Impact: Adverse effects on vulnerable and marginalized groups (VMGs). Communities, which meet the conditions of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (SSHUTLC) under ESS7, are present in the country and might be affected by project activities. They are considered vulnerable and disadvantaged in Uganda and include the Batwa, Ik, Tepeth and Benet.

Impact mitigation: Project activities are not anticipated to cause relocation or impact resources or cultural heritage of vulnerable and marginalized groups;

A Vulnerable and Marginalized Group Framework (VMGF) has been prepared by project's appraisal to provide guidelines on how to avoid adverse impacts of the project on these communities and ensure their access to services and potentially participation and access to other project benefits;

PIT should ensure that Vulnerable and Marginalized Groups Plans (VMGP) are developed for subprojects likely to impact these groups.

The SEF includes provisions for consultation with the Batwa, Ik, Tepeth and Benet communities which is provided for under ESS10.

Impact: Destruction of cultural heritage sites/physical-cultural resources (PCRs). As the project will finance some limited civil works, some excavation and movement of earth can be expected. The activities to be financed by the project are small scale and very limited in scope and the potential impact on known and unknown physical and cultural resources is likely to be minimal.

Impact mitigation: At this stage in project preparation, the presence of culturally significant sites associated with the project cannot be determined. The project will avoid impacts on cultural heritage and where such avoidance is not possible, will identify and implement measures to address these impacts in accordance with the mitigation hierarchy;

A chance find procedure has been included in this ESMF and will be included in subsequent ESMPs.

Negative impacts/risks at the operations stage

Impact: Solid waste accumulation. Disposal of solid waste from the facilities operations is likely to be a challenge to the beneficiaries and/or users of those facilities.

Impact mitigation: For facilities that will start operations during the tenure of the PIT, the PIT should ensure that the facilities continue to adhere to/implement the WMP included in the site-specific ESMPs;

At the expiry of the tenure of the PITs and after full hand-over of the facilities, the local government structures at the districts and cities should support the beneficiaries to dispose of waste from the facilities e.g. the cities have gazetted waste disposal areas and trucks for transporting the waste which they can use to transport waste from the facilities.

After the handover of the facilities, the relevant local government structures at the district and city levels should continue to offer trainings to the beneficiaries in waste management based on waste management procedures are incorporated into the subproject ESMPs.

Impact: OHS aspects during the operation of equipment. Occupational health and safety risks that may arise during operation of the equipment include Injuries resulting from cuts, burns, electrocution etc.

Impact mitigation: For facilities that will start operations during the tenure of the PIT, the PIT should ensure that the facilities continue to adhere to/implement the Health, Safety, and Environmental (HSE) plans are developed as part of the subproject ESMPs;

At the expiry of the tenure of the PITs and after full hand-over of the facilities, the local government structures at the districts and cities especially the Senior Labour Officers should conduct OHS inspections and support the beneficiaries with refresher OHS trainings.

Impact: Child abuse including molestation. Since some of the facilities will be childcare centres, there is the risk of children being mistreated by the care takers or bigger children who access the facilities.

Impact mitigation: The PIT should ensure that the facilities continue to adhere to GBV and SEA/SH mitigation measures reflected in the subproject ESMPs;

The PIT should sensitise the women (beneficiaries) about the potential and dangers of such incidents.

The PIT should ensure that the facilities implement a child protection policy. After handover of the facilities and expiry of the tenure of the PIT, this role should be played by the respective local government structures especially the Community Development Officers and Community Liaison Officers of the Uganda Police;

Have restrictions on age limits for children who are allowed into the facilities.

1. INTRODUCTION

1.1 Background

The Government of Uganda, through the Ministry of Gender, Labour and Social Development (MGLSD) is in the process of securing funds from the World Bank for the proposed Generating Growth Opportunities for Women (GROW) Uganda Project. The GROW Project will support the country's efforts to provide increased access to finance for women's enterprises; build business and digital skills; enhance women's social networking, provide opportunities for relevant exposure and mentorship. Furthermore, the project will address social norms and negative cultural practices that constrain women's economic empowerment. This is in line with Uganda's Vision 2040; "a transformed Ugandan society from a peasant to a modern and prosperous Country". The project will build on earlier World Bank interventions in the social sector and it is estimated to run for a period of five (5) years.

In order to aid various stakeholders to identify and effectively manage potential environmental and social risks and impacts of the proposed project during implementation; environmental and social due diligence instruments have to be prepared in accordance with international good practice as well as the World Bank ESF and Government of Uganda (GoU) requirements.

The Environmental and Social Management Framework (ESMF) has been developed in tandem with a Stakeholder Engagement Framework (SEF), and the Vulnerable and Marginalized Group's Framework (VMGF) and the Resettlement Policy Framework (RPF) as a set of due diligence instruments required to address and manage the environmental and social risks and impacts associated with the GROW Project. The framework has been prepared to meet the Government of Uganda's and the World Bank's Environmental and Social requirements and will be disclosed as part of the project appraisal process. MGLSD, PSFU, MUBS and the various other service providers will be responsible for implementing the provisions and recommendations outlined in the outlined in the ESMF.

This ESMF has been prepared in compliance with the ESF established by the funding agency, the World Bank (WB), as well as by the Government of Uganda's environmental and social management legal provisions which stipulate that funding of development plans and programs shall be subject to prior assessment and the mitigation of potential environmental and social effects of planned projects.

The proposed GROW Project

The Government of Uganda, through the Ministry of Gender, Labour and Social Development (MGLSD) is in the process of securing funds from the World Bank for the proposed Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project. The GROW Project will support the country's efforts to provide increased access to finance for women's enterprises; build business and digital skills; enhance women's social networking, provide opportunities for relevant exposure and mentorship. Furthermore, the project will address social norms and negative cultural practices that constrain women's economic empowerment. This is in line with Uganda's Vision 2040; "a transformed Ugandan society from a peasant to a modern and prosperous Country". The project will build on earlier World Bank interventions in the social sector and it is estimated to run for a period of five (5) years.

Women in Entrepreneurship

Women in Ugandan have performed fairly well in entrepreneurship compared to other African and Arab countries. The rate of growth in the number of women-owned enterprises had outpaced that of male owned by 1.5 times by 2014 (Women's Entrepreneurship Development in Uganda, ILO, 2014). The

Census of Business Establishments Report, UBOS 2011 indicate that 44% of businesses with fixed premises in Uganda are owned by females. The Mastercard Global Index, 2019 also reveals that one in three (33.8 %) of all businesses in Uganda are owned by women—the highest rate in the Middle East and Africa regions. This indicates that there is an opportunity of tapping into women entrepreneurship as a vanguard for socioeconomic transformation of the country.

Constraints to Women Economic Empowerment and Entrepreneurship

Much as many Ugandan women start businesses, most businesses are started out of necessity rather than opportunity (Women's Entrepreneurship Development in Uganda, ILO 2014). These enterprises are constrained by many barriers some of which are discussed below.

Access to finance is a critical constraint to self-employed women for financing start-ups, development and growth of their enterprises. The credit services are gender insensitive to take care of the special barriers and constraints women face in the financial market. This challenge is worse for women entrepreneurs who want to grow their enterprises from micro into small medium firms. The GoU flagship programs focusing on micro-entrepreneurship in the informal sector, and targeting women and female (and male) youth include the Youth Livelihood Program (YLP) and Uganda Women Entrepreneurship Programme (UWEP), which provides training and interest-free credit, based on a revolving fund model to groups of women entrepreneurs. However, UWEP has been providing support to micro entrepreneurs who are not supported to transition to medium enterprises. The government's Livelihoods Support Program within the Bank-financed Northern Uganda Social Action Fund (NUSAF) supported the formation of self-help groups with important results in economic empowerment. While the project does not target women exclusively, women make up more than half of beneficiaries. The self-help groups strengthened livelihoods and connections to markets, with spill over effects on household conflict management and decision making. Furthermore, women entrepreneurs often have less access to social networks that would enable them to move into more profitable markets and sectors. Throughout a firm's life, the diversity of networks can impact an entrepreneur's access to credit, learning about new market opportunities and acquiring the skills needed to successfully operate the business. The quality of women's networks can have strong impacts on the information and exposure women have regarding business opportunities. A study[1] of women entrepreneurs in Uganda finds that women's exposure to male role models and knowledge of earnings across different sectors play critical roles in enabling some women to cross over into more profitable male-dominated sectors.

Social norms also exert a strong influence over the strategic choices of women economic participation. This influence can be direct (for example, expectation that "women do not work as mechanics") or indirect (for example, "women are responsible for childcare"), both of which may lead women to choose sectors and scale of business that are compatible with domestic tasks rather than choosing on the basis of where the best opportunities are (World Bank 2019. Profiting from Parity: Unlocking the Potential of Women's Business in Africa. Washington DC). Gender norms are also apparent in intra-household decision-making, impeding women's ability to invest profits in their businesses, because their hard-won earnings are diverted to other household and extended family needs. Experience from the Uganda Skills Development Project indicates that economic empowerment of women through skilling sometimes attracts GBV from male spouses, which adversely affects the survival and thriving of women-owned enterprises.

[1] Campos et al. 2015. "Breaking the Metal Ceiling Female Entrepreneurs Who Succeed in Male-Dominated Sectors." Policy Research Working Paper 7503. December)

Women often enter entrepreneurship without the education or skills to succeed. Over sixty-eight percent (68.4%) of women in employment in Uganda lack a trade, technical skills, or a specialization (National Labour Force Survey 2016/17, UBOS, 2018).

Lack of access to digital technologies is also a constraint on women's economic activity. In Uganda, only 44 % of women-owned enterprises could use a phone at any time compared to 62 % of men enterprises (Uganda Communications Communication 2015 Survey on access & usage of ICT).

Basic economic and social infrastructure is another constraint affecting women entrepreneurship, including absence of shared production infrastructure and child-care facilities which presents challenges for women entrepreneurs at their enterprises or during trainings.

The COVID-19 pandemic has exacerbated unemployment with 57% job losses. More than 2 million of the lost jobs were formal jobs in the services sector, with close to 1.6 million of the affected workers employed by small firms of 5-49 employees. In addition, 62.2% of female managed firms laid off workers due to the financial constraints posed by the pandemic compared to 56.8% in male managed firms. The pandemic has also exacerbated labour productivity, with 35 % decline. The labour productivity of female managed firms reduced by 44.4% compared to 31.1% for male managed firms (Rapid assessment of impact of COVID-19 on Labour, Employment and Productivity, MGLSD 2021).

There is a risk of a "lost generation" as economic pressures could push girls into early marriage/motherhood instead of the labour market. Now is the time to support the school-to-work transition, enhance access to credit and skill-building, and work toward more inclusive workplaces. Another dimension of risks faced by school going children, especially girls is the risk of being withdrawn from school or attending school irregularly in order to support family enterprises or to take up domestic chores while the mothers manage their enterprises.

1.2 Objective of this ESMF

Key objectives of the ESMF are to:

Provide a framework for integration of social and environmental aspects at all stages of project planning, design, execution and operation;

Enhance positive social and environmental impacts of the project and avoid/minimize potential adverse impacts;

Enhance capacity building, knowledge and awareness for environmental and social risk management for all project stakeholders;

Make environment information available to stakeholders and the public to foster consensus and project ownership or collective responsibility for socio-environment actions.

In line with environmental requirements of Government of Uganda (GoU) and the World Bank' Environmental and Social Framework (ESF), the ESMF shall be applied to the project components. The ESMF provides guidance for identifying potential environmental and social impacts during project planning, design and implementation and outlines management measures required to address them. Appropriate institutional arrangements for implementing the ESMF and capacity building needs have also been provided in the ESMF. Aspects related to compensation and resettlement are provided for under a Resettlement Policy Framework (RPF) for the Project.

1.3 Methodology used to prepare the ESMF

The ESMF was prepared by a joint team from the Ministry of Gender, Labour and Social Development (MGLSD) with support from the Private Sector Foundation, in line with good international practice, the World Bank Environment and Social Framework, and the National Environment Act of 2019 and other applicable policies, laws and regulations." The ESMF was prepared based on the following methodology

- Document review
- Consultations with key stakeholders
- Meetings and workshops

1.3.1 Document review

In the process of preparing the ESMF, a number of documents were reviewed. The key documents that were consulted included the Project Appraisal Document (PAD), the Environmental and Social Review Summary (ESRS), the Environmental and Social Commitment Plan (ESCP) and the project's other ESF instruments (SEF, RPF and the VMGF). Other documents consulted were; Uganda's Vision 2040, the National Development Plan (NDPIII), newspaper articles, the Ministry of Gender, Labour and Social Development (MGLSD) Ministerial Policy Statement (MPS), the implementation reports of the Skills Development Facility which is Component 3 of the World Bank Funded Uganda Skills Development Project, World Bank Report on GBV within refugee hosting districts, 2020 Other documents reviewed were the World Bank Environmental and Social Framework (ESF), international conventions ratified by Uganda, the Constitution of the Republic of Uganda and other relevant policies and laws. GBV Referral Path, National Action Plan II on Child Labour were reviewed and analysed to ascertain trends and recommendations made for safe and effective implementation of the GROW Project. Other World bank reports reviewed were; World Bank Managing Risks of Adverse Impacts on Communities from temporary projects induced influx (2016); Good Practice Note addressing Gender Based Violence in Investment Projects, Financing involving Major Civil Works (2018); Working together to prevent sexual exploitation and abuse; Recommendations for World Bank Investment Projects (2017). Reports and guidelines from Development Partners such as UNDP, UNDP, UN Women and the United Nations High Commission for Refugees (UNHCR) were also reviewed.

1.3.2 Consultations with key stakeholders

Key Stakeholder Interviews and focus group discussions were held to obtain views from the different stakeholders regarding the proposed project. Stakeholder undertaken in February 2022 by the joint technical team representing the MGLSD and PSFU. Based on this, a Stakeholder consultation plan was developed. During the stakeholder consultation engagements, the background and objectives of the GROW Project were presented to the stakeholders and their concerns and clarifications about the project were addressed. These mainly related to aspects to do with; the project design, benefits, potential risks and mitigation measures**.**

The focus group discussions (FDGs) were used for special categories of community members such as women, older persons, women living with chronic conditions, female youth, ethnic minorities and other VMGs, while the interviews were mostly used in formal settings such as government offices and with local leaders. Some focus group discussions were also held with district and sub county technical planning committees as well as Parish development committees.

These interviews were conducted with key stakeholders from the following entities: MDAs like Ministry of Tourism Wildlife and Antiquities, Ministry of Lands, Housing and Urban Development, Ministry of Gender, Labour and Social Development, Ministry of Water and Environment, Various Local Governments, Development Partners, Private Sector, Civil Society Organisations, Women Organisations,

Faith Based Organisations (FBOs), Religious and Cultural Organisations, Organisations of people with disability. Other stakeholders included: Uganda Wildlife Authority (UWA) and the National Forestry Authority (NFA), in the event that some sub projects may be within or close to protected areas. VMGs such as ethnic minorities, refugees and the disabled will also be consulted.

1.3.3 ESMF preparation meetings and workshops

Under the coordination of the MGLSD, several meetings that included personnel from MGLSD and the World Bank safeguards team were held to plan, draft or review the ESMF for the Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project. These were held in the period between December 2021 and February 2022.

1.3.4 Relation of the ESMF to other Safeguards Instruments/Documents

This ESMF will not be implemented in isolation. It will be complemented by/used together with other environmental and social safeguards instruments for the GROW project which include; the Resettlement Policy Framework (RPF), Stakeholder Engagement Framework (SEF) and the Vulnerable and Marginalized Group's Framework (VMGF).

2. PROJECT DESCRIPTION

2.1 Project Development Objective and Indicators

The Project Development Objective (PDO) is to increase access to services that enable female entrepreneurs to increase the social and economic impact of their enterprises in targeted locations, including host and refugee communities. The key performance indicators related to this objective are:

Increasing access to services for women entrepreneurs

- Number of female entrepreneurs who complete the core female entrepreneur course, disaggregated by district and refugee status.
- Number of micro and small enterprises accessing loan finance from formal financial institutions under the project, disaggregated by district and refugee status of firm owner (CRI).

Enabling the growth of women-owned small and micro-enterprises in Uganda

- Number of jobs of enterprises benefiting from the project, disaggregated by gender, district, and refugee status (CRI).
- Number of enterprises benefiting from the project that transition from informal to formal, disaggregated by district and refugee status.

Women entrepreneurs increase the economic and social impact of their enterprises

- Number of direct beneficiaries of enterprises supported by the project, disaggregated by district and refugee status.
- Percentage of women benefiting from the project who state their economic situation has improved due to the project, disaggregated by district and refugee status.
- Percentage of direct beneficiaries of enterprises supported by the project stating that their involvement in decision-making over household expenditures has increased, disaggregated by district and refugee status.

2.2 Description of Project Components

The project consists of four components that together constitute a comprehensive package of customized support for empowering female entrepreneurs to grow and transition their enterprises from micro to small and from small to medium. Component 1 will provide enterprise development services for women through training (technical, life-skills, digital), business advisory services, and enhanced networks for women through platforms that facilitate market linkages and value chain development and seek to change negative social norms that prevent women from engaging business activities. Component 2 will facilitate access to finance for women entrepreneurs to transition from micro enterprises to small and medium enterprises. This component will address the key constraint of access to larger scale finance for women entrepreneurs to expand their business. Component 3 will support investments in enabling infrastructure and facilities including common-user facilities and childcare facilities to ensure that women have access to economic and social infrastructure. Component 4 will support project management, policy innovation, and evidence generation. These components will include host communities and have specialized activities that address the specific needs of women entrepreneurs that are refugees and that are from refugee hosting community locations. Brief details about the project components are presented below:

Component 1: Support for Women Empowerment and Enterprise Development Services

This component will focus on supporting enterprise development services and increasing access to social and business networks. The component will (a) expand access to tailored packages of personal and enterprise development support for women's business growth, with a tailored module for refugee needs (b) expand access to mentorship, social and business networks, and (c) tackle social norms constraining women's economic participation and productivity through mind-set trainings for women and men, sessions on social norms and engagements with men and wider community. The support will be integrated for refugees and host community members and underpinned by principles of Green, Inclusive, Resilient Development (GRID).

This component has four subcomponents, Subcomponent A would support the mobilization of women entrepreneurs through support to existing and new women platforms and identification of the beneficiaries of the project. Subcomponent B supports a "core course" required of all women entrepreneurs choosing to participate in GROW. Subcomponent. The subcomponent C will focus on support for trade/sector specific skills trainings. The subcomponent D would support a "Women Entrepreneurship Workplace Placement Program".

Component 2: Access to Finance for Women Entrepreneurs

This component will support access to finance for women entrepreneurs to transition from micro enterprises to small and medium enterprises. This component will address the key constraint of access to larger scale finance for women entrepreneurs to expand their business. Currently few commercial financial institutions (FIs), such as Banks, and micro-finance institutions (MFIs) offer women specific financing products. Women entrepreneurs can mostly obtain small scale financing ($1,000 – 3,500) from banks and MFIs. Together with Component 1, the component will simultaneously address the demand and supply side constraints accessing finance (see context section above). Specifically, Component 1 will invest in the "investment readiness" of women entrepreneurs and Component 2 the capacity of financial sectors to serve women entrepreneurs as well as incentivize credit provision through matching grants linked to lending from participating financial institutions (PFIs). In doing so, GROW will address the existing market constraints that are particularly pronounced in RHDs and have impeded women entrepreneurs from expanding their operations and achieving more resilient businesses. **This component has three subcomponents,** Subcomponent 2A will support women entrepreneurs with grants to expand innovative or high impact interventions. The business plan competition will seek business plans from high-potential women entrepreneurs interested in expanding their enterprises with ventures that have the potential to create jobs especially for women and youth, focus on social enterprises such as childcare facilities etc. The objective of this activity will be to support financing of those businesses that usually would not be financed through credit from financial institutions and to incentivize expansion in these non-traditional areas.

Subcomponent 2B will support women entrepreneurs, including refugees and women entrepreneurs from host communities, to meet the capital needs for business expansion and growth. The subcomponent will adopt an innovative approach to enable the target beneficiaries to access the credit they need to expand their enterprises. It involves the project providing a complementary grant that leverages PFIs to provide the credit component from their existing capital as well as relevant credit lines. During the initial phase, the project will focus on the matching grant scheme while exploring options to establish a line of credit or fund that would enable financial institutions to secure the long-term sustainability of the mechanism.

Subcomponent C will address the supply side systemic constraints that financial institutions participating in the project face in meeting the financing needs of female entrepreneurs. The funding for the activities under this subcomponent will be provided to PFIs as part of their contracts for implementing subcomponent 2B, with the PFIs being required to specify the capacity and system investments they would make as part of the competitive selection process.

Component 3: Enabling Infrastructure and Facilities for Women Enterprise Growth and Transition

Component 3 finances investments in infrastructure and facilities that address constraints women face in expanding and growing their micro, small and medium enterprises. Studies from Uganda, Sub-Saharan Africa, and around the world conclude that access to skills, enterprise development and credit services are not in themselves sufficient for women to grow and improve the performance of their enterprise.[2] In addition, women need access to basic infrastructure and facilities that enable them to reduce the time they spend on household production tasks, such as cooking, cleaning and childcare, and increase the time they spend on market work including growing and increasing the productivity of their business.[3] The type of infrastructure investments that can change the nature of home production include childcare facilities, safe transportation, markets.[4] The component will also strengthen women's voices and leadership in local government planning processes. In RHDs, this component will build on the value-chain analyses and market information captured by DRDIP and, through MGLSD's MoU with DRDIP, will support priority infrastructure that will support women entrepreneur's needs. **This component has two subcomponents,** subcomponent 3A will support women entrepreneurs in collaboration with local governments, existing entrepreneur associations and UIA to identify opportunities to invest in multi-purpose service and production facilities that align with the Uganda Investment Authority's (UIA) regional industrial parks. These multi-purpose facilities will integrate multiple services that support women to access skilling, business development, and production related services including workspaces for women micro, small, and medium enterprises, ICT and digital access facilities, multi-purpose meeting and training rooms, and relevant production facilities. It will also integrate breastfeeding, childcare, and GBV response facilities that women entrepreneurs will be able to access when they use the facilities for training, business development, skilling, and other activities.

Subcomponent 3B is about enabling access to gender inclusive workplace infrastructure. GROW will adopt a workplace approach to upgrading existing facilities that are close to their enterprise premises or

[2] Suresh de Mel, David McKenzie and Christopher Woodruff (2009), 'Are Women More Credit Constrained? Experimental Evidence on Gender and Microenterprise Returns' American Economic Journal: Applied Economics' 1 (3), pp. 1-32; World Bank (2012) *World Development Report 2012: Gender Equality and Development*. World Bank: Washington D.C.; Solene Delacourt and Anne Fitzpatrick (2021), 'Childcare Matters: Female Business Owners and the Baby-Profit Gap', *Management Science* 67 (7), pp 4455-4474;

[3] Taryn Dinkelman and L. Rachel Ngai (2022), 'Time Use and Gender in Africa in Times of Structural Transformation'*, Journal of Economic Perspectives* 36 (1), pp. 57-80.

[4] As noted above, social norms also about women's home and market work also restrict women from re-allocating time from home work to market work. These social constraints are tackled in Component 1 above. Women are also at risk of gender-based violence (GBV) if they do not conduct household work, further constraining their ability to re-allocate time to growing their business. See Oxfam (2018), *Gender Roles and the Care Economy in Ugandan Households: The Case of Kaabong, Kabale and Kampala Districts*, p 48.

regularly utilized as part of their business activities. As detailed in Box 3, this will include markets, schools, skill centers, and common user production facilities. This will ensure the facilities are as close as possible to the enterprises of the target beneficiaries that enable them to spend more time on growing their enterprises. The subcomponent will target increasing access to gender inclusive facilities for 150,000 women entrepreneurs (including refugees and host community members whose number will be determined at a later stage before project commencement). The project will support women entrepreneurs to establish a social enterprise to operate the facility that serves a group of women entrepreneurs that either live in close proximately or share a common facility, such as a market.

Component 4: Project Management Support, Policy Innovation, and Evidence Generation

The objective of this component is to strengthen the capacity of government institutions to deliver a coordinated and high-quality package of "wrap around support" to the targeted beneficiaries as well as to tackle policy constraints that impede women's economic empowerment. It consists of two subcomponents: (a) project management support for high-quality implementation; and (b) policy innovation and evidence generation.

Subcomponent 4A: Project management support for high-quality implementation. The objective of this subcomponent is to enhance the capacity of national, district, and community institutions to implement the project. This includes financing of Project Support Teams (PSTs) at the key implementing agencies (MGLSD, PSFU, and MLG) as well as financing capacity building activities. The capacity building activities will include (a) orientation and sensitization of district, sub-county, parish-level and refugee settlement stakeholders; (b) formation and orientation of technical and implementation support teams at district and sub-county/settlement levels; (c) capacity building of the national, district, sub-county, parish, refugee settlement and implementation support teams; and (d) development of key partnerships including the holding of quarterly review meetings for all stakeholders involved in the project at the regional and district levels.

Subcomponent 4B: Policy innovation and evidence generation. The objective of this subcomponent is to implement a learning agenda for the project as well as generate evidence that will underpin dialogue and reforms on creating an enabling policy environment for female entrepreneurship and women's economic empowerment (WEE). This will include financing of additional data collection efforts (beyond the information gathered through the project's management information system and digital delivery platforms), analysis and publication of data from project and non-project datasets on female entrepreneurship, climate resilience and WEE, establishment of a data portal, and research workshops and policy forums on female entrepreneurship and WEE. In addition, the learning agenda could also include the design and implementation of innovative pilot activities within the GROW project to test what works to address the key gender constraints faced by the beneficiaries targeted under the project. This work will be designed and conducted in collaboration with the World Bank's Africa Gender Innovation Lab (AFRGIL) as well as other local research institutes and development partners. The team will hold a research workshop to explore the possibility of including a rigorous impact evaluation of a program component or one or more of the pilot interventions. The impact evaluation (IE) will complement the information gathered through regular monitoring and evaluation (M&E) activities. The research design of the IE will establish a causal link between the program and any key outcomes of interest to help provide rigorous evidence of the program's impact.

2.3 Project Beneficiaries

The GROW Project beneficiaries will include: **The primary beneficiaries of the project are the women and their enterprises that receive direct support under the project.** The project aims to reach about 30,000 female owned enterprises (including refugee owned business) and about 185,000 women entrepreneurs (including refugees and host community members) with a package of assistance, including access to finance, training, business support services, and childcare among others. It aims to support micro enterprises transitioning to small and small enterprises transitioning to medium. In addition, the Bank team will ensure that GROW does not duplicate the support envisaged under the Bank-financed project, INVITE, which also aims to support small and medium enterprises. The GROW project implementation will support complementarity by linking women entrepreneurs to the INVITE-financed credit lines after they have transitioned and grown from micro to small and small to medium.

- **Under component 1:** The project aims to support about 5,000 women entrepreneur platforms targeting nearly 150,000 women entrepreneurs with networking and leadership support, GBV sessions, and a training course on core business skills, climate change, and green jobs. In addition, under this component about 20,000 women enterprises will receive trade-specific skills training, benefiting nearly 60,000 women (these women will be both the enterprise owners as well as women employed by the enterprise). This includes an estimated 600 platforms in RHC districts benefiting approximately 13,320 women entrepreneurs in RHC districts.

- **Under Component 2:** The project aims to support 25,000 women micro enterprises to transition to small enterprises with bridging finance. The project aims to support 3,000 women small enterprises to transition to medium enterprises with bridge finance. This includes approximately 2,200 micro enterprises and 110 small enterprises in RHC districts.

- **Under Component 3:** The project aims to support 55,360 women entrepreneurs and employees (direct beneficiaries) as well as 3.8 million local citizens (indirect beneficiaries) with access to climate resilient and adaptive infrastructure and facilities. The project aims to support 42,000 female direct and 2.5 million indirect beneficiaries with access to local infrastructure and facilities (subcomponent 3.A) and 13,360 female direct and 1.3 million indirect beneficiaries with access to regional facilities. This includes an estimated 6,600 women entrepreneurs and employees as well as 456,00 indirect beneficiaries (men and women) in RHDs.

Table 1: Categorization of Enterprises Based on Size and Turnover

Micro enterprise	Fewer than 5 workers and annual turnover of less than UGX 10 million (less than US$2,810)
Small enterprise	Having 5–49 workers and annual turnover of UGX 10-100 million (US$2,810 – US$28,100)
Medium enterprise	Having 50–100 workers and annual turnover of UGX 100-360 million (US$28,100 – US$101,100)
Large enterprise	Having more than 100 workers and annual turnover of more than UGX 400 million (US$112,360)

The project will operate nationwide, including in the Kampala district. The distribution of project funds across regions will be determined based on more in-depth mapping of the women enterprises and the value chain analyses that are planned. Sector selection will be based on the outcome of the value chain

analyses and on growth prospects for women enterprises in a given sector as well as opportunities for moving into greener jobs and sectors. However, a negative list of sectors linked to environment and social standards will be developed to ensure there are no safeguard issues during project implementation. Beneficiaries of the project will be selected through criteria yet to be agreed. These may include (a) having a bank account; (b) being formally registered; (c) evidence of filing tax returns (for the transition from small to medium enterprises); (d) having focus on annual revenue performance over the course of the year, rather than at just one point; and (e) having a business plan for expansion, including the perspective of current and future climate risks, impacts, and opportunities for supporting women's movement into greener jobs and sectors.

The project will also support women in addressing GBV and the institutions that serve them through sessions with women entrepreneurs who are part of the platforms. The platforms will include support to adolescent girls' transition from school to work. The project will also benefit the families of the women who receive support and the communities in which they live by raising women's incomes benefiting about 650,000 individuals.

3. POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

In this section the Uganda policies, legal, regulatory and institutional frameworks for environmental and social management are discussed, and also the World Bank Environmental and Social Framework (ESF) are discussed.). The frameworks reviewed were as summarised in the **Figure 1** below.

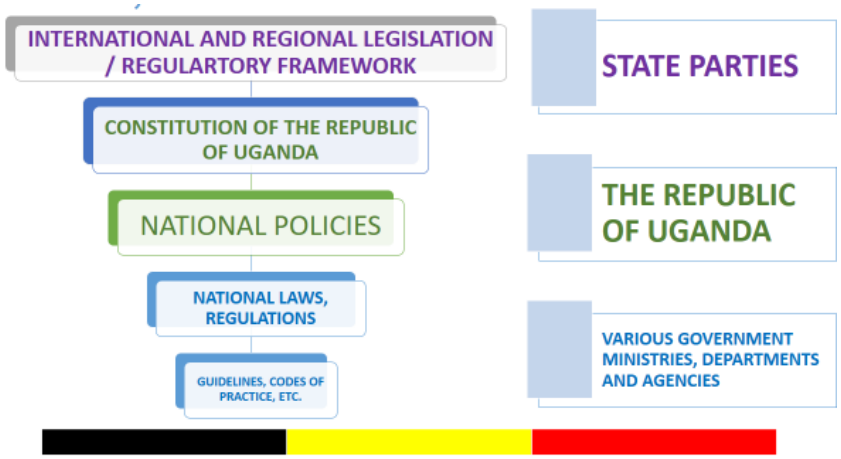


Figure 1 - Legislative Framework In Uganda's Context

3.1 Relevant Policy Framework

The relevant policy framework to the GROW Project are discussed in **Table 2** below

Table 2: Relevant Policy Framework

Policy	Goal/Aim	Relevance to the GROW Project
The Uganda Vision 2040	The goal is to foster socio-economic transformation from a subsistence-based economy to an industrialized one.	This vision recognizes the importance of socio-economic transformation. As such, E&S issues are critical to sustainable social economic development. The proposed Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project is in conformity to this vision, as it is designed to ensure that Environmental and social risks and concerns are mitigated.
The Uganda Gender Policy, 2007	The goal of the Policy is to achieve gender equality and women's empowerment as an integral part of Uganda's socio-economic development. One of the policy's objectives is to reduce gender	The GROW Project will especially address aspects of gender inequality in skilling interventions and management of enterprises as provided for under this policy Women should have equal opportunity as

Policy	Goal/Aim	Relevance to the GROW Project
	inequalities so that all women and men, girls and boys, are able to move out of poverty and to achieve improved and sustainable livelihoods. The policy is a guide to all stakeholders in planning, resource allocation, implementation and monitoring and evaluation of programmes with a gender perspective.	men for the available jobs at all levels of the project. The recruitment process will be carried out in conformity with this policy. The GROW Project will contribute to the improvement in female entrepreneurship in distribution of products, and access to finance for equitable access to services and products provided under the project. It will also help in narrowing the gender gap in certain skill and enterprises.
The National HIV/AIDS and the World of Work Policy, 2007	Provides a framework for prevention of further spread of HIV and mitigation of the socio-economic impact of the epidemic within the world of work in Uganda. It provides the principles and a framework for a multi-sectoral response to HIV/AIDS in Uganda's work places.	As required by this policy, it is important that MGLSD and PSFU as the project implementing agencies have adequate measures to mainstream HIV/AIDS into the proposed GROW Project interventions.
The National Employment Policy (2011)	It is aimed at increasing productivity, competitiveness and employability of the labour force, especially the youth and other most vulnerable members of the labour force. It also aims at promoting and protecting the rights and interests of workers in accordance with existing labour laws and fundamental labour standards.	Employment to the GROW Project will be carried out in line with this policy. Furthermore, no child labour will be practiced on the sub projects.
The Uganda National Culture Policy, 2013	The policy was designed to enhance the integration of culture into national development. It is the first comprehensive instrument taking into account the diversity of Ugandan cultures, recognising the need to promote culture and, the need for social inclusion and to respect cultural diversity.	The GROW Project activities could have an impact on both the intangible and tangible cultural heritage aspects, and therefore the necessary cultural resources safeguards would need to be put in place.
The National Child Labour Policy, 2006	This policy is aimed at prohibiting employment of children	Children may be enticed to the sub projects under the GROW Project in search of employment opportunities. The PITs will ensure child labour is not engaged by any of the project implementing agencies, partners or Service providers.

Policy	Goal/Aim	Relevance to the GROW Project
The Older Persons Policy, 2009	The policy guarantee older persons a dignified life	The policy recognises that people reaching old age should continue enjoying dignified lives through active participation in economic, culture and political spheres.
The Uganda National Community Development Policy	The policy aims at enhancing participation and community ownership of government initiatives	Adherence to this policy shall ensure sustainable economic development of Uganda
The Uganda National Youth Policy, 2001	This policy aims at enhancing the economic contribution of youth to development	Adherence to this policy shall ensure that youth, especially female youth are not left out of the GROW project interventions.
The Persons with Disability Policy, 2006	This policy aims at promoting the rights of persons with disabilities	The rights of PWDs shall be upheld throughout the project components and entire project life
The National Equal Opportunities Policy, 2006	This policy developed under Article 21 of the Constitution of Uganda aims at ensuring equal access to opportunities and prohibits discrimination of any kind.	Opportunities under the GROW project shall target all categories of persons, with affirmative action given to vulnerable persons.
The National Social Protection Policy, 2015	This policy addresses the fact that social protection is a pre-requisite for social development.	Social protection directly reduces poverty, supports excluded citizens in access to services and provides foundation for productive lives. The GROW project shall address these aspects through its interventions.
The National Land Policy, 2013	The goal of the policy is to ensure efficient, equitable and sustainable utilization and management of Uganda's land and land-based resources for poverty reduction, wealth creation and overall socio-economic development.	The policy addresses the need to mitigate the impacts of investments (such as those that may be attributed to GROW Project) on land and other natural resources to deliver equitable and sustainable development; and protect the land rights of citizens in light of such investments, including the rights of vulnerable groups.
The National Land Use Policy, 2011	The aim of the policy is to: "achieve sustainable and equitable socio-economic development through optimal land management and utilization"	The implementation of some GROW Project sub projects may entail restrictions on the use of the land and this will be carried out in conformity with this policy

Policy	Goal/Aim	Relevance to the GROW Project
The National Environment Management Policy, 1994	It provides for sustainable economic and social development, through a number of strategies that include Environmental Assessments.	Aspects of Environmental and Social Risk Assessment and Management have been integrated into the project with the objective of ensuring sustainability in the project interventions.
The National Water Policy, 1999	This policy aims to manage and develop the water resources of Uganda in an integrated and sustainable manner. The water policy requires an integration of the water and hydrological cycle concerns in all development programs	The policy applies to the sub projects under the GROW Project that may involve undertaken close to the water sources, posing risk of contamination or destruction of the community water sources. Implementation of GROW Project components will be done in conformity with this policy.
The Climate Change Policy 2013	The Climate Change Policy 2013 promotes harmonized and coordinated approach towards a climate resilient and lo carbon development for sustainable development. It promotes conservation of water, forests, wildlife and fisheries in climate change adaptation and mitigation measures	The GROW Project will promote reduction of negative environmental impacts and hence promote the green jobs and technologies. GROW Project will be implemented in conformity with this policy.
Forestry Policy, 2001	The Goal of the Policy is to ensure an integrated forest sector that achieves sustainable increase in the economic, social and environmental benefits from forests and trees by all the people of Uganda, especially the poor and vulnerable.	Some enterprises / sub projects may encroach on forests and such protected fragile eco systems, hence this project shall uphold the provisions of this policy.
National Wetlands policy, 1995	The policy promotes the protection of Uganda's wetlands in order to sustain their ecological and social economic functions.	The GROW Project shall ensure that all sub projects uphold the principals of this Policy.
The National Action Plan on Gender Based Violence (GBV)	Findings on the National Situation Gender Based Violence Analysis (2010) revealed that, Uganda has much Gender Based Violence which afflicts both females and males. The findings further indicated that, GBV issues in Uganda originate from institutionalized male dominance as opposed to female subordination, leading to unequal power distribution in the home and the society	Both males and females need to be given opportunities during planning and implementation, to ensure that no or minimum impacts arises due to Project implementation.

Policy	Goal/Aim	Relevance to the GROW Project
	plus resultant GBV violations based on male dominance and male superiority tendencies.	

3.2 Relevant Legislative Framework

The key legislative framework relevant to the planning and implementation of GROW Project is presented in **Table 3** below.

Table 3: Legislative Framework Relevant to the GROW Project

Legislation	Objective/goal	Relevance to the GROW PROJECT
The Constitution of the Republic of Uganda, 1995 – As amended	This is the supreme law of the country and it among other things, calls upon the Government of Uganda to promote sustainable development and public awareness of the need to manage, promote and protect the rational use of natural resources, in a balanced and sustainable manner for present and future generations.	The GROW Project ESMF outlines the mechanisms for Environmental and Social Risk Assessment and mitigation measures to ensure that the project is in compliance with constitutional obligations.
Employment Act, 2006 and its associated regulations - Sexual Harassment Regulations, 2012, Employment (Employment of Children) Regulation	Provides for the recruitment, contracting, deployment, remuneration, management and compensation of workers. Section 32 of the Act prohibits employment of children under 12 years. A child of 12-14 years can only be employed for light work under supervision of an adult and not during school hours. The Act also prohibits employment or work, which is injurious to a child's health, dangerous, hazardous or otherwise unsuitable.	Labour conditions and relations during the implementation of GROW Project will be governed by the employment Act. In accordance with the Act and World Bank ESS2, GROW Project implementing partners shall ensure that children below the legal age requirement are not employed. Even underemployment for light works that are possible under the sub project, beneficiaries shall ensure that children do not work beyond permitted working hours and for a permitted time period. The most important consideration is that any piece of work should not jeopardize the health and wellbeing of a child. It is worth noting that there is no conflict between the Employment Act and ESS2. Both emphasize that work should not jeopardize the health, education, and morals of a child. The sub projects shall be implemented in line with this Act to ensure that every employer with more than 25 workers has a Sexual Harassment Policy, workers are given written employment particulars with clear terms and conditions, are protected from Sexual

Legislation	Objective/goal	Relevance to the GROW PROJECT
		harassment, etc.
The Occupational Safety and Health Act, 2006 and its associated regulations	This Act consolidates, harmonises and updates the law relating to occupational safety and health. Section III of the Act provides for duties, obligations and responsibilities of employers. Section VI of the Act provides for duties, rights and responsibilities of workers.	Potential hazards associated with the activities of some sub projects under the GROW project may jeopardise the safety and well-being of workers and project host communities. Therefore, project implementing agencies, project beneficiaries and workers will have a duty to uphold safety and health standards in the work place and the communities in which they operate. It shall be ensured that the equipment and technologies brought into the country comply with the desired safety and health standards.
Other Labour Laws; Labour Arbitration and Settlement Act as Amended, 2020, The labour Unions Act, 2006	These acts provide for the right to associate, collective bargaining, mediating, reconciliation and arbitration of labour disputes; monitoring compliance with the labour standards.	The principals stipulated in these labour laws shall be upheld throughout the project and within all its sub projects.
The National Social Security Fund Act, Cap 222	This law provides for membership payments of contributions and payment of benefits out of the fund to contributing members. It caters for all employees between the age of sixteen years and fifty five years of age.	The principals stipulated in this Act shall be upheld throughout the project and within all its sub projects. Enterprise shall be encouraged to save for its employees
The Persons with Disability Act, 2020	The Act upholds the constitutional right of freedom of persons with disability. It provides for the promotion of all fundamental and human rights.	The GROW Project shall have affirmative action for Women with Disabilities to ensure that they equitably access the available opportunities.

Legislation	Objective/goal	Relevance to the GROW PROJECT
Domestic Violence Act, 2010 and its associated regulations	This Act addresses domestic violence, in the context of any attack against someone. It provides for the protection and relief of victims of domestic violence, as well as punishment of perpetrators. It gives the procedures to be followed in the protection and compensation of victims of domestic violence.	The procedures outlined in this Act shall be followed to prevent domestic violence and to address any cases that may arise in that regard.
Penal Code Act, 120	This Act makes provisions on defilement and Rape. This makes defilement and Rape criminal offences and prescribes punishments.	The project shall ensure that there are no acts of defilement and rape associated with the project and its sub projects.
The HIV/AIDS Prevention and Control Act, 2014	This Act makes provisions for prevention and control by public and private institutions. It provides for the prevention of stigma and discrimination.	The GROW Project shall ensure that in the process of its implementation does not expose anyone to HIV infection. Stigma and discrimination shall be avoided in the project and sub projects.
Institution of Traditional or Cultural Leaders Act, 2011	This Act operationalises Article 246 of Uganda's Constitution on the institution of traditional and cultural leaders.	Traditional and cultural leaders shall be considered as key stakeholders to ensure that traditions and cultures of Uganda are positively upheld.
Equal Opportunities Commissions Act, 2007	This Act establishes the EOC to effect and ensure that Article 32 (3) of Uganda's Constitution is upheld.	The provisions of this Act shall be considered and applied in allocation of resources under the GROW project and its sub projects. Thus the project shall promote equity and social inclusion.
The Children (Amendment) Act, 2016	Provides for the rights and protection of children. It sets the minimum age for employment (in light, non-hazardous work) at sixteen years of age.	The provisions of this Act shall be upheld to ensure that children's health, welfare and education are not negatively impacted by the GROW project and its sub projects.
The Land Acquisition Act, Cap 226	The Act spells out modalities that the Government has to follow for purposes of compulsory acquisition of land for public use whether for temporary or permanent use	Acquisition and restrictions on the use of land by the host communities of the GROW Project will be carried out within the provisions of the Land Acquisition Act. The guidelines in the Resettlement Policy Framework (RPF) shall be closely adhered to during the lifetime of GROW Project.

Legislation	Objective/goal	Relevance to the GROW PROJECT
The National Environment Act, 2019 and its associated regulations.	The objectives of the Act include: to provide for the management of the environment for sustainable development; to provide for strategic environmental and social assessment; and to address emerging environmental management issues, among others	The Act through its respective Regulations addresses projects and sub projects that may be subjected to environmental and social assessments. This to a large extent depends on the nature and scale of the projects and subprojects. Also worth noting is that hazardous and non-hazardous waste may be generated from sub project activities. The waste will have to be addressed in line with the National (Waste Management) regulations of 1999.
The Public Health Act, Cap 281	The objective is to provide local authorities with administrative powers to take all lawful, necessary and reasonable measures to prevent the occurrence of, or deal with, any outbreak or prevalence of any infectious, communicable or preventable disease and to safeguard and promote public health.	The GROW Project Implementing Agencies shall put in place measures to protect the public's health during project implementation. Of particular significance is the issue of transmission of the COVID-19 pandemic in addition to other communicable diseases.
The Workers Compensation Act, Cap 225	This law provides for compensation to be paid to workers (or their dependents) for injuries suffered and scheduled diseases incurred in the course of their employment.	Workers that are injured or ill due to employment during the implementation of the GROW Project, will need to be compensated in line with this Act.
The Water Act, Cap 152	This law provides for the management of water resources and the protection of the water supply. It regulates public and private activities that may influence the quality and quantity of water available for use and establishes the Water Policy Committee to maintain an action plan for water management and administration. It gives general rights to use water for domestic use, firefighting or irrigating a subsistence garden. A permit is required to use water for constructing or operating any works.	Water may need to be abstracted for use in some of the sub project activities and so such use will be governed by the provisions of this Act.
The Local Government Act, 1997	This Act provides for the decentralised governance and devolution of central government functions, powers and services to local governments that have their own political and administrative set-ups.	The respective district local governments in the host project districts will be consulted and involved in the implementation and monitoring of the sub projects within their areas.

Legislation	Objective/goal	Relevance to the GROW PROJECT
The Historical Monuments Act, Cap 46	The main goal of the reservation and protection of historical monuments and objects of archaeological, paleontological, ethnographical and traditional interest. It requires that any person who discovers any portable object in the course of an excavation shall surrender such objects to the Minister who shall deposit them in the museum.	Archaeological, paleontological, ethnographical, traditional and historical monuments may be discovered as part of project construction activities and particularly where excavation work is involved. These shall be handled in line with the provisions of this Act.
The Uganda Wildlife Act, 2019	The main goal of the Act is the conservation and sustainable management of wildlife. The Act defines and regulates activities that are undertaken in conservation areas and those that involve the utilisation of wildlife or wildlife products, or that impact on wildlife or a wildlife conservation area	There is a possibility that GROW project activities might be undertaken in areas within and around protected areas although efforts will be made to avoid this scenario. Nevertheless, the provisions of the Wildlife Act will be followed to ensure that the activities of these sub projects, communities, refugee settlements and public institutions that are within and around such protected areas such as wildlife and forest reserves are in accordance with the legal requirements.
The National Forestry and Tree Planting Act, 2003	The objective of this policy is to foster Conservation, sustainable management and development of forests for the benefit of the people of Uganda	Some sub projects of the GROW Project may directly affect forests, which will require getting permits especially where gazetted forests (Central or Local Forest reserves, Community or Private Forests) are encroached upon. In non-gazetted forests, project implementation teams will negotiate with the owner(s) on the most appropriate means of restoration or compensation.
The Refugee Act, 2006	The Act provides for the legal standards and protection of Refugees in Uganda	Some sub projects of the GROW Project may be undertaken close to or within the refugee settlements and their host communities. Because of their vulnerable status, refugees will be deliberately targeted through this project.
Employment Act 2006	This Act spells out general principles regarding forced labor, discrimination in employment, sexual harassment and provisions to settle grievances. It further provides that, a child under the age of twelve years shall not be employed in any business, undertaking or workplace. The Project implementers are required to not	This Act will regulate labour conditions for the project activities both during its implementation and operation

Legislation	Objective/goal	Relevance to the GROW PROJECT
	engage any child workers at the Project site during the Project lifecycle and to also ensure that there is no forced labour under the Project.	

3.3 International Conventions, Treaties ratified by the Government of Uganda (GoU)

The key international conventions and treaties ratified by GoU that are applicable to the planning, implementation and monitoring of the GROW Project are discussed in **Table 4** below.

Table 4: Key International Conventions and Treaties Ratified by GoU that are Applicable to the GROW Project

Convention/treaty	Objective/Aim	Relevance to GROW Project
Convention on Elimination of all forms of Discrimination Against Women (CEDAW) 1979	This Conventions advocates for the rights of women everywhere, including their economic rights	The GROW project will contribute to the realisation of the economic rights of women.
Convention on the Rights of Persons With Disabilities, 2006	This Conventions advocates for the rights of Persons With Disabilities, including the right to participate in economic activities and processes at all levels.	The GROW project will ensure that women with disabilities are effectively mainstreamed in the activities covered under the project.
International Covenant on Economic Social and Cultural Rights, 1976	This Convention provides for the right to social and economic rights including right to work, right to social security, right to cultural identity, right to health and education, etc.	The GROW project shall address the economic rights of women including their rights at the workplace.
UN Convention on the Rights of a Child,1990	This Convention highlights the fundamental rights of a child – it protects the child from child labour, promotes their right to health and education. It also refers to the rights of children in decision making.	The GROW Project shall uphold the provisions of this Convention in promoting the rights of children and protecting children from abuse.
Convention on Biological Diversity, 1992	The three main goals of the convention are conservation of biodiversity; sustainable use of biodiversity; and fair and equitable sharing of the benefits arising from the use of genetic resources.	Some subprojects under the GROW project may be implemented in protected areas. The PIT will use the screening form provided in this ESMF to screen off and avoid funding such subprojects. Where avoidance will not be possible, the PIT will ensure that the subprojects sign MOUs with the

Convention/treaty	Objective/Aim	Relevance to GROW Project
		relevant authorities such as the UWA, NFA etc.
Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)	This convention seeks to ensure that international trade in species of wild fauna and flora does not threaten their survival in the wilderness.	Subprojects that undermine CITES will not be funded under the GROW project. These will be screened off/out using the screening form provided in this ESMF.
Convention on Wetlands (Ramsar, Iran, 1971)	The Convention on Wetlands of International Importance, called the Ramsar Convention, is an intergovernmental treaty that provides the framework for national action and international cooperation for the conservation and wise use of wetlands and their resources.	Subprojects that are located in wetlands that are protected under the Ramsar convention will not be funded under the GROW project. They will be eliminated at the screening stage using the screening form provided in this ESMF.
The African Convention on the Conservation of Nature and Natural Resources, 1968	Encourage conservation, utilization and development of soil, water, flora and fauna for the present and future welfare of mankind, from an economic, nutritional, scientific, educational, cultural and aesthetic point of view.	The PIT will ensure that adequate provisions are made in the subproject ESMPs to ensure compliance with this convention.
The World Heritage Convention, 1972	The primary mission of the Convention is to identify and protect the world's natural and cultural heritage considered to be of Outstanding Universal Value.	Destruction of cultural heritage sites is not expected under the GROW project. However, in case of any chance finds, a chance finds procedure has been included in this ESMF under annexes.
The Stockholm Declaration, 1972	The objective of the declaration is to coordinate global efforts to promote sustainability and safeguard the natural environment.	The declaration will be relevant in the management of environmental and social risks of GROW Project.
Bonn Convention, 1979	The objective of the Bonn Convention is the conservation of migratory species worldwide.	The GROW Project in line with this convention will be mindful of the effects of its sub projects that may be located along migratory routes.
East African Community Protocol on Environment and Natural Resources, 2006	The objective of this protocol is to provide for EAC joint effort to co-operate in efficient and sustainable use and management of natural resources and promote adaptation to climate change.	The protocol will be relevant in promoting efficiency and sustainable use and management of the natural resources in a way that promotes adaptation to climate change.
The Nile Basin Cooperation Framework Agreement, 2010	Objective of the agreement is to achieve sustainable socioeconomic development through the equitable utilization of, and benefit from, the common Nile Basin water resources.	The PIT will ensure that subprojects under GROW comply with this treaty/agreement. Provisions will be made in the subproject ESMPs.

Convention/treaty	Objective/Aim	Relevance to GROW Project
OAU Convention, 1969	Specifies the aspects of the Refugee problem in Africa. Who a refugee is, who is excluded from international protection, when refugee status ceases, the rights of refugees, their obligations and administrative matters.	The convention will be relevant for the sub projects under rural communities, refugee and host communities.
The Paris Agreement	The Paris Agreement requires all countries both developed and developing to make significant commitments to address climate change through decreasing global warming described in article 2 of UNFCCC.	Some sub projects under the GROW Project will be critical for reversing the effects of climate change. Examples are tree nursery establishment projects and production of alternative sources of energy for cooking such as briquettes.
The various ILO Conventions on; Labour Inspection (C81), 1947[; Equal Remuneration (C100), 1951; Asbestos (C162), 1986; Fundamental principles and Right at Work; Freedom of association and effective recognition of the right to Collective Bargaining; Elimination of Discrimination in respect of Employment and Occupation	Uganda has ratified 30 of 119 ILO Conventions. The Conventions address the rights of workers in various sectors and economic activities.	To ensure compliance with the ILO conventions, a Labour Management Plan (LMP) will be developed. Provisions on labour management will also be included in the subproject ESMPs.

The various ILO Conventions Consulted included:

1. ILO Convention Labour Inspection (C81), 1947
2. ILO Convention labour Inspection in Agriculture (129)
3. ILO Convention on Equal Remuneration (C100), 1951
4. ILO Asbestos Convention (C162), 1986
5. Fundamental principles and Right at Work Conventions
6. Freedom of association and effective recognition of the right to Collective Bargaining
7. Elimination of all forms of Forced or Compulsory Labour
8. Elimination of all forms worst forms of Child Labour, 1999
9. Effective abolition of Child labour
10. Elimination of Discrimination in respect of Employment and Occupation-

Other relevant Regional Treaties Consulted:

1. African Charter on Human and people's Rights, 2009
2. Maputo Protocol on the Rights of Women in Africa, 2003
3. African Charter on the Rights and Welfare of the Child, 1999

4. East African Community treaty, 1999
5. East African Common Market Protocol, 2010 and the Free Movement of Persons Regulations

3.4 World Bank's Environmental and Social Standards Applicable to GROW PROJECT and Risk Classification

In October 2018, the World Bank launched ten (10) Environmental and Social Standards (ESS) designed to help ensure that programs proposed for Bank Financing are environmentally and socially sustainable, and thus improve decision-making. **Table 5** below outlines the ESS and their application to the Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project.

Table 5: World Bank Environmental and Social Standards Applicable to the GROW Project

S.N	Environmental and Social Standard	Objectives	Applicable?		Reason
			Y	N	
1	**ESS1: Assessment and Management of Environmental and Social Risks and Impacts**	i. To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs. ii. To adopt a mitigation hierarchy approach. iii. To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project. iv. To utilize national environmental and social Institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate. v. To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.	Y		i. The project will support activities under Components 2 and 3 that are likely to generate environmental health and safety risks and impacts. Component 2 will provide funds to women to transition from micro to small enterprises, and from small to medium enterprises, which could result in small-scale civil works, while Component 3 will finance demand driven enabling infrastructure and facilities including childcare facilities, common production facilities (e.g. milling, pasteurization, storage, cooling, printing, and packaging), upgraded input and craft markets and trading centers as well as water, electricity, and digital access points. While all the activities are expected to carry relatively moderate E&S impacts due to the limited scope of the works, there are inherent risks such as those related to ESHS, labor issues, GBV/SEA risk is anticipated arising from construction works to be undertaken under component 3 at existing government facilities, social exclusion, and inadequate stakeholder engagement and a

					security risk in some parts of the country. ii. In short term, the project activities may be affected by the ongoing COVID-19 pandemic, which requires the project activities to apply the relevant disease preventive measures. iii. Component 4 covers Project Management, Policy Innovation, and Evidence Generation and details of activities for each of these aspects shall undergo an E&S scoping .
2	**ESS2: Labor and Working Conditions**	i. To promote safety and health at work. ii. To promote the fair treatment, non-discrimination and equal opportunity of project workers. iii. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. iv. To prevent the use of all forms of forced labor and child labor. v. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. vi. To provide project workers with accessible means to raise workplace concerns.	Y		i. The project will involve direct workers, contracted workers, and primary supply workers. All labor will likely be locally hired. The project will adhere to Uganda's Labor Laws and the Bank's standards concerning labor conditions and Occupational Health and Safety (OHS), including child labor. Requirements will be noted in the LMP. The project presents occupational health and safety risks that may arise from the construction and equipping of public facilities. To ensure the health and safety of workers during the construction and operational phases of the project, the Borrower has developed a Health, Safety, and Environmental (HSE) plan as part of the ESMF, in line with World Bank Group General Environment, Health, and Safety (EHS) Guidelines. ii. The project LMP will also outlines a workers' GRM. The standards explained in the LMP will also be included in site-specific ESMPs. These plans will include procedures on

					investigation and reporting of incidences and non-conformances, emergency preparedness and response procedures, and continuous training and awareness to workers.
3	**ESS3: Resource Efficiency and Pollution Prevention and Management**	i. To promote the sustainable use of resources, including energy, water and raw materials. ii. To avoid or minimise adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. iii. To avoid or minimize project-related emissions of short and long-lived climate pollutants. iv. To avoid or minimize generation of hazardous and non-hazardous waste. v. To minimize and manage the risks and impacts associated with pesticide use.	Y		i. Due to the nature and relatively low scale of the activities, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction. These risks include the normal impacts of civil works (i.e., generation of solid waste, dust and noise generation, air emissions from vehicles, soil erosion, pollution from construction wastes, and water use) and in instances where fumigation is conducted for the disinfection of COVID-19 this could pose a risk to environment and population depending on the disinfectants being used. ii. The implementation of mitigation measures, which are proposed in this ESMF and ESMPs (including those proposed in WB General Environmental and Health Safety Guidelines (EHSGs)) such as dust suppression where applicable and vehicle and truck maintenance shall be applied to minimize the impact of air emissions during construction/rehabilitation, and residual impacts are expected to be limited in scope and duration. iii. The noise generated from the use of construction machinery and truck movements is expected to be short-term. iv. During the operational phase,

					depending on the nature of support and enterprises developed, there could be the generation of wastes and chemicals. Adequate training and provision of waste management procedures have been incorporated into the project ESMF. Waste Management Plans will be developed as part of the ESMPs.
4	**ESS4: Community Health and Safety**	i. To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances. ii. To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams. iii. To avoid or minimise community exposure to project-related traffic and road safety risks, diseases and hazardous materials. iv. To have in place effective measures to address emergency events. v. To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risksto the project-affected communities.	Y		i. During the construction phase, the communities may be exposed to construction and transport vehicles, dust emissions, noise, and potential construction site and material handling-related accidents. The risks are expected to be avoided and/or mitigated through adopting best practices in line with General EHSGs. A risk hazard analysis and mitigation plan, proportionate to the risks identified, will be developed and included in the site specific ESMPs. ii. Adverse social impacts such as gender-based violence (GBV), sexual exploitation, and the transmission of communicable diseases such as HIV/AIDS on affected communities may also occur because of project activities. The country has been hit by the COVID-19 pandemic which is affecting the entire country and spread to both urban and rural communities. This might affect project activities, which requires the project activities to apply the relevant disease preventive measures provided for by Ministry of Health and World Health Organization. The client will be required to comply with the community health and safety requirements as stipulated in WBG EHS guidelines.

					iii. The potential risks and mitigation measures for impacts on beneficiaries have been analyzed in this ESMF and will be detailed in site-specific ESMPs.
5	**ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**	i. To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives. ii. To avoid forced eviction iii. To mitigate unavoidable adverse social and economic impacts from land acquisition or iv. Restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. v. To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure vi. To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.	Y		i. Physical and economic displacement is not anticipated under the project since the public facilities to be constructed under Component 3 will be located on local government/district land. ii. A Resettlement Policy Framework (RPF) has been developed to clarify resettlement principles, organizational arrangements, and design criteria to be applied to sub-projects or project components to be prepared during project implementation. Once the sub-project or individual project components are defined and the necessary information becomes available, the framework will be expanded into a specific plan proportionate to potential risks and impacts. Project activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and approved by the Bank. iii. Special attention during the development of the RAPs should be paid to the current national social-economic dynamics, World Bank Environment and Social Standard ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.

		vii. To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.			
6	**ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources**	i. To protect and conserve biodiversity and habitats. ii. To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. iii. To promote the sustainable management of living natural resources. iv. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	Y		i. Given the nature and scope of the project activities, there is minimal impact envisaged on the biodiversity, since the proposed projects are likely to be undertaken in the urban settings where the habitats may already be altered or destroyed. ii. For any facilities to be established in virgin areas, however, potential impacts on biodiversity (flora and Fauna) will be assessed, and proposed mitigation measures included in the ESMPs. This ESMF provides guidance on screening and mitigation measures to ensure that project activities do not alter or cause the destruction of any critical or sensitive natural habitats.
7	**ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**	i. To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ii. To avoid adverse impacts of projects on Indigenous Peoples or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.	Y		Communities, which meet the conditions of SSHUTLC under ESS7, are present in the country and might be affected by project activities. - They are considered vulnerable and disadvantaged in Uganda and as such, a Vulnerable and Marginalized Group Framework (VMGF) has been prepared by project's appraisal to provide guidelines on how to avoid adverse impacts of the project on these communities and ensure their access to services and potentially participation and access to other project benefits. Project activities are not anticipated to cause relocation or impact resources or cultural heritage of VMG under

		iii. To promote sustainable development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate and inclusive. iv. To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples affected by a project throughout the project's life cycle. v. To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples in the three circumstances described in this ESS. vi. To recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.			ESS7. The SEF includes provisions for consultation with the VMG communities which is provided for under ESS10.
8	**ESS8: Cultural Heritage**	i. To protect cultural heritage from the adverse impacts of project activities and support its preservation. ii. To address cultural heritage as an integral aspect of sustainable development. iii. To promote meaningful consultation with stakeholders regarding cultural heritage. iv. To promote the equitable sharing of benefits from the use of cultural heritage.	Y		i. As the project will finance some limited civil works, some excavation and movement of earth can be expected. The activities to be financed by the project are small scale and very limited in scope and the potential impact on known and unknown physical and cultural resources is likely to be minimal. ii. At this stage in project preparation, the presence of culturally significant sites associated with the project

					cannot be determined. The project will avoid impacts on cultural heritage and where such avoidance is not possible, will identify and implement measures to address these impacts in accordance with the mitigation hierarchy. iii. A chance find procedure has been included in the ESMF and will be included in subsequent ESMPs.
	ESS9	FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects, and monitor portfolio risk, as appropriate to the nature of intermediated financing.	Y		Develop, maintain, and implement an ESMS to identify, assess, manage, and monitor the environmental and social risks and impacts of [FI subprojects] that receive support from the GROW Project.
10	**ESS10: Stakeholder Engagement and Information Disclosure**	i. To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. ii. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance. iii. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them. iv. To ensure that appropriate project information on environmental and social	Y		i. The project assessment and implementation procedures should promote and allow for meaningful and culturally appropriate consultation and participation, including that of host communities at the different levels, including the right to public information and disclosure. Likewise, ESS 10 recognizes the importance of open and transparent engagements between stakeholders which allows project teams to respond to concerns and grievances raised by affected communities through an established Grievance Redress Mechanism (GRM). ii. A stakeholder Engagement Framework has been developed and a plan shall be developed in addition to consultations already undertaken to date.

		risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. v. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.			

3.5 World Bank Group EHS Guidelines Applicable to GROW Project

The World Bank Group EHS General Guidelines in **Table 6** will apply to the GROW Project

Table 6: World Bank General EHS Guidelines applicable to GROW Project

Applicable Issue from the Guidelines	**Relevance of the Guidelines to GROW Project**
Environmental • Air Emissions and Ambient Air Quality • Energy Conservation • Wastewater and Ambient Water Quality • Water Conservation • Hazardous Materials Management • Waste Management • Noise • Contaminated Land	Some sub projects under component 3 of the GROW Project may generate emissions to air; waste water; noise; or other waste at any stage of the project life-cycle, from construction, operation, to decommissioning phases of the project. As far as possible, these adverse impacts to human health, safety, and the environment from emissions to or pollution of air, land and water shall be avoided, minimized, and controlled, using appropriate measures as prescribed in the sub project specific ESMPs. Some of the beneficiary enterprises or their sub projects may be consuming energy or other resources such as water, as part of their processes, such as motors, pumps, and fans; compressed air systems and heating, ventilation and air conditioning systems (HVAC); and lighting systems. The GROW project will ensure that these energy and water conservation aspects are addressed as per the guidelines.

Applicable Issue from the Guidelines	Relevance of the Guidelines to GROW Project
Occupational Health and Safety • General Facility Design and Operation • Communication and Training • Physical Hazards • Chemical Hazards • Biological Hazards • Radiological Hazards • Personal Protective Equipment (PPE) • Special Hazard	All components and subcomponents of the GROW project will ensure that all reasonable precautions to protect the health and safety of workers are implemented including within the sub projects. Risk assessment shall be undertaken to assess the various hazards (physical, chemical, biological, radiological and other special environment hazards) involved in the activities and appropriate controls shall be instituted. Aspects of training, health and hygiene monitoring, work environment monitoring, etc. shall all be addressed within the project and sub project for the PITs and the service providers. Some OHS specific interventions shall include: • Only allowing trained and certified workers to install, maintain, or repair electrical equipment; • During construction, operation and maintenance, specific training, safety measures, personal safety devices and other precautions should be defined in a health and safety plan • Testing temporary and permanent structures for integrity prior to undertaking work, including safety equipment and working machinery; • Implementation of a fall protection program that includes training in climbing techniques and use of fall protection measures; inspection, maintenance, and replacement of fall protection equipment; and rescue of fall-arrested workers, among others; • Provision of an adequate work-positioning safety device system for workers. • Safety signage shall be installed and other obstructions shall be removed prior to undertaking work.
Community Health and Safety • Water Quality and Availability • Structural Safety of Project Infrastructure • Life and Fire Safety (L&FS) • Traffic Safety • Transport and management of	The GROW Project components and activities shall all be undertaken in line with these guidelines to minimise negative impacts on community health and safety. Aspects to be addressed shall include water quality monitoring, traffic management, health monitoring and emergency preparedness and response. Some of the community health and safety specific interventions shall include: • Hoarding of sites where construction work is being undertaken. • Safety signage shall be installed and other obstructions shall be removed prior to undertaking work; • Extensive public consultation during the planning of the construction works. • Ensure that measures such as speed limits and signs to manage traffic and road safety risks are incorporated in site-specific ESMPs;

Applicable Issue from the Guidelines	Relevance of the Guidelines to GROW Project
Hazardous Materials • Disease Prevention • Emergency Preparedness and Response	Similarly, section-specific guidelines shall be applicable to the specific enterprises undertaking operations such as aquaculture, dairy processing, poultry processing, etc. For each of these, targeted interventions shall be done to ensure community and workers' health and safety.
Construction & decommissioning. • Environment • Occupational Health & Safety • Community Health & Safety	All the above aspects of environmental, Occupational Health & Safety as well as Community Health & Safety shall be adhered to throughout the project and sub project life cycle, from the operational or construction phases to the decommissioning phases.

3.6 Environmental and Social Risk Classification

3.6.1 Environmental Risk Rating

Overall, the project will generate positive outcomes through enhancing women's income, productivity, and household welfare. Notwithstanding, the project will support activities under Components 2 and 3, and to a lesser extent under Components 1 and 4, that are likely to generate environmental health and safety risks and impacts. Component 2 will provide funds to women to transition from micro to small enterprises, and from small to medium enterprises, which could result in small-scale civil works, while Component 3 will finance demand driven enabling infrastructure and facilities *Sub-component 3a (Childcare infrastructure and facilities)* will finance: (a) Childcare infrastructure: the construction, rehabilitation or upgrading of childcare facilities on community, existing school, or government land. (b) Childcare equipment: the provision of equipment for the childcare facilities including books, toys, furniture, digital facilities, etc. (c) Digital access points including financing the provision of equipment for accessing computers, printers, the internet and other digital services and training as required. (d) Childcare training and start-up funding: the provision of business skills training and limited startup funding to help women entrepreneurs establish quality childcare centers (e) Local and community capacity building: provide limited financing for training and capacity building for the local department of education as well as local Women's Councils. *Sub-component 3b (Household and socio-economic infrastructure and technology)* will finance: (a) *Energy:* including sub-projects in (i) off-grid solar systems, (ii) upgrades and rehabilitation of community-level electricity distribution systems, (b) *Water:* including sub-projects in (i) rehabilitation of water supply systems that benefit the household and/or enterprises of women entrepreneurs, such as wells, boreholes, pumps, water tanks, etc. (ii) extension of existing water supply systems (c) *Market and Transport Safety and Access Enhancements*: including: (i) construction or upgrading of marketplaces and stalls; (ii) installation of lighting; (iii) construction of water and toilet

facilities for markets; and (iv) construction of child care facilities (d) *GBV One-Stop-Shop Service Facilities*: give the option for women entrepreneurs and local leaders to construct and/or rehabilitate facilities for delivering integrated GBV services. *(d) Time-saving connections and technology*. small one-off grants ($300) for appliances e.g. energy saving stoves, fridges, household plumbing, and eligible connection costs relating to electricity, water and internet services.

Sub-component 3c (Multi-purpose service and production facilities) will finance: (a)Feasibility assessments: for each candidate location for a multi-purpose facility (b)Multi-purpose facility construction and/or upgrading: finance the design and construction of up to 25 multi-purpose service and production facilities. (c) Multi-purpose equipment and training: finance the provision of equipment for the facility and relevant training. The skills enhancement and training under Components 1 and 4 may also to a lesser extent carry EHS risks and also lead to downstream activities with EHS risks. Key risks and impacts associated with these activities, that will largely occur during the construction phase, include noise, dust emission, solid waste accumulation, occupational health and safety risks (OHS), community health, and safety risks (CHS) during implementation of civil works and later during operation of the project facilities, and the risks of communicable diseases including COVID-19 pandemic. The operation and maintenance of the constructed facilities and also the SMEs may lead to moderate environmental risks and impacts related to OHS and community health and safety aspects during the operation of equipment and disposal of solid waste from the facilities operations. Although the identified risks are localized in nature, of low magnitude, and temporary duration, and the low magnitude of the cumulative risks from the project activities, the overall Environmental Risk rating at this stage is Substantial due to the current low capacity of the MGLSD to manage environmental risk and the wide range of possible subprojects.

3.6.2 Social Risk Rating

The project is designed to contribute to social economic empowerment and generate opportunities for women to grow their micro and small enterprises in targeted districts, including in refugee and host communities. To achieve this the project will carry out several activities that are likely to have social impacts which have been assessed to be Substantial.

Component 1 will provide Support for Women Empowerment and Enterprise Development Services and aims at supporting access to finance through the creation of and linkages to financial services for women. The selection criteria and screening of beneficiaries needs to be clear, inclusive and acceptable to the Bank and beneficiaries to otherwise exclusion of potential beneficiaries can occur including women with disability, Indigenous women, widows, single women, poorer women and all other marginalized and disadvantaged categories of women. Regional balance should also be considered and intensive publicity of the project through accessible channels undertaken to ensure full participation of the target groups.

Component 2: Financial Accelerator Facility for Women Entrepreneurs. This component will support access to finance for women entrepreneurs to transition from micro enterprises to small and medium enterprises. This component will address the key constraint of access to larger scale finance for women entrepreneurs to expand their business. This component needs to take into account the generally low literacy levels among women which could lead to a number of potential women beneficiaries being excluded and SEA/SH risks likely to be faced by women in terms of selection into the program in exchange for inclusion and in the workplace, however provision of appropriate programs and inclusive selection criteria will ensure no one is excluded in the process and documents prescribing processes and

collateral written in local languages. PSFU will be the apex institution for administering the grants and will therefore need to establish the overall ESMS including screening procedures for proposals to be submitted to the PFIs which are to be identified. Risks associated with this process including the capacity of the PFIs to adequately screen for all social risks associated with the proposed activities. As such training and capacity building will be needed on the ESMS with the PFIs who will in turn need to provide support to the entrepreneurs.

Component 3 will support Demand-driven Enabling Infrastructure and Facilities Development for Enterprise Growth and Transition. This will finance the construction of the selected facilities such as processing plants, child-care centers, etc. Sub-component 3b focus is on household and socio-economic infrastructure and technology. This sub-component will support women entrepreneurs in collaboration with their communities and local governments to identify, prioritize and address critical gaps in the provision of household and socio-economic infrastructure that prevent them from growing their micro and small enterprises. The selection process will be demand driven and the types of sub-projects financed will complement strategic sector investments. It will focus on last-mile and household-level gaps that prevent women from accessing these services and effectively utilizing them to reduce the time burden and social constraints of household responsibilities and accessing market alternatives to home production as well as input and product markets relevant to their enterprises and will support activities such as; Increasing access to household electricity including sub-projects investments that would ease food preparation and cleaning workloads as well as improve enterprise production opportunities. Possible investments could include (i) off-grid solar systems, (ii) upgrades and rehabilitation of community-level electricity distribution systems; Increasing access to water for household and enterprise production purposes; Market and Transport Safety and Access Enhancements: Subprojects could include: (i) construction or upgrading of marketplaces and stalls; (ii) installation of lighting for security and extended business hours; (iii) construction of water and toilet facilities for markets; and (iv) construction of child care facilities to encourage women's participation and minimize the problem of child neglect; GBV One-Stop-Shop Service Facilities; Time-saving connections and technology.

Due to the anticipated small scale of these works, the influx of labor into benefiting communities is not expected, thus issues such as SEA/SH and the spread of communicable diseases associated with the presence of workers will be negligible. Due to the community nature of works risk such as working without contracts, child labor, discrimination, and lack of access to GRM. Physical and economic displacement are not expected from the construction activities because they are expected to be carried out in the footprint of land owned by local governments/districts. However, a Resettlement Policy Framework has been developed to provide guidance in the event of any such displacement on any of the infrastructural development works or any other activity. If affected, vulnerable and disadvantaged individuals or groups such as; women with disability, indigenous women, widows, single women, poorer women and all other marginalized categories of women are expected to benefit through the various project's interventions rather than being negatively impacted. A Labour Management Procedure will be included in the Environment and Social Management Framework to guide civil works and minimize any risk associated with labor including influx of labor and SEA among others and a Vulnerable and Marginalize Group Framework will guide project implementation and inclusion of the marginalized categories.

Component 4 finances project management support, policy Innovation, and evidence generation. The project needs to strengthen the social risk management team, by hiring a social development specialist for each PIT who will focus on social risk management of the project and in addition continue to build

capacity of the MGLSD and PSFU teams on efficient and effective management of the social risk to strengthen management of social risk management. However, the MoGLSD has no experience implementing World Bank projects under the ESF and they will require capacity building efforts to equip them to manage social risks. The Ministry is currently under resourced in terms of personnel and funding to manage social risk. As such the social risk rating is substantial.

3.6.3 Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

As described in the social risk section, SEA/SH drivers such as labor influx, presence of large-scale construction workforce etc are expected to be minimal under the project. However, SEA/SH risks may occur associated with increased financial independence or empowerment of women which may cause tensions within households, risk associated with inclusion of women in project benefits; and risks faced by women during training sessions or learning opportunities in component 2. As such, the project includes interventions meant to address other drivers within benefiting communities such as social norms and lack of access to financial resources as well as requirements for participating institutions around SEA/SH prevention and response. The project will also seek to change negative social norms through sessions on preventing and responding to GBV, engaging with men and community leaders, and the like. With the rate of anticipated SEA/SH risk, its risk rating is substantial at this stage.

3.7 Comparison of the World Bank ESS and the National Requirements

Table 7: Comparison of Uganda's National System for handling E&S Risks and World Bank ESF

World Bank ESS provisions	National Legal Instruments provisions	Gaps identified in the two	How the gaps have been addressed (if applicable
ESS 1: Assessment and Management of Environmental & Social Risks and Impacts (requires among others): a) ESIA required for projects risk and impacts, to a level that is proportionate with the risks. b) ESIA must include all standard contents (as specified) including consideration of alternatives and good stakeholder engagement c) ESIA must also consider risks and	Constitution (1995) requires GOU to ensure environmental protection & provides Ugandans a right to clean & healthy environment. National Environment Management Policy (1994) calls for sustainable development that maintains and enhances environmental quality & resources to meet needs of present & future generations. NEA 2019 (section 110-4) requires ESIAs for projects likely to have environmental impacts. Projects needing a full EIA are stipulated in Schedule 5 (substantial to high risk projects) and those requiring Project Briefs are in Schedule 4. Also requires monitoring and audits. The NEA (2019) (section 5.2(j)	ESS1 and National legislation are largely aligned, with both requiring assessment of activities to a level if proportionate to the of risks and impacts. The legislation. Shortcomings however include a lack of a requirements to consider risks and impacts associated with the project´s primary suppliers	GROW project is likely to generate environmental and social risks and impacts. Social risks and impacts may arise from influx of labor for potential employment during refurbishment activities, the risk of spreading HIV/AIDS and COVID-19 among project workers and local communities, potential for gender-based violence (GBV), impact on indigenous peoples and local communities, and inadequate grievance redress mechanism (GRM). These activities

World Bank ESS provisions	National Legal Instruments provisions	Gaps identified in the two	How the gaps have been addressed (if applicable
impacts associated with the project´s primary suppliers	explicitly requires the application of the mitigation hierarchy in ESIAs (avoid, minimize, restore, offsets), Section 49(3) of the NEA requires a proponent to have and implement an "environmental Management System".		detail the need to conduct environmental and social assessment to determine the specific risks and impacts, and measures to mitigate them consequently triggering the ESS1.
ESS 2: Labor and Working Conditions: There must be adequate safety and health at work.	National Industrial Policy 2008 provides strategies for OHS. Workers Compensation Act, 2000 provides for the provision of financial compensation for work related injury or illness. Occupational Safety and Health Act of 2006 consolidates, harmonizes and updates the law relating to occupational safety and health.	There is still no policy to guide its implementation of the Occupational Safety and Health Act (2006). There are conflicts between the mandates in the OSH and the Physical Planning Acts. There is also limited coordination between DOSH, Police, and Ministry of Health on data collection and oversight of OSH compliance in the workplace	The Subprojects to evaluate and include mechanism for assessment, management and coordination of OSH and community safety. The project has followed ESS2 and developed labour management procedures with relevant provisions to bridge the gap.
ESS 3: Pollution Prevention and Resource Efficiency: a) Promote the sustainable use of resources, b) Avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution and emissions from project activities c) Avoid or minimize generation of hazardous and non-hazardous	The Constitution provides for a right to a clean and healthy environment Environment Management Act (1996) Environmental Management (Waste Management and Sanitation) Regulations (2008) NEA 2019, Section 5 (d) includes the principle that there shall be "optimum sustainable yield in the use of renewable natural resources" 2011 EIA Guidelines for water resources related projects assist planners, developers, practitioners safeguarding water resources through EIAs. Public Health Act Cap 281	Lack of air quality standards that have remained in draft form. Pollution remains a significant problem throughout Uganda (air, soil, water and noise). As with most other safeguards, adherence to best practice is relatively good for bank or donor funded projects, and those of stock-exchange listed companies, but poor when it comes to smaller proponents, many government	The project will follow provisions of ESS3 on resource efficiency in its activities to ensure compliance with the requirements. World Bank Group EHS Guidelines will be applied.

World Bank ESS provisions	National Legal Instruments provisions	Gaps identified in the two	How the gaps have been addressed (if applicable
waste d) To minimize and manage the risks and impacts associated with pesticide use	requires every local authority to take measures for preventing any pollution dangerous to public health.	projects and where contractors from some countries are involved.	
ESS 4: Community Health and Safety) Safety, Health, and Environmental issues are included in the Occupational	Occupational Safety and Health Act, No 9 of 2006 and the Workers Compensation Act, No 8 of 2000. Public Health Act Cap 281 requires every local authority to take measures for preventing any pollution dangerous to public health.	Health and safety issues are generally taken care of in World Bank and donor funded projects, but less so otherwise	The project has included identification of community health and safety risks and mitigation measures in its environmental and social screening process and the labour management procedures
ESS 6: Biodiversity Conservation & Sustainable Management of Living Natural Resources: a) To protect and conserve biodiversity and habitats. b) Where biodiversity impacts likely, apply mitigation hierarchy and precautionary approach in project design & implementation c) Promote sustainable management of living natural resources. d) Support livelihoods of local communities, including Indigenous Peoples e) Seek inclusive economic	Policies such as the Wildlife Policy, 2014; Forestry Policy 2001 and legislation right from the Constitution (1995), Environment Management Act (1996) Parks and Wildlife Act (1997), National Biodiversity Strategic Action Plan, provide for biodiversity conservation and the sustainable use of living resources.	Implementation is variable – good in the case of donor or Bank funded projects, but modest to poor otherwise. Even though screening of projects is undertaken by NEMA at an early stage to identify potential biodiverse areas, political interference puts certain natural habitats at risk especially wetlands and forests.	Mitigation hierarchy is explicitly required by the NEA (2019) (section 5.2(j) and further elaborated (section 115) - (avoid, minimize, restore, offsets)

World Bank ESS provisions	National Legal Instruments provisions	Gaps identified in the two	How the gaps have been addressed (if applicable
development that integrates conservation needs and development priorities.			
ESS7-Sub-Saharan African Historically Underserved Traditional Local Communities	There is no legislation, which is equivalent to this ESS7 principle in Ugandan Law. However, Article37 of the Constitution seeks to protect the right of all Ugandans to have their culture and traditions respected. Specifically, the Article enshrines the right to belong to, enjoy, practice, profess, maintain and promote any culture, cultural institution, language, tradition, creed or religion in community with others. The National Land Policy 2013 affirms that the land rights of pastoral communities will be guaranteed and protected by the state, by ensuring that pastoral lands are held, owned and controlled by designated pastoral communities as a common property under customary tenure. The Land Act of 1998 and the National Environment Act protect customary interests in land and traditional uses of forests.	In practice, however, there is no legislation nor institutional arrangements in place to enable this to happen. As such, it is fair to say that while it is not the intention of the Government to exclude traditional local communities, The Ugandan system does not include the necessary provisions to overcome the historical obstacles to such communities enjoying the benefits of the development process.	The ESS7 will prevail during project implementation
ESS8- Cultural Heritage	The Historical Monument Act, Cap 46requires Preservation and protection of historical monuments and objects of archaeological, paleontological, ethnographical and traditional interest. It requires that any person who discovers any portable object in the course of an excavation shall surrender such objects to the Minister who	The Historical Monument Act is in alignment with this ESS	The National legislation will be adopted since it accords with the ESS8

World Bank ESS provisions	National Legal Instruments provisions	Gaps identified in the two	How the gaps have been addressed (if applicable
	shall deposit them in the museum.		
ESS9: Financial Intermediaries: a) Requires setting out how the FI will assess and manage environmental and social risks and impacts associated with the sub-projects it finances. b) Promote good environmental and social management practices in the sub-projects the FI finances; and within the FI.	No specific instruments on Financial intermediaries.	Not assessed	Participating Financial Institutions will be required to establish environmental and social management systems that is appropriate to the nature and scale of activities financed through them.
ESS 10: Stakeholder Engagement & Information Disclosure	When consultations are held, explanations must be given in a form, manner and language understandable to affected people	Gap - There are no explicit provisions for consultations and disclosure	The project has followed ESS5 and developed SEF procedures with relevant provisions to bridge the gap.

3.8 Institutional Framework

The various government institutions have the mandates in relation to environmental and social risks and impacts, including development, implementing and enforcing the laws and policies in relation to environmental and social risk management. NEMA, is mandated by the National Environment Act, 2019 to coordinate management of environment and is responsible for overseeing the environmental and social assessment process. MGLSD is in charge of social related aspects of projects. **Table 8** below summaries the key institutions and their relevance to environmental and social aspects of GROW.

Table 8: Institutions, their Roles, Responsibilities and Relevance to the GROW Project

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the GROW Project
1	Ministry of Gender, Labour and Social Development (MGLSD)	The Ministry through its various departments shall responsible for its mandate of ensuring that good employment policies, good health and safety, cultural	Apart from its overall functions, MGLSD shall undertake oversight role over the project and its sub projects to ensure compliance with E&S national laws and World Bank

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the GROW Project
		and gender practices are upheld in the workplaces and in the communities. In terms of management of environmental and social risks and impacts, the ministry develops, reviews and enforces laws to ensure E&S compliance under all project components and sub projects. These include laws on Occupational Safety and Health, Gender and inclusion, labour and employment, preventing and responding to GBV and child protection.	Standards. It shall also provide accounting to the WB through MoFPED. The MGLSD PIT will ensure smooth implementation of the GROW Project by the various implementing agencies under the project. The PIT unit will ensure that the required instruments for managing E&S risks are prepared and implemented, these include: ESCP, ESMF, RPF, SEF, ESMPs, RAPs VGMF and VGMPs, and LMP. The ESMPs will be prepared once the project locations have been identified but before commencement of implementation of the components. In addition, the human resource unit of MGLSD will oversee the management of social aspects under its jurisdiction such as adherence to labour and working conditions and HIV/AIDS. The ministry shall ensure that the sub projects are implemented in line with the country's labour and employment policies and guidelines; monitoring compensation for occupational injuries and diseases; mediating labour disputes; participating in conflict resolution; monitoring compliance with the labour standards; and ensuring that the equipment and technologies brought into the country comply with the desired safety and health standards. The Ministry will also oversee management of child protection and gender activities to address Violence Against Children (VAC), Sexual Exploitation and Abuse (SEA), Gender

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the GROW Project
			Based Violence risks and impacts.
2	Ministry of Finance, Planning and Economic Development (MoFPED)	The Ministry is responsible for macroeconomic stability, prudent fiscal management, appropriate distribution of Government funds for efficient and effective service delivery, promoting transparent administration in the collection and utilisation of revenues, ensuring appropriate management of revenues as well as assessment and monitoring of impacts that accrue from monitoring the revenues on the economy. To this end, MFPED shall ensure resource allocation towards the main streaming and management of environmental and social risks and impacts under all project components and sub projects.	The Ministry will work closely with the World Bank to implement the bilateral financing modalities of the GROW Project, taking into consideration the E&S aspects of the project components. Ensure that the implementing agencies effect the Environmental and Social Commitment Plan (ESCP) in accordance with the financing agreement of the GROW Project.
3	Private Sector Foundation Uganda (PSFU)	The mandate of the PSFU is to coordinate the private sector and advocate for it to play a pivotal role in the project. In so doing, it shall ensure that management of environmental and social risks and impacts under all project components and sub projects is mainstreamed. PSFU advocates for a sound E&S risk management across the entire private sector in Uganda.	PSFU will be responsible for coordinating with MGLSD PIT and beneficiary stakeholders in implementing the project to ensure compliance with E&S safeguards. PSFU will ensure implementation of activities falling under the PSFU PIT, including sound fiduciary management in compliance with the project financing agreement; Coordinate with MGLSD PIT in Project monitoring and reporting activities; Coordinate the development and implementation of all safeguard documents by the different Sub projects; Ensure timely reporting of the ESHS aspects to the World Bank; Coordinate the grants awards

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the GROW Project
			process under the component; Monitoring and supervising of sub projects to ensure compliance with the agreed environmental and social standards; Handling all environmental, social and other grievances related to the project; Development of checklists for monitoring and auditing the integration of the E&S aspects by the beneficiaries.
5	Office of the Prime Minister (OPM)	The mandate of the office of the prime minister is to instil and maintain efficient and effective systems in government that enable Uganda rapid development of Uganda. In overseeing all government business as well as disaster related activities, including refugee settlements, the OPM shall be expected to mainstream E&S aspects into all its project related activities and interventions.	OPM shall ensure the coordination of government business, in addition to coordinating all aspects that relate to refugee settlements.
6	Ministry of Lands, Housing and Urban Development (MoLHUD)	The MoLHUD is mandated to develop and manage policy and standards relating to land management, housing, and urban development. MoLHUD shall be expected to mainstream E&S aspects into all its project related activities and interventions, particularly those involving land acquisition and resettlement, if any.	MoLHUD will be responsible, where necessary, for giving policy guidance during project planning and implementation, for any beneficiary sub projects. Project implementation for enterprise development and infrastructure development, should take into consideration aspects of spatial planning, with policy guidance from MoLHUD in collaboration with the respective local government authorities.
7	National Environment Management	NEMA is the principal government agency in charge of overseeing environment	Project implementation should be able to take into consideration sustainable environment aspects

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the GROW Project
	Authority (NEMA)	management in Uganda. It delivers its mandate by coordinating, monitoring, regulating and supervising all activities in the field of environment. It collaborates with lead agencies in the execution of this mandate.	such as balancing the built and natural environment, providing for future expansion of the businesses, etc. The project shall ensure compliance to environment requirements including avoidance of degradation, pollution and other such activities. The PIT will ensure the proper management and rational utilisation of environmental resources under the GROW project.
7	Ministry of Health (MoH) - Health Facilities	MoH is mandated to do policy review and development, supervision of health sector activities, formulation and dialogue with health development partners, strategic planning, setting standards and quality assurance, resource mobilisation, advising other Ministries, Departments and Agencies (MDAs) on health-related matters, and ensuring quality, health equity, and fairness in contribution towards the cost of health care. MoH shall be expected to mainstream E&S aspects into all its project related activities and interventions.	The Ministry of health and its health facilities are key actors in the MGLSD GBV referral pathways. MoH will collaborate with the project to provide any necessary services to GBV victims and survivors particularly in emergency and continuing health care such as emergency contraception, post exposure prophylaxis, collecting forensic evidence used in prosecuting GBV cases, counselling, etc. The PIT will ensure that the Health facilities provide any health services that may be required during the implementation of the sub projects.
8	MoES – vocational institutions	The MoES is mandated to provide quality education and sports services in the country, which are constitutional obligations for the Ugandan State and Government. Its mission is "to provide technical support, guide, coordinate, regulate and promote quality education, training and sports to all persons in Uganda for	Schools have been identified among the infrastructure that will be established under the GROW project. The MoES will continue to play its oversight role in the running of such schools irrespective of whether they were existing and simply refurbished or newly established schools. . .

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the GROW Project
		national integration, development and individual advancement." MoES shall be expected to mainstream E&S aspects into all its project related activities and interventions.	

4. BASELINE CONDITIONS

This chapter highlights the baseline of the environmental and social components in the country that may be impacted by the Project. This information is important in monitoring the impact of the project within the project areas if need arises and furthermore, this information is important in informing decisions aimed at reducing or mitigating the current existing issues.

4.1 Project Location

GROW Project will be a nation-wide project and thus, the rationale for selecting project areas will be devised by the respective PITs under its implementation. Marginalised and vulnerable communities or groups including unemployed female youth, older women, disabled women, GBV survivors or those at risk of GBV, refugee women and women in refugee host communities shall be critically looked at. Refugee camps are already known and may be targeted where the project activities are undertaken within their proximity. This will be based on the assessment to determine level of vulnerability of the various communities.

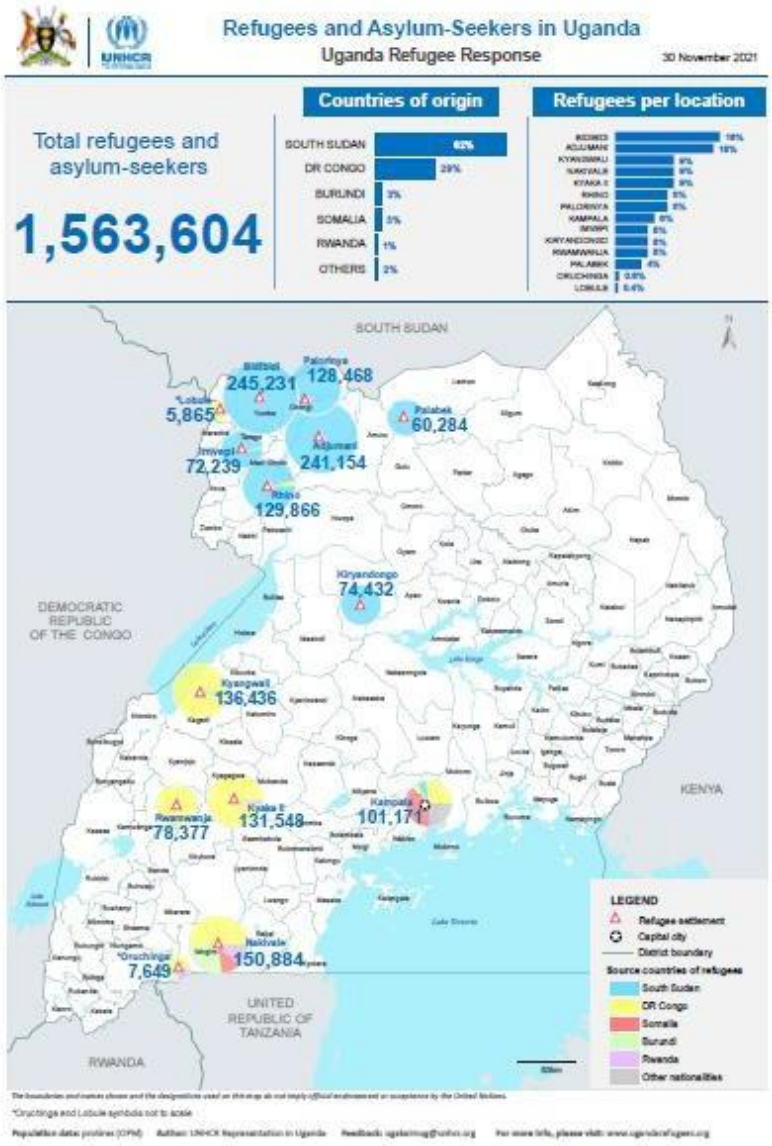


Figure 2: Project Location

4.2 Biological Environment

4.2.1 Forest cover

One of the leading environmental challenges Uganda currently faces is deforestation. Uganda has continued to experience forest loss at an unprecedented scale as indicated by a reduction of forest cover from 24% in 1990 to 8% of the total land cover in 2019. There are currently 506 Central Forest Reserves (CFRs) in Uganda under the management of the National Forestry Authority (NFA). Although the country has an established environmental management framework that is supposed to avert the effects of forestry degradation, substantial efforts are still required for effective results to be realised. There are a number of tree planting initiatives that have been undertaken countrywide focusing on increasing forest cover such as the Sawlog Production Grant Scheme (SPGS), which provides grants to promote the planting of forests by private individuals as a way of easing pressure on the forestry stock in the existing central forestry reserves. Some projects and sub projects may be located close to or within protected forests, thus there is a risk that they may exacerbate the problem of deforestation.

4.2.2 Biodiversity

Due to the uniqueness and diversity of ecosystems and variation of climatic conditions in Uganda, the country hosts 53% of the world's mountain gorillas, 11% of the global recorded species of birds, 7.8 % of global mammalian species, 19% of Africa's amphibians and 14% of African reptilians. The country also hosts a high number of globally threatened species i.e. 39 mammals, 25 birds, 12 amphibians, 3 reptiles and 45 plants. At the national level, the number of threatened species is even much higher, underscoring the need for increased species protection in Uganda.

Threats to Biodiversity: Threats to biodiversity include conversion and degradation of the natural ecosystem, invasive species, excessive harvesting of flora and fauna, illegal wildlife trade, poaching, human-wildlife conflict, disease outbreaks, plastic waste and pollution of water bodies. Increase in human population has also resulted in communities settling close to areas of high wildlife populations resulting in crop raiding, spread of zoonotic diseases, loss of property and attacks on humans often resulting in retaliatory killing of wildlife. The number of reported cases of HWC has increased over the years with Murchison Falls Conservation Area (MFCA) registering the highest number. Species often associated with these conflicts include elephants, lions, hippopotamus, baboons and monkeys. These conflicts have cross cutting impacts on human livelihoods, biodiversity conservation and the economy.

4.2.3 Water quality

Water quality: The data obtained during the monitoring of the water quality for the various major rivers indicated that River Mobuku had the highest pH while River Rwizi had the lowest. The high pH levels recorded by river Mobuku is attributed to the geological chemical formation of the area. Lake George had the lowest pH while Lake Albert had the highest pH, it was noted that pH and electrical conductivity of Lake Victoria for the year 2016 were higher than that of 2018. However, for dissolved oxygen (DO), concentrations in the various points of the lake showed high levels of DO in 2016 than there was in 2018. Dissolved oxygen is necessary to many forms of life including fish, invertebrates, bacteria and plants.

Other rivers whose pollution level is steadily increasing yet water demand is also increasing are River Rwizi, River Mpanga and River Nyamwamba. Pollution load in River Rwizi is expected to continue growing if no intervention is undertaken. There is projected gradual increase in the concentration of

Biological Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) which represents concentration of organic matter in the water.

Kilembe mining area adds Cu to Nyarusenghe stream which consequently pollutes Nyamwamba River. The water in the section of Nyarusenghe stream is polluted by Cu and Fe. The concentration of Co, Cu, Zn and Pb in vegetables (*Amaranthus*) grown in Kilembe catchment were higher than the recommended levels for human consumption. Wetlands at the mouth of River Nyamwamba discharge point to Lake George are critical for water filtration and ought to be well protected.

There is increased BOD and COD along River Mpanga at the point where the river receives effluent from an abattoir and the hospital wastewater, therefore, the main pollution sources upstream include: Kabundaire abattoir; where waste is directly deposited in the river untreated; Kabarole main referral hospital; The sewage treatment ponds and Mpanga market area where there is high risk of waste from the market entering the river.

Interventions to control water pollution should include containment of tailings erosion, demarcation, isolation and treatment of underground mine water and leachate, mapping highly contaminated soils and prohibition of cultivation or grazing animals on such soils, enforcement of waste management regulations and protocols, strengthening enforcement of the existing legal frameworks and expansion of the Integrated Water Resources Management (IWRM) framework to include other aspects like poverty eradication and disaster preparedness.

4.2.4 Soil conditions

Soil Condition: In Uganda, soil organic matter is low to medium in most places, and is declining due to increased erosion and poor land management practices. Soil organic carbon and soil pH are key indicators of the status of soil health, the pH of Uganda's soils vary, owing to a climate gradient, but has a narrow range between 4.8 and 6.3. High soil pH is mainly in the Karamoja region, where conditions are generally dry; otherwise the rest is low because of wet conditions.

Soil degradation is a major threat to food security in Uganda and is responsible for siltation and pollution of lakes, rivers and open water sources, which has affected livelihoods. Major causes of soil degradation in Uganda are nutrient depletion and soil erosion. The degradation of the soil resource in Uganda is attributed to population growth and the attendant effect on land ownership and fragmentation, land tenure, adoption of inappropriate land and soil management practices, and the low use of fertilizers and organic manure. The population explosion seems to out-match farmer's ability to find arable land and 50% of the land have soils of medium productivity. This means encroachment of protected land in places s' ability to find arable land.

Interventions should include revision of the legal framework e.g. the National Environment (Minimum Standards for Management of Soil Quality) Regulations and the National Environment (Hilly and Mountainous Area Management) Regulations, mapping of erosion risk and soil nutrient deficiency, enforcing the adoption of appropriate soil and water conservation strategies.

4.2.5 Air Quality

Air quality; Human survival, security and well-being is underpinned by the state of the environment and its ecosystems. Our natural environment provides us with essential life support services of air, water and food. Air is an atmospheric resource for human well-being which key factor is air quality that is adversely

affected by environmental pollution. The key contributors of air pollution in Uganda are particulate matter (PM 2.5), emission of gases like Nitrogen Oxides (NOx), Sulphur Oxides (SOX), Methane (CH4) and others like black carbon (BC). Beside the key sources of air pollution in Uganda include emission from motor vehicles, unpaved roads, burning of waste, industries, domestic emission and construction activities. Air pollution contributes to poor human health which is characterised by respiratory diseases and morbidity. The national air quality monitoring network is yet being set up but presently NEMA has two stations where it collects data. The air quality data so far got is within the acceptable World Health Organisation (WHO) guideline limits.

4.2.6 Wetlands

Uganda is host to a number of wetlands of international importance. However, over the years, the country's wetland cover has reduced due to wetland degradation. Over 80% of Ugandans are involved in agriculture and 69% rely on subsistence farming and are heavily dependent on wetlands. As a result of the increased use of wetland areas, there has been an increase in the incidents of wetland degradation mainly by encroachers leading to a reduction in the total area under wetland coverage in Uganda.

Wetland coverage reduced from 15.5% in 1994 to 13% in 2017. Of the remaining wetland, 8.9% is still intact while 4.1% is degraded. Considering the cover at drainage basin level, wetland degradation was highest in Lake Kyoga and Edward basins (42% and 34% respectively) and lowest in the Kidepo and Aswa basins (1% each). Further analysis showed that Mbale district had the most degraded wetlands with 99% of its wetlands are under threat while Ntoroko had the lowest percentage of degraded wetlands (2%) (NSOER 2018/19).

Construction and civil works at the common-user facilities are not expected to impact wetland resources, however, some sub-projects under the GROW project may be located close to or within wetlands. In addition, some contractors may use swamps along roads as water and sand sources for construction works. There is therefore a there is a risk that they may exacerbate the problem of wetland pollution or destruction, for example when construction waste is illegally dumped in swamps adjoining roads. The beneficiaries will have to acquire the relevant permits and approvals from the authorities such as wetland use permits from the DWRM and adhere to the provisions of the National Environment (Wetlands, River Banks and Lake Shores Management) Regulations, 2000.

4.2.7 Climate change

Uganda continues to experience the effects of climate change in the form of deteriorating snow cover on Mount Rwenzori, extreme weather events such as floods and landslides, all of which have destroyed property and claimed lives of many Ugandans as well as affected their associated livelihoods. Uganda launched its National Climate Change Policy in 2015 and submitted its Nationally Determined Contributions (NDCs) or proposed greenhouse gas emissions reductions to the United Nations Framework Convention on Climate Change in 2018.

The country has witnessed massive losses of natural vegetation and intensification of human activities. This situation is further aggravated by the overexploitation of natural resources, use of unsustainable harvesting and agronomic practices, and effects of climate change. Uganda has witnessed many environmental problems including frequent occurrences of landslides and floods causing deaths and loss of property, loss of biodiversity, low agricultural output, and reduced forest and wetland goods and services.

It is also critical to consider climate which is an atmospheric resource that is greatly affected by weather variability and climate change that subsequently impact on human well-being. Extreme weather conditions and climate events like floods and droughts have adverse effects on human livelihood capitals like food and income and thus affecting human well-being. Furthermore, rise in temperatures affects ecosystem functions and services such as loss of biodiversity species, increase in invasive species and total species extinction. Besides rise in temperature is a major cause of drought which hinder the regulating functions of ecosystems for environmental integrity, climate resilience, disaster risk reduction and human livelihoods. For instance, according to UNICEF 2017 report, Uganda has one of the fastest changing climates in the world and temperatures are predicted to rise by an unprecedented 1.5 degrees in the next 20 years. Extreme climate events like floods and drought and weather variability such as rise in temperatures and rain storms do not only affect the environment but also have adverse impacts on agriculture and other livelihood assets (NSOER 2018/2019).

4.2.8 Areas with special risks (Hazards and Disasters)

Are there areas in the Country with specific biophysical characteristics that could present special risks (e.g. landslides in Bududa, flooding in Kasese, recurrent drought in Karamoja, earthquakes in western Uganda etc.), triggered by climate related events. Of all project components, climatic conditions and/or climate change will be most relevant to Component 3 which will involve construction of enabling infrastructure and facilities (common-user facilities). Such construction works especially involving earthworks could be affected by extreme climatic conditions such as floods or its consequence – landslides. Some sub-projects under the GROW may contribute to climate change related impacts either through increase or reduction in greenhouse gas emissions as well as adaptation and resilience of livelihoods, infrastructure and ecosystems. In this regards climate risk assessment and mitigation will be necessary.

4.3 Socio-economic Environment

4.3.1 Population

Uganda's population was estimated at 40.9 million persons in 2019/20 indicating an increase of about 3.2 million persons from 37.7 million estimated from the 2016/17 survey. The sex ratio was estimated at 97 females per 100 males. The proportion of the population aged below 14 years constituted slightly less than half of the total population (44 %). The urban population increased by two percentage points from 25 percent in 2016/17 to 27 percent in 2019/20. The dependency ratio decreased between the two survey periods from 97 in 2016/17 to 92 in 2019/20 (UNHS 2019/2020).

Uganda's mid-year (2021) population is estimated at 41 million people of which 51% are females. The population is rapidly increasing and it is projected to reach 69.75 million in 2040 (www.ubos.org). The country has one of the youngest population in the world with 75% under the age of 30 years. The rapid population growth has resulted into a large number of new labour market entrants but the market is constricted. The constricted labour market disproportionately affects the females than males. Women are generally excluded from the world of work.

Uganda's female labour force participation rate is generally low estimated at 44.9% compared to 61.2% for men. This implies that 55.1% of working age females are outside the labour force. The majority of of those outside the labour force are preoccupied with family responsibilities and many are satisfied with subsistence agriculture (National Labour force Survey 2016/17, UBOS, 2018).

Relation to the project:
Population size correlates with magnitude of benefit/ impact that will emanate from the proposed project. Local leaders will have jurisdiction over areas in which the project will be implemented. These leaders will lend support to the project through information dissemination to the public;
Project areas/sites with high population densities in the Districts may have a direct correlation to number of impact receptors (e.g. people exposed to risk of accidents on roads used by construction traffic) and expected number of people seeking construction jobs.

4.3.2 Uganda Economic Outlook

According to the African Development Bank, Uganda's economy registered strong growth in 2019 estimated at 6.3%. Studies have further shown that Women in Ugandan have performed fairly well in entrepreneurship compared to other African and Arab countries. The rate of growth in the number of women owned enterprises had outpaced that of male owned by 1.5 times by 2014 (Women's Entrepreneurship Development in Uganda, ILO, 2014). The Census of Business Establishments Report, UBOS 2011 indicate that 44% of businesses with fixed premises in Uganda are owned by females. The Mastercard Global Index, 2019 also reveal that one in three (33.8 %) of all businesses in Uganda are owned by women—the highest rate in the Middle East and Africa regions. This indicates that there is an opportunity of tapping into women entrepreneurship as a vanguard for socioeconomic transformation of the country.

This was largely attributed to growth in the services sector at 7.6%, which has been a major driver of development. However, in light of the COVID-19 pandemic, Uganda's economic growth rate for the FY 2019/20 has been revised downwards from 6% to about 3%. The effect of the Covid-19 has impacted on the service sector and the most severely affected by the downward trend in growth are women.

Relation to the project: The GROW Project will target women whose livelihoods have been severely affected by the Covid-19 pandemic.

4.3.3 Employment

Uganda's female labour force participation rate is generally low estimated at 44.9% compared to 61.2% for men. This implies that 55.1% of working age females are outside the labour force. The majority of those outside the labour force are preoccupied with family responsibilities and many are satisfied with subsistence agriculture (National Labour Force Survey 2016/17, UBOS, 2018).

The women who participate in the labour force face specific barriers, constraints and challenges such as sociocultural norms that affect their career and business progression. Whereas labour underutilisation is high in Uganda, the composite underutilisation is higher among women (39.0%) compared to men at 31.5%. The unemployment rate is also higher among the women (11.4%) compared to 8.2% for men. In addition, many women (50.5%) aged 18-30 years are Not in Education, Employment or Training (NEET) compared to 29% for females (National Labour Force Survey 2016/17, UBOS, 2018). This implies that more women than men are not realising their full economic potential.

On the part of those in employment, women are also disproportionately disadvantaged. Out of every 100 women who are in employment, only 26 (26.3%) are in paid employment compared to 40.8% for men. Even then, most of those in paid employment are involved in low status poorly paid jobs. The implication is that 73.7% of the women in employment are self-employed. It is important to note that a large proportion of women in self-employment (22.2%) are compelled by family while 38.1% joined self-

employment because they could not find a job. This implies that majority are in non-satisfactory self-employment and would want to change the job if there was an opportunity. The women in self-employment status in Uganda are own account workers (57.8%), employers (1.7%) and contributing (14.1%). The employers and own account workers constitute the women in entrepreneurship.

Working population is the population within the working age that was engaged in the production of goods and provision of services for others or own final use. The UNHS 2019/20 asked respondents if they were engaged in any work during the last 7 days prior to the survey date.

Table 8 shows that of the 40.9 million people in the country, 21.4 million (52%) were of working age. Of the WAP, seventy-four percent (15.9 million) were working, that is, engaged in the production of goods and services for others or for own final use. Though there were more of the females (53%) than males (51%) in the WAP, the proportion of working males (78%) was higher than for working females (71%). Residential differentials showed that the proportion of working population to the WAP in rural areas was higher than urban by about eleven percentage points.

Table 9: Distribution of working age and working population (14-64 years), (%) Background characteristics

Distribution of working age and working population (14-64 years), (%) Background characteristics	**Total Population ('millions)**	**Working Age Population (WAP)**	**Working Population**	
Number ('millions)	**Percent to Total Population**	**Number ('millions)**	**Percent to WAP**	
Sex				
Male	20.1	10.2	50.9	8.0	78.1
Female	20.8	11.1	53.4	7.9	71.1
Residence				
Urban	10.9	6.2	56.8	4.1	66.9
Rural	30.1	15.2	50.5	11.8	77.5
Sub-regions				
Kampala	1.7	1.1	65.4	0.6	59.0
Buganda South	5.4	2.9	53.7	2.1	73.4
Buganda North	4.3	2.2	51.9	1.8	78.7
Busoga	4.0	1.9	48.0	1.6	81.3
Bukedi	2.4	1.2	48.5	0.9	77.5
Elgon	2.1	1.1	52.8	0.8	69.9
Teso	2.2	1.1	50.0	0.9	80.7
Karamoja	1.1	0.5	44.7	0.3	66.7
Lango	2.4	1.3	53.8	0.9	69.7
Acholi	1.8	0.9	52.3	0.5	56.5
West Nile	3.2	1.6	50.2	1.3	80.4
Bunyoro	2.6	1.3	51.0	1.0	79.8
Tooro	3.0	1.6	53.3	1.2	74.7
Ankole	3.3	1.8	54.5	1.4	76.1
Kigezi	1.6	0.9	54.5	0.6	72.2

Uganda	**40.9**	**21.4**	**52.2**	**15.9**	**74.4**

4.3.4 Women in business in Uganda

According to results from the Uganda Household Survey 2009/10, 75.9% of Ugandans were self-employed, including 86.2% of working women and 72.1% of working men (UBOS, 2013, p. 18).8 The self-employment rate is also high among the 18-30 age-group: 61.5% among young women and 52.5% among young men (UBOS, 2013, p. 19). Relatedly, according to MTIC, (2017/18), gender disaggregated data in Uganda is not easy to obtain due to the informality of most business operations. It is estimated that 53% of the businesses in the country operated informally5. Businesses in the Trade sub-sector employed the majority (42.32%) people in the country, in 2011 of which 68% were male while 32% were female. In the same year, majority of the male employees were in the Trade sub-sector (41.53%), followed by the Accommodation & Food services sub- sector with 14.32%. Further, out of the total number of females employed, 44.10% were in the Trade sub-sector followed by 22.51% in the Accommodation & Food Services sub-sector; Education, Health & Social (8.93%); Recreation & Personal (7.79%), among others. As of 2011, there were a combined 1,076,534 in comparison to only 477,230 females. Therefore, the interventions by projects such as UWEP and now GROW are justified to help women scale up their economic activities and boost their growth opportunities.

Table 10: Employment Statistics

Sector	**Male**			**Female**		
Indicator	**2001**	**2007**	**2011**	**2001**	**2007**	**2011**
Agriculture & Forestry	9,736	28,407	31,317	5,047	7,689	9,779
Forestry			683			138
Fishing	903	1,012	13,873	96	73	235
Mining & Quarrying	1,235	1,493	3,192	374	149	742
Food Processing		39,633	50,745		8,766	12,611
Other Manufacturing	70,588	32,456	88,352	16,543	6,522	22,560
Utilities	2,829	2,738	2,161	615	484	483
Construction	6,633	8,993	14,398	707	1,257	2,251
Trade	102,222	46,776	447,064	76,053	12,173	210,477

[5] TRADE AND INDUSTRY SECTOR STATISTICAL ABSTRACT,2017/18

Transport, Storage & Communications	10,161	17,665	13,483	3,737	3,291	2,830
Accommodation & Food Services	16,269	32,796	154,167	37,862	17,662	107,436
Information & Communication			14,401			3,863
Financial & Insurance	4,742	13,537	27,135	3,358	5,729	11,772
Real Estate & Business	15,871	27,540	53,124	4,308	5,096	14,135
Education, Health & Social Services	13,353	51,746	81,546	13,646	28,122	42,630
Recreation & Personal	16,706	13,003	80,893	10,524	4,544	35,288
Total	**271,248**	**317,795**	**1,076,534**	**172,870**	**101,557**	**477,230**

Furthermore, the UBOS 2019, national household survey provides information on women and men employers (self-employed who employ others) and independent workers without employees (self-employed, working on their own account). **The first category is more likely to represent entrepreneurs.**

According to the 2019/2020 UNHS report, women are underrepresented in the population of employers compared to men (5% vs.7%) and overrepresented in the population of own-account workers (47% vs 36%)(UBOS 2021a)

Table 11: Women Entrepreneurship in Uganda

	UNHS 2019/2020		**UNHS 2016/17**	
	Employers (%)	Independent workers (without employees) (%)	Employers (%)	Independent workers (without employees) (%)
Overall	6.4	42.3	44.3	50.3
Sex				
Male	7.4	37.6	5.5	43.8
Female	5.0	47.3	2.9	57.6
Residence				
Urban	8.8	37.5	3.5	56.6
Rural	5.1	43.9	5.9	37.0
Special groups				
Youths (ages 18-30)	4.2	36.3		46.5

Women entrepreneurs typically operate smaller firms than men and are more likely to operate in non-capital intensive and less profitable sectors. For example, a World Bank study found that businesses owned by men are 3.1 times larger and earn 2.5 times more than female-owned firms (Campos et al. 2014). In 2014, only 6 per cent of female entrepreneurs in Uganda were operating in male-dominated sectors (referred to as sectoral "crossovers), even though male-dominated sectors tend to be more lucrative, and women who "crossover" into male-dominated industries tend to earn as much money as men do (Campos et al. 2014). The key enabling factors allowing these women to successfully enter male-dominated fields were access to social networks to provide information and exposure to new lines of

business; a male role model or an avenue for gaining experience in the sector, often through a male family member; and technology (Campos et al. 2014).

4.3.5 Indigenous people in Uganda

Socio-cultural aspects of VMGs in Uganda

Generally, power and gender relations between the men and the women favour men and women continue to suffer very high time burdens in pursuing their livelihood strategies (Uganda Gender Policy, 2007). All consultations with men and women revealed the prevalence of this form of negative masculinity. Both men and women largely do the gender ascribed jobs in the community, largely the traditional subsistence cultivation of traditional crops.

Among the Batwa for example, cultural values and norms do not allow a male healthcare provider to attend to women during delivery and hence this makes female Batwa reluctant to seek medical services from the health centres that have male staff. There is still substantial use of the traditional herbs to cure malaria, respiratory tract infections and pneumonia which unfortunately has led to a high mortality rate. The relationship between the marginalised and vulnerable groups and their dominant neighbours is characterised by 'discrimination, marginalisation and stereotyping'. For example, the Batwa community are described as short, lazy and 'irresponsible people' by the other surrounding tribes (Kabananukye, 2016). The concept of patriarchy and gender segregation applies across most tribes in Uganda.

VMG communities have significant cultural sites. Although some of these sites have been gazetted as National Parks or Tourist sites, most members of vulnerable and marginalized groups still rely on them for subsistence and livelihoods.

Ethnic minorities in Uganda

The Ik, Batwa, Benet and Tepeth have been dispossessed of their ancestral land through various developments. Many still live in small huts made of sticks and grass.

- **Poverty:** High poverty levels in these communities caused by highly undependable climate, low produce and low market prices, for their produce even if the communities depend on farming.
- **Inadequate land for settlement:** The Ik, Batwa, Benet and Tepeth are mobile due to land tenures systems, their social life or various uncertainties. They move when their lands are acquired from them or when they need to grow crops, away from where animals threaten to destroy them. When they are not assured of permanent settlement, they construct temporary shelters.
- **Economic activities** Similarly, these indigenous groups such as the Batwa, face challenges that limit their participation in economic activities for example cultural practices that limit their survival to particular areas, social exclusion by the majority groups and their cultural lifestyle is not based on cash economy. However, there have been some efforts to improve their self-reliance. Kanungu District, for instance, has persistently provided various crop seeds through their agricultural initiatives but the Batwa have in turn sold such agricultural inputs. Although they are known as hunters, they also do other forms of labour at low pay. Some do basic jobs or agriculture, while others make handicrafts and jewellery for sale to locals and tourists. They also do singing and dancing as form of entertainment for payment by visitors. Tourists pay some money to the dancing groups to be entertained.
- **Education:** For most ethnic these groups, (Ik, Batwa, Benet and Tepeth), access to education remains a challenge. This is attributed to their unique social cultural practices such as their

nomadic lifestyle, scarce school facilities in their localities, discrimination and stigma, and fear of the unknown. Yet education would allow for social transformation, self-sufficiency and promote self-esteem. Education offers the potential to undertake training in technical skills or to access employment, all of which would help these ethnic groups overcome the poverty they live in.

- **Health service access:** Access and utilization of health care services remains a challenge for most of the Ik, Batwa, Benet and Tepeth. Factors such as limited awareness and acceptance of modern medicine, stigmatization by health workers, distance from health centers, over reliance on traditional medicine as well as high costs associated with access to health care. This has exposed them to the risk of high disease burden, high levels of infant and maternal mortality, high HIV prevalence etc.
- **Social dynamics:** Women participation in social and community management activities is minimal compared to men. There are small numbers of women that participate in community meetings and this reflects the power dynamics in society; few women among them have the level of education needed to take up positions in local governance or obtain government employment.
- **Poor road network and other services:** Further still, the Ik, Batwa, Benet and Tepeth tend to live in areas characterised by very bad terrain and poor road network which renders them hard to reach. As such accessibility to them is a problem mainly due to the mountainous nature of their locations. This limits access to markets and other social services.
- **Socio-cultural issues:** It is also pertinent to note that the communities where these ethnic minorities live are characterized by social problems such as extreme and abject poverty, child marriages, alcohol/substance abuse and domestic violence. The relationship between the marginalised and vulnerable groups and their dominant neighbours is characterised by 'discrimination, marginalisation and stereotyping'. For some of these ethnic minorities, the concept of patriarchy and gender segregation is dominant, as is the case in most other tribes in Uganda.

    1. Eviction of VMGs from their homelands (Natural Forests) has limited their access to food, medicine, and shelter. As a result, some of them are plagued by starvation, sickness and exposure. For instance, the number of Batwa in Bundibugyo and Kisoro Districts are said to be reducing and therefore on the verge of total extinction due to the HIV/AIDS, which they have acquired as a result of integration with other communities who believe that one can get cured of the infection after canal knowledge with a Mutwa woman (Kabananukye, 2016).
    2. As traditional hunters/gatherers, the Ik have witnessed the depletion of wild game in their areas due to cutting down of trees and the widespread use of illegal guns; Timu forest which is a center for their rituals and traditions is slowly becoming depleted causing gathering methods to be more difficult and greatly affecting the performance of their rituals and traditions. The Dodoth and Turkana graze in Ik lands during which they cut down trees for fencing their homestead and kraal; Frequent attacks from hostile ethnic groups especially the Tepeth in Moroto are attacked by the Pokot and Turkana from the Kenya. The Ik are attacked by other Karamojong ethnic groups.
    3. The Benet, also known as Ndorobos, are 20,000 in number and live in Kween district on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, are on the verge of extinction due to takeover of Mt. Elgon by Uganda Wildlife Authority as a protected area for wildlife.

- **Leadership:** Since the ethnic minorities lack numeric advantage, their participation in leadership at all levels is minimal. For example, it was only in 2015 that the Ik community were given affirmative action constituency and they got their first representation in Parliament of the Republic of Uganda in the 10th Parliament. Local leadership is optimistic that such representation can help to advocate for further recognition of such groups to ensure the effective participation in leadership, governance and the achievement of the NDP III goal.

4.3.6 Child Labour in Uganda

Child labour is defined in the Uganda National Child Labour Policy as work that is hazardous or exploitative and threatens the health, safety, physical growth and mental development of children[6]. According to the Uganda National Household Survey (2019/20) by the Uganda Bureau of Statistics, Child labour doubled from 2,057,000 (14%) to 4,096,000 (28%) of the 14,987,929 children in Uganda aged five to 17, and continues to rise. Such a statistic indicates that Uganda is at risk of losing a future productive workforce. Furthermore, findings after 20th March 2020 revealed that 22 percent of the children aged 5-17 years engaged in child labour excluding household chores; an increase from 14 percent registered before 20th March 2020. This was attributed to the absence of schooling during the reference period thus most school going children were then engaged in work.

Table 12: Child Labour

	Before 20th March 2020					After 20th March 2020				
Age groups	Male	Female	Urban	Rural	Total	Male	Female	Urban	Rural	Total
5-11 years	17.6	11.7	9.3	16.5	14.7	25	20.1	11.9	26.3	22.6
12-13 years	22.8	11.3	7.4	19.7	16.9	39.6	34.4	22.6	41.8	37.1
14-17 years	11.9	6.8	8	9.8	9.3	12.6	8.5	9.7	10.9	10.6
(15-17) years	16.9	10.3	8.7	15.3	13.7	24.1	19.3	13	24.7	21.8

UBOS 2020, Statistical Abstract.

<u>Relation to the project:</u> The low percentage/proportion of women in formal employment reinforces the rationale for the GROW project which seeks to empower women entrepreneurs with skills and capital.

Trend in child labour estimates excluding household chores

This is further demonstrated by the figure below which indicated that the rate of child labour estimates excluding household chores had increased for children aged 5-17 years from 14 percent in 2016/17 to 18 percent in 2019/20.

[6] National Child Labour Policy (2006), MoGLSD, Uganda

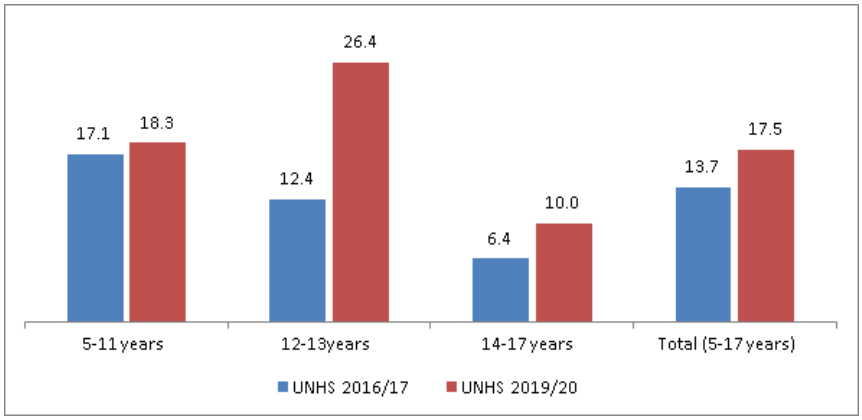


Figure 3- UBOS Statistical Abstract 2020

When further analysed by region, the rate was also highest among children aged 5-17 years in Bunyoro (35%) and lowest in Kampala (6%) as shown in the figure below.

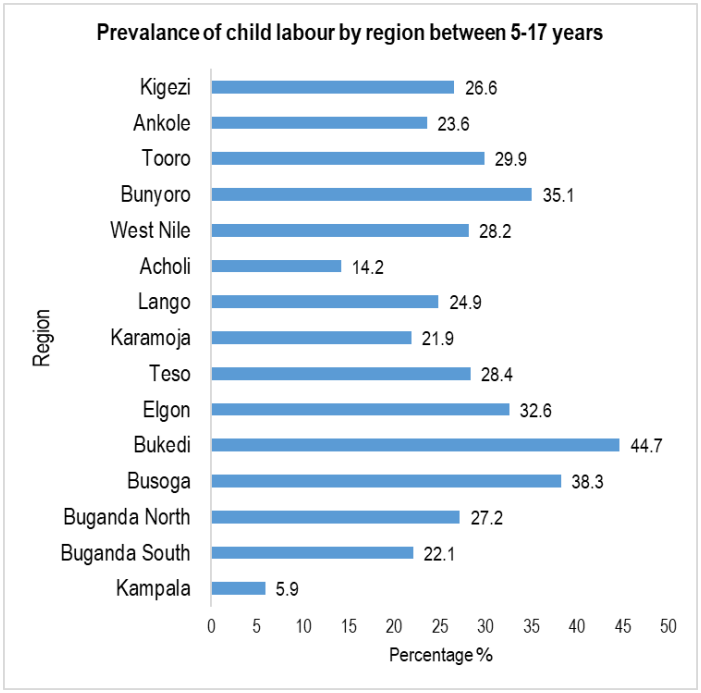


Figure 4 - Prevalence of child labour by region

4.3.7 GBV prevalence in Uganda

According to the UN report, (2006), Gender-based violence is defined as any act of violence that results in physical, sexual, or psychological harm or suffering to women, girls, men, and boys, as well as threats of such acts, coercion, or the arbitrary deprivation of liberty. The 2016 Uganda Demographic and Health Survey revealed that up to 22% of women aged 15 to 49 in the country had experienced some form of sexual violence. The report also revealed that annually, 13% of women aged 15 to 49 report experiencing sexual violence. This translates to more than 1 million women exposed to sexual violence every year in Uganda. Violence against women and girls (VAWG) constitutes a major obstacle to the empowerment of women (UNFPA 2010).

Prevalence rates of GBV in Uganda are high compared to both global and regional averages. Overall, 51 percent of all women and 52 percent of all men aged 15-49 in Uganda reported experiencing physical or sexual violence (by any perpetrator) at least once since the age of 15. Similarly, one in five women (22%) and men (20%) have also experienced physical violence (UDHS 2016). By comparison the global average prevalence rates for violence against women (physical or sexual) aged 15-49 is estimated by the World Health Organization (WHO) at 35.6 percent and the regional (Africa) average is 37.7 percent. In most cases (60 percent), perpetrators were intimate partners. Furthermore, the 2016 Uganda Demographic and Health Survey (UDHS) data indicates that beyond Intimate Partner Violence (IPV) Non-Partner Sexual Violence (NPSV) and child sexual abuse are the two most prevalent forms of GBV.

Table 13: Driver and Sustainers of SGBV in rural areas

Drivers	Maintainers	Effect
Restricted livelihood opportunities /Unemployment	Idleness	**High alcohol consumption**-promiscuity, infidelity, defilement, rape in and out of marriage. **Sex as entertainment**- nothing else to do to fill time.
	Inverted power relations.	Women main providers and heads of families as most men abandon them and abdicate responsibility.
	Lack of money	**Barter sex/commercial sex** – young girls barter/sell sex for favors such financial help, food and other basic necessities-rural areas inclusive which has under-age commercial sex workers especially on transit routes for long haulage truck drivers, contract workers in rural areas among others
Limited services (health care, SGBV information)	Limited and inaccessible use of health care services	**Infrequent use of services.** Limited diagnosis and treatment of SGBV, Assault and STIs.
Culture of silence	Culture of the of the locals –rape and defilement are not common normally and it is a taboo to speak about them hence not	**Shame** Problem of rape and defilement is frequently hidden and solved traditionally.

	reported such not spoken about or reported Ignorance of the dangers of sexual violence on the side of the girls	
	Fear of bringing shame and disharmony on HH and concerned families.	**SGBV**– marital rape continues in marriage
Parent's perception of their girls as a source of income	Culture of silence and inaction from local authorities.	Under-age marriages continue

Source: Review of various documents

4.3.8 Violence Against Children

Violence against children includes all forms of violence against people under 18 years old, whether perpetrated by parents or other caregivers, peers, romantic partners, or strangers. Violence against children, entails physical, sexual, and emotional violence, which has devastating effects on physical and mental health of children[7]. According to UNICEF country profiles report (2019), nearly one in five children experienced physical violence by a parent, adult caregiver, or other adult relative (girls, 18.7%; boys, 21.7%) in the past 12 months. About one in five girls (18.2%) and one in four boys (25.1%) experienced physical violence by a peer in the past 12 months. Additionally, 15% of the boys and 34% of the girls had been subjected to child marriage by their parents before the age of 18. Of 18-24-year-old Ugandans, one in three girls (35%) and one in six boys (17%) reported experiencing sexual violence during their childhoods. This included 11% of girls experiencing pressured or forced sex. Relatedly, of Ugandans ages 13-17 years, one in four girls (25%) and one in ten boys (11%) reported sexual violence during the survey period as was the case for 18-24-year-old females who had sex before age 18, one in six (15%) reported exchanging sex for material support in childhood[8]. As such, the project should devise mechanisms that help to respond to the vices of violence, abuse, neglect and exploitation of children during and after its lifetime.

4.3.9 Land tenure and land use in Uganda

In Uganda, land can either be owned in perpetuity or for a given period of time. The Land Act, cap 227 identifies four forms of land tenure systems in Uganda which include; Customary, Leasehold, Freehold and Mailo. The mailo land tenure system is similar to the freehold except that for the former, the occupants are obliged to pay an annual nominal ground rent. Although Uganda's statutory laws grant men and women equal rights to land and other property regardless of their marital status, application of these laws has not supported equitable distribution and benefits. This is partly due to weak institutional

[7] https://www.who.int/news-room/fact-sheets/detail/violence-against-children

[8] Uganda Violence Against Children Survey Findings from A National Survey. Ministry of Gender, Labour and Social Development August 2018

capacity of the legal system, particularly in rural areas, that hampers effective enforcement and administration of the laws (ICRW, 2011).

Women ownership of land is still limited due to gender disparities and cultural practices driven by patriarchy. Practices around marital property and inheritance, in particular, continue to be dominated by customs that impose serious constraints on women's ability to own and control land resources. These customs limit the user rights of land by women to their relationships with the male family members (heads), thereby making their user rights secondary to those of the men, who tend to have rights to land as a right at birth. Women are also vulnerable to land grabbing, and denial of land rights is usually exacerbated by events such as the loss of a spouse or parent. In consideration of this situation, it will be important during the implementation of the GROW Project that women's right to access to, ownership of and titling of land shall be promoted. The GROW sub projects will support equitable benefits among male and female members of households. The consent of both women and men of the households will be sought prior to sub project implementation in order to ensure that the opinions and views of the women and other vulnerable family members are considered in the management of project impacts and benefits.

Relation to the project: Of all project components, land tenure and land use will be most relevant to Component 3 which may involve and acquisition for the common-user facilities. In such a case, the Resettlement Plan Framework (RPF) will guide the process of land acquisition and resettlement.

4.3.10 Health

Realisation of economic rights depends on health status of the population. Women's access to health services remains limited by a number of factors, including the burden of work, cost of the services, gender dynamics, location of the health facilities, etc.

Health facilities in Uganda include Hospitals and Health Centres (IV, III and II). The health facilities are unevenly distributed across the regions of the country, whereby 45 % of the health care facilities are located in the central region. The western region has the highest number of Regional Referral Hospitals and Health Centre IVs while the Eastern region has the highest number of Health Centre IIIs. Between 2016/17 and 2017/18, there was a reduction in the number of Health Centre IIs and General Hospitals while there was a six-fold increase in the number of clinics. There have been efforts to upgrade HC IIs to HCIIIs to cater for aspects including provision of maternity services for women. It is worth noting that most of the facilities remain poorly equipped with some having no access to basics such as electricity. According to the National Budget Framework Paper for FY 2019/2020, the budgetary allocation to the health sector for the FY 2019/2020 stood at 8.9% as a share of the national budget for FY 2019/2020. Also, worth noting was that 54% of the budget for the sector was to be bridged through Development partner support.

Relation to the project: Health conditions will be most relevant for implementation of Component 3 of the project expected to utilize a number of construction workers. The risk of accidents at construction sites means that easy and quick access to health care units is essential.

4.3.11 Education

In Uganda, there is a wide gap between men and women in terms of education. Women generally have limited access to education and the school dropout rate is higher among the girl children than boys. This situation is likely to be exacerbated by COVID-19 pandemic.

The education system of Uganda ranges from early childhood programme (for children aged 3-5 years), seven (7) years of primary education, four (4) years of Ordinary Level secondary education, two (2) years of Advanced Level secondary education and the final tier is three (3) to five (5) years of Tertiary education. The tertiary education level in Uganda is comprised of two categories: namely degree awarding universities and 'other tertiary institutions' (i.e. the technical subsector which offers diplomas and certificates). Business, Technical, Vocational Education and Training (BTVET) is an integral part of Post Primary Education and Training (PPET). It constitutes both the second and third levels of the education system. There is a higher enrolment of girl children at the lower levels however due to several challenges associated with gender inequality, there are high dropout rates of girl children along the education path. Some of these factors include cultural beliefs and practices of sustaining boys in schools rather than girls, defilement and early marriages before completion of school, distance to schools, etc.

In 2015, EMIS of MoES reported that the enrolment of girls in BTVET was 42% of the total enrolment. In year 3, total enrolment of the boys was 71.4% compared to the 28.6% for girls indicating a high dropout for girls in BTVET. 75% of the instructors were male, which created a gap in terms of role models and counsellors for female students.

Enrolment in higher / tertiary education had the following gender gaps; in Agriculture males accounted for 81% of the enrolment, forestry had 72% while science had 69%, veterinary had 82% of the enrolment.

All the above factors have contributed to high poverty levels among women due to their early school dropout and lack of skills to be engaged in better paying jobs, most women are employed in lower cadre or low paying jobs, economic dependence of women on their spouses and other male relatives, among others.

Relation to the project: Education will be most relevant for implementation of Component 1 in that, understanding the levels of education of most of the intended beneficiaries will inform the design and packaging of the core course(s) for those women entrepreneurs.

5. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS OF GROW

The proposed Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project is likely to result in both positive and adverse E&S impacts.

5.1 Potential Positive Impacts

The GROW Project is expected to have significant positive impacts that are largely of a socio-economic nature. The expected general positive impacts of the project include the following:

The project is expected to contribute to several tangible and positive economic impacts including business development services for women entrepreneurs, access to finance for women entrepreneurs, and access to infrastructure that address time and production constraints of women entrepreneurs and their enterprises;

The project is likely to have greater multiplier effects given that it will be implemented as a package;

It is also expected to contribute to greater agency of participants as evidenced by higher participation in household decision making and autonomy over use of income, as well as increased participation in groups (such as self-help groups and other community groups);

Enterprise development services are conducted through training. The training is expected to improve women's business management skills and shift their mindsets towards entrepreneurship;

The creation of revolving funds that provide credit to women entrepreneurs, will meet their financing need and enable them to expand their businesses;

Access to infrastructure such as childcare centers that improves women entrepreneurs time and production constraints, will increase their general participation in the labor market as entrepreneurs, since there is reduced time use on care giving activities.

Other positive impacts are presented in **Table 14** below according to the different components:

Table 14: Positive Impacts of the GROW Project

Project component	Impacts
Component 1: Support for Women Empowerment and Enterprise Development Services *Subcomponent 1A: Supporting creation and strengthening of women platforms, community mobilization, and mind-set change* *Subcomponent 1B: Support for core business development for micro and small enterprises*	Expansion of access to tailored packages of personal and enterprise development support for women's business growth, with a tailored module for refugee needs; Expansion of access to mentorship, social and business networks for women through platforms that facilitate market linkages and value chain development; Improved skills of women entrepreneurs through the trainings and mentorship program and hence improved productivity; Tackling/elimination of social norms constraining women's

Subcomponent 1C: Support for trade/sector specific skills *Subcomponent 1D: Women entrepreneurship work placement program*	economic participation and productivity through mind-set trainings for women and men, sessions on social norms and engagements with men and wider community. The support will be integrated for refugees and host community members and underpinned by principles of Green, Inclusive, Resilient Development (GRID).
Component 2: Access to Finance for Women Entrepreneurs *Sub-component 2A: Grant support for micro enterprises through business competition* *Sub-component 2B: Facilitating access to credit for enterprise growth* *Sub-component 2C: Enhanced Loan Products and Processes for Women Entrepreneurs*	Sub-component 2A: Supporting women entrepreneurs with grants to expand innovative or high impact interventions; The business plan competition will seek business plans from high-potential women entrepreneurs interested in expanding their enterprises with ventures that have the potential to create jobs especially for women and youth, focus on social enterprises such as childcare facilities etc.; The grants will be for those women entrepreneur that have an interest in expanding their business. The business plan competition will support up to 3,000 women entrepreneurs (500 from RHDs). Sub-component 2B: Availability of capital for business expansion and growth. This sub-component will support women entrepreneurs, including refugees and women entrepreneurs from host communities, to meet the capital needs for business expansion and growth. Sub-component 2C: Improved access to credit from financial institutions. Under this subcomponent, GROW will address the supply side systemic constraints that financial institutions participating in the project face in meeting the financing needs of female entrepreneurs; Improved service delivery through provision of technical support will to the selected PFIs to implement mechanisms and business tools to address barriers.

Component 3: Supporting investments in enabling infrastructure and facilities including common-user facilities and child-care centers *Sub-component 3A: Multi-purpose service and production facilities to boost women enterprise productivity* *Sub-component 3B: Enabling Access to Gender Inclusive Workplace Infrastructure*	Sub-component 3A: Improved productivity due to the provision of multi-purpose service and production facilities; Improved income and livelihoods due to improved productivity; Creation of a conducive work environment for women entrepreneurs due inter alia, to the establishment of child-care centres in the facilities. Creation of employment opportunities especially for those who will work at the common-user facilities and the child-care centres Improved skills including ICT skills. Sub-component 3B: Creation of a conducive working environment thereby leading to improved productivity; Improved confidence levels of the women entrepreneurs accessing such facilities.
Component 4: Project Management Support, Policy Innovation, and Evidence Generation *Sub-component 4A: Project management support for high-quality implementation* *Sub-component 4B: Policy innovation and evidence generation*	*Sub-component 4A and 4B:* Creation of employment opportunities for Project Implementation Teams (PITs) at the MGLSD and Project Support Teams (PSTs) at MGLSD, PSFU and MLG and lower local governments (districts, sub-counties, parishes, and refugee settlements); Enhanced capacity of staff of the key implementing agencies (MGLSD, PSFU, and MLG); Support to the implementing agencies in the smooth coordination of the GROW Project activities; Enhancing knowledge on national laws and regulations on environmental and social risks and impacts management; environmental and social management systems; World Bank ESF and ESMS of the World Bank-funded projects; Improve the Government's ability to respond effectively in the event of an emergency (e.g. COVID19) through mitigation, response, and recovery measures.

5.2 Potential Negative Impacts/Risks and Mitigation measures

5.2.1 Negative impacts/risks (general) at the planning and implementation stage

Impact: Likelihood of excluding certain categories of potential beneficiaries during selection like women with disability and poorer women or vulnerable and disadvantaged individuals or groups. Component 1 of the project aims at supporting access to finance through the creation of and linkages to financial services for women. Failure to have clear screening and selection criteria could lead to exclusion of other categories of potential beneficiaries in the process; like women with disability and poorer women or vulnerable and disadvantaged individuals or groups.

Impact mitigation: The PITs should develop criteria for screening and selection of beneficiaries for financing that are clear, inclusive and acceptable by key stakeholders. Regional balance should be considered during the selection of beneficiaries including intensive publicity of the project through accessible channels to ensure full participation of the target group. Service providers will also be recruited to provide capacity building on social inclusion to all relevant stakeholders.

Impact: Likelihood of excluding certain categories of potential beneficiaries (women) with low literacy levels. Component 2, aims at supporting the human capital and social capital development through provision of skills development (technical, life-skills, digital), business advisory services, platforms that facilitate market linkages, and value chain development. However, failure to take into account the general low literacy levels among women could lead to a number of women potential beneficiaries being excluded.

Impact mitigation: The PIT will ensure that appropriate programs and a detailed inclusive selection criteria are put in place will ensure no one is excluded in the process.

5.2.2 Construction phase impacts/risks for component 2 and component 3

The project will support activities under Components 2 and 3 that are likely to generate environmental health and safety risks and impacts. Component 2 will provide funds to women to transition from micro to small enterprises, and from small to medium enterprises, which could result in small-scale civil works, while Component 3 will finance demand driven enabling infrastructure and facilities including childcare facilities, common production facilities (e.g. milling, pasteurization, storage, cooling, printing, and packaging), upgraded input and craft markets and trading centers as well as water, electricity, and digital access points. Key risks and impacts associated with these activities, that will largely occur during the construction phase, include the following;

Impact: Construction noise and vibrations. Construction noise and vibrations may result from exposure to construction and transport vehicles. This will affect the workers and the nearby communities. Given the sacle of the activities, these impacts are expected to be minimal.

Impact mitigation: The PIT will ensure that the contractors and service providers adopt best practices in line with General EHSGs;

The PIT should ensure that a risk hazard analysis and mitigation plan, proportionate to the risks identified, is developed and included in the subproject ESMPs.

Impact: Dust emission. Dust generated/emitted by connstruction and transport vehicles and from materials storage areas is likely to affect the communities and construction workers.

Impact mitigation: The PIT should ensure that contractors water construction areas to suppress dust;

Regular vehicle and truck maintenance should be emphasized (by the PIT) to control dust;

Travel speeds past roadside markets should be safely low to avoid dust plumes;
The PIT should ensure that construction workers are provided with appropriate PPEs;

Ensure proper storage and management of materials on site.

Impact: Solid waste accumulation. Activities at the construction and/or rehabilitation sites under component 2 and 3 are likely to result into accumulation of waste which could present nuisance conditions and cause pollution of the nearby areas. Due to the nature and relatively low scale of the activities, the risks and impacts related to waste accumulation and pollution will however, be minor, temporary, and confined to the area immediately surrounding the construction.

Impact mitigation: The MGLSD and PSFU PITs should develop a WMP as part of the site-specific ESMPs, for each subproject;

PIT should ensure that measures and actions to manage waste and hazardous materials, are developed and implemented;

PIT should ensure adequate training and provision of waste management procedures are incorporated into the subproject ESMPs;

PIT should ensure that the sub-projects submit statements of compliance with Environmental and Social Standards, including management of waste and hazardous materials, if any.

Impact: Occupational health and safety risks (OHS). The project presents occupational health and safety risks that may arise from the construction and equipping of public facilities. These may include Injuries resulting from cuts, falls, etc., electrocution, dust, noise and body vibration from machinery/equipment.

Impact mitigation: The PIT should ensure that Health, Safety, and Environmental (HSE) plans are developed as part of the subproject ESMPs, in line with World Bank Group General Environment, Health, and Safety (EHS) Guidelines;

PIT should ensure that all workers are provided with requisite protective gear i.e. gloves, gumboots, overalls, muffs.

Impact: Poor Labour and working conditions. The project will involve direct workers, contracted workers and primary supply workers. These are likely to be subjected to poor labour and working conditions including; lack of employment contracts, summary dismissals, exclusion of vulnerable and disadvantaged individuals or groups from employment opportunities, lack of proper gender-sensitive sanitary facilities, lack of meals and drinking water and, child labour, sexual exploitation and abuse/sexual harassment (SEA/SH).

Impact mitigation: PIT should ensure that the project will adheres to Uganda's Labor Laws and the Bank's standards concerning labor conditions and Occupational Health and Safety (OHS), including child labor;

Prepare, adopt and implement the Labor Management Procedures (LMP) for the Project, including, 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 PIT will ensure that contractors adopt and implement LMP prior to engaging project workers;

The project LMP will also outlines a workers' GRM.

The standards explained in the LMP will also be included in site-specific ESMPs. These plans will include procedures on investigation and reporting of incidences and non-conformances, emergency preparedness and response procedures, and continuous training and awareness to workers;

Project Consultants/contracted staff shall be managed in accordance with Contract terms and conditions. Contract terms and conditions shall be assessed for their compliance with the project labor management procedures;

PIT will ensure that all contractors for civil works prepare Labor Management Plans acceptable to the Client and the Bank prior to carrying out any civil works or other project activities.

Impact: Community health and safety. During the construction phase, the communities may be exposed to construction and transport vehicles, dust emissions, noise, and potential construction site and material handling-related accidents. Adverse social impacts such as gender-based violence (GBV), sexual exploitation, and the transmission of communicable diseases such as HIV/AIDS on affected communities may also occur because of project activities. The country has been hit by the COVID-19 pandemic which is affecting the entire country and spread to both urban and rural communities. This might affect project activities, which requires the project activities to apply the relevant disease preventive measures provided for by Ministry of Health (MoH) and World Health Organization (WHO).

Impact mitigation: The MGLSD and PSFU PITs should prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project, including but not limited to, behavior of Project workers, potential risks of labor influx, including the transmission of HIV/AIDS, COVID-19 and other communicable diseases, response to emergency situations, and include these measures in the ESMPs to be prepared in accordance with ESMF, in a manner acceptable to the Bank;

PIT should ensure that GBV and SEA/SH mitigation measures are reflected in relevant ESMPs before the preparation of the procurement documents. These measures will include but not be limited to, signing of enforceable Codes of Conduct by workers, establishment of referral pathways with support from the MGLSD's/PSFU GBV Specialist, sensitization activities for workers/communities by relevant Service providers and consultant staff, etc.

PIT should develop Traffic and road safety measures and actions in accordance with the Public Service Standing Orders on Fleet Management, PIU Policies and the Traffic and Road Safety Act prior to effectiveness of project sub-component works;

PIT should ensure that measures to manage traffic and road safety risks are incorporated in site-specific ESMPs.

Impact: Physical and/ or economic resettlement. Significant physical and economic displacement is not anticipated under the project since the public facilities to be constructed under Component 3 will be located on local government/district land. However, some activities under Component 3 especially those associated with last mile and household level gaps may require land to be acquired or restrictions on land use which may result in loss of crops, trees or structures on a temporary or permanent basis.

Impact mitigation: In the event that any land will be required outside of government lands a Resettlement Policy Framework (RPF) has been developed to clarify resettlement principles, organizational arrangements and compensation which will be provided to affected PAPs. Resettlement Action Plans proportionate to potential risks and impacts will be developed for subproject. Project activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and approved by the Bank. Special attention during the development of the RAPs should be paid to the current national social-economic dynamics (Vulnerable population – women, Indigenous People, Persons with Disability (PWDs).

Impact: Destruction of critical or sensitive natural habitats. Given the nature and scope of the project activities, there is minimal impact envisaged on the biodiversity, since the proposed projects are likely to be undertaken in the urban settings where the habitats may already be altered or destroyed.

Impact mitigation: This ESMF provides guidance on screening and mitigation measures to ensure that project activities do not alter or cause the destruction of any critical or sensitive natural habitats;
For any facilities to be established in virgin areas, however, potential impacts on biodiversity (flora and Fauna) will be assessed, and proposed mitigation measures included in the ESMPs.

Impact: Adverse effects on vulnerable and marginalized groups (VMGs). Communities, which meet the conditions of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (SSHUTLC) under ESS7, are present in the country and might be affected by project activities. They are considered vulnerable and disadvantaged in Uganda and include the Batwa and Ik.

Impact mitigation: Project activities are not anticipated to cause relocation or impact resources or cultural heritage of Batwa, Ik, Tepeth and Benet and other marginalized groups;

A Vulnerable and Marginalized Group Framework (VMGF) has been prepared by project's appraisal to provide guidelines on how to avoid adverse impacts of the project on these communities and ensure their access to services and potentially participation and access to other project benefits;

PIT should ensure that Vulnerable and Marginalized Groups Plans (VMGP) are developed for subprojects likely to impact these groups (Iks, Batwas, Tepeth and Benet);

The SEF includes provisions for consultation with the Batwa and Ik communities which is provided for under ESS10.

Impact: Destruction of cultural heritage sites/physical-cultural resources (PCRs). As the project will finance some limited civil works, some excavation and movement of earth can be expected. The activities to be financed by the project are small scale and very limited in scope and the potential impact on known and unknown physical and cultural resources is likely to be minimal.

Impact mitigation: At this stage in project preparation, the presence of culturally significant sites associated with the project cannot be determined. The project will avoid impacts on cultural heritage and where such avoidance is not possible, will identify and implement measures to address these impacts in accordance with the mitigation hierarchy;

A chance find procedure has been included in this ESMF and will be included in subsequent ESMPs.

5.2.3 Negative impacts/risks at the operations stage

Impact: Solid waste accumulation. Disposal of solid waste from the facilities operations is likely to be a challenge to the beneficiaries and/or users of those facilities.

Impact mitigation: For facilities that will start operations during the tenure of the PIT, the PIT should ensure that the facilities continue to adhere to/implement the WMP included in the site-specific ESMPs;

At the expiry of the tenure of the PITs and after full hand-over of the facilities, the local government structures at the districts and cities should support the beneficiaries to dispose of waste from the facilities e.g. the cities have gazetted waste disposal areas and trucks for transporting the waste which they can use to transport waste from the facilities.

After the handover of the facilities, the relevant local government structures at the district and city levels should continue to offer trainings to the beneficiaries in waste management based on waste management procedures are incorporated into the subproject ESMPs.

Impact: OHS aspects during the operation of equipment. Occupational health and safety risks that may arise during operation of the equipment include Injuries resulting from cuts, burns, electrocution etc.

Impact mitigation: For facilities that will start operations during the tenure of the PIT, the PIT should ensure that the facilities continue to adhere to/implement the Health, Safety, and Environmental (HSE) plans are developed as part of the subproject ESMPs;

At the expiry of the tenure of the PITs and after full hand-over of the facilities, the local government structures at the districts and cities especially the Senior Labour Officers should conduct OHS inspections and support the beneficiaries with refresher OHS trainings.

Impact: Child abuse including molestation. Since some of the facilities will be childcare centres, there is the risk of children being mistreated by the care takers or bigger children who access the facilities.

Impact mitigation: The PIT should ensure that the facilities continue to adhere to GBV and SEA/SH mitigation measures reflected in the subproject ESMPs;

The PIT should sensitise the women (beneficiaries) about the potential and dangers of such incidents.

The PIT should ensure that the facilities implement a child protection policy. After handover of the facilities and expiry of the tenure of the PIT, this role should be played by the respective local government structures especially the Community Development Officers and Community Liaison Officers of the Uganda Police;

Have restrictions on age limits for children who are allowed into the facilities.

Inclusion and nondiscrimination of vulnerable and disadvantaged individuals or groups

Inclusion and nondiscrimination refers to disadvantaged and vulnerable individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, economic disadvantages, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's

benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so.

Inclusion and nondiscrimination risk criteria: To help determine the risk of Inclusion and nondiscrimination for the Project, the following five risk criteria were applied:

I. Presence of disadvantaged or vulnerable or marginalized groups (e.g., refugees) in the project area.
II. Higher concentration of disadvantaged and vulnerable individuals or groups in project area (mainly urban areas).
III. Project benefits directly relevant to disadvantaged or vulnerable individuals or groups (i.e., health, education, or service providers).
IV. Reported incidents of violence against disadvantaged or vulnerable individuals or groups in the project area.
V. Project activities conducive to discrimination or harassment (i.e., employment, application process for services, in-person receipt of services).

Based upon these criteria projects are classified as either High-risk, Moderate risk or Low Risk as per risk related to exclusion and discrimination. The Project risk rating is considered Moderate as risk Criteria 1,2, 5 for components 1,2 and 3.

Risks

(i) Risks of vulnerable and disadvantaged individuals or groups declining to access project services for fear of rejection, retaliation, or being reported to the police; (ii) risks vulnerable and disadvantaged individuals or groups patients being reported to the police if their status is disclosed as part of project processes; and (iii) risk of vulnerable and disadvantaged individuals or groups being excluded from project employment opportunities.

Mitigation measures

The following mitigation measures are proposed to manage the risk of exclusion and discrimination of vulnerable and disadvantaged individuals or groups.

Management of project social and environmental risks and impacts

- Identification of good practices (e.g., training, protocols, and outreach efforts) to provide to various stakeholders in the sector.
- Enhance consultations with stakeholders, including NGO/CSO to ensure inclusion and nondiscrimination.
- Establish a World Bank enhanced implementation support and monitoring and hotline.

Labor and Working Conditions

- Training on inclusion and non-discrimination, including on vulnerable and disadvantaged individuals or groups for clients (e.g., workers, contractors, and sub-contractors) and mobilization of communities.
- Include in the contract provisions of non-discrimination and enhance CoCs (Codes of Conducts) to guard against all forms of discrimination.
- Enhance monitoring and supervision through a World Bank enhanced implementation support and monitoring, community monitoring.
- Principles of inclusion and non-discrimination, including based on vulnerability, included in enhanced hiring procedures (LMP e.g., TORs, advertisements).

Community health, safety, and security

- Training and codes of conduct for project workers.

Stakeholder Engagement

- Assess/review project's inclusion and nondiscrimination in consultations with entities' working on vulnerable and disadvantaged individuals or groups.
- Collaborate with stakeholders, including NGO/CSOs to enhance access to GRMs, in refugee and host communities.
- Update the Stakeholder Engagement Plan to include communications and engagements of disadvantaged and vulnerable individuals or groups, including NGO/CSOs.
- Enhance and strengthen joint supervision through a World Bank enhanced implementation support and monitoring.

6. PROCEDURES TO ADDRESS ENVIRONMENTAL AND SOCIAL ISSUES

This section defines steps, actions and responsibilities for screening, assessing and managing environmental and social risks and impacts of subprojects in line with the national legislation and World Bank standards.

6.1 The ESIA Process

In compliance with the National Environment Act (NEA) and the Bank Standards, particularly ESS1, environmental and social assessment for GROW subprojects shall be closely integrated with the project's economic, financial, institutional, social, and technical analyses during the selection, siting, and design of the Project. In addition to integrating environmental and social aspects in the aforementioned, risks and impacts that could occur during implementation will be mitigated, monitored and reported.

The responsibility to integration of environmental and social aspects into the subproject shall be of the subproject proponent and will be verified by the MGLSD and PSFU.

This will involve applying the appropriate level of ESIA to the subproject, aligned to identification, preparation, appraisal, approval and implementation of the subproject. The ESIA process in Uganda, illustrated in **Figure 5**, will be applied in a manner that ensures complying with the applicable Bank Standards as described in the ESF. The process involves:

a. Screening and risk classification.
b. Preparation of Project brief (for subprojects with low or moderate risk classification and that do not require full/ detained ESIA under NEA 2019);
c. Detailed environmental and social impact study for projects with moderate to high risk classification; and require full ESIA under NEA);
d. Decision making by NEMA (and lead agencies) and for GROW, decision making includes review and clearance by MGLSD (and PSFU) and the Bank before submission to NEMA.

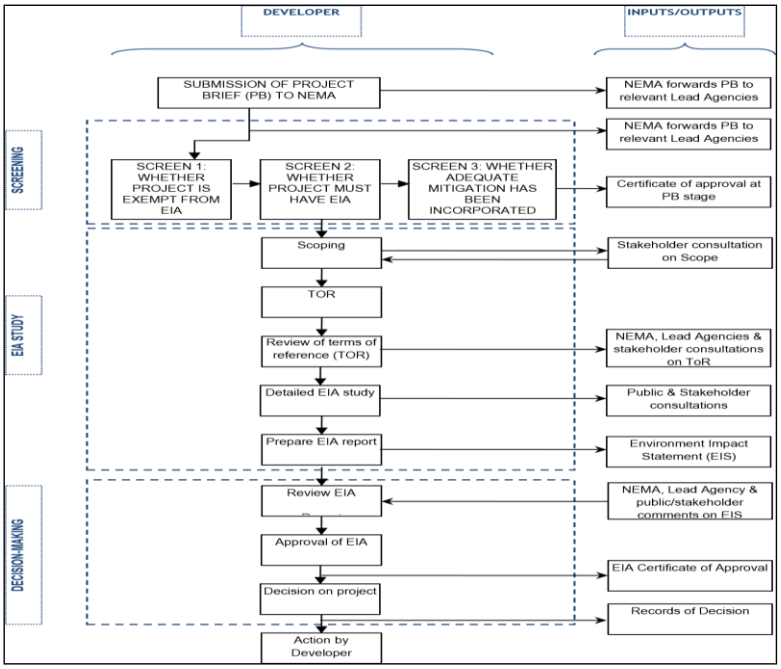


Figure 5 - The ESIA process in Uganda

6.1.1 Environmental and Social Screening

The objective of screening is to determine the extent to which a project is likely to affect the environment and therefore, be able to determine the level of assessment required. GROW subprojects shall be screened in line with the NEA 2019 and the ESF. The screening will also identify the need to produce RAPs and VMGPs for the sub-projects. Screening will be undertaken for each subproject at identification stage and by its proponents, review and cleared by the relevant Participating Financial Institution (PFI), and MGLSD and PSFU PITs.

According to section 112 of the National Environmental Act (2019) screen of projects is already implied by the categorization in schedule 4 and 5. Section 112 indicates that the developer of a project set out in Schedule 4, shall undertake an environmental and social impact assessment by way of project brief which is submitted to the Authority or Lead Agency in the manner prescribed by National Environment and Social Assessment Regulations.

Section 113, categorization of projects for purposes of environmental and social impact assessments. Schedule 5 provides that the developer shall conduct an environmental and social impact assessment by way of scoping; prepare terms of reference for an environmental and social impact study; and undertake an environmental and social impact study as prescribed by regulations. The environmental

and social impact assessment undertaken, shall assess the potential impacts of individual projects and their contribution to the total cumulative effect.

With regard to the Banks ESF, the current overall Project (GROW) E&S Risk Classification is Substantial. The Bank will review the risk classification assigned to the overall Project on a regular basis, including during implementation, and will change the classification where necessary, to ensure that it continues to be appropriate. Any change to the classification will be disclosed on the Bank's website.

Under the ESF, subprojects, that are identified, prepared and implemented during the course of the GROW, will be subject to appropriate environmental and social assessment as follows: (a) High Risk subprojects, in accordance with the ESSs; (b) Substantial Risk, Moderate Risk and Low Risk subprojects. If the risk rating of a subproject increases to a higher risk rating, the subproject proponent and MGLSD/PSFU will apply the relevant requirements of the ESS and the ESCP will be updated as appropriate. See Box 1 for guidance on risk classification under the ESF.

Box **1:** E&S risk classification according to World Bank's Environmental and Social Framework

Aspect	**High Risk Projects**	**Substantial Risk Projects**
Project type, location, sensitivity, scale	"Complex large to very large scale in sensitive location(s) ".	"Not as complex; large to medium scale not such sensitive location ".
Nature & magnitude of risks & impacts, available mitigation	Mitigation unproven: unable to entirely address significant risk; high residual value.	Mitigation more reliable: significant risks but possible to avoid or address.
Borrower capacity and commitment	Challenges and concerns about track record regarding E&S issues, significant stakeholder engagement capacity, commitment, track record concerns.	Some concerns about borrower track record, engagement capacity but readily addressed.
Context of risk relevant to ES measures	Significant effects on ability to mitigate risk - significant contextual risks outside project control impacting on E&S performance and outcomes.	Some effects on ability to mitigate risk - known and reliable mechanisms to prevent or minimize, enforcement is weak in some respects, some stakeholder engagement concerns but readily addressed.
Aspect	**Moderate Risk Projects**	**Low Risk Projects**
Project type, location, sensitivity, scale	"No activities with high potential for harming people or environment; located away from sensitive areas ".	"Few or no adverse risks and impacts.
Nature & magnitude of risks & impacts, available mitigation	Easily mitigated: site specific, low magnitude risks.	No further assessment after screening but Some basic EHS measures are often necessary.
Borrower capacity and commitment	Sufficient borrower experience, track record, stakeholder engagement capacity.	Minimal or negligible risks to and impacts on human populations and/or the environment
Context of risk relevant to ES measures	No effects on ability to mitigate risk – no contextual risks with effects on E&S performance	Negligible risk.

Exclusion Criteria

The Project will exclude the following types of activities as ineligible for financing under the Project:

- Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) impacts.
- Activities that will be implemented in ecologically sensitive areas or protected areas.
- Activities that have a high probability of causing serious adverse effects to human health and/or the environment.
- Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.
- Activities that may have significant negative effects on the lands or rights of Vulnerable or Marginalised Groups.
- Activities that may involve significant involuntary resettlement or land acquisition.
- Activities that impact have significant impacts on cultural heritage.

6.1.2 Preparation of Project Briefs

The Bank requires appropriate level of environmental and social assessment of subprojects in accordance with national law and any requirements of the ESSs that the Bank deems relevant to such subprojects. For GROW, a project brief shall be prepared if required by NEA 2019 and the risk classification for the subproject is low or moderate under ESS1. The Brief shall provide essential project information to guide integration of environmental and social aspects into the design and decision making as well as help integrate environmental and social aspects into the subproject design. The report shall include the following key information:
a) Contact details of developer;
b) Characteristics of project;
c) Project description;
d) Reasons for project;
e) Background to the project;
f) Project site;
g) Baseline data;
h) Physical form of the development;
i) Construction practices;
j) Operations;
k) Analysis of alternatives;
l) Other large projects within the area of influence of the proposed project;
m) Characteristics of the potential impacts;
n) Nature, extent and magnitude of impacts;
o) Probability of impacts;
p) Duration frequency and reversibility of impacts;
q) Mitigations measures proposed; and
r) Trans-boundary nature of the impacts.
s) an ESMP including implementation arrangement and capacity of the subproject proponent.

The details of environmental and social baseline and risks to be are contained in the ESIA regulations and ESS1. Environmental and social assessment of the ESF. The proponents of the subprojects will be required to demonstrate that environmental and social aspects have been integrated into the design and included in the ESMPs given that ESIAs are not necessary for the subprojects under the GROW project. A screening checklist that will be used for the subjects has been included as Annex 1.

6.1.3 Scoping and Terms of Reference (ToR)

The purpose of scoping is to determine the scope of work to be undertaken in assessing the environmental and social impacts of the proposed project. It identifies the critical environmental and social impacts of the project for which in- depth studies are required, and elimination of the insignificant ones. The scoping exercise should involve all the project stakeholders so that consensus is reached on what to include or exclude from the scope of work. It is also at this stage that project alternatives are identified and taken into consideration. The contents of the scoping report are the same as the project brief, however, more detail is likely to be needed. This may involve some preliminary data collection and field work. Scoping and preparation of terms of reference for NEMA consideration will be undertaken where the subproject screening determines a full ESIA is required.

Scoping and preparation of terms of reference will be undertaken for each subproject at preparation stage and by the its proponents, review by the relevant PFI, MoGLSD and PSFU PITs, and cleared by the Bank.

6.1.4 Environmental and Social Impact Study

According to the National Environment (Environmental and Social Assessment) Regulations, No.143 of 2020, Environmental and Social Impact Study (ESIS) refers to the detailed study conducted to determine the possible environmental impacts of a proposed project and measures to mitigate their effects. The ESIS process contains the following key stages:

a) Scoping and ToR;
b) Preparation of the ESIS;
c) Review of EIS and Decision on project; and
d) Environmental Monitoring.

In preparing an ESIS, relevant information is collected on issues of real significance and sensitivity. The baseline shall be collected on all relevant aspects and impacts covered by the ESIA Regulations 2020 and the Bank's ESS1-ESS10. These are then analyzed, mitigation measures developed for the adverse impacts and compensatory measures recommended for unmitigated environmental impacts. Measures aimed at enhancing beneficial or positive impacts are also given.

The ESIS shall also contain and environmental and social monitoring plan (**See monitoring below for more information**). The ESMP matrix that includes a column for code/number (for ease of reference), impact/risk, mitigation measures/actions written in a succinct manner, Key Performance Indicators, monitoring frequency, responsibility for implementation, responsibility for monitoring, and cost will be prepared. In ESMP, in addition to the matrix above should include institutional arrangements and capacity for ESMP implementation and monitoring (focus on Executing agency i.e. MGLSD and PSFU, Supervision Consultant, Contractor, beneficiary responsible for the subproject and also the role of NEMA; reporting arrangements, that is monthly by the Contractor or subproject proponent and quarterly by MGLSD/PSFU to the Bank and other stakeholders; and Requirements such annual audit.

An ESIS documents the findings and is submitted to NEMA by the developer.

Responsibilities: ESMP will be undertaken by consultants hired by respective sub-project proponents and reviewed by the Project Implementation Team (PIT) and the World Bank.

6.1.5 Review of Project Brief/ESIS and Decision on Project

The Developer is required to submit ten (10) copies of the ESIS to NEMA for review and approval. NEMA then forwards a copy to the Lead Agencies for comments. NEMA in consultation with the Lead Agencies (in this case including the District Local Governments) shall review the contents of the ESIS, paying particular attention to the identified environmental and social impacts and their mitigation measures, as well as the level of consultation and involvement of the affected stakeholders in the ESIS process. In this review, the level to which the ToR set out for the study is addressed shall be considered. In making a decision about the adequacy of the ESIS, NEMA shall take into account the comments and observations made by the Lead Agencies, other stakeholders and the general public. NEMA may grant permission for the project with or without conditions, or refuse permission. If the project is approved, the Developer will be issued a Certificate of Approval.

Subproject proponents, after preparing ESIA/Project Brief in line with national legislation and ESF will submit for review by the relevant PFI, MoGLSD and PSFU PITs. When satisfied with the quality og the Project Brief/ESIS, MoGLSD will submit to the Bank for clearance before submission to NEMA.

6.1.6 Public consultations and disclosure

NEA 2019 and ESS1 requires stakeholders to be engaged throughout the project implementation cycle. As part of the engagement, public consultations will take place during the environmental and social screening process, and the input from the public consultations will be reflected in the design and the mitigation and monitoring measures. Consultations will also be undertaken during the scoping period and the preparation of the terms of reference of the Environmental and Social Impact Assessment. This is supposed to be done by an ESIA practitioner.

6.1.7 Environmental and Social Management Plan

Project Briefs/ESIS as part of standard content will contain Environmental and Social Management Plans (ESMPs) and this section provides guidance and format for their (ESMPs) development.

ESMP for GROW is intended to ensure efficient environmental and social management of its activities. The ESMP translates recommended mitigation and monitoring measures into specific actions that will be carried out by the proponent. The main components of an ESMP are described in **table 15** below, which reflects practice at the World Bank. Ideally the ESMP should contain the following:

a) Summary of the potential impacts of the proposal;
b) Description of the recommended mitigation measures;
c) Statement of their compliance with relevant standards;
d) Allocation of resources and responsibilities for plan implementation;
e) Schedule of the actions to be taken;
f) Programme for surveillance, monitoring and auditing; and
g) Contingency plan when impacts are greater than expected.

The ESMP should contain commitments that are binding on the subproject proponent. It provides a basis for a legal contract that prescribes responsibilities of the proponent. The ESMPs establish environmental and social performance standards and requirements for those carrying out the works or

providing supplies. NEA 2019 requires developers to implement an environmental and social management system for the operational phase of the project, and the ESMPs provide the foundation fr meeting this requirement. Before start of any subproject works, the a Contractor engaged by subproject owners shall be required to develop the Contractors ESMP to guide implementation of the civil works.

Table 15: Components of ESMP

Components of ESMP	
ESMP Component	**How to address**
Summary of impacts	The predicted adverse environmental and social impacts for which mitigation is required should be identified and briefly summarised.
Description of mitigation measures	Each mitigation measure should be briefly described with reference to the impact to which it relates and the conditions under which it is required (for example, continuously or in the event of contingencies). These should be accompanied by, or referenced to, project design and operating procedures which elaborate on the technical aspects of implementing the various measures.
Description of monitoring programme	The monitoring program should clearly indicate the linkages between impacts identified, measurement indicators, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions.
Institutional arrangements	Responsibilities for mitigation and monitoring should be clearly defined, including arrangements for coordination between the various actors responsible for mitigation.
Implementation schedule and reporting procedures	The timing, frequency and duration of mitigation measure should be specified in an implementation schedule, showing links with overall project implementation. Procedures to provide information on the progress and results of mitigation and monitoring measures should also be clearly specified.
Cost estimates and sources of funds	These should be specified for both the initial investment and recurring expenses for implementing all measures contained in the ESMP, integrated into the total project costs, and factored into loan negotiations.

Source: adapted from World Bank, 1999

In addition, the Environment and Social Management Plans (ESMP) will contain provisions on the management of inclusion and non-discrimination of vulnerable and disadvantaged individuals or groups. These provisions are consistent with recent actions taken by the GOU that are highlighted and included in Annex 11.

The purpose and objective of these provisions is to ensure: (i) that project impacts do not fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable; (ii) there is no prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged or vulnerable; (iii) Bank financed operations are implemented through their respective life cycles in a manner that is aligned with the inclusion and non-discrimination principles embedded in applicable Bank requirements including the Environmental and Social Standards in line with WB Policy paragraph 4 (b) ESF paragraph 28 (b) of ESS1 on Assessment and Management Environment and Social Risk and Impacts.

Guidelines on the implementation of the provisions will be developed and widely disseminated. These will address inclusion and nondiscrimination that cover vulnerable and disadvantaged individuals or groups monitoring to

ensure the implementation of the mitigations measures for their inclusion and non-discrimination. The Project Operational Manual (POM) will provide guidelines to facilitate the implementation of these provisions.

6.1.8 Environmental and Social Monitoring

Monitoring is the continuous and systematic collection of data in order to assess whether the environmental objectives of the project have been achieved. Good practice demands that procedures for monitoring the environmental and social performance of proposed projects are incorporated in the ESIS.

The purpose of monitoring is to:

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

To assist in implementation of identified mitigation and monitoring strategies, an environmental and social monitoring plan will be developed. It will describe the various environmental and social management strategies and programmes to be implemented. It will also identify the management roles and responsibilities for ensuring that monitoring is undertaken, results are analyzed and any necessary amendments to practices are identified and implemented in a timely manner.

The monitoring plan shall provide for monitoring of both project implementation and environmental quality. It shall contain a schedule for inspecting and reporting upon the implementation of the project and associated mitigation measures identified in the ESIS. The monitoring plan shall also identify the key indicators of environmental and impact. Further, the plan shall provide a schedule for monitoring each indicator and for reporting the monitoring results to NEMA or the Local Authority.

The data collected during monitoring is analysed with the aim of:

a) Assessing any changes in baseline conditions;
b) Assessing whether recommended mitigation measures have been successfully implemented;
c) Determining reasons for unsuccessful mitigation;
d) Developing and recommending alternative mitigation measures or plans to replace unsatisfactory ones; and
e) Identifying and explaining trends in environment improvement or degradation.

The MGLSD and PSFU will develop a standard set of indicators applicable to all subprojects, and some optional ones that may be apply to only specific subprojects.

World Bank Enhanced implementation support and monitoring

The World Bank will provide enhanced implementation support and monitoring to all World Bank operations on inclusion and non-discrimination to vulnerable and disadvantaged individuals and groups in Uganda. The World Bank together with IFC will hire a renowned independent entity with a strong knowledge of the Ugandan context and a track record of enhanced third party implementation support and performance monitoring. The entity will in turn hire NGO/CSOs with expertise and experience in inclusion and non-discrimination issues related to vulnerable and disadvantaged individuals and groups in Uganda.

Objectives of enhanced implementation support and monitoring

The hired entity by the World Bank to support the PIU will primarily focus on:

- Enhancing implementation support in addressing grievances and concerns from beneficiaries, communities, and workers relating to discrimination or exclusion from project benefits.
- Enhancing existing project level grievance mechanisms and developing and operating an independent mechanism that would monitor and manage issues of discrimination or exclusion raised directly through this mechanism or some other channel.
- Assisting the World Bank in strengthening capacity of Project Implementation Units, workers, and contractors to address inclusion and non-discrimination, including conducting consultations on inclusion and non-discrimination with vulnerable and disadvantaged individuals and groups.
- Developing a strong IT system and process that secures personal data and information in a manner that is safe, ethical and confidential to ensure that it can't be used to discriminate against vulnerable and disadvantaged individuals and groups.

Where cases of discrimination or exclusion of vulnerable and disadvantaged individuals and groups are reported, the entity will report the grievances to the World Bank and PIU and follow up on agreed actions to resolve the case. In addition, the entity will monitor the efficacy and effectiveness of the implementation of the mitigation measures at ensuring inclusion and non-discrimination of vulnerable and disadvantaged individuals and groups and allow recourse where incidents of exclusion or discrimination are reported.

Scope of enhanced implementation support and monitoring

To provide enhanced implementation support and monitoring to WB operations the entity is required will help develop and implement the following activities:

- **Establish an effective monitoring mechanism for vulnerable and disadvantaged individuals and groups related grievances** through enhancing existing project level grievance redress mechanisms and designing and operating a mechanism for managing and documenting cases of discrimination, exclusion, and/or retaliation under the core principles of safety, ethics, and confidentiality in the collection, classification, storage, transfer, and management of data and evidence.
- **Establish a case and referral management system** that will: manage cases reported through the project Grievance Redress Mechanism and/or a hotline to be established for all World Bank operations in Uganda; and refer complainants to appropriate counselling, legal and support services as needed.
- **Facilitate outreach and sensitization** by preparing community and beneficiary information materials on community rights on Bank financed operations within the Constitution of Uganda (informed by official circulars issued by the government on non-discrimination and inclusion) and World Bank policies. In addition, they will help the World Bank to prepare and implement a plan to disseminate information about the support available to communities.
- Supporting the World Bank staff to **provide capacity strengthening and technical support** training government staff and consultants, contractors and workers on non-discrimination and inclusion by developing training materials, identifying venues, providing trainers, etc.
- **Develop a monitoring and evaluation system** to evaluate how the mitigation measures being implemented are working to allow improvement and changes as required and regularly evaluate the effectiveness of mitigation measures in ensuring non-discrimination and inclusion on Bank financed projects.

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Roles and responsibilities of Enhanced implementation support and monitoring

The Government of Uganda (GOU) and the project implementation unit (PIU) are responsible for the implementation of all project activities including all mitigation measures outlined in this framework. The Bank provided enhanced implementation support and monitoring is specifically focused on supporting the PIU to implement and monitor the mitigation measures on inclusion and non-discrimination of vulnerable and disadvantaged individuals and groups.

Support to the PIU includes developing a mechanism for managing and documenting cases of discrimination, exclusion, and/or retaliation as well as recommending correctives measures. The GOU and PIU remain responsible for the implementation of correctives measures or actions plans to implement these recommendations.

6.2 Appraisal, Support and Management of Financial intermediaries

PFIs shall comply with this ESMF, national legislation on environment and social risks and impacts of development projects and the World Bank ESF.

In this regard:

a) MGLSD and PSFU will prepare, consult upon, disclose and implement an E&S Capacity Building Plan to include, at a minimum:
   (i) assessment of capacity and resources for E&S management by PFIs (once identified)
   (ii) awareness training on E&S requirements and tools under the project for PFIs) and
   (iii) one-on-one support to PFIs on implementation of the required tools.

b) MGLSD and PSFU will incorporate appropriate environment and social clauses in all legal agreements with between MGLSD and PFIs to ensure that PFIs adopt and implement the E&S tools (including environmental and social clauses in legal agreements) and specific assessment instruments, as appropriate, as per the E&S Integration Plan and develop and/ or strengthen their ESMS, as appropriate.

c) MGLSD and PSFU will outline in detail its/their procedures for E&S due diligence on PFIs' ESMS as well as specific activities financed under GROW, and procedures will:

   (i) state roles and responsibilities of the Ministry and PFIs in E&S due diligence and monitoring of specific activities financed under GROW.
   (ii) Contain reporting formats and requirements for PFIs to report at least annually to BoU on ESMS implementation as well as screening and monitoring outcomes of specific activities financed under GROW;

d) MGLSD and PSFU stipulate that ESMS shall be a disbursement condition from MGLSD to PFIs for GROW funding and contain sample E&S language for the MGLSD financing agreement / master financing agreement with PFIs.

e) For PSFU the monitoring requirements will need to demonstrate how they will review the subprojects being selected by the PFIs to ensure they are following the agreed screening approaches, exclusion criteria and management of E&S risks during implementation and ensuring there is the required level of management oversight. The project will conduct a readiness assessment of the apex PSFU's ESMS as a condition of effectiveness.

f) PFIs that will receive the GROW funds will develop, maintain, and implement an ESMS to identify, assess, manage, and monitor the environmental and social risks and impacts of FI subprojects ***before carrying out screening of any proposed FI subproject.*** Once established, both PSFU and PFIs shall maintain and implement the ESMS throughout Project implementation and monitor compliance with the same. The ESMS shall include, inter alia, the following elements:
   (i) Identification of the FI subprojects that may receive support from the Project.

(ii) An environmental and social policy endorsed by the FI senior management specifying any details on the E&S policy that may be relevant.
(iii) Clearly defined procedures for the identification, assessment and management of the environmental and social risks and impacts of FI subprojects, in accordance with ESS9, including, inter alia, stakeholder engagement and disclosure requirements
(iv) Exclusion list with the activities that are not eligible for financing,
(v) An organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities detailing specific details, as needed, including a Designated senior management representative to have overall accountability for environmental and social performance of FI subprojects that receive support from the Project.
(vi) Monitoring and reporting of environmental and performance of FI subprojects and the effectiveness of the ESMS.
(vii) Incidents and accidents notification and subsequent reporting requirements
(viii) An external communications mechanism, including measures to respond to public enquiries and concerns in a timely manner.

These ESMS, plans and procedures may be developed by the MoGLSD and PSFU cleared by the Bank during implementation of the project.

7. STAKEHOLDER CONSULTATIONS AND ENGAGEMENT

7.1 Overview

Meaningful engagement with stakeholders is necessary for the project's social license of operation and sustainability. Engagements to date have been guided by ESS 10 Stakeholder Engagement and Information disclosure. Guidelines for inclusion and working with stakeholders including VMGs, refugees and vulnerable and disadvantaged individuals or groups, have been discussed. The project has had extensive stakeholder engagement from early stages of the project identification and preparation, with interested parties such Ministries, Departments and Agencies (NPA, UIA, NEMA, NFA, MTIC) among others. Other stakeholder engagements included coordinators of CSOs working with VMGs, private sector representatives, civil society organizations including faith-based institutions.

As seen under the ESS10 Stakeholder Engagement and Information Disclosure under the ESF recognizes the importance of open and transparent engagement with project stakeholders. Success of any project is hinged on the level and quality of stakeholder engagement, which is to be an inclusive process expected to occur throughout the project life cycle. Engagement is more useful when introduced in the early phases of project development and is mainstreamed into all levels of decision-making. To this end, a Stakeholder Engagement Framework (SEF) as part of the Project ESMF has been prepared. As part of the GROW project, stakeholder engagement should be allocated an adequate budget to undertake implementation of the environmental and social mitigation measures for effective and meaningful stakeholder engagement with all of the project affected groups throughout the life cycle of the project. GoU through MGLSD and Ministry of Finance Planning and Economic Development have committed to implement the project in compliance with the World Bank's ESF as documented in the Environmental and Social Commitment Plan which forms part of the Financing Agreement.

7.2 Objectives of stakeholder and Community Consultations

The consultations with stakeholders and communities were carried out to specifically achieve the following objectives to:

a. provide information about the project and to tap stakeholder information on key environmental and social baseline information in the project area;
b. provide opportunities to stakeholders and project beneficiary communities including refugees, VMGs and vulnerable and disadvantaged individuals or groups to discuss their opinions and concerns respectively;
c. solicit the stakeholders' views on the project and discuss their involvement in the various project activities;
d. discern the attitudes of the community and their leaders towards the project so that their views and proposals are taken into consideration in the formulation of mitigation and benefit enhancement measures;
e. identify specific interests of and to enhance the participation of vulnerable and disadvantaged individuals or groups; and
f. Inform the process of developing appropriate management measures as well as institutional arrangements for effective implementation of the Project.

7.3 Engagement with stakeholders

Initial preparatory stakeholder engagements meant to inform project design were held between 23rdMarch and 20th April 2022 and this will be a continuous process throughout the life cycle of the GROW. However, stakeholder engagement had taken place to inform project scoping and identification. Details about the purpose of the ESMF and other environment and social safeguards instruments (ESMF, RPF, VMGF, ESCP and this SEF) in regard to Generating Growth Opportunities for

Women (GROW) Uganda were communicated through an official email from MGLSD, with an introductory letter about the project attached. Stakeholder consultations and discussions with relevant sector institutions, including but not limited to MGLSD, OPM, UNHCR and PSFU among other members was undertaken with the use of online platforms such as Zoom, WhatsApp, Google meet, WebEx, email correspondences as well as telephone-based consultations with relevant key stakeholders.

7.4 Issues of focus during stakeholder engagement

The stakeholders were invited to respond to specific questions relating to the GROW project and were also encouraged to make additional comments during the consultation process. Some of the key issues discussed with stakeholders regarding the project were summarized as follows:

a. Provision of information on the project to the stakeholders i.e., its development objective, key components, activities to be undertaken;
b. Target beneficiaries of the project;
c. Modalities of mobilizing communities to engage in GROW with a focus on the youth, women and other vulnerable groups;
d. Implementation of the project in VMG communities
e. Suggestions on how best the project could be implemented while ensuring sustainability; and
f. Any other suggestions to improve project plans and its implementation.

7.5 Stakeholders engaged

The respective stakeholders that were consulted in the first phase (phase 1) and the issues that were raised and responses from MGLSD are summarised in **Table 16** below. A total of 116 individuals participated in the consultations and of these, 57 (49.1%) were men and 59 (50.9%) were women, which was an almost balanced representation. The stakeholder consultation meeting attendance lists for phase 1 are presented in **Annex 2.** The stakeholder consultation meeting attendance list for phase 2 is presented in **Annex 3**.

Table 16: Summary of Stakeholders Engaged during phase 1 of the consultations

S/N	Institution Consulted	Male	Female	Total
1	• Ministry of Gender, Labour and Social Development (MGLSD)	5	10	15
2	• Ministry of Finance, Planning and Economic Development • Uganda Investment Authority (UIA) • National Planning Authority	2	3	5
3	• Private Sector Foundation Uganda (PSFU)	5	2	7
4	• Office of the Prime Minister (OPM)	2	2	4
5	• Ministry of Trade, Industry and Cooperatives	3	2	5
6	• Ministry of Agriculture, Animal Industry and Fisheries	2	2	4
7	• Ministry of Lands, Housing and Urban Development (MLHUD)	3	5	8
8	• Ministry of Tourism, Wildlife and Antiquities (MTWA) • Department of Museums and Monuments (DMM) • Uganda Wildlife Authority (UWA)	1	1	2
9	• Ministry of Water and Environment • National Forestry Authority (NFA) • National Environment Management Authority (NEMA)	3	2	5
10	• Makerere University Business School (MUBS) • Other Higher institutions of learning – Kyambogo	1	1	2

	University, Makerere University			
11	• Private Sector • Private Sector Foundation Uganda (PSFU) • Commercial Banking and Financial Institutions • Non-Governmental Organisations (NGOs) • Uganda Manufacturers Association (UMA)	4	3	7
12	• Development Partners, • UNDP • UNHCR	6	6	12
13	• VMGs Representative Organisations; • Organisations of people with disability - NUDIPU, • Women's disability group, etc.	2	2	4
14	• Civil Society Organisations: • Women Organisations, Faith Based Organisations (FBOs) • Religious and Cultural Organisations • Gender Activists	3	2	5
15	• Ministry of Local Government • Randomly Selected Local Governments	5	6	11
16	• Local communities with potential beneficiaries of the project • Community members • Women	10	10	20
	Total	**57**	**59**	**116**

Summary of key issues raised by GROW Project Stakeholders

Table 17: Summary of Key Issues Raised by GROW Stakeholders_ Phase 1 of Consultations

S.N	Valued Design, Environmental and Social Component (VESC)	Recommendations and comments
1	Project Design	1. The Project Implementation Teams (PITs) to engage the Uganda Wildlife Authority (UWA) during the GROW project / sub project design for those located close to or within Protected Areas to avoid impacting on critical habitats such as breeding grounds and nesting sites. 2. Follow the mitigation hierarchy i.e. Avoidance (divert the sub projects), Minimize (choosing the best location options, avoid the existing tourism / wildlife areas) and follow UWA Guidelines for the design of Biodiversity Offsets. 3. Alternative project designs should be explored to ensure that the project does not adversely impact the tourist value of the protected areas. 4. The designs should be aligned with the culture of the people. 5. Livelihood options should be proposed by the affected households and involve the VMGs in the design of the GROW Project. 6. Align the components under the GROW Project with another World Bank financed Forest Landscape Project, to ensure synergies and avoid duplication of resources and efforts. 7. Assess the characteristics of the VMGs and use this information in the design of the GROW Project. 8. The design of the Enhancing Growth Opportunities and Productivity for Women Enterprises (GROW) Project should be aligned to ensure synergies and avoid institutional conflicts. 9. Clear implementation modalities of all the components should be developed in partnership with the Office of the Prime Minister, District Local Governments and other key stakeholders prior to project implementation. 10. Projects with multiple Implementation Units have a risk of implementation delays and conflicts. These risks should be managed. 11. The PIT s should use the same pre-existing structures for effective project implementation of the GROW Project. 12. Buy Uganda and Build Uganda (BUBU) should be factored in the design and implementation of GROW Project to escalate the intended benefits.
2	ESIA Studies	Ensure that ESIA studies undertaken and approvals granted prior to project implementation.
3	Influx of Labour, and Working Conditions	1. GROW Project to develop a Labour Force Management Plan to ensure workers are given contracts, have descent and safe working conditions and are allowed to bargain collectively. 2. Document the number of jobs and quality (casual, semi-skilled and skilled labour) that will be created by GROW Project.

		3. The project should employ locally available labour and expertise to the greatest extent. 4. Document the jobs created by the GROW Project so that the impact of the project can be further emphasized. 5. GROW Project should use the existing labour force management frameworks e.g. District Labour Officers. 6. Undertake skilling of the rural people in order for them to participate in the project. The PWDs, Youth, Women, and Girls should be trained to take up off-grid project opportunities. 7. Sourcing for Service providers should be done locally and fairly especially for off-grid projects. 8. The project should put in place measures to avoid Gender Based Violence (GBV) and Violence Against Children (VAC).
4	Health and Safety of workers and communities	1. The two PIT s to work with the Department of Occupational Safety and Health (DOSH) in the monitoring and supervision of Service providers to ensure workers' and community health and safety are properly managed during GROW Project implementation. 2. Infrastructure such as schools, water supply schemes and health centres should be designed with participation of both host communities and VMGs.
6	Loss of Land and Restrictions in Land Use	1. Where necessary, the PIT s should acquire land prior to project implementation. 2. Adequate and timely compensation should be provided to project affected communities, if any. 3. Cut-off dates should be communicated earlier to the Project Affected Communities.
7	Environment, Biodiversity and Natural Resources Management	1. The GROW Project should not be implemented among communities that encroach/occupy protected areas as this may legitimize their illegal occupation. 2. Natural resources, wildlife, Forestry and Biodiversity Experts should be part of the ESIA studies especially for sub-components close to or within protected areas such as Forest Reserves and National Parks. 3. There is a potential risk of hazardous and non-hazardous waste e.g. electronic waste being generated. GROW Project should include E-waste management strategies in the ESMF. 4. Reuse, and recycling of waste should be prioritised for waste management.
8	Vulnerable and Marginalised Groups	1. The vulnerable groups were identified as female-headed households, people with disabilities (PWDs), the elderly, child headed households, women at risk, and people with diseases. 2. The ethnic minorities were also recorded among the marginalized communities in Uganda. The people who live in Islands were also identified as marginalized. 3. Consider the refugee camps as a nucleus for the project be designed to cater for the Refugee Host District. 4. Study the viability of all proposed sub projects in relation to VMGs 5. Consider increasing the grant component to enhance the

		services to the VMGs.
9	Physical and intangible Cultural heritage	1. Engage the Department of Culture at MGLSD to develop the capacity on culture management during GROW Project. 2. Always engage the Department of Culture in advance to avoid emergency response when cultural aspects impede project activities. 3. Engage caretakers of the intangible sites. 4. Work with the Local Leaders and the Cultural institutions during the mapping and relocation process for of Physical Cultural Resources (PCRs). 5. Support appeasement ceremonies during relocation of PCRs. 6. Support the MoTWA to introduce cultural resource centres for Refugee camps and other VMGs. 7. Support relocation of the PCRs
10	Financial intermediation	1. Repossession of products that are acquired on loans by beneficiaries should be minimized through due diligence and sensitization of beneficiaries of the GROW Project. 2. The Private sector will largely partner in the implementation of the project to effectively represent the interests of their members. 3. A clear subsidy should be provided in the project design for the project beneficiaries.
11	Stakeholder Engagement and Information Disclosure	1. Undertake stakeholder analysis before selection of partnerships. 2. Engage the Uganda Wildlife Authority as one of the key stakeholders during project design and implementation monitoring. 3. Engage the Ministry of Water and Environment since it has positive impact in the environmental conservation. 4. Consult the Department of Culture at MGLSD 5. Consult the Department of Museums and Monuments. 6. Consult cultural institutions such as Buganda Kingdom and other Cultural Institutions in the countryside on the management of cultural artefacts. 7. Consult Worldwide Fund for Nature (WWF) Uganda Country Office during the project design. WWF has implemented many projects and documented lessons, challenges and opportunities. 8. Use the appropriate language during stakeholder engagements. 9. GROW Project should develop and implement Stakeholder Engagement Plans. 10. Use Free Prior and Informed Consent (FPIC) during stakeholder engagement.

Table 18: Summary of Key Issues Raised by GROW Stakeholders_ Phase 2 of Consultations

Stakeholder	Issues/concerns	Response/Action plan
National Planning Authority	There is need to ensure that all these interventions being made do not overlap to minimize waste and duplication since there are already existing government led interventions such as UWEP and now the Parish Development Mode[9]l.	Project will work to provide credit to already existing entities which are already and small medium level as opposed to start ups at micro level.
Ugandan Investment Authority	The project is yet to come out and explicitly indicate the type of Common- User facilities that it intends to establish	For now, what is clear, the Common User facilities will include child care facilities, machines, lavatories and the like.
	UIA already has similar structures/spaces for SMEs but they aren't being utilized by the intended beneficiaries.	
	There is need to have an assessment to inform the establishment of these Common User Facilities	The project will carefully study make practical recommendations to inform establishment of these Common User facilities.
	There is need to show synergies between different projects that are running such as the Parish Development Model, GROW and INVITE	Noted
	There is need to have proper guidelines on how to link users to the common user facilities.	These guidelines will be shared before project implementation commences
	As part of its investment strategy, UIA preserves space for SME growth across the country.	
	UIA also needs to know the linkage between of PDM, GROW and INVITE projects to see where it can plug-in and help to inform project implementation.	Noted
	On the issues of land -UIA has previously donated land to women for example in Soroti and Namanve but the women entrepreneurs haven't taken possession owing to the cost of carrying out the associated studies and assessments.	MGSLD will further engage with UIA as explore ways of how best the GROW project can utilize this opportunity of available land to enhance women's growth opportunities.
	Recently, UIA, embarked on a land mobilization drive across the country and from this they were able to get land from various regions such as West Nile, Lango with Nebbi donation 511 acres, Madi Okollo 515acres, Yumbe 1224 acres, Pader 500 acres, Dokolo 200 acres, Oyam 54 acres, Lira 300 acres, Ankole sub-region 25 acres, Kigezi 6 acres, Rukunigri 203 acres, Kisoro 620, Tooro 502 acres and Nakasongola 640 acres.	Noted, MGSLD will explore how it can ride on this to mitigate the risks involved in land take and acquisition.
	Before the UIA take possession of land due diligence	Noted, where required GROW will

[9] The PDM is a multi-sectoral strategy to create socio-economic transformation targeting the 39% households in subsistence economy, to move them into the money economy using the Parish as the epicenter for development- https://eprcug.org/eprc-highlights/parish-development-model-key-issues-that-may-derail-progress/-accessed 21/04/22

	studies such as ESIA and RAP are undertaken in compliance with national laws and international best practices.	also conduct the requisite due diligence studies to comply with the national laws and World bank standards specifically ESS1, ESS5, ESS10 and any other Environment and Social Standards that may apply in line with WB ESF framework.
	Land is only given out to potential users after undertaking the required due diligence studies.	Noted
	Regarding grievances -UIA noted that they normally encounter grievances especially those related to land take and acquisition but use existing structures at district and community level to resolve any issues that arise.	Noted, GROW project also recommends a Grievance Redress Mechanism in cognizance of the existing grievance redress structures such especially at district and community level.
Ministry of Finance Planning and Economic Development	The General feeling is that there is a duplication of interventions from UWEP	Unlike UWEP, GROW has been designed in such a way that it provides credit to already existing entities owned by women which are already at small medium level as opposed to start ups at micro level.
Ministry of Local Government	There is need to include the vulnerable and marginalized groups in this intervention to ensure that they are extricated from the pangs of poverty.	All components will integrate disability inclusion, using best practices on how to best run entrepreneurships and jobs platforms for women with disabilities and digital platforms for female entrepreneurs
	The project should have updated gender disaggregated data to inform the design and implementation of the GROW project.	Review and analysis of data regarding entrepreneurship in Uganda will be done and presented in the safeguards documents(ESMF) to inform project design and implementation.
	On the issue of DLGs capacity to implement such projects-The DLGs capacity needs enhancement to help in project implementation and monitoring. However, they need to be involved right from inception so that they can have full appreciation of the project objectives, intended out comes and target groups.	Noted
Ministry of Trade, Industry and Cooperatives	Women should be encouraging to formalize businesses so that they can tap into this government led intervention.	Noted
	There is need to teach the women entrepreneurs value addition skills for purposes of competitiveness and growth in business	Noted-Through training, the project intends to deliver Core course and sector specific training to respective women's groups and

		through these trainings they will be equipped with various skills such as processing, marketing branding and the like.
	Women entrepreneurs should be encouraged to join business forums to ensure that they get free mentorship and expert views and ideas on the dos and don'ts' of where they can pick crucial tips for business growth and success	Noted
Ministry of Tourism, Wild life and Antiquities	Does the project intend to support any startups?	Women in Tourism will be supported at both group level and individual level
	Will there be any form of capacity building for the women entrepreneurs?	Peer learning is going to be encouraged- the GROW project will provide structured peer support to women entrepreneurs who are serious about growing their businesses, with mentoring and guidance from lead female entrepreneurs
	There are serious issues of GBV specifically in the tourism sector that need to be mitigated.	Given the scope of this project, GBV policy and action plan with activities that reflect the priorities and needs identified by the communities and GBV actors to mitigate the risk of GBV on the project.
	There are also cases of child labour especially in recreational areas such as clubs, restaurants in rural areas	The project should have a child protection plan to serve as a guiding instrument for child protection
	Need to sensitize the business community specifically women entrepreneurs about the need to employ skilled personnel. .	Noted, project proponent will ensure that the respective entrepreneurs are equipped with the requisite skills. Employment of skilled manpower is crucial for competitiveness and productivity in the tourism industry since in largely depends on skill levels, professionalism, commitment, passion, loyalty and soft skills of the workers
Ministry of Gender Labour and Social Development	The project will work with local governments to ensure that the project is a success since they will be carrying out most of the verification and monitoring of these projects	Noted
	Project beneficiaries can be given autonomy to change the business portfolio for as long as they notify the monitoring officer-to spread the risk and make the intervention more sustainable.	Noted
	The project should have officer stationed where it	The project will establish

	has a foot print so that they can efficiently issues that arise in each respective region.	functional human structures for purposes of implementing and monitoring the activities of the beneficiary groups.
	Verification of applicants is very important and this will be only possible with the help of district structures such as the (District Executive Committee, District Technical Planning Committee, Sub- County Executive Committee and Sub- County Technical Planning Committee	Noted
	Project design should also give assign sufficient funds for institutional support to help in monitoring the project since some of the beneficiaries are in hard-to-reach areas and accessing them is very difficult.	Noted
	On the issue of training-There is need to have a proper training structures and personnel, from experience, the trainings delivered in the previous projects under UWEP were found to be inadequate. marketing, book keeping, Value addition and packaging training cannot be entrusted by grassroots trainers	The project will conduct training to enhance human endowment by supporting training in topics known to improve the success of women entrepreneurs
	The project should also include the Vulnerable and marginalized groups for example under UWEP, Indigenous groups in Bundibugyo and Kabale such as the Batwa, IK in Kaabong were considered for funding Majority are involved in agriculture, art and craft, weaving, tailoring and embroidery and cosmetology.	Noted
	Regarding management of E&S Safeguards-The project should make it categorically clear, that no enterprise will access credit if it is involved in a business that degrades the environment, such as sale of charcoal, fire wood, sale of alcoholic beverages which cause social disharmony.	Noted
	There is also need to sensitize the men to help diffuse and alleviate any misconceptions about women enhancing and boosting their enterprises. Most men have a tendency of abdicating responsibility once they realize that their spouses are earning an income.	Before implementation sensitization will be carried in beneficiary communities and men will be invited to fully appreciate the objectives of the project.
	The project should also try as much as possible to diffuse GROW from local politics to prevent it from being hijacked.	Noted -Project will be implemented based on the guidelines and governance structures established
	The project also needs to be implemented in a phased-out manner to avoid to ensure success, a lot of issues are picked up as the project progresses, therefore the project is able to find remedies for the challenges encountered along the way.	Noted
	Regarding OHS-there is need to carry OHS for livestock keepers, crops farmers and these issues	OHS issues are part of the project and will be addressed as and

	should be verified by the CDO using a standard checklist from MGLSD	when required to safeguard all involved from harm.
UNDP	Project should follow the **Do No Harm** principle, to ensure that through this intervention social and environment risk aren't triggered and where it is inevitable mitigate measures for negative effects on the social fabric should be instituted especially among the Vulnerable and Marginalized groups such as indigenous persons, the old, sick and infirm, refugees among others.	Noted
	There need to give space and opportunities to potential beneficiaries who come up with new innovations	Noted -where feasible new innovations will be supported as long as they fulfil the requirement of the implementing entity.
	Need to ensure that all these groups are formalized for traceability and sustainability purposes.	All groups to established will be formalized and legally registered.
	How deliberate is the project about helping vulnerable and marginalized groups?	All components will integrate disability inclusion, using best practices on how to best run entrepreneurships and jobs platforms for women with disabilities and digital platforms for female entrepreneurs.
	Is the project targeting youth led-groups?	Yes-the project will target all groups as long as they're registered and fully operational.
	There is need to include enterprises that are borne out of local innovation such groups making bags, tiles, and other construction materials out of plastics.	Noted
Makerere University Business School	There is need to understand the level where entrepreneurs are	Noted
	Training materials for all the targeted groups will need to be translated and simplified for easy understanding.	Noted, this will help to ensure that beneficiaries can easily acquire skills and knowledge regardless of their literacy levels.
	Peer learning will need to be used by the project so that entrepreneurs can have hands on experience	Noted- the project intends to use peer learning to enable sharing ideas and experiences. Similarly, entrepreneurs will have access to mentors that would support their enterprise growth and transition
	The project will need to carry out a needs assessment a have a clear understanding of the training needs.	Noted, this will help to assess the specific training needs of the potential beneficiaries.
	The project should have a **ToT** (Training of trainers) strategy in the respective regions to help train the various women led entrepreneur groups	For purposes of extending the training to rural areas and hard to reach areas, the project intends to use this strategy to ensure that quality trainings are delivered to

		all groups
	There is need engage husbands to be part of the training so that they can appreciate what the project objectives and goals	Before implementation sensitization will be carried in beneficiary communities and men will be invited to fully appreciate the objectives of the project.
	The project proponent can work reputable NGOs and CSOs such as Council for Economic Empowerment for Women of Africa - Uganda Chapter (CEEWA- U) who have experience of working with women entrepreneurs.	Noted
Kyambogo University	The project should have mitigation measures for Gender based violence.	The project will have GBV action plan to guide on how best GBV issues can be handled
	What type of women are being targeted?	The women being supported are those who businesses are at small and medium and need their businesses to be transitioned to the next stage of business growth
	There is need to benchmark this project from previous projects.	Noted
	Specifically what type of vulnerable groups are being targeted?	Vulnerable groups include the disabled, refugees and indigenous and marginalized groups such as the Batwa and IK
Makerere University Kampala	The project should explore options of a teaching and learning center for the children in the child care center	Noted
	The project should consider training care givers for the children.	Noted
	Training should be carried out with due consideration to the different literacy levels.	Noted
NEMA	There is need to follow the law when deciding on the assessments to be done especially for infrastructure projects.	Before implementation the respective laws and international best practices regarding Environmental and social safeguards will be followed through the requisite assessments
	There need to have proper identification of impacts, this will guide on the type safeguards documents that have to be prepared such as ESIA, Project briefs, RAP and the like.	Noted
PSFU	Sensitization should be carried out within the beneficiary communities on risks associated with the project.	The project proponent will have a stakeholder engagement plan to guide the sensitization and area specific community outreach activities related to the project.
	The project will use existing structures to prepare for prevention and response to risk associated the project such as sexual exploitation and assault	Noted
	There is need to incorporate environmental and	Noted, all these will be followed

	social sustainability in the project	to the letter through various E& S studies related to the project activities.
	The project also needs to come out strongly on issues related to GBV	The project will have GBV action plan to guide on how best GBV issues can be handled. Specifically, WB guidance noted 2018 on management of GBV risks will be used together with MGSLD guidelines on GBV.
UNDP	What happens when the resources are siphoned by the men?	The project will use existing structures to ensure that it mitigates against the risk of siphoning of credit accessed to enhance business growth.
	There is need to carry out community wide sensitization and invite the men to be part of these sensitizations.	Noted
	What are the project objectives of GROW, how different are they from UWEP?	GROW is targeting already established businesses while UWEP was focusing on start ups
	Is there a component on mentorship and coaching of selected women entrepreneurs?	
NFA	NFA is already conducting projects in forested areas that are home to indigenous groups such as the Batwa and it has entered into arrangements such as collaborative forest management with the adjacent communities to help support and enhance their livelihoods	Noted
NUDIPU	There is need to build capacity of project personnel on issues related with disabled persons	MGLSD and MLG will support training and technical assistance for local government staff on all issues related to the project
	Will this credit be for paying back?	Yes the project will be for paying back and the proposed interest rate is between 6-8% p.a
	The Common User Facilities should have assistive devices for the visually impaired, rumps for those with wheel chairs to enable them access and utilize these facilities	Noted
	There is need to give the beneficiaries proper training	Noted
	Training materials should be designed and produced to benefit all including the disabled, the visually impaired and the illiterate.	Noted
	What specific measures are to mitigate loss and ensure that successes are scaled up?	The project will put in place appropriate mechanisms to ensure that beneficiaries are held accountable in case they default on payment.
	How can the project leverage from the so many	This is noted, further

	women with disabilities that NUDIPU has mobilized from VSLA groups and have started IGA under the iSAVE inclusive economic empowerment program?	consultations will be held with NUDIPU to ensure that the groups referred to fit the selection criteria.
Micro finance Support Center	Is there room for partnerships to work with the project?	MGSLD will engage various stakeholders to see how best it can co-opt them to support the successful implementation of the project.
	Can women operating in SACCOs be able to access credit and training from the project?	All women entrepreneurs who fulfil the selection requirements will benefit from credit and training offered by GROW
IRCU	We hope that the terms and conditions are favourable for the potential beneficiaries	MGSLD is mindful of the economic situation of the groups and targeted beneficiaries and will ensure that the terms and conditions of accessing credit are fair to all.

8. GRIEVANCE REDRESS MECHANISM

8.1 Introduction

ESS10 requires that concerns and grievances of project-affected parties related to the environmental and social performance should be addressed and responded to by the developer/project proponent in a timely manner. Additionally, ESS 7 emphasises that grievance mechanism should be culturally appropriate and accessible to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.

The objective of the grievance mechanism is to resolve and remedy complaints that may result from direct and indirect consequences of the GROW Project activities. The mandated stakeholders will leverage existing Local Grievance Redress Mechanisms, which include Chairperson 1 (LC1) and other relevant existing structures at parish, sub-county, district and national levels.

The GRM will handle complaints arising from activities and implementation of the proposed GROW Project as well as the losses and damages caused by construction works, and any direct or indirect environmental and social impacts. The GRMs will be established prior to implementation and will remain operational for the duration of the project. Affected communities and other potential complainants should be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and through booklets and information brochures during consultations meetings and other stakeholder engagement activities.

Anticipated grievances for the GROW project will include those related to:

- Crop damage;
- Sexual Exploitation and abuse;
- Family wrangles;
- Noise pollution;
- Waste Management;
- Wrongly recorded personal or community details;
- Wrongly recorded assets including land details and/or affected land area/crops;
- Recent change of asset ownership;
- Incorrect computation of compensation; and
- Names missed out of RAP register.
- Social Exclusion

Implementing Agencies (MGLSD and PSFU) will implement an effective GRM at the highest level (national – ministries and departments) that will oversee all the other 4 levels of GRMs across all project components a cross all districts, with the objective of helping to ensure that the affected communities and third parties avoid resorting to the judicial system as much as possible. The project's GRM will include four successive tiers of extra-judicial grievance review and resolution. The first and second tiers are the Grievance Resolution Committees (GRCs) at village/parish and sub-project levels. The third and the fourth tiers are the GRM Focal Persons at the district and the PIU offices. Complainants will, however, have the option to seek redress from the judicial system at any time.

Composition of the Grievance Resolution Committee (GRC) Process for respective established enterprises Nationwide Projects A local GRC will be established at parish, sub-counties and district levels with an office. A committee of 6 persons elected from four different categories shall comprise the following:

1) Representative from the implementing agency (PSFU, MGLSD)

2) Grievance Officer or CDO
3) Selected Village GRC member
4) Representative of a Project Affected People (PAP) as a committee member;
5) Female Representative
6) The Local Councilor 1
The Committee will be constituted through a participatory, transparent, democratic and gender sensitive election process where participants (stakeholders present/proposed beneficiaries) shall be nominated, seconded and shall be voted for to respective office positions. And since the project targets women, the Committee will emphasise having more women elected as its executive and in the leadership positions.

8.2 The Two-Stage Grievance Resolution Process
The resolution of grievances will be a two-stage process.

a) The first stage will involve the following main steps:

i. Receipt of grievances;
ii. Screening of grievances; and
iii. The GRC Hearing Procedure.

b) The second stage will involve the following steps:

i. Implementing agencies resolution at central level;
ii. Closure of grievances; and
iii. Grievance records and documentation.

The steps above are detailed hereafter.

8.3 Receipt of Grievances
Any PAP from the affected communities can lodge a grievance or complaint verbally, ~~,~~ in writing, or through a hotline/toll free number for confidential and sensitive reporting. Grievances will be logged with a designated Grievance Officer, an LC1 official or the Project's Community Development Officer at district and sub county levels right from the village or parish level by completing a written grievance registration form that will be available at construction sites, Liaison Centres, districts, project's website and in implementing agencies' offices. An example of a grievance log will be provided in the Stakeholder Engagement Plan. Details of grievances or complaints logged verbally will be captured as per the particulars of the grievance log.

The Grievance Officer or the Project's Community Development Officer of each district will review the received grievances and record them in a Grievance Register. To simplify the process of lodging a grievance, a variety of grievance log-in-channels will be used such as a dedicated phone number, web sites, e-mails, in-person, anonymous, suggestion box, among others.

All the grievances received be recorded by the Community Development Officer on the grievance registration form and logged into the Grievance Register. A copy of the logged grievance will be signed by aggrieved person and Community Development Officer

During SE exercises or meetings organised in each project-affected area at the time of ESIA, RAP, Lively hood assistance preparation, Community Development Officers will explain to local communities the alternative ways of lodging a grievance. The GRM procedures will be disclosed through the Project's website and will also be advertised on billboards/posters in each community and at the entrance of the service provider's office premises clearly visible to the public. Information material on GRM will also be made available at the information desks in districts covered by the project.

To ensure that all grievances are captured, the implementing agency will explain how the grievances received by district GRC members may be channeled through the Project's GRM. Training will be conducted for all GRC members on their roles and responsibilities and the implementing agency shall regularly monitor to ensure no grievances are missed.

8.4 Grievance Screening

All grievances will be registered, reported and tracked by implementing agency in the Grievance Register by a Grievance Focal Point who is responsible for receiving, logging, referring and following up on grievances. Once a grievance is logged, the related event(s) that caused the grievance will be tracked to prevent similar grievances or occurrences. The status number and trends of grievances will be discussed during weekly E&S meetings during the construction phase.

8.5 The GRC Hearing Procedure

A local GRC will be established at village/parish, sub-counties and district levels with an office. Once a grievance has been logged, the corresponding local GRC will be engaged to define a solution to the grievance. At this stage the grievance is reviewed in an informal (oral) way and the GRC members make and sign the minutes on the matter. If at Stage 1 the PAP's complaint is not resolved, the PAP is informed about grievance resolution procedures of Stage 2. The PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. Timeframe for resolving the stage 1 grievance is 30 days. Special provisions will be made for any complaints of a confidential nature. Complaints on GBV and VAC shall be received and referred immediately to service providers. The GRC shall convene whenever necessary (but at least once a month) and shall include the six members as defined in section 6.2 above.

The LC 1 official or Grievance Officer will act as secretary of the GRC and shall be responsible for creation, coordination, and documentation. Members of the GRC will be invited in accordance with the types of complaints to be addressed. The meeting will start without the complainants by reviewing all PAP complaints received since the last GRC meeting, and to propose a solution to all grievances within the past one month. Then, the GRC will welcome the complainants whose grievances had been reviewed during the previous meeting to discuss proposed resolution.

For each grievance, the GRC will determine whether additional investigations are warranted. If so, additional information will be collected before the next GRC meeting and such information will be provided to the PAP before the meeting. The GRC will then inform the PAP about the date, time and place of its review meeting, and invite the affected persons accordingly.

The GRC will receive the complainant(s) and discuss with them the solution(s) to the grievance(s) that have been logged. The Committee shall draw up and sign the minutes of their discussion on the matter. If the grievance is satisfactorily resolved, the PAP will also sign the minutes in acknowledgement of the agreement. In cases where the project has agreed to put in place additional measures, the details will be specified, with a timetable for delivery, in the minutes of the meeting. If the grievance remains unresolved, the Stage 2 escalation process will be explained to the PAP. Stage 3 shall be handled by the implementing agencies' heads of department together with other relevant stakeholders.

Implementing Agencies Resolution at Central Level (second stage)

If the complainant is not satisfied, the GRC assists him/her in lodging an official grievance in accordance with the procedures of Stage 2 (where the plaintiff should be informed of his/her rights and obligations, rules and procedures of making a grievance, format of grievance, terms of grievance submission, etc.).

8.6 Closure of Grievances

A grievance will be considered "resolved" or "closed" when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or has been implemented to the satisfaction of

the complainant, a complaint closure form will be signed by both parties (Representative of the implementing agency/LC 1 and the complainant), stating that the complainant considers that his/her grievance is closed. The grievance will then be archived in the Project Grievance database. In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome.

8.7 Grievance Records and Documentation

PSFU will nominate a GRM Focal Point who will be responsible to manage a grievance database to keep a record of all grievances received. The database will contain the name of the individual or organisation lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by the Service provider or other relevant party; the outcome; and how and when this decision was communicated to the complainant. The Supervising Consultant and Service Provider in their monthly monitoring reports will provide information on grievance management. Grievance monitoring and reporting will occur in quarterly, annual reports.

8.8 Disclosure of GRM

The GRM will be disclosed as early as possible and maintained throughout the Project lifecycle. It will be disclosed in a culturally appropriate manner in English and other languages in respective districts in an understandable format to all affected communities, stating the following information:

- Anyone can raise complaints, grievances, concerns, ask questions or make comments or suggestions related to the Project;
- Anyone can contact the GRM focal point using the GRM focal point's contact details provided;
- the GRM focal point is responsible for receiving complaints, grievances, concerns, questions, comments, suggestions, and for responding to the person on a non-anonymous basis or generally via the Project's website on an anonymous basis;
- the GRM focal point will confirm receipt of the complaint, grievance, concern, question, comment, suggestion, either providing a preliminary answer or confirming the expected timing to provide an answer; and
- by using this grievance mechanism, the complaint, grievance, concern, question, comment, suggestion with respect to the mini grid Project development will be received by the Project proponent which will endeavour to answer the complaint, grievance, concern, question, comment, suggestion and engage with the complainee and the Project's other relevant parties to mitigate any complaint, grievance, concerns, or incorporate any comment, suggestion in the Project development to the extent possible.

The local government and all stakeholders will also be advised on the GRM so that they can communicate the step-by-step process to the Project affected people. A template of the GRM recording form can be found in the Annex 11 of this ESMF.

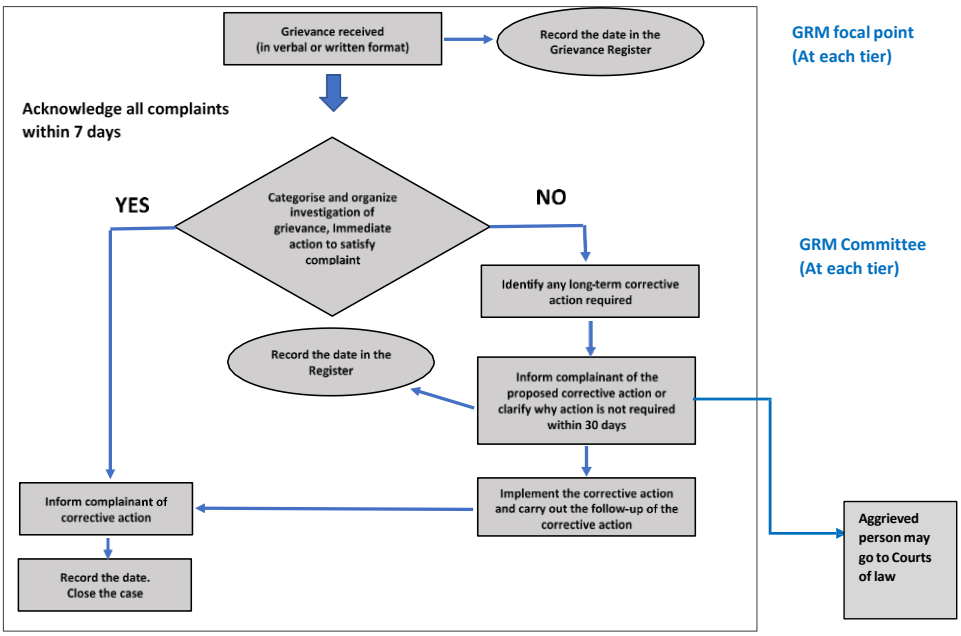


Figure 6 - The Process Flow Chart of Grievance Redress Mechanism

9. PROJECT IMPLEMENTATION ARRANGEMENTS

9.1 Institutional and Implementation Arrangements

a) **The government will mainstream implementation of the GROW project into existing structures at the national and local level.** This will avoid duplication, help ensure sustainability, and increase efficiency of project implementation. However, given gaps in institutional and technical capacity identified during preparation, the project will augment existing implementation capacity with additional institutional structures and capacity building support to ensure smooth implementation and delivery of the "wrap around support" to the targeted beneficiaries, including female entrepreneurs in RHCs. Figure 7 below summarizes these institutional arrangements.

b) **The government will establish a Project Steering Committee (PSC) to oversee and coordinate implementation of the project at the policy level**. The Permanent Secretary of the MGLSD will chair the PSC and have overall responsibility for project coordination. The PSC will consist of the permanent secretaries of the implementing agencies (the Ministry of Finance, Planning and Economic Development (MFPED) and the MLG), the Executive Director of PSFU as well as key technical ministries and agencies (the Office of the Prime Minister (OPM), the Uganda Investment Authority (UIA), the Ministry of Trade, Industry and Cooperatives). The PSC will liaise with an advisory group that will comprise selected women entrepreneur bodies.

c) **The PSC will have the following main roles and responsibilities:** (a) coordinate policy actions among public institutions to facilitate project implementation and promote the growth of female enterprises; (b) provide guidance to the Project Technical Committee (see below) and program management teams; (c) oversee the financial risks during implementation and suggest mitigating measures; (d) oversee the project's grievance redress mechanism and support resolution of safeguard-related complaints as required; and (e) act as the main focal point for interaction with development partners and other stakeholders on behalf of the project. In addition, the PSC will host two annual meetings with the World Bank team to review the project results, discuss key issues, and agree on key milestones over the following six months. The review meeting will be based on a technical review conducted and led by the World Bank team in collaboration with the PTC. The MGLSD will act as the secretariat for the biannual project review meeting and will also be responsible for organizing the meeting, including inviting additional organizations or agencies to the meeting as necessary.

d) **The government will also establish a Project Technical Committee (PTC) to coordinate implementation of the project components at the technical level.** The PTC will be chaired by a Director from MGLSD and will comprise the key commissioner-level staff responsible for implementation of each component and subcomponent (MGLSD, PSFU, and MLG) as well as commissioner-level staff from agencies with an implementation support role (OPM, UIA, National Environmental Management Authority (NEMA)). The PTC will coordinate preparation of and revisions to the Project Operations Manual (POM), monitor project implementation, address any technical issues and challenges that impact implementation of the project, endorse consolidated technical and financial management reports, provide technical guidance on implementation, and escalate to the PSC any policy issues requiring high-level attention.



Figure 7 - Institutional Coordination Arrangements

e) **Project Advisory Committee for Refugees (PACR).** The MGLSD, in collaboration with the PSFU and the MFPED, will utilize the same PACR established as part of the Bank-financed INVITE project. The PACR will consist of representatives of the OPM and the United Nations High Commission on Refugees, and selected representatives of other implementing agencies. Its purpose is to ensure coordination and complementarity with other implementing agencies, consolidate lessons learned from other projects and policy initiatives, and provide feedback in the implementation of programmed RHD activities. The use of this PACR will avoid institutional duplication and further strengthen coordination with the INVITE project, including the units within the PSFU implementing these activities.

f) **The MGLSD will be the overall coordinating ministry for the project and will also be responsible for selecting the target beneficiaries and implementing key project interventions**. The MGLSD will therefore have overall responsibility for project implementation and accounting for the project funds to the National Parliament. As summarized in Table 5 below, MGLSD will implement the platform mobilization and communication activities (subcomponent 1A), the core female entrepreneurship training and business development support (subcomponent 1B), the work placement initiative (subcomponent 1.D), the business competitions (subcomponent 2A), and the multi-purpose facilities and infrastructure upgrades in partnership with MLG (component 3). Separately, the Permanent Secretary will appoint a commissioner to oversee implementation of the policy innovation and evidence generation initiative (subcomponent 4B). The MGLSD will also establish an MoU with OPM that will enable the project to use OPM's DRDIP implementation structures to implement in RHC districts. This will include providing additional resources to OPM to increase the readiness of refugee female entrepreneurs to access and benefit from GROW's subcomponent activities, particularly the local entrepreneur platforms (subcomponent 1A), the core course (Sub-component 1B) as well as the bridging finance interventions (component 2).

g) **The PSFU will implement key project interventions and play a critical role in liaising with private sector institutions including training providers, banks, and entrepreneur associations.** Specifically, the PSFU will implement the demand-driven sector-specific and technical training

and mentoring support (subcomponent 1C), the complementary grants mechanisms (subcomponent 2B, and the gender financial products support (subcomponent 2C). The MGLSD in partnership with MLG will play a critical role in ensuring local governments actively support implementation of the project and delivery of the wrap around support to beneficiaries as well as implement the infrastructure and facilities component (Component 3). MGLSD and MLG will support training and technical assistance for local government staff including community development officers, commercial officers, and production officers. See table for details on the division of responsibilities and relevant implementing partners for each subcomponent.

Table 19: Implementing Responsibilities and Partners

Component	Sub-component	Implementing Agency	Implementing Partners
Component 1: Women Empowerment and Enterprise Development Services	1A: Strengthening Women Platforms & Mindset	MGLSD	MLG & OPM
	1B: Enterprise Development Support	MGLSD	MUBS & OPM
	1C: Trade/Sector Skills	MGLSD	Enterprise Uganda
	1D: Entrepreneur Work Placement	MGLSD	-
Component 2: Access to Finance for Women Entrepreneurs	2A: Business Competition Grants for Innovation	MLGSD	OPM
	2B: Facilitating Access to Credit	PSFU	PFIs
	2C: Enhanced Loan Products and Processes for Women	PSFU	PFIs
Component 3: Enabling Infrastructure.	3A: Multi-Purpose Facilities	MGLSD	UIA, MTIC & SH
	3B: Gender Inclusive Workplace Infrastructure	MGLSD	MLG & MES
Component 4: Project Management Support	4A: Project Management Support for High-Quality Implementation	MGLSD & PSFU	-
	4B: Policy Innovation and Evidence Generation	MGLSD	OPM

h) **To augment the capacity of MGLSD and PSFU to deliver high-quality interventions to beneficiaries, the project will finance the eligible operational costs of a Project Implementation Team (PIT).** MGLSD and PSFU will establish Project Implementation Team (PIT) drawing on government and technical personnel that will, at a minimum, consist of the following professional staff: (a) project coordinator (MGLSD), (b) deputy project coordinator (PSFU), (c) entrepreneurship empowerment specialist, (d) access to finance specialist, (e) communication specialist, (f) financial management specialist, (g) procurement specialist, (h) environment and social risk management specialist, (i) M&E specialist, and (j) digital specialist, and (k) M&E specialist. These costs will be financed through Component 4a including externally recruited staff to augment internal MGLSD and PSUF capacity. The team will be assigned to work at MGLSD and PSFU depending on each agency's implementation responsibilities with the sub-team at MGLSD led by the Project Coordinator and the sub-team at PSFU led by the Deputy Project Coordinator.

i) **The PIT will include a refugee specialist to support MGLSD and PSFU, and to ensure coordination with refugee stakeholders at the national and sub-national levels.** They will ensure that the capacity building activities are appropriately delivered within RHDs. The MGLSD

refugee specialist will also sit within the Secretariat for the Jobs and Livelihoods Integrated Response Plan to ensure GROW's close alignment and ability to support implementation of the JLIRP and alignment with Uganda's CRRF. The refugee specialist in the PSFU PST will also coordinate with the INVITE PIU to ensure close alignment of the two projects. Project monitoring and evaluation staff will be responsible to ensure that appropriate data is collected within refugee settlements in liaison with OPM and UNHCR.

j) **At the district level, the project will work closely with the district level administration structure and those of refugee settlements.** The district implementation support teams will consist of designated government staff and contract staff, depending on the capacity and need of the district. The district implementation team will be led by a district government official to ensure ownership and sustainability. The project will use the district structure that includes the departments of community development, production, planning etc. These departments will be supported through project resources to allow them carry out their responsibilities under the project. The platforms will be the key project interface with the project district implementation support team. The platforms will be the institutional arrangement that supports implementation of all the projects components. Through the platforms the district project teams will conduct project orientation, outreach and communication to potential beneficiaries on all the project components, conduct social norm sessions, support to build collect voice and share market information and information on other enterprise growth opportunities. The platforms will have the broader objective to tackle policy and institutional constraints for women entrepreneurs, provide peer learning and mentorship. In refugee settlements, district officials will work closely with OPM's refugee camp commandants and existing settlement structures.

9.2 Results Monitoring and Evaluation Arrangements

The monitoring and evaluation of the implementation of this ESMF will be in integrated into the Project Monitoring and evaluation.

Monitoring and Regular Reporting

a) **Objectives and design**. The objective of the M&E system is to track the project's implementation progress and achievement of expected outcomes to enable the government (national and sub-national) and Bank teams to address issues as they arise. An integrated web-based data collection platform will be established at the MGLSD into which data on implementation progress and outcomes will be entered will be entered to track implementation of project interventions and their outcomes. The MGLSD will contract a consulting firm to design and develop the integrated data platform, which will include an interface that allows the persons responsible for M&E at all implementing agencies to enter monitoring data as they collect.

b) **The MGLSD will lead the overall M&E efforts.** The ministry already has an experienced M&E specialist on its staff, who has been responsible for leading the efforts to track UWEP's implementation progress and outcomes. This person will serve as the Coordinator of the M&E team. Staff with specialized skills in (a) survey design, implementation, and analysis; (b) operations and maintenance of management information systems; and (c) data manager; and (d) others as needed will comprise the M&E team at the MGLSD.

c) **M&E teams will be established as members of all PSTs at both the national and sub-national levels**. They will be responsible for collecting and sharing information presented in the results

framework in accordance with the procedures laid out in the M&E monitoring plan, and entering the data into the integrated data platform. Data from each implementing agency will be aggregated with the data of others and used as the basis of quarterly progress reports.

d) **Data generation and reporting**. The data to track the key performance indicators come from (a) project-specific surveys and questionnaires, (b) project service providers (women's entrepreneurship platform managers, trainers, revolving fund managers, facility managers); (c) local governments (district plans); (d) and sector service providers (electricity and water companies); (e) consultant reports; and (f) supervising engineers' reports on construction progress., the implementing agencies, and from project-specific data collection efforts. The MGLSD PCT is responsible for preparing the quarterly financial and progress report, consolidating information from each PIT and from the integrated data platform. The PCT will submit quarterly project progress reports to the World Bank, to the PSC, and to other the stakeholders within 45 days of the end of each quarter. Under the leadership of the PSC, the Project's PTC and PITs will conduct joint twice-yearly supervision missions with the Bank's task team during which they will discuss the findings of the progress reports and agree on actions to address issues raised in the reports. The government and World Bank will prepare a comprehensive midterm review of the project implementation and results in 2025/26.

e) **Capacity building for M&E**. The project will provide support to strengthen capacity for M&E of the MGLSD and of the national and subnational PSTs. Specifically, the project will finance consultants who will work with the MGLSD to prepare a detailed M&E and reporting system plan, provide on-the-job and other training for M&E specialists (at both the MGLSD), and provide other capacity support required to establish and operate an effective M&E system. The project will also finance follow-on training and workshops with M&E specialists to ensure that normal staff turnover does not disrupt the M&E effort.

Evaluation and Learning

f) **With support from Component 4, the Project will use various mechanisms to implement an evaluation and learning agenda.** As noted above, this will include potential pilots that will enable the GoU and the Bank to better understand and improve project implementation and outcomes as well as additional studies and surveys that tackle broader institutional and structural constraints preventing women from expanding their enterprises. In addition, the Project will conduct an outcome evaluation of the project. GoU and the World Bank will also conduct a Mid Term Review (MTR) for the Project, during which the target values will be reviewed and any required Project design adjustments will be discussed and made. The GoU team will also work with the World Bank Africa Gender Innovation Lab to explore the possibility of including an impact evaluation of a program component or one or more of the innovative pilot interventions. An impact evaluation will provide rigorous evidence of the program's impact and will help promote the project to a wider audience.

9.3 Sustainability

g) **The project aims to support female entrepreneurs grow and transform their micro and small enterprises to larger more profitable firms, which should enable many to sustain their operations.** Improvements in firm management due to training, mentoring, establishment of business networking opportunities, and increased access to finance is expected to increase the overall profitability of firms. Assistance with creating market linkages through market

assessments and value chain analysis during project implementation is further expected to increase firm success.

h) **The platform model under component 1 has evidence of having spill-over effects on large groups of women beyond the project:** The platform model will ensure a women's empowerment collective model that can be utilized by women entrepreneurs and others in the entrepreneurship eco-system (from private sector, financial sector, investors, technology companies, and the like) long after the project ends. The platforms of active, engaged and empowered women across different sectors can be further utilized as a "one-stop" vehicle to deliver other future interventions such as cash transfers, reproductive health, childcare, women-specific schemes ensuring access to land and coordinated services on gender-based violence. The platform can also be an active channel for citizen feedback to the government of Uganda. This platform model has shown to be successful at delivering a layered range of interventions in Uganda, Nigeria, India, Bangladesh and Kenya. Coordinating all project activities through platforms or women's empowerment collectives has been a key part of project design to ensure sustainability.

i) **Financial support is a bridge to more formal financial sector services.** The financial support will act as "bridge finance" for micro and small women entrepreneurs and poise them to transition to available market options (for example: the INVITE supported credit line). Applicants for the funds will be required to demonstrate a high likelihood of being able to repay the loans, including through use of psychometric questionnaires to assess the credit-worthiness of applicants. Sub-component 1D responds to evidence that competitively awarded stipends have the potential for long-term income generation for small entrepreneurs as well as evidence that women pivoting to male dominated sectors have a higher chance at income generation.

j) **Infrastructure is demand-driven and is nested in local governance institutions.** Small-scale Infrastructure responds to feedback and requests for clusters of women entrepreneurs (through Platforms) that can directly impact their businesses. Infrastructure does not follow a one size fits all but is tailored for both micro entrepreneurs and small entrepreneurs. The infrastructure component also supports district government to invest in gender-sensitive infrastructure (That can have broader public good beyond just for women entrepreneurs). Other types of infrastructure, such as markets or trading centers, will also be sustained through the collection of user fees. The owners of the facilities and infrastructure will explore entering into a partnership with a private firm to manage and operate the facilities.

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10 MONITORING AND REPORTING OF THE IMPLEMENTATION OF THE ESMF

10.1 Regular Monitoring and Inspection of Compliance

The different PITs will put in place adequate institutional arrangements, systems and resources to ensure effective monitoring of the ESMF and the relevant plans associated with sub project works in each component. The goals of monitoring will be:

- To measure the success rate of the activities;
- Determine the effectiveness of the mitigation measures to the negative impacts; and
- Determine further interventions (such as mitigation) are required or enhance the monitoring.

The goal of inspection activities is to ensure that component activities comply with the plans and procedures laid out in the ESMF. Monitoring responsibilities and inspection activities will be carried out by PIUs of the implementing agencies which will administer the overall project-related environmental and social monitoring and implementation as laid out in this ESMF through their Environment and Social specialists.

Environment and Social safeguard specialists of implementing agencies (PIT) shall perform quarterly spot checks and field visits on sub-projects to verify authenticity of reports submitted by sub-projects and supervision/verification consultants.

This ESMF is the overall document that will guide the development of sub-project specific ESMMPs. The respective PITs Environment and Social specialists will assess the compliance of the activities of the project and its workers against the ESMMPs and will report possible non-compliance to the PIT Project Coordination Manager. Third party monitoring will be undertaken by lead agencies such as NEMA, NFA, UWA in line with their mandate. The ministry (MGLSD) will perform its role through the PIT. MGLSD has the authority to inspect any facility for compliance with national requirements on safety in workplaces. The World Bank will undertake project implementation support and supervision missions twice a year, however may increase frequency of the missions as necessary to enhance compliance with Bank standards.

Upon project completion, the World Bank may undertake an assessment of the success of the ESMF and include relevant information in the Project Completion Report. This is to ensure that all ESMF and site specific ESMMPs objectives have been achieved. In case of non-compliance with any of the ESMF objectives, remedial measures may be undertaken.

10.2 Quarterly Monitoring and Reporting

The findings from the regular monitoring and inspection for compliance with Environmental and Social risk management (monitoring reports) will be compiled by the two PIUs (MGLSD PIT and PSFU PIU) and sent to the PS, MGLSD for review, validation, compilation and onward submission to the bank. The PIT will prepare quarterly monitoring reports while the sub-projects shall prepare monthly and quarterly reports for submission to the PIU. These monthly and quarterly monitoring reports, along with a quarterly summary of the ESMF implementation prepared by the PIT, will be consolidated by the Environmental Specialist at the PIT to cover ESHS activities of the PIT and, the performance of the sub-projects. The report (consolidated) will be shared with the World Bank for review, after which they may be shared with other interested stakeholders by the Project Coordination Manager. This is further aimed at tracking the status of implementation of the ESMF and national safeguards requirements and to ensure compliance with the ESMF plans and procedures throughout the implementation of the project.

GROW Project and sub-projects are required to report all environmental and social incidents to their respective PITs in accordance with the ESCP, based on the guidance in the World Bank Environmental and Social Incident Reporting Toolkit requirements (ESIRT). Contracts for all contract

workers will include a code of conduct, which will be signed when hired with provisions to report all Environmental and Social incidents on sites.

The respective PITs (MGLSD and PSFU) will report all the environmental and social incidences to the PIT regularly for submission to the World Bank in accordance with the World Bank Environmental and Social Incident Reporting Tool Kit (ESIRT). Reports on major incidences such as fatalities, HSE incidences, Sexual Exploitation and Abuse (rape and defilement, GBV/VAC), etc. will be compiled and reported to the World Bank within 48 hours whereas minor incidences will be reported to the World Bank through incidental, and quarterly reports. Such incidence reporting (major and minor) will be included in relevant project contracts for Component 3 sub projects.

10.3 Contingent Emergency Response Component (CERC)

The CERC is designed to provide swift response in the event of an Eligible Crisis or Emergence through a portion of the undisbursed project envelope to address immediate post-crisis and emergency financing needs. The CERC may be used following natural disasters or other crises and emergencies allowing funds to be reallocated from other components of the project. In the event of an emergency event, it is not anticipated that a re-allocation of project funds will cause serious disruption to project implementation.

Activities under the GROW Project will be governed by the World Bank Directive Contingent Emergency Response Component (CERC) (October, 2017). The PIT for MGLSD and PSFU will be the implementing Agency for the CERC.

Disbursement of emergency financing under the CERC will be contingent upon:

a) the recipient establishing a nexus between the disaster event and the need to access funds to support recovery and reconstruction activities (an “eligible event”); and

b) Submission to and no objection granted by the World Bank of an Emergency Action Plan (EAP).

The EAP will include a list of activities, procurement methodology and safeguards procedures. The EAP will require consideration of safeguard implications for any proposed emergency supplies procurement or reconstruction activities. The World Bank, through the no objection process, will closely examine the nature of the proposed activities, particularly those Grid expansion and last mile connection, to ensure

(i) that they are not prohibited under the negative list and

(ii) that the recipient is aware of the required safeguard compliance documentation before initiating the process by which the proposed works will be prepared and implemented.

Emergency activities financed under the CERC will involve financing provision of critical goods or emergency recovery and rehabilitation works and it is likely these will fall into substantial or high risk according to the World Bank ESF risk classification.

Activities that fall under high risk could involve procurement of emergency supplies such as medicine and water and do not require the application of safeguard instruments, post-screening or assessment.

Other emergency supplies, such as fuel products, will require safeguard instruments (such as ESMPs) to ensure procurement, storage and dispensing procedures are adequate.

Preparation of the Environmental and Social Management Plan (ESMP) will have regard to this ESMF and safeguard instruments will require World Bank approval prior to commencement of activities. Importantly, the ESMP will need to include procedures for:

i. Consultation and disclosure;

ii. Integration of mitigation measures and performance standards into contracts; and

iii. Supervision/monitoring and reporting measures to ensure compliance.

10.4 Emergency Reporting

The respective PITs (MGLSD-REP and PSFU) will be responsible for reporting the environmental and social incidences whenever such incidences occur. The PIT will compile and report incidences to the World Bank within 48 hours for major incidences such as fatalities, HSE incidences, Sexual Exploitation and Abuse (rape and defilement, GBV/VAC), etc. whereas other minor incidences will be reported to the World Bank through quarterly reports. Such incidence reporting (major and minor) will be included in relevant project contracts for sub projects under component 3.

10.4.1 Reporting procedure

Initial communication

Initial communication of the emergency/incident to the responsible personnel/ project worker at the project site will involve making a written communication to the respective PIT environment and social specialist.

GBV and SEA related cases, will be rated using the World Bank's assessment tool. MGLSD and PSFU PITs shall implement actions recommended for the appropriate level of risks prior to work effectiveness and workers' deployment. This would include signing of enforceable Codes of Conduct by workers, establishment of referral pathways with support from the MGLSD's/PSFU GBV Specialist, sensitization activities for workers/communities by relevant Service providers and consultant staff, etc. three months after project effectiveness.

Classification

Classification of the incident will entail ascertaining the type of the incident, that is; whether the incident is minor (e.g. near miss, minor injury) or major (e.g. disablement, fatality). The type of the incident will further inform the reporting timelines to the PIT and the World Bank respectively. Major incidences will be reported to the Bank within 48 hours while minor ones can be reported on a quarterly basis (included in the quarterly ESHS report). The sub-projects will submit incident reports to the PIT on a monthly basis except for the major accidents which must be reported (to the PIU) within 12 hours of occurrence.

Notification

Notification will involve getting details of the victim, the circumstances under which the incident occurred and the time at which the incidence occurred.

Investigation

After the respective PIT receives notice of the incident, investigations will commence focussing inter alia, on the root cause(s) of the incident and identifying corrective and preventive action.

Response

Responding to incidences includes coming up with corrective and preventive measures that must be implemented within specified timelines to ensure that such incidences do not re-occur.

Follow up
This is aimed at finding out if the response was complete, its effectiveness and any lessons that can be learnt from the process.

10.5 Roles and Responsibilities

The PIT at MGLSD will assume the overall implementation of the project. The Project Manager, Project Coordination Manager, Environmental Specialist, Social Safeguards Specialist, Gender Specialist and other technical officers at the Ministry of Gender, Labour and Social Development (MGLSD) shall constitute the PIU. The PIT shall be responsible for consolidation of E&S management reports, verification of incidences and quality control and quality assurance of the reports before they are submitted to the World Bank.

The PITs of the implementing agencies (MGLSD and PSFU) Environment Specialists, Social and Gender specialists will be responsible for overseeing the monitoring of the ESMF for their Project Components.

The PIT Environment and Social staff of the respective implementing agencies (MGLSD and PSFU) will oversee the implementation of the monitoring plan. The PIT Environment and Social Staff will conduct field supervision visits to the different project sites

Site-specific ESMPs will be developed and implemented by the implementing agencies (MGLSD and PSFU) with support from hired Consultants to assist in the development of the ESMPs. The implementing agencies (MGLSD and PSFU) will ensure that the ESMPs are in conformity to the ESMF.

Overall, the World Bank will undertake project implementation support and supervision missions twice a year to ensure effective environmental and social safeguards management and that the project development objectives are realised.

11. CAPACITY BUILDING AND TRAINING

11.1 Introduction

Key sector institutions, including the MGLSD and PSFU will have responsibilities for implementing the proposed project. As part of this project, GROW will move towards the establishment of two fully-staffed PITs with specialists dedicated to the implementation of the project and the effective coordination.

The measures adopted under the project's institutional capacity will continue into the proposed GROW Project and directly benefit GROW Project implementation, ensuring that the MGLSD staff's capacity for implementing the GROW Project will be strong from the beginning of the project. This will include the integration of additional staff recruited under the project into the GROW Project's PIU.

MGLSD has low capacity for the implementation of World Bank-funded projects and provision of overall coordination of project activities. A GROW Project implementation Unit (PIU) shall be established and adequately staffed to supervise, monitor, and report on all project activities. The PIT will also benefit from support provided by the Occupational Safety and Health Department (DOSH) of the MGLSD, which will be further strengthened under the GROW Project.

Although the implementing institutions (MGLSD and PSFU) have managed environmental and social risks and impacts on previous and/current World Bank funded projects such as the Skills Development Project (SDP) under the PSFU, a systematic capacity building of the relevant staff in these institutions on the new Environmental and Social Framework (ESF) requirements will be necessary. This is partly because some of these projects were designed under the old Environmental and Social Safeguards policies of the World Bank.

Therefore, for effective implementation of the GROW Project, it is important for staff from the implementing agencies to undertake capacity building and training on national laws and regulations on environmental and social risks and impacts management; environmental and social management systems; World Bank's ESF and Environmental and Social Management Systems (ESMSs) for World Bank projects.

11.2 Environmental and Social Capacity Building Plan

11.2.1 Personnel from: MGLSD, PSFU, and other MDAs closely associated with GROW Project

It is also recommended that prior to commencement, a 2-3-day workshop is held in Kampala targeting MGLSD, PSFU, and other MDAs closely associated with the project. The workshop as detailed below will aim at providing attendees with the basic approach to implementing the guidelines provided in the ESMF combined with the use of appropriate tools, such as the screening form, ESMP template and ESMF Annual Reporting Form. Refresher courses should be held as needed during the course of the project. The trainings will be organised by MGLSD (being the lead implementing agency) with support from the World Bank.

The details of the capacity building needs and the Training Format are presented in **Table 20** and **Table 21** respectively.

Table 20: Capacity Building Needs and Training Schedule

Aspect	Key issues to be addressed	Mode of engagement	Stakeholders	Responsible entity	Timing
World Bank ESF	World Bank Environment and Social Standards (ESSs)	Training	Technical personnel from: MGLSD's PIT and, PSFU PIU, and other MDAs closely associated with GROW Project.	MGLSD	Prior to commencement of project activities and once the relevant staff are in place.
EHS	ESHS requirements, including those specified in ESMMPs and project contracts	Training	Service providers, Commercial Financial Institutions (CFIs) and supervision/ verification consultants	MGLSD	During project implementation
Good International Industry Practices (GIIPs)	Improve knowledge on GIIPs in ESHS Safeguards	Training	Senior Managers of the two PIUs and other staff of the PIUs	MGLSD	During project Implementation

Table 21: Proposed Training Format for ESMF Implementation

Module	Duration (days)
Day 1 Introduction a. Objective of the ESMF b. Key stakeholders with a role in the ESMF c. Relevant legislative and regulatory acts and World Bank ESF d. Baseline Environmental and Social Conditions e. Structure and role of Project Implementation units and relevant governmental authorities	1
Day 2 Summary of guidelines for the subprojects a. Environmental and Social Screening and Impact Assessment b. Stakeholder Consultations and Engagement c. Environmental and Social Impacts and Mitigation Measures d. Monitoring and Reporting e. Grievance Redress Mechanism f. ESMP & ESMS	1

Module	Duration (days)
Day 3 Capacity Building and Implementation Budgets a. Capacity building requirements b. Budgeting for the implementation of EMPs, ESMS, VGMPs, RAPs and other safeguard management plans c. Q&A session	1 day
Total	**3 days**

11.2.2 Training of Service Providers, Commercial Financial Institutions, Supervision Consultants and those Implementing the Subprojects

The training will also cover some of the safeguards areas of specific interest, including but not limited to: Development & Implementation of Contractor's ESMP, Environmental and Social Management Systems, Health and Safety Management Systems (both Occupational and Community Health and Safety), management and use of Auxiliary Facilities (e.g. Camp and Equipment Yard, Borrow Areas), environmental and social due diligence, Labour influx management and use of Code of Conduct, Child abuse/defilement, Grievance Redress Management, and so on.

A proposed format for a 2-day training is provided in **Table 22** below

Table 22: Awareness Training for Service Providers, CFIS, Supervision Consultants, and those Implementing the Subprojects

Module	Duration (days)
Day 1 **Awareness raising** a. Environmental & Social awareness and the importance of effective mitigation b. Sound Practice for Environmental and Social mitigation measures c. Compliance with WB ESF and local legislation on OHS, ESMP, SEP, RAP, and VMGMP d. Stakeholder engagements e. SEA, GBV and VAC f. Contract management requirements	Half day
Day 2 **Technical training** a. Development/Implementation& scope of Service providers' ESMPs b. Environmental, Health & Safety Management onsite c. Acquisition & management of auxiliary facilities and construction materials sites d. Labour influx management and child abuse e. Grievance Redress Mechanism, Process and Committees f. Implementation of the ESMP (contract clauses) g. Monitoring and Reporting of ESMPs, SEPs, RAPs, and VMGMP h. Climate change	1.5 days

i. Biodiversity	
Total	**2 days**

11.2.3 Training of Safeguards staff

During the Implementation of the project and as part of capacity building for support towards the Implementation of this ESMF and its associated tools, it is recommended that the safeguard specialist undergo the World Bank ESF training and the following internationally recognised training:
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a. ISO 45001:2018 Occupational Health and Safety Management System (Lead implementers)
b. ISO 14001: Environmental Management System (Lead Implementer).
c. Quality Management System 9001 (Lead Implementer and Auditors).
d. Labour Management practices by ILO.
e. NEBOSH International General Certificate in Occupational Health & Safety
f. Land acquisition and management related courses
g. SEA, GBV and VAC training
h. Stakeholder engagement related training.
i. Attend international conferences on climate change, biodiversity, impact assessments to share and learn best practices for replication in the project implementation.

12 ESMF IMPLEMENTATION SCHEDULE AND BUDGET

This section presents the budget estimates for implementation of the Environmental and Social Management Framework (ESMF). However, detailed budgets for specific sub-projects will be developed during the preparation of the Environmental and Social Management Plans (ESMMPs) under the GROW Project.

12.1 ESMF Budget

The budget, implementation timing and responsibilities are presented in **Table 23** below.

Table 23: ESMF Implementation Schedule and Budget Estimates

Environment and Social Management Measure	Implementation stage or phase	Timing and Frequency	Budget in USD		
			MGLSD	PSFU	TOTAL
1. Training and Capacity Building of Technical Teams Training, capacity building and technical assistance to central and local government staff and PSFU teams involved in preparing the ESF documents and subsequently monitor the sub project specific ESMPs, as applicable;	Prior to Project effectiveness	Monthly	200,000		200,000
2. 1) **Assessment and management of environmental and social risks and impacts** i. Environmental and social assessment ii. Environmental and social audits iii. Monitoring of environment and social compliance iv. Permit, consents and authorizations v. Third party monitoring-Multi-sectoral monitoring committee meetings	Project effectiveness One year on obtaining ESIA Project effectiveness	 Once Twice	500,000 150,000 200,000		500.000

Environment and Social Management Measure	Implementation stage or phase	Timing and Frequency	Budget in USD		
			MGLSD	PSFU	TOTAL
	Project effectiveness	Quarterly Once	50,0000 50,000	100,000 100,000	
3. Environmental and Social Safeguards Staff Recruitment **ORGANIZATIONAL STRUCTURE**: establish and maintain an organizational structure with qualified hired staff and resources to support management of E&S risks Recruitment of safeguard specialists PSFU (2), and MGLSD PIT (4)	Before project implementation	To be conducted once before project implementation	300.000	300,000	300,000
4. Development of management plans **ENVIRONMENTAL AND SOCIAL ASSESSMENT / MANAGEMENT PLANS AND INSTRUMENTS / CONTRACTORS** Prepare, publicly disclose, the project Environmental and Social Management Framework (ESMF) and ensure compliance of the project activities. Assess environmental and social risks and impacts of the proposed subprojects under project activities in accordance with the project ESMF Prepare, publicly consult, disclose, adopt, and implement, Environmental and Social Management Plans, Stakeholder Engagement Plan and/or other instruments, if required for the respective Subproject activities - (ESMS, GBV, SEA, VAC, GRM, RAP, stakeholder Plans and VMGP) Incorporate relevant aspects of this ESCP, including any Environmental	Before project implementation	To be conducted before the project implementation	50,000	10,000	10,000

Environment and Social Management Measure	Implementation stage or phase	Timing and Frequency	Budget in USD		
			MGLSD	PSFU	TOTAL
and Social Management Plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Regularly update Environmental and Social Management Plans, Stakeholder Engagement Plan or other instruments based on updated guidance by WHO on COVID19.					

13 CONCLUSION AND RECOMMENDATION

This ESMF describes the proposed GROW components, identifies likely environmental social and social impacts and proposes management measures to control environmental and social impacts during project implementation.

This ESMF provides guidance on how environmental and social impacts of the project shall be assessed and managed. This notwithstanding, at a general level, potential impacts of project components have been discussed and possible mitigation provided.

Specific measures shall be implemented by Service providers, and such measures shall form part of the Service providers' ESMPs. Socioeconomic impacts such as those associated with involuntary resettlement and compensation can be easily dealt with through the RAP– Relevant guidance will be available within the RPF prepared in parallel to this ESMF.

Preliminary institutional and capacity assessment undertaken during the preparation of this ESMF indicates that there is adequate social safeguards capacity at the Ministry of Gender, Labour and Social Development (MGLSD) but inadequate environmental capacity. Training is therefore recommended for staff in the Project Implementation Unit (PIU) together with the PIT of the Private Sector Foundation Uganda (PSFU). Alternatively, an Environmental Safeguards Specialist should be hired by the project on contract, to oversee its implementation. It is expected that there is adequate safeguards capacity at the District/City levels and this shall be used to guide implementation of the ESMF.

It can also be concluded that there are adequate environmental and social policies in Uganda to guide the preparation of the relevant safeguards assessments during implementation, but with tendencies of weak follow-up during supervision and monitoring.

Once environmental and social impacts are properly managed, the GROW Project will have immense positive benefits to the project direct and indirect beneficiaries, their communities and the surrounding environment.

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ANNEXES

Annex 1: Environmental and Social Screening Form

Note: The Environmental and Social Screening Form (ESSF) is designed to avail information to the decision makers during project implementation. It identifies impacts and mitigation measures and recommends further environmental and social analysis if required. This form will be filled for each sub-project by the PIT and the project proponents.

Please type or print clearly, completing this form in its entirety. You may provide additional information on a separate sheet of paper if necessary. Kindly note that the information you are to provide is required by the National Environment Act, 2019.

Component under GROW Project	
Name of Sub project	
Project Objective	
Expected Commencement Date	
Proposed Main Project Activities	
Location (District, Parish, Village)	
Name of Evaluator	

Exclusion Criteria

If an activity will be identified to have the following risks, it will be ineligible for financing under the Project:

- Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) impacts.
- Activities that will be implemented in ecologically sensitive areas or protected areas.
- Activities that have a high probability of causing serious adverse effects to human health and/or the environment.
- Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.
- Activities that may have significant negative effects on the lands or rights of Vulnerable or Marginalised Groups.
- Activities that may involve significant involuntary resettlement or land acquisition.
- Activities that have significant impacts on cultural heritage.

1) BRIEF DESCRIPTION OF THE PROPOSED PROJECT

---

2) EMPLOYEES AND LABOURERS

Number of people to be employed: Employees and Labourers	**During Construction**	**During Routine Operation**
FULL-TIME		
PART-TIME		

3) DESCRIPTION OF PROCESS THAT COULD BE IMPLEMENTED

3.1 Briefly describe the nature of the subproject.

3.2 List the type and quantity of raw materials to be used in the project and highlight their sources

Material	Quantity	Source

4) POTENTIAL ENVIRONMENTAL IMPACTS

Please indicate environmental impacts that may occur as a result of the proposed project.

4.1 The Biological Environment

4.1.1 The Natural Environment

Describe the habitats and flora and fauna in the project area and in the entire area expected to be affected by the sub-project (e.g. downstream areas, access roads):

_____

- Will the subproject directly or indirectly affect:
  - Natural forest types? YES _____NO _____
  - Swamps? YES _____NO _____
  - Wetlands (i.e., lakes, rivers, swamps, seasonally inundated areas)? YES _____NO _____
  - Natural critical habitats (parks, protected areas)? YES _____NO _____
- Other habitats of threatened species that require protection under Ugandan laws and/or international agreements? YES _____NO _____
- Are there according to background research / observations any threatened/ endemic species in the project area that could be affected by the project? YES _____NO _____
- Will vegetation be cleared? If yes, please state the distance/length of affected area

YES _____NO _____

- Will there be any potential risk of habitat fragmentation due to the clearing activities? YES _____NO _____
- Will the project lead to a change in access, leading to an increase in the risk of depleting biodiversity resources? YES _____NO _____

Provide an additional description for "yes" answers:

_____

4.1.2 Protected Areas

- Does the subproject area or do subproject activities: Occur within or adjacent to any designated protected areas? YES _____NO _____
- Affect any protected area downstream of the project? YES _____NO _____
- Affect any ecological corridors used by migratory or nomadic species located between any protected areas or between important natural habitats (protected or not) (e.g., mammals or birds)? YES ___NO ___

Provide an additional description for "yes" answers:

_____

4.1.3 Invasive Species

- Is the sub-project likely to result in the dispersion of or increase in the population of invasive plants or animals (e.g., along distribution lines)? YES _____NO _____

Provide an additional description for a "yes" answer:

_____

4.1.4 Impact identification and classification

When considering the location of a subproject, rate the sensitivity of the proposed site in the following table according to the given criteria. Higher ratings do not necessarily mean that a site is unsuitable. They do indicate a real risk of causing undesirable adverse environmental and social effects, and that more substantial environmental and/or social planning may be required to adequately avoid, mitigate or manage potential effects. The following table should be used as a reference.

Roads and Footpaths	**Potential for Adverse Impacts**				
	None	**Low**	**Medium**	**High**	**Unknown**
Soil erosion or flooding concerns (e.g. due to highly erodible soils or steep gradients)					
Number of stream crossings or disturbances					
Wet season excavation					
Creation of quarry sites or borrow pits					
Significant vegetation removal					
Wildlife habitats or populations disturbed					
Environmentally sensitive areas disturbed					
Cultural or religious sites disturbed					
Economic or physical resettlement required					
New settlement pressures created					
Other (specify):					

	Potential for Adverse Impacts				
	None	**Low**	**Medium**	**High**	**Unknown**
New access (road) construction					
New access (road) construction					
Existing water sources supply/yield depletion					
Existing water users disrupted					
Downstream water users disrupted					
Increased numbers of water users due to improvements					
Increased social tensions/conflict over water allocation					
Sensitive ecosystems downstream disrupted					
Economic or physical resettlement required					
Local incapacity/inexperience to manage facilities					
Other (specify):					

4.2 The Physical Environment

4.2.1 Geology/Soils

- Will slope or soil stability be affected by the project? YES _____NO _____
- Will the subproject cause physical changes in the project area (e.g., changes to the topography)? YES _____NO ____
- Will local resources, such as rocks, wood, sand, gravel be used? YES _____NO _____
- Could the subproject potentially cause an increase in soil salinity in or downstream the project area? YES _____NO _____

- Could the soil exposed due to the project potentially lead to an increase in lixiviation of metals, clay sediments, or organic materials? YES _____NO _____

Provide an additional description for a "yes" answer:

_____

4.2.2 Landscape / Aesthetics

- Is there a possibility that the sub-project will adversely affect the aesthetics of the landscape? YES _____NO _____

Provide an additional description for a "yes" answer:

_____

4.2.3 Pollution

- Will the sub-project use or store dangerous substances (e.g., large quantities of hydrocarbons)?
- YES _____NO _____
- Will the subproject produce harmful substances? YES _____NO _____
- Will the subproject produce solid or liquid wastes? YES _____NO _____
- Will the subproject cause air pollution? YES _____NO _____
- Will the subproject generate noise? YES _____NO _____
- Will the subproject generate electromagnetic emissions? YES _____NO _____
- Will the subproject release pollutants into the environment? YES _____NO _____

Provide an additional description for a "yes" answer:

_____

4.3 The Social Environment

4.3.1 Land Use, Resettlement, and/or Land Acquisition

Describe existing land uses on and around the sub-project area (e.g., community facilities, agriculture, tourism, private property, or hunting areas):

_____

- Are there any land use plans on or near the sub-project location, which will be negatively affected by subproject implementation? YES _____NO _____
- Are there any areas on or near the subproject location, which are densely populated which could be affected by the sub-project? YES _____NO _____
- Are there sensitive land uses near the project area (e.g., hospitals, schools)? YES _____NO_____
- Will there be a loss of livelihoods among the population? YES _____NO _____
- Will the sub-project affect any resources that local people take from the natural environment? YES _____NO _____
- Will there be additional demands on local water supplies or other local resources? YES _____NO _____
- Will the sub-project restrict people's access to land or natural resources? YES _____NO _____
- Will the project require resettlement and/or compensation of any residents, including squatters?

YES _____NO _____

- Will the subproject result in construction workers or other people moving into or having access to the area (for a long time period and in large numbers compared to permanent residents)? YES _____NO _____
- Who is/are the present owner(s)/users of resources/infrastructures the subproject area?

_____

4.3.2 Loss of Crops, Fruit Trees, and Household Infrastructure

Will the subproject result in the permanent or temporary loss of:

- Crops? YES _____NO _____
- Fruit trees / coconut palms? YES _____NO _____
- Household infrastructure? YES _____NO _____
- Any other assets/resources? YES _____NO _____

4.3.3 Occupational Health and Safety, Health, Welfare, Employment, and Gender

- Is the sub-project likely to safeguard worker's health and safety and public safety (e.g., occupational health and safety issues)? YES _____NO _____
- How will the project minimize risk of HIV/AIDS? _____
- How will the sub-project minimize the risk of accidents? How will accidents be managed, when they do occur? _____
- Is the project likely to provide local employment opportunities, including employment opportunities for women? YES _____NO _____

Provide an additional description for "yes" answers:

_____

4.3.4 Historical, Archaeological, or Cultural Heritage Sites

Based on available sources, consultation with local authorities, local knowledge and/or observations, could the sub-project alter:

- Historical heritage site(s) or require excavation near the same? YES _____NO _____
- Archaeological heritage site(s) or require excavation near the same? YES _____NO _____
- Cultural heritage site(s) or require excavation near the same? YES _____NO _____
- Graves, or sacred locations (e.g., fetish trees or stones) or require excavations near the same? YES _____NO _____

Provide an additional description for a "yes" answer:

_____

4.3.5 Vulnerable and Vulnerable Groups (VMG)

Is the subproject likely to affect any VMG?

YES _____NO _____

List the VMG(s) that is likely to be affected by the subproject

Briefly explain/describe how the VMG will/is likely to be affected by the subproject

_____

_____

Note: ESIAs will not be necessary for the subprojects, only ESMPs will be required. Other instruments that will be required include SEP, RAP and VMGMP.

CERTIFICATION

We certify that we have thoroughly examined all the potential adverse effects of this subproject.

Reviewer: ……

Name: ……

Signature: ……

Date: ……

Environmental and Social Checklist Form to be used by the PIT at project screening stage

Issues	**Mitigation Measures**
Natural Habitat Disturbance	● Strengthening local authorities and conservation personnel responsible for managing natural resources ● Public Awareness Programme ● Agricultural extension programmes ● Avoid disturbance of important areas of biodiversity ● Avoid placement of transmission lines across bird flyways and provide devices that will discourage birds from flying into lines and nesting on pylons
Erosion and sedimentation	● Drainage and erosion prevention and modified construction techniques during the construction period ● Re-vegetation programme
Community Health and Safety	● Communities near or on-site should be informed of project activities ahead of time especially if it affects their use of resources (traffic for example, etc.) ● Extensive public consultation during the planning of power line and power line right-of-way locations ● Accurate assessment of changes in property values due to power line proximity ● Siting power lines, and designing substations, with due consideration to landscape views and important environmental and community features ● Location of high-voltage transmission and distribution lines in less populated areas, where possible ● Use of signs, barriers (e.g. locks on doors, use of gates, use of steel posts

	surrounding transmission towers, particularly in urban areas), and education 128 /public outreach to prevent public contact with potentially dangerous equipment ● Grounding conducting objects (e.g. fences or other metallic structures) installed near power lines, to prevent shock. For more detailed guidelines, refer to the World Bank Group's Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution.
Worker Health and Safety	● Only trained and certified workers will be allowed to install, maintain, or repair electrical equipment; ● Ensuring that live-wire work is conducted by trained workers with strict adherence to specific safety and insulation standards. ● Testing structures for integrity prior to undertaking work; ● Implementation of a fall protection program that includes training in climbing techniques and use of fall protection measures; inspection, maintenance, and replacement off all protection equipment; and rescue of fall-arrested workers, among others; ● Safety belts should be of not less than 16 millimetres (mm) (5/8 inch) two-in one nylon or material of equivalent strength. Rope safety belts should be replaced before signs of aging or fraying of fibres become evident; ● When operating power tools at height, workers should use a second (backup) safety strap; ● Signs and other obstructions should be removed from poles or structures prior to undertaking work; ● An approved tool bag should be used for raising or lowering tools or materials to workers on structures. ● Training of workers in the identification of occupational EMF levels and hazards; ● Establishment and identification of safety zones to differentiate between work areas with expected elevated EMF levels compared to those acceptable for public exposure, limiting access to properly trained workers; For more detailed guidelines, refer to the World Bank Group's Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution.
Water and soil quality	● Appropriate locations for handling, storing and disposing of oil products and other harmful chemicals ● Limited use of pesticides
Involuntary resettlement	● Avoid silting infrastructure where people will be disturbed and where resettlement could be an issue ● Consultations with affected persons ● Prepare and implement resettlement plan and alternatives for affected persons ● Cash compensation based on District assessment rates for loss of up to 25% of property or production ● Relocation support and livelihood development plan for those affected by more than 25% of property or production ● Affected peoples given opportunity to identify potential settlement areas ● Host communities brought into the planning process for resettlement ● Strengthening of local authorities and line agencies responsible for carrying out resettlement and agricultural extension and possible involvement of local NGOs

Impacts on Landscape	● Considerations of aesthetic and cultural values in design of project features ● Re-vegetation programme
Loss of Cultural Property	● Avoidance of all culturally important sites

Issues	**Mitigation Measures**
Impacts on Landscape	● Considerations of aesthetic and cultural values in design of project features
Loss of Cultural Property	● Avoidance of all culturally important sites
Resettlement	● Avoid disturbing existing land use patterns and inhabited areas or alterations of existing structures ● Consultations with affected persons if required ● Mechanism for prompt and fair payments, monitoring and grievance procedures if necessary

Annex 2: Summary Matrix of stakeholders consulted _phase 1 of consultations

Consultations Held Physically, Telephonically, Email, Etc.

S/N	Name	Gender	Designation	TELEPHONE / EMAIL	ENTITY
1	Domisiano Owor	M	Senior Wild Life Officer (Swo)	+256701332400-owordon@gmail.com	MoTWA
2	Micheeal Mugaba	M	Wild Life Officer (W0)	+256775338632 Michealmugaba7@gmail.com	MoTWA
3	James Mboijana	M	Tourism Development Officer (Tdo)	+256772579760 Jmboijana2@gmail.com	MoTWA
4	Alex Asiimwe	M	Commissioner		
5	Eva Katusabe	F	OSH Inspector		
6	Rebecca Nabwire	F	Principal Labour Inspector		
7	Harriet Asibazuyo	F	Senior Equity Officer		
8	Ritah Nakonde	F	Labour Officer		
9	Diana Ninsiima	F	Environment Officer		
10	Openy Geofrey	M	Risk Manager		
11	Susan Muwanga	F	Principal Gender Officer		
12	Dr. Paul Okiror	M	Enviromental Specialist	+256782224828 p.okiror@energy.go.ug	MGLSD
13	Catherine Ajiambo	F	Research Officer (Ro)	+256782499093 Catherineajiambo@gmail.com	RO
14	Noel Komunda	M	Gender Specialist	+256751027127 noel.komunda@gmail.com	MGLSD
15	Dorothy Achan	F	Social Safeguards Specialist (S.S.S)	+25677247201 Dorothy.achan1@gmail.com	MGLSD
16	Francis Xavier Ochandi	M	Sociologist	+256704526428 Frankxavie256@gmail.com	MGLSD
17	Nakabiri Grace	F	Sociologist	+256777360784 nakabiragrace@gmail.com	MGLSD
18	Brenda Owomugisha	F	Safe Guard	+256773187290 b.owumugisha@energy.go.ug	MGLSD
19	Julius Byenkya Atwoki	M	Social Risk Management Specialist		PSFU

20	Elisha Lugoloobi	M	Transaction Execution Specialist	+256701407330 elugoloobi@PSFU.or.ug	PSFU
21	Peter Makero	M	Enviromental Specialist	+256758289019 makeropeter@gmail.com	PSFU
22	Charles Omara	M	Risk Manager	+256772491675 comara@uecc.or.ug	PSFU
23	Elisha Lugoloobi	M	Transaction Execution Specialist	elugoloobi@PSFU.or.ug	PSFU
24	Justine Ahebwa	F	Environment Management Officer	+256782446231 justineahebwa@gmail.com	NFA
25	Maxwell Kabi	M	Coordinator Forest Resource Utilisation	+256782453853 maxkabi@nfa.org.ug kabimaxwell@gmail.com	NFA
26	Julius Ahiro	M	M&E Officer	+256782306100 anyol@gmail.com	NFA
27	Stephen Galima	M	Coordinator National Forest Management	+256772925762 stephong@nfa.org.ug	NFA
28	Mackline Natukunda	F	Partnership Community Officer	+256778140510 Kundamackline@gmail.com	NFA
29	Christine Mugenyi	F	Environment Partnership Officer	+256782417524 christinem@nfa.org	NFA
30	Edgar Buhaga	M	Deputy Director Planning And Monitoring Research	+256782572521 Edgar.buhanga@wildlife.go.ug	UWA
31	Justine Namara	F	Manager EA And Oll Monitoring	+256772413432 Justinenamara@wildlife.go.ug	UWA
32	Kaganzi Emmanuel	M	Assistant Commissioner Physical Planning	Kagaemma@gmail.com	MLHUD
33	Martha Mugarura	F	Assistant Commissioner Urban Development	masharuks@gmail.com	MLHUD
34	Dorothy Achan	F	Social Safeguard Specialist	+256772472551	MLHUD
35	Ronald Murungi	M	Physical Planner (Pp)	+256774720219	MLHUD
36	Pamela Latim	F	Physical Planner	+25678743487 pamelakarz@gmail.com	MLHUD

37	Mary Frances Namakula	F	Senior Government Valuator (Sgv)	+256779625996	MLHUD
38	Jonan Kayima	M	Social Development Specialist	Jonankayima@yahoo.com	MLHUD
39	Maria Nanteza	F	Acting Environment Officer (Ag. Eo)	Maria.nanteza@yahoo.com	MLHUD
40	Jacqueline Nnassuna	F	Sociologist	jnnassuna@gmail.com	MLHUD
41	Catherine Ajiambo	F	Research And Conservation Officer	catherineajiambo@gmail.com	DMM
42	Caroline Namboozo	F	Senior Socio Development Officer	cnambozo@gmail.com	REA
43	Eunice Ngangeyu	F	Research Officer	+256773490366 ngngna@gmail.com	DMM
44	Nasser Kibirige	M	Engineer	birik2k@yahoo.com	DMM
45	Danids Halongo	M	Conservator	+256778021648	UGANDA MESEUM
46	Vincent Ngabirano	M	Educational Officer	ngabirano@yahoo.com	UGANDA MESEUM
47	Amon Mugume	M	Natural Scientist	amugume@yahoo.com	UGANDA MUSEUM

Annex 3: Summary Matrix of stakeholders consulted _phase 2 of consultations (virtual)

Stakeholder	Key personnel consulted	Contact	Date	Method of Engagement	Gender		
					Male	Female	Total
Uganda Investment Authority	Ms. Winnie Lawoko-Olwe,	0752230303	23/02/22	Virtual Meeting (Zoom)		1	3
	Ms. Susan Nakibuuka	0782749568	23/02/22	Virtual Meeting (Zoom)		1	
	Ms. Eria Kaweireku	0772697592	23/02/22	Virtual Meeting (Zoom)	1		
Ministry of Finance, Planning and Economic Development	Ms. Azizah Nabitalo	0779311292	23/02/22	Virtual Meeting (Zoom)		1	1
National Planning Authority	Ms. Judith Mutabazi	0777919566	23/02/22	Virtual Meeting (Zoom)		1	1
Ministry of Local Government	Ms. Ruth Kashaga Development Officer	0787897945	23/02/22	Virtual Meeting (Zoom)		1	1
Ministry of Trade Industries and Cooperatives	Mr. Stephen Mbogo Kirya	+256702172770	23/02/22	Virtual Meeting (Zoom)	1		1
Ministry of Tourism, Wildlife and Antiquities	Ms. Harriet Kizza	0752354888	23/02/22	Virtual Meeting (Zoom)		1	1
Office of the Prime Minister	Mr. Peter Malinga	0772392187	24/03/22	Virtual Meeting (Zoom)	1		1
United Nations Development Programme	Ms. Harriet Karusigarira	0704986308	24/03/22	Virtual Meeting (Zoom)		1	1
Kyambogo University	Kebirungi Harriet	0772835518	24/03/22	Virtual Meeting (Zoom)		1	3
	Ms. Grace Muhoozi	0702487890	24/03/22	Virtual Meeting (Zoom)		1	

	Ms. Lilian Namubiru		24/03/22	Virtual Meeting (Zoom)		1	
Makerere University Business school	Dr. Diana Ntamu	0772370007	24/03/22	Virtual Meeting (Zoom)		1	1
National Forestry Authority	Byaruhanga Julius	077292520	25/03/222	Virtual Meeting (Zoom)		1	3
	Margret Kyohairwe	0782 730 799.	25/03/222	Virtual Meeting (Zoom)		1	
	Julian Nyamusana,	0772379205	25/03/222	Virtual Meeting (Zoom)		1	
National Environmental Management Authority	Leila Akello Gonasa	0782730799	25/03/222	Virtual Meeting (Zoom)		1	1
United Nations Development Programme	Beatrice Mugambe	0704986308	25/03/222	Virtual Meeting (Zoom)		1	1
Inter Religious Council of Uganda	Irene Nakasolya	0772351955	25/03/222	Virtual Meeting (Zoom)		1	4
	Patrick N. Barasa,	0784215793	25/03/222	Virtual Meeting (Zoom)	1		
	Caroline Tusiime		25/03/222	Virtual Meeting (Zoom)		1	
	Caroline Bunga Idembe		25/03/222	Virtual Meeting (Zoom)		1	
National Union of the Disabled Persons of Uganda-NUDIPU.	Asale Deborah	0774032821	25/03/222	Virtual Meeting (Zoom)		1	5
	Oyuu Iyute Deborah,	0772646195	25/03/222	Virtual Meeting (Zoom)		1	
	Oyuki Yofisa -	0782948459	25/03/222	Virtual Meeting (Zoom)	1		
	Sarah Ojirot	0751658970	25/03/222	Virtual Meeting (Zoom)		1	
	Popuras Aisu		25/03/222	Virtual Meeting (Zoom)		1	
Total							**28**

Annex 4: Chance find Procedures

Note: These procedures are to be used for management of chance finds on the subprojects

A Chance Finds Procedure to guide management of any accidental discoveries of physical-cultural (PCRs) resources in the process of implementing the RRF. The procedure will be as follows:

a. Stop the construction power lines s in the area of the chance find; Delineate the discovered site or area;

b. Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Directorate of Museums and Monuments take-over;

c. Notify the supervisory Engineer who in turn will notify the responsible local authorities and the Directorate of Museums and Monuments under the Ministry of Tourism, Wildlife and Antiquities (within 24-48 hrs or less);

d. The Directorate of Museums and Monuments would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the Directorate of Museums and Monuments (within 24 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values;

e. Decisions on how to handle the finding shall be taken by the Directorate of Museums and Monuments. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage;

f. Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Directorate of Museums and Monuments; and

g. Construction work could resume only after permission is given from the responsible local authorities and the Directorate of Museums and Monuments concerning safeguard of the heritage;

h. These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered are observed;

i. Construction work will resume only after authorization is given by the responsible local authorities and the National Museum concerning the safeguard of the heritage; and

j. Relevant findings will be recorded in World Bank Implementation Supervision Reports (ISRs), and Implementation Completion Reports (ICRs) will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

Annex 5: Incident Reporting Form for Subprojects

Note: This form is to be used by subprojects for reporting all incidents, as per commitments in the Environment and Social Commitments Plan (ESCP)

(Note: It is important that incidences of child abuse and sexual harassment and severe criminality / social risks that may involve Project staff are documented and brought to attention of MGLSD for information and determination if further investigation is needed to avoid any possible negative consequences on the Project)

1	From:	
2	Title	
3	To:	
4	Title / Organisation	
5	Date of submission:	
6	Date of re-submission	
7	Details of Incidence	
8	Incident No. (month/No) e.g. first fatal in October	
9	Nature of Incident (e.g. Multiple Fatality)	
10	Severity of incident	
11	Who is the victim?	
12	Name / Occupation of Project staff involved / suspected to be involved? (if known at this stage)	
13	Date Incident Happened	
14	Location of Incident	
15	Date / Time Incident Reported to Contractor / Consultant	
16	Details of Person(s) Who Reported	
17	To Whom was incident Reported?	
18	Mode of Reporting (verbal/written report) – *if written attach report.*	
19	Details of the Incident (key facts pertaining to the incident and how it happened)	
20	Who else was informed about this incident?	
21	What Action (s) has been taken by Contractor / Consultant to address the problem? And When?	
	Details of Actions By MLGSD	
	Name / position of MLSGD staff incident was reported	
	Comments / Recommendations for MGLSD staff for which Incident was first reported	
	2nd Name/Position / Department for which incident was reported in MGLSD / Follow up Action Recommended.	.

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Annex 6: Instructions for preparing a Health, Safety and Environment Management Plan (HSE-MP)

Note: These instructions are to be used by the sub-projects to guide them in preparing their HSE management plans. This tool will be used together with Annex 10: HSE plan

1) Within a specified period from signing the Contract, the Contractor shall prepare an HSE-MP to ensure the adequate management of the health, safety, environmental and social aspects of the works, including implementation of the requirements of these general conditions and any specific requirements of an ESMP for the works. The contractor's EHS-MP will serve two main purposes:

The contractor's HSE-MP shall provide at least;

- a description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in an ESMP;
- a description of specific mitigation measures that will be implemented in order to minimize adverse impacts;
- a description of all planned monitoring activities and the reporting thereof; and
- the internal organizational, management and reporting mechanisms put in place for such.

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

HSE Reporting

The Contractor shall prepare monthly progress reports to the Client on compliance with these general conditions, the sub-project ESMP if any, and his own HSE-MP. The contractor's reports will include information on:

HSE management actions/measures taken, including approvals sought from local or national authorities;

(i) Problems encountered in relation to HSE aspects (incidents, including delays, cost consequences, etc. as a result thereof);
(ii) Non-compliance with contract requirements on the part of the Contractor;
(iii) Changes of assumptions, conditions, measures, designs and actual works in relation to HSE aspects; and
(iv) Observations, concerns raised and/or decisions taken with regard to HSE management during site meetings.

3) The reporting of any significant HSE incidents shall be done as soon as practicable. Such incident reporting shall therefore, be done individually. The Contractor should keep his own records on health, safety and welfare of persons, and damage to property. It is advisable to include such records, as well as copies of incident reports, as appendixes to the monthly reports. Details of HSE performance will be reported to the Client.

Training of Contractor's Personnel

4) The Contractor shall provide sufficient training to its own personnel to ensure that they are all aware of the relevant aspects of these general conditions, any project ESMP, and its own HSE-MP, and are able to fulfil their expected roles and functions. Specific training will be provided to those employees that have particular responsibilities associated with the implementation of the HSE-MP. Training activities will be documented for potential review by the Client.

Amongst other issues, training will include an awareness session for all employees on

- HIV-AIDS
- Sexual and Gender based violence

- Child labour
- Sexual Exploitation and Assault

Annex 7: Template for Labor Management Procedures (LMP)

Note: These procedures will be used for management of Labor issues on the GROW project. Once developed they will be adopted and used by the subprojects to ensure that they comply with national and international labor laws and policies including the World Bank's ESF, especially ESS2: Labor and Working Conditions.

This procedure seeks to ensure the inclusion of measures, to manage risks associated with employment under the project, and to help determine the resources needed for planning and management. It sets out the approach to meet the national requirements, as well as the objectives of the World Banks's Environmental and Social Framework, specifically the objectives of ESS2: Labour and Working Conditions and Occupational Health and Safety.

During operations, the Plan will ensure that project management will be committed on a continuous basis throughout the life of the project, to evaluate risks and impacts and to have in place adequate measures and procedures to manage adverse impacts.

The Code of Conduct will also be adopted throughout project implementation It is important to note the LMP is a live document and can be updated to meet the demands of the project.

The basic contents of a Labour Management Procedures include:

1. Overview of Labor on the project
2. Assessment of Key potential labor risks
3. Brief Overview of Labor Legislation: Terms and Conditions
4. Brief Overview of Labor Legislation: Occupational Health and Safety
5. Responsible staff
6. Policies and Procedures
7. Age of Employment
8. Terms and Conditions
9. Grievance Mechanism
10. Contractor Management
11. Community workers
12. Primary supply workers

Annex 8: Grievance form

Note: This form is to be used for recording and tracking of grievances on the GROW project. It will be used by the subprojects for reporting grievances to the PIT, the PIT will then do follow-ups to ensure that the grievances are closed up.

GRIEVANCE FORM	
Date:	
Reference Number:	
Full Name (optional and can be left blank for anonymous grievances):	
ID Number (optional and can be left blank for anonymous	
CONTACT INFORMATION: *(Please mark how you would like to be contacted: mail, telephone, email, in person)*	By Post: *Please provide mailing address* By Telephone: By Email:
TYPE OF GRIEVANCE:	Individual: Group: Cultural:
DESCRIPTION OF INCIDENCE OR GRIEVANCE:	*What happened? Where did it happen? Who did it happen to? What is the result of the problem?*
HAS THIS GRIEVANCE BEEN RAISED PREVIOUSLY BY YOU OR ANYONE ELSE?	No Yes Details:
DATE OF INCIDENCE GRIEVANCE:	One-time incidence/grievance (date …) Happened more than once (how many times …)

	On-going (currently experiencing problem)
WHAT WOULD YOU LIKE TO SEE HAPPEN TO RESOLVE THE PROBLEM?	
Signature: Date: Please return this form to: Grievance Manager *[Add details of contact]*	
ASSESSMENT CATEGORY	
GRIEVANCE ACCEPTED Yes / No	
RESPONSE/ FOLLOW UP (SUMMARY OF RESPONSE AND CORRECTIVE ACTIONS TAKEN)	
RESPONSE TO APPLICATION Date: Person: Observations:	
CORRECTIVE ACTION AND SIGN-OFF Applicant satisfied with corrective action: Yes / No (Details) Is further action required: No / Yes (Details) If Yes, date sign-off received from Application:	

Annex 9: Waste Management Plan

Note: This form is to be used by subprojects for management of waste generated by the activities

1 INTRODUCTION

This generic Waste Management Plan (WMP) will prepared to address waste management issues associated with subprojects under the GROW Project in line with legal and regulatory requirements. It is a template that will guide the preparation of the site specific subproject WMPs. The site-specific HSE plans shall be informed by the relevant WBG General Environment, Health and Safety Guidelines (also refer to Table 6 of this ESMF).

1.1 Definition of Waste

The National Environment (Waste Management) Regulations 2020 state that "waste" any substance or object which is dumped, abandoned, discarded or disposed of or intended or required by law to be disposed of.

1.2 Key Laws and Regulations

Reference will be made to the provisions in the following legal framework:

a. Constitution of the Republic of Uganda, 1995
b. National Environment (Waste Management) Regulations, 2020
c. The National Environment Act, 2019
d. The Water Act Cap 152
e. The National Environment (Standards for Discharge of Effluent into Water or on Land) Regulations, 1999
f. The National Environment Management Policy, 1994
g. World Bank Group General environmental, health and safety standards, 2007

1.3 Waste Management Principles

Waste will be managed in line with the hierarchy of waste management options ordered by preference as follows:

Waste Prevention – It is the responsibility of all project beneficiaries, contractors and service providers to limit the amount of waste produced, insofar as is reasonably and economically practicable. This is to be achieved by careful consideration of the disposal implications of all developments and purchases.

Reuse – It is the responsibility of all subproject owners, project beneficiaries, contractors and service providers in so far as is reasonably and economically practicable to reuse articles that have not yet reached the end of life.

Recycling – Where opportunities exist and where regulations apply, waste recycling shall be encouraged and implemented to minimize the amounts of waste destined for landfill.

Transport – Waste will be collected from site waste hold/storage areas at regular intervals to authorized transfer, treatment or disposal sites only. Transportation of waste shall be done by NEMA Licensed Waste Transporters. Any vehicle used for the transportation of waste must be fit for purpose.

Treatment – Where wastes are sent for treatment to render safe or reduce hazardous properties of waste prior to recycling or disposal, it must be ensured that the segregation, storage, handling, transport and treatment processes comply with legislation.

Disposal – Where the production of waste is unavoidable, it shall be ensured that the segregation, storage, handling, transport and disposal processes comply with legislation and contract requirements. Hazardous wastes where possible, shall be treated using appropriate technologies to remove or minimize the hazardous properties prior to disposal. All treatment/sorting facilities shall be licensed by NEMA such that they are permitted to accept, transfer and treat wastes accordingly.

2 MANAGEMENT STRATEY AND ACTIONS

2.1 Strategy and commitment to continuous improvement

During the term of the Project, relevant changes in technology and work methods will be examined for opportunities to improve processes and systems for the benefit of all project stakeholders. The Subproject Manager will be accountable for ensuring continuous improvement in all aspects of the implementation of the Project.

a. The subproject owner or contractor commits that waste management in the project is achieved through best practice – by applying the waste management hierarchy, with waste prevention and minimisation being the priority followed by reuse and recycling/recover, and safe disposal.
b. Attain waste segregation/ separation at source thereby easing succeeding management measures and preventing contamination among different categories, particularly contamination of non-hazardous waste with hazardous waste.
c. Administrative controls including documentation of waste quantities and waste transfer, and code of conduct. Waste transfer form must be signed to ensure waste is passed to the right persons/authority.
d. Sensitisation and induction of employees and visitors regarding their responsibility towards waste minimization and management and the importance of their compliance and cooperation
e. Binding sub–contractors, service providers and suppliers to requirements of this Plan;
f. Establishing suitable materials storage areas including platforms, ware houses and open piles, clearly screened off.
g. A proper chain of custody with clear documentation will support waste transfer Systems
h. Special handling of hazardous waste management using procedures agreed with a licenced waste handler sub-contractor.

2.2 Waste Management Hierarchy

In deciding on the best method for managing any waste, there is a hierarchy for decision making which addresses issues such as sustainability, cleaner production, health, safety, and environmental protection. The same hierarchy will be applied to the subproject at each level, starting at the top of the hierarchy. The hierarchy will be as follows:

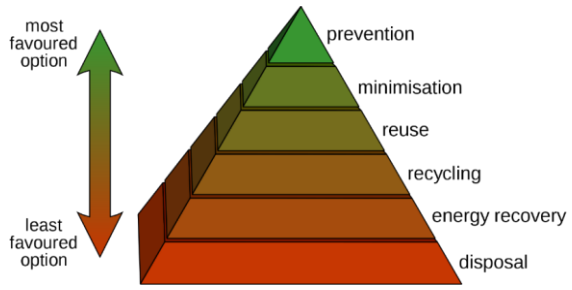


Figure: A pyramid of the waste management hierarchy which shall guide waste management on the subprojects

Avoidance/Prevention: Waste avoidance by reducing the quantity of waste being generated. This is the simplest and most cost-effective way to minimize waste. It is the most preferred option in the Waste Management Hierarchy and is therefore ranked first. All waste generators shall endeavor to prevent waste by tight estimating to ensure that large surpluses of construction and other materials are not delivered to site; supplier coordination (requiring the supplier to take back/buy back surplus and sub-standard/rejected materials); operate a "just in time" delivery system (coordinating material delivery with its use).

Reuse: Reuse occurs when a product is used again for the same or similar use with no reprocessing. Reusing a product more than once in its original form reduces the waste generated and the energy consumed, which would have been required to recycle.

Recycle and Reprocess: Recycling involves the processing of waste into a similar non-waste product consuming less energy than production from raw materials. Recycling spares the environment from further degradation, saves landfill space and saves resources.

Disposal: Removing waste from worksites, compounds and offices and dumping in a licensed landfill site, or other appropriately licensed facility.

2.3 General Storage, Collection and Transport of Waste

The following measures to minimize adverse impacts will be instigated:

a. Handle and store waste in a manner which ensures that it is held securely without loss or leakage, thereby minimizing the potential for pollution;
b. Use waste hauliers authorized or licensed to collect specific categories of waste;
c. Remove waste in a timely manner;
d. Maintain and clean waste storage areas regularly;
e. Minimize windblown litter during transportation by either covering trucks or transporting waste in enclosed containers;
f. Obtain the necessary waste disposal permits from NEMA, if they are required, in accordance with the National Environment (Waste) Management Regulations 1999;
g. Dispose of waste at licensed waste disposal facilities;
h. Develop procedures such as a ticketing system to facilitate tracking of loads, particularly for chemical waste, and to ensure that illegal disposal of waste does not occur; and
i. Maintain records of the quantities of waste generated, recycled and disposed where feasible.

2.4 Temporary Waste Storage and Segregation

Waste storage facilities will be provided as a secure, short term store for all waste streams generated on site prior to them being collected by relevant waste carriers for final disposal. Wastes must be classified and segregated in accordance with the National Environment (Waste) Management Regulations 1999 to ensure that each category of waste transported by or on behalf of the project meets the waste acceptance criteria of the authorised waste receiving site/process. All project beneficiaries, contractors and service providers have a responsibility to ensure that the waste generated by their activities are segregated and identified as follows:

Waste Electrical and Electronic Equipment

Waste Electrical and Electronic Equipment (WEEE) is any item that that is powered by mains or battery electricity. WEEE must be segregated from other waste.

Waste Batteries – There are certain battery types that are classified as Hazardous Waste and so must be segregated, stored and transported for recycling separately from non-hazardous batteries and or other waste.

Waste Destined for Recycling – Project beneficiaries, contractors and service providers will as opportunities arise implement waste recycling schemes to minimise the amount of biodegradable waste that goes to landfill and to reduce the impact to the environment from the final disposal of other wastes. Plastic bottles, glass, aluminium cans, and metals will be stored onsite and then given away for recycling.

Domestic Waste – Domestic Waste is the non-infectious and non-hazardous waste found in any household or office. It shall be segregated according to the labels.

Food (Catering) Wastes

a. Catering waste is divided into food waste and non-food waste.
b. Catering waste shall be collected and separated by personnel in the catering team and then transported by the waste collector.
c. Food waste shall be removed daily from the kitchen.
d. Food waste shall always be contained in plastic bags for disposal to prevent pest like flies and rats from breeding.
e. Non-food waste (beverage cans, packing materials, etc.) shall be collected in separate containers.

Medical Waste

The key to minimization and effective management of health-care waste is segregation (separation) and identification of the waste. The most appropriate way of identifying the categories of medical care waste is by sorting the waste into color-coded plastic bags or containers (WHO, 1995). In addition to the color coding of waste containers, the following practices are recommended (WHO, 1995).

a. Bags and containers for infectious waste will be marked with the international infectious substance symbol;
b. All sharps will be collected together, regardless of whether or not they are contaminated. Containers should be puncture-proof (usually made of metal or high-density plastic) and fitted with covers. They should be rigid and impermeable so that they safely retain not only the sharps but also any residual liquids from syringes. To discourage abuse, containers should be tamper-

proof (difficult to open or break) and needles and syringes should be rendered unusable. Where plastic or metal containers are unavailable or too costly, containers made of dense cardboard are recommended (WHO, 1997); these fold for ease of transport and may be supplied with a plastic lining.

Chemical Waste

Chemical waste that is produced should be handled in accordance with the National Environment (Waste) Management Regulations, 1999. Containers used for the storage of chemical waste should:

a. Be suitable for the substance they are holding, resistant to corrosion, maintained in good condition, and securely closed;
b. Display a label in English
c. Containers used for the storage of chemical wastes shall be suitable for the substance they are holding, resistant to corrosion, maintained in a good condition, and securely closed Display a label. Proper labelling is essential.
d. The storage area for chemical waste shall:
   - ❖ Be clearly labelled and used solely for the storage of chemical waste;
   - ❖ Have an impermeable floor and bundling, of capacity to accommodate 110% of the volume of the largest container or 20% by volume of the chemical waste stored in that area, whichever is the greatest;
   - ❖ Have adequate ventilation;
   - ❖ Be covered to prevent rainfall entering (water collected within the bound must be tested and disposed as chemical waste if necessary);
   - ❖ Be arranged such as to separate incompatible materials

Waste Management and Disposal Practices

Excavated Materials

a. Excavated materials are not considered likely to cause adverse impacts, since they may be possible to be used as reclamation fill, which is considered a useful reuse of the material. Any uncontaminated inert material may be delivered to public fill site.
b. Surplus excavated material, quarry overburden, rock rejected for aggregate, aggregate surplus to the requirements and the like shall not be discarded indiscriminately.
c. Different types of surplus excavated materials shall be deposited separately in the spoil dumps or quarries requiring restoration.

Construction and Demolition Waste

a. Careful planning and good site management can minimize over ordering and waste of materials such as concrete, mortars and cement groups;
b. If feasible, the noise enclosure shall be designed so that the materials are reusable after it has been dismantled and removed;
c. The design of formwork could maximize the use of standard wooden panels so that high reuse levels can be achieved;
d. Alternatives such as steel formwork or plastic facing could be considered to increase the potential for reuse;
e. Disposal of construction waste can either be at a specified landfill, or a private landfill to be acquired by the contractors.

Medical Waste

Description – Medical care based wastes including used and/or contaminated sharps will be generated at health care centers (manned by HIV/AIDS service providers). This particular waste is hazardous by its nature and is basically classified in infectious and non-infectious wastes.

2.5 Disposal Options

Medical waste will be handled as follows:

a. General medical care based wastes (packaging e.g. boxes etc.) will be disposed just like for domestic refuse;
b. Highly infectious waste shall, whenever possible, be sterilized immediately by autoclaving. It therefore needs to be packaged in bags that are compatible with the proposed treatment process: red bags, suitable for autoclaving, are recommended.
c. Small amounts of chemical or pharmaceutical waste may be collected together with infectious waste;
d. Disposal by incinerating aims at complete combustion of medical waste to totally burn it up to complete sterile ashes.

There are incinerators locally fabricated in Uganda. A good example is the MAK IV incinerator that has been specially invented for the burning of medical waste such as used cotton, syringes and safety boxes. The stainless-steel machine uses waste paper as fuel and burns at up to about 1200 degrees Celsius. The top of the incinerator is covered with sand, to stop air leakage but also work as refractory powder, to prevent heat loss. It can burn 5 kilos of waste in about 25 minutes.

Hazardous (Chemical) Waste

- For the processes which generate chemical waste, it may be possible to find alternatives which generate reduced quantities or even no chemical waste, or less dangerous types of chemical waste.
- The wide range of materials and chemicals involved such as oil, lubricants, cutting oils, sludge, paints etc. Hazardous waste shall be identified, classified, handled and disposed of safely.
- The machinery used during construction will require maintenance that will include change of engine oil, hydraulic oil and coolants.
- The maintenance schedule varies from machine category and the type of fluid changed. Typically, maintenance is determined by the number of hours of operation of a machine as shown below for bulldozers:
    - ✓ Every 250 hours or monthly - Engine oil & filters plus transmission filters.
    - ✓ Every 500 hours or 3 months - Fuel filters and hydraulic system filters.
    - ✓ Every 1000 hours or 6 months - Transmission oil and final drive oil.
    - ✓ Every 2000 hours or one year - Hydraulic system oil and Coolant
    - ✓ For small vehicles, maintenance is typically carried out after accumulation of 2500 miles usually after 3 months i.e. 4 oil changes per year. The number of machines and the frequency of service are related to construction activity.

A NEMA-Licensed Contractor will be engaged to transport and dispose of chemical waste. Advice should be sought from the District Environment Officers or City Environment Officers about safe

handling, storage, transport, treatment and disposal for any other waste substance or material that is not covered in this WMP.

3 ADMINISTRATIVE ARRANGEMENTS

The subproject owners and contractors will implement this plan, however its implementation will be checked and monitored by the relevant PFI, MGLSD/PFSU and other regulatory agencies and stakeholders for as part of the subproject ESMP. The roles and responsibilities of the subproject staff with respect to this Plan are defined below.

1.1 Roles and responsibilities

The roles and responsibilities are summarized in Table 1 below.

Table 1: Roles and Responsibilities

Contract Requirements	Description
Subproject/Contractor's Manager	• Providing financial and human resources for implementing the plan • Demonstrating commitment by clearly communicating the importance of implementing the plan. • Enforcing accountability, particularly for non-compliance
E&S Specialists	• Supervising implementation of the plan • Disseminating the plan • Revision of the plan • Implementation of the plan, including measures for prevention, minimisation, reuse and recycling, • Allocation waste collection bins/facilities, collection and disposal of wastes, • Conducting training and sensitisation, and • Reporting
Foremen/site managers	• Minimising waste generation in their activities • Receiving and deploying bins and facilities in their sites, • Reminding workers in their work sections or specific sites to observe waste management rules such as "no littering", • Making certain that containers are taken way to empty to central collection facility
All workers and visitors	• Minimise generation of waste • Place waste in their segregation bins, • Guide colleagues to observe waste management measures, for example inform persons littering to use bins.

4 INSPECTION, MONITORING AND REPORTING

Subproject sites will be inspected to ensure compliance with waste management requirements as part of the environmental inspection. This will include:

a) Inspection of construction work areas for litter,
b) Improper disposal of waste and inadequate separation of waste streams
c) Inspection of recycling and waste containers to ensure correct use and regular waste collection
d) Inspection of construction areas to confirm proper storage and bunding of hazardous materials including waste.

Records of inspections will be kept on site and any non-conformances will be reported to the PFI and/or MoGLSD/PSFU as part of the monthly reporting requirements. Significant non-conformances will be reported immediately. Parameters shall be defined as in example in Table below.

Table 2: Monitoring matrix

#	**Parameter to be monitored**	**Reason for Monitoring**	**Monitoring Location**	**Method**	**Frequency**	**Targets and Standards**
1.	Licenced hazardous waste handler is engaged	Safe disposal of hazardous waste	N/A			Meet all legal requirements
2.	Colour coded Waste bins are provided in work zones and central collection point	Ensure segregation and storage	Work zones	Inspection	Monthly	Dust bins and collection containers are in all at all times
3.	Wastes are placed in respective containers and not littered	Ensure no littering	All work zones	Inspection	daily	No littering
4.	Gender segregated toilet facilities are provided on all auxiliary facilities.	Safe disposal of human waste	All auxiliary facilities	Facilities planning and implementation	Throughout Project period	All facilities have toilets
5.	Schedule for deployment and removal/emptying of	Safe disposal of human waste	All temporary work zones	Inspections	Daily	All work zones have safe toilets and prevent environmental pollution.

	safe mobile toilet facilities is developed and implemented for all temporary work zones.					
6.	Volume of waste per category is determined	Waste management tracking to facilitate waste hierarchy approach	Entire project	Records	Monthly	Waste volumes records are kept.
7.	Volume of waste recycled or reused.	Waste management tracking to facilitate waste hierarchy approach	Entire project	Records	Monthly	Waste volumes records are kept.
	Waste transfer forms filed	Safe final disposal	Office	Records	Monthly	Tracking of all waste
8.	Training and awareness undertaken for all workers (and "DO NOT LITTER" and other signed pinned in appropriate locations).	Build capacity and mind-set to manage waste	Entire project	Records and interviews	Monthly	All employees are aware of

Annex 10: Health, Safety and Environmental (HSE) Plan

Note: This form is to be used for HSE management on the subprojects

1 INTRODUCTION

1.1 Overview of the HSE Plan

This generic Health, Safety and Environmental (HSE) plan has been prepared to address HSE management issues associated with subprojects under the GROW Project in line with legal and regulatory requirements. It is a template that will guide the preparation of the site specific subproject HSE plans. The site-specific HSE plans shall be informed by the relevant WBG General Environment, Health and Safety Guidelines (also refer to Table 6 of this ESMF).

1.2 Leadership and Commitment

1.2.1 Commitment to HSE through leadership

Responsibility for HSE lies with the subproject stakeholders (subproject proponents, contractors and service providers) line management and their top executives shall be personally involved in HSE management. Their (project proponents, contractors and service providers) commitment to HSE is to be evident and auditable at all levels within their organizations.

2 POLICY AND STRATEGIC OBJECTIVES

2.1 HSE policy, access and responsibility

Subproject owners, contractors and service providers shall have documented HSE policies, developed with active employee participation and implemented throughout their organizations. Company HSE Policy requirements are to be adapted and incorporated as required.

2.2 Subproject owners/Contractor's/service provider's policy on accidents and losses

Subproject owners/Contractor's/service provider's HSE policy is to reflect the accident-free (zero) mind-set as a long-term target.

3 ORGANIZATION, RESOURCES, AND DOCUMENTATION

3.1 Employee contribution

Contractors and/or service providers shall ensure that their personnel are working in compliance with contractually agreed working practices and have actual influence on their working situation in matters concerning health, safety, and environment.

3.2 Organization and communication

Subproject owners/contractor's/service provider's organization shall facilitate effective HSE management and communication, with emphasis on HSE as an integrated element in planning and implementing operations.

3.3 Mapping of working environment, information, and training

Contractor/service provider shall ensure that:

- The working environment and any follow-up measures are appropriately mapped. Based on the results from the working environment mappings, a plan for follow-up and improvement of the

working environment is to be established. All actions are to have a timeline and a responsible person.

- Prudent routines are in place to regulate coordination between different employers.
- The safety and health services have the necessary information about the working environment.
- Personnel receive necessary information and training in order to avoid and prevent work-related diseases.
- Personnel receive necessary information about the risk and health exposure relating to the working environment.

3.4 HSE training of managers and supervisors

Subproject owner's/Contractor's/service provider's managers and supervisors who will be involved in planning, monitoring, checking, or carrying out the Work are to have undergone formal HSE training, regardless of their level in the organization. Contractor shall define HSE training norms and training programmes for managers at all levels.

3.5 Personnel HSE induction programme

Subproject owners/contractor/service provider shall establish special arrangements for training new personnel in relevant local procedures and in any specific hazards inherent in the activity.

3.6 Training programme

Subproject owners/Contractor shall have documented systems in place for selecting and training personnel to ensure that the Work is executed by qualified individuals with adequate skills. Contractor shall establish arrangements which ensure that Contractor's and Subcontractors' personnel are familiar with and trained in the risks relevant for the scope of the work, such as:

- Basic industrial HSE
- Contractor's HSE policy and management system
- Company's HSE policy
- Company's defined safety-critical procedures
- Company's Personal Safety Involvement (PSI) program
- Any specific hazards inherent in the activities
- Correct use of hand tools and rotating equipment
- Correct use of personal protective equipment
- Emergency response

Subproject owner /Contractor shall put arrangements in place to ensure that the HSE knowledge and training of personnel are continuously documented and updated.

3.7 Assessing the suitability of Subcontractors

Subproject owner/Contractor shall assess the HSE expertise and record of Subcontractors. Contractor shall document its methods for identifying the standards and requirements to be met by Subcontractors, and for ensuring that these standards and requirements are understood and observed.

4 EVALUATION AND RISK MANAGEMENT

4.1 Risk Assessment

Subproject owner /Contractor shall utilize suitable and generally recognised methods for identifying and assessing HSE hazards and their consequences; and document these methods.

4.2 Security Management

Subproject owner/Contractor/service provider must always:

- Have implemented security measures which protect Company against relevant threats related to the Work. The level of security is to be flexible and adapted to the relationship between the threat and activities ongoing at any given time.
- Have a system in place for handling and securing of classified documents and electronic data.
- Be able to verify the identity of personnel who are to perform Work for Company.

4.3 Work-related injury and illness

Contractor shall systematically follow up incidents of Work-related injury and illness. Personnel are to be encouraged to propose countermeasures, and to prevent new incidents from occurring.

4.4 Working environment

Subproject owner /Contractor shall have a system that ensures and documents the identification and following up of all physical, chemical, ergonomic, and psychosocial/organizational factors which could be potentially detrimental to health and performance. This system is to be linked to continuous systematic monitoring of the exposure of personnel to these factors, and to a programme for reducing exposure that could be harmful to health. Contractor shall establish a bi-annual follow-up plan that describes the main activities for controlling and improving the working environment.

4.5 Work time, shift plans, and use of overtime

Upon request, Subproject owner/Contractor shall submit to the Project Implementation Team (PIT) plans for work time and shift plans. Contractor shall ensure that working hours, overtime, and restitution time are systematically monitored; and that the use of overtime does not represent a risk to human health or safety or to the environment.

4.6 Chemicals

Subproject owners/Contractor shall have a system which ensures and documents that all chemicals due to be used at the worksite are evaluated for their health risk during transport, use, and disposal; and that chemicals with the smallest health risk are given preference whenever this is technically and operationally feasible.

4.7 HSE data sheets

Subproject owner/Contractor shall have a system in place that ensures that correct information is available on the health risk and the fire, explosion, and environmental hazards posed by chemical products used at the worksite. The Safety Data Sheets (SDSs) are to be made available (and kept updated) in English and where possible, translated in languages that are understood by the personnel who will perform the works.

4.8 Personal protective equipment

Contractor/service providers shall be able to demonstrate that the personal protective equipment (PPE) used in performance of the work provide satisfactory protection in the relevant tasks. The standard of PPE must conform or be equivalent to a recognized international standard. Documented arrangements

are to be in place for provision and maintenance of PPE, both standard issue and items required for special operations. PPE distribution records and schedules should be included in reports submitted to the PIT.

4.9 Use of hand tools

Hand tools are to be managed according to Company procedure. A knife must not be used unless identified as the most suitable tool for the task. Use of a knife requires approval by the responsible manager, and such use is to be limited to defined tasks and managed through the work permit system. Cut-resistant gloves must be worn when using a knife.

4.10 Environmental management system

Subproject owner/Contractor shall have an environmental management system conforming to or developed to a level comparable to a recognised international standard, e.g., latest revision of ISO 14001 or equivalent standard. Contractor shall ensure that the system is well known by Contractor's personnel, and actively adhered to.

4.11 Environmental impact assessment and monitoring

Subproject owner/Contractor shall have a system in place which ensures and documents the evaluation and follow-up of the work's environmental impact. The follow-up is to include environmental monitoring where required. Evaluation and monitoring results are to be used systematically to minimise the environmental impact.

4.12 Selection of environmentally optimal solutions

Subproject owner/Contractor shall have a system in place that ensures and documents the selection of environmentally optimal solutions. The environmental aspect is to be included in all technical evaluations which involve discharges. The results of these evaluations are to be documented in an environmental accounting system and will serve as an evaluation criterion when selecting solutions based on cost/benefit analyses.

4.13 Waste management

Subproject owner/Contractor shall implement appropriate measures to prevent or reduce the generation of waste. Contractor shall have implemented a system for identifying, classifying, and handling waste. Hazardous waste is to be handled in accordance with the National Environment (Waste Management) Regulations 1999. Consumer and production wastes are to be segregated.

Subproject owners/Contractors and service providers shall ensure that the operations on site are conducted in a tidy and proper manner, with waste materials stored in a way such that they cannot escape owing to high wind or other adverse weather conditions. All storage of potentially environmentally damaging fluids, including fuels, is to include provisions for spillage containment. Waste management on site will be managed in accordance with the Waste Management Plan (WMP).

4.14 Use of potentially environmentally harmful chemicals

Subproject owner/Contractor shall have a system in place which ensures and documents the evaluation of measures to reduce discharges/ emissions to soil, water, and air. Contractor shall give emphasis to reducing chemical usage and replacing environmentally harmful chemicals; and include measures based on these evaluations in an environmental action plan or HSE programme.

Contractor must not use or discharge any chemicals without permission from NEMA and/or clearance from the supervising consultant.

5 PLANNING AND PROCEDURES

5.1 HSE management system

Subproject owner/Contractor shall establish an HSE management system, which it shall prepare in consultation with Contractor's employee representatives. Contractor shall ensure that the HSE management system is updated throughout the work.

Subproject owner/Contractor shall ensure the HSE management system addresses all the identified risks associated with the specific Work to be performed; and includes as a minimum occupational health, working environment, safety, security, the environment, and emergency response. Separate objectives are to be defined for each of these main areas.

5.2 HSE programme

Subproject owner/Contractor shall establish an HSE programme covering occupational health and the working environment, safety, security, the environment, and emergency response.

Subproject owner/Contractor shall submit the HSE programme to the supervising consultant and PIT for review in accordance with agreed milestones. Contractor must notify the consultant in advance of possible changes to the programme.

In addition, the HSE programme is to:

- Identify regulations and other specific requirements relating to HSE which apply to the works.
- Define activities which are to be initiated to meet prevailing requirements.
- Define the risk management system.
- Define applicable risk acceptance criteria.
- Define the hazards to be addressed, how these are to be controlled, and which methods should be used if necessary to regain control.
- Identify procedures to be developed or Company procedures to be adapted and incorporated.
- Define Company/ Contractor responsibilities and interfaces, and Contractor's strategy for supervising Subcontractors.
- Identify and schedule Contractor's training requirements.

5.3 Emergency preparedness

In an emergency, Contractor must be able to establish and maintain contact with next-of-kin, media, unions, and authorities in consultation with the supervising consultant and PIT, unless otherwise agreed. Contractor shall have a system in place ensuring that updated and relevant personnel data are readily available in Contractor's office. The data are to include social serial numbers and relevant personal data for next of kin. Contractor shall have a documented organization for providing immediate and long-term care for personnel and their relatives in the event of a hazardous condition or an accident.

Subproject owner/Contractor shall demonstrate an emergency preparedness plan for the different phases of the Work, which requires acceptance by Company. Subproject owner/Contractor shall develop, implement, and maintain a plan for medical treatment and case management, which may include an on-site medical facility.

6 IMPLEMENTATION AND MONITORING

6.1 Supervision and monitoring of Work activities

Subproject owner/Contractor shall supervise and monitor work activities to ensure full compliance with all relevant HSE requirements. Contractor shall pass on the results of this supervision and monitoring without undue delay to Contractor's management and personnel. Contractor shall verify that personnel are familiar with work instructions and procedures, and that they are capable of acting according to the instructions provided. Contractor shall perform frequent management inspections to verify compliance with prevailing standards.

The project staff including the consultant, Contractor's foremen and supervisors and representatives of PIT will meet on a regular basis to discuss expectations and challenges of the HSE work.

6.2 Undesirable events/ hazardous conditions

C Subproject owner/contractor shall comply with all official requirements for notifying and reporting undesired events/ hazardous conditions relating to safety, occupational health, and the environment. Contractor shall document routines for ensuring such compliance.

Subproject owner/Contractor shall report to the consultant all notifiable undesirable events/hazardous conditions experienced on site without undue delay, whether the event occurred at Contractor's premises or at another location. The report is to include the date of the event, its causes, and any preventive follow-up measures taken.

6.3 Reporting events with a high loss potential

Subproject owner/Contractor shall report all events suffered by the Company (Contractor) and having a high loss potential to Company to the PIT within 24 hours of the Incident. Contractor shall provide information on possible underlying causes.

6.4 Reporting personnel injuries

Subproject owner/Contractor shall notify the PIT of any injury suffered by the personnel/project workers, specifying the direct and underlying causes.

6.5 Incident follow-up system

Subproject owner/Contractor shall have a system in place to record and follow up corrective and preventive actions resulting from undesired events. Contractor shall ensure the system facilitates systematic transfer of experience.

6.6 Investigation and reporting of major incidents

Subproject owner/Contractor shall have a documented process for investigations, including identifying who will lead investigations and clearly defining competence requirements for key positions in the investigation team. Investigation reports are to be made available to relevant personnel and PIT. Contractor shall ensure findings and mitigating actions are documented, followed up, and communicated (internally and to the PIT).

The PIT has the right to participate in any investigation carried out by the Contractor to address incidents, near misses, and injuries related to Work.

The PIT is entitled to investigate independently incidents, near misses, and injuries, regardless of the actions taken by Contractor to investigate the same incidents, near misses, or injuries.

At any location at which work is performed, the PIT shall have for investigation purposes unrestricted access to all the Contractor's facilities on site and information the PIT deems relevant.

6.7 Occupational health

Subproject owner/Contractor shall have a system in place which documents systematic health monitoring as specified by Applicable Laws and good professional practice. Contractor shall ensure that monitoring leads to appropriate action plans, which are then regularly followed up.

The system is to provide for identification, evaluation, and reporting of work-related illnesses and corrective measures; follow-up of personnel on sick leave; and prevention and treatment of alcohol and drug abuse.

6.8 HSE performance indicators

Subproject owner/Contractor shall submit a monthly HSE report to the PIT as part of Contractor's overall monthly report. This HSE report is to cover the status of identified HSE hazards and significant HSE aspects. The status of all activities in the HSE programme is also to be detailed in full. Preventive measures which have been initiated or implemented are to be briefly described.

Subproject owner/Contractor shall have a documented system in place to monitor HSE performance against targets for defined key areas and activities, with feedback to personnel.

Unless otherwise agreed, the following HSE data are to be provided by Contractor:

- Number of accidents/ losses
- Number of near-misses/ hazardous conditions
- Number of undesirable events with high loss potential
- Number of first aid cases
- Number of medical treatment cases
- Number of restricted work day cases
- Number of lost-time injuries
- Hours worked (see below)
- Total Recordable Injury Rate per 200 000 working hours
- Registered overtime
- Sickness absence (as a percentage of normal working hours)
- New cases of work-related illness.

6.9 Experience transfer

Subproject owner/Contractor shall document formal requirements for HSE experience transfer. Contractor must provide sufficient time and resources to facilitate systematic improvement.

Transfer of HSE experience is to form part of Contractor's close-out report to PIT. Contractor shall prepare this report concurrently with performance of the work, and it is to address the following as a minimum:

- How Contractor's HSE programme has functioned (when the programme has been drawn up).
- Unforeseen problems — how these were overcome and recommended future approaches.

- Underlying causes of personal injuries and work-related illness, and how these have been followed up.
- Positive HSE aspects which should be considered for future activities.
- Any damage to equipment, and recommendations on avoiding similar damage in future operations.
- Suggested improvements to work routines.

Subproject owner/Contractor shall discuss the current status of the above items with the PIT at regular meetings.

7 COMPANY'S HEALTH, SAFETY & ENVIRONMENTAL (EHS) POLICY

The Company's EHS Policy should be attached here.

Annex 11: Example GROW Environmental and Social Screening Checklist (ESSC) for Component 2

Note: This checklist is an example of the one that will be used by the PFIs for screening of beneficiaries' business plans/proposals. The checklist will form part of the ESMS and will be applied by the PFIs and verified by the apex FI

Exclusion Criteria

If an activity will be identified to have the following risks, it will be ineligible for financing under the Project:

- Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) impacts.
- Activities that will be implemented in ecologically sensitive areas or protected areas.
- Activities that have a high probability of causing serious adverse effects to human health and/or the environment.
- Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.
- Activities that may have significant negative effects on the lands or rights of Vulnerable or Marginalised Groups.
- Activities that may involve significant involuntary resettlement or land acquisition.
- Activities that have significant impacts on cultural heritage.

Environmental and Social screening guiding questions (Yes or No)

1) Is the sub-project found in the list of project that require ESIA or partial ESIA as per Schedules 4 and 5 of the National Environment Act, 2019? ……

2) Will the sub-project affect people's use of natural resources (e.g., drinking and washing water, land cultivated for food, wood fuel, traditional medicines plant, and extraction of building materials, etc.)?.....

3) Will the sub-project restrict people's access to natural resources at any time before, during, or after construction? .....

4) Will the sub-project affect land or water use, or require leases, or changes in tenure? ……

5) Will the sub-project require resettlement of any residents? .....

6) Will the sub-project result in construction workers or other people moving into or having access to the area? .....

7) Is the sub-project site culturally or archaeologically sensitive? .....

8) Is it a sub-project site located in or nearby a cemetery or memorial area? .....

9) Is the vegetation at sub-project site mainly forest, swamp vegetation, or farmland? .....

10) Will the sub- project change the vegetation cover of the area? .....

11) Will the sub-project affect important species, habitats, or ecosystems in the area?
.....
12) Is the sub-project located on a steep slope or very-gently-sloping land? .....

13) Will a large land area or a high proportion of a community's land be affected by subproject?
.....

14) Will quarries or borrow pits-be developed or operated under the project? .....

15) Are there important species, habitats, or ecosystems in the sub-project site (in the immediate area or off site) or is the area environmentally sensitive or fragile? (For e.g.: birds, bats, bees, etc.) .....

16) Will vegetation be removed or any surface left bare? .....
17) Will the sub-project generate waste products (including increased sewage or solid wastes)? .....

18) Will the sub-project or its waste disposal affect the quality of local streams or the groundwater? .....

19) Will the sub-project create dust or noise problems? .....

20) Will the sub-project require intensive labour work force? .....

21) Will the sub-project have a large scale use of pesticides and chemical fertilizers?
.....
22) Will the subproject have highest risk of workers' exposure to COVID-19 pandemic?

If yes, what measures will be taken to reduce this risk?
.....

23) Will the subproject result in expansion of COVID-19 in the community?
If yes, what measures will be taken to reduce this impact?
.....
.....
.....
.....
.....

If the answer to any of the questions is "yes", Environmental and Social Management Plan (ESMP) is required in the sub-projects proponents' loan documents

If the answer to any of the questions related to land acquisition is "yes", please consult the RPF and prepare the Resettlement Action Plan (RAP)
DECISION MAKING:
o Sub-project categorization: .....

o ESIA required:……(✓Yes) ..... (✓No)
o ESMP required:……. (✓Yes).....(✓No)

CERTIFICATION

We certify that we have thoroughly examined all the potential adverse impacts of this sub-project as described in the sub-project brief. To the best of our knowledge, the associated E&S risk management instruments (ESMP, RAP) if any, will be adequate to avoid or minimize all adverse environmental and social impacts.

PFI
Name:
Position:
Telephone:
Signature:

PSFU Verification
Name:
Position:
Telephone
Signature:

Annex 12: Actions taken by GOU to Ensure Inclusion and Non-Discrimination

Annex 12 highlights recent actions taken by the GOU to ensure inclusion and non-discrimination of vulnerable and disadvantaged individuals or groups. It also includes transcripts of relevant Guidelines and Circulars issued by the GOU.

The Anti-Homosexuality Act was passed on May 26, 2023. The GOU has continued to ensure inclusion and non-discrimination in all its projects and consistent with this, the GOU has taken the following measures:

- **Letter of Assurance** (Sept 21, 2023) to all Ministries, Agencies, and local governments to implement mitigation measures on non-discrimination in WB-financed operations.
- **Budget execution circular** (July 10, 2023) to all public servants to ensure that projects are in line with Ugandan Constitution which emphasizes equality of all persons without prejudice or discrimination.
- **Circular on provision of health services** (June 5, 2023) that includes measures not to discriminate or stigmatize any individuals who seek health care for any reason.
- **Circular on provision of education** (August 18, 2023) services to all people without discrimination and exclusion in the delivery of education services, programs, and projects.
- **Circular issued by the Director of Public Prosecutions** (August 25, 2023) stating that prosecutors should seek guidance from ODPP before decision to charge is made under the AHA.

Of particular importance is the Letter of Assurance of September 21, 2023, from the Permanent Secretary/Secretary to the Treasury on Uganda's Social Safeguard Policies following excepts:

"Following the World Bank Group's concern with Uganda's enactment of the Anti-Homosexual Act, 2023 and as communicated in the budget Execution Circular 2023 of FY 2023/2024 on 18th July 2023, we guide:

- *All World Bank-financed projects must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreement*
- *Under these projects, no person will be discriminated against or stigmatized, and the principles of non-discrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.*
- *All implementing entities of World Bank projects should agree and implement specific mitigation measures to address non-discrimination.*
- *These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including a World Bank enhanced implementation support and monitoring, where applicable.*
- *Each project implementing entity shall develop comprehensive guidelines to address non-discrimination."*

The following transcripts of relevant Guidelines and Circular issued by the GOU are included this annex: Letter of Assurance; Circular on provision of health services; Circular on provision of education; Circular issued by the Director of Public Prosecutions, and relevant excerpts from the Circular on Budget Execution.

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This subject please quote No.

ALD 141/259/01 TC

Ministry of Finance, Planning &
Economic Development,
P.O. Box 8147
Kampala, Uganda

21st September 2023

WORLD BANK
21 SEP 2023
RECEIVED

All Accounting Officers

All Ministries, Departments and Agencies

All Local Governments

UGANDA'S SOCIAL SAFEGUARD POLICIES

I am writing in reference to the above subject. Further reference is made to the Anti-Homosexuality Act, 2023 (AHA) that came into force on 30th May 2023.

Following the World Bank Group's concern with Uganda's enactment of the Anti-Homosexuality Act, 2023 and as communicated in the Budget Execution Circular of FY 2023/2024 on 18th July 2023, we guide that;

- All World Bank-financed projects must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements.
- Under these projects, no person will be discriminated against or stigmatized and the principles of non-discrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring where applicable.
- Each project implementing entity shall develop comprehensive guidelines to address non-discrimination.

Specific Measures for High Risk Sectors

Health

- The Ministry of Health issued a circular on August 8, 2023 that guarantees access to health care services for all and prohibits the discrimination or stigmatization of any individual who seeks health care services on any grounds.
- The Ministry of Health will widely disseminate and socialize health sector guidelines for the effective implementation of the circular.
- Implementating entities should strengthen grievance redress mechanisms, and third-party monitoring systems in collaboration with national and international partners.

Education

- The Permanent Secretary in the Ministry of Education and Sports on 18th August 2023 issued a circular stating that the Ministry of Education and Sports does not permit any form of discrimination against any persons in the delivery of education services, programs and projects.
- In light of that circular, the Ministry should ensure that there is no discrimination (including any form of bullying) against teachers and students on any grounds.
- The Ministry of Education and Sports will prepare project specific guidelines to address non-discrimination.
- Implementating entities should strengthen grievance redress mechanisms, including an independent hotline and third-party monitoring systems where necessary.

Ramathan Ggoobi
PERMANENT SECRETARY/SECRETARY TO THE TREASURY

Rt. Hon. Prime Minister, Office of the Prime Minister

Attorney General, Ministry of Justice and Constitutional Affairs

Hon. Minister of Finance, Planning and Economic Development

Hon. Minister of Education and Sports

Hon. Minister of Health

Hon. Minister of Gender, Labour and Social Development

Hon. Minister of Energy and Mineral Development

The Principal Private Secretary to H.E. the President

The Solicitor General, Ministry of Justice and Constitutional Affairs

The Permanent Secretary, Ministry of Health

The Permanent Secretary, Ministry of Education and Sports

The Permenant Secretary, Ministry of Gender, Labour and Social Development

The Director of Public Prosecutions

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BPD 86/179/01



Ministry of Finance, Planning & Economic Development,
P.O. Box 8147
Kampala, Uganda

10th July, 2023

All Accounting Officers (Central Government, Missions Abroad, and Local Governments)

All Chief Executive Officers of State-Owned Enterprises and Public Corporations

THE BUDGET EXECUTION CIRCULAR (BEC) FOR FINANCIAL YEAR 2023/2024

A. INTRODUCTION

1. This Circular is issued in fulfilment of Article 155 (1) of the Constitution, and Sections 13 (5) and 14 (1) of the Public Finance Management Act, 2015 (Amended).
2. The theme for the FY 2023/2024 Budget has been retained as: "***Full Monetization of the Ugandan Economy through Commercial Agriculture, Industrialization, Expanding and Broadening Services, Digital Transformation and Market Access***". The Budget for FY 2023/2024 was approved to address the strategic mission of facilitating more Ugandans to join the money economy.
3. The purpose of this Circular is to communicate the following:
   i. The FY 2023/2024 Annual Cash Flow Plan **(Annex 1)**;
   ii. The Policy, Operational and Administrative Guidelines for execution of the Budget in FY 2023/2024.
4. As you execute the Budget for FY 2023/2024, I urge all Accounting Officers to ensure that all program activities contribute towards addressing the following objectives:
   i. Completion of public investments with higher multiplier effects on attainment of NDPIII and the NRM 2021-2026 Manifesto;
   ii. Full-scale implementation of the Parish Development Model (PDM);
   iii. Enhanced revenue mobilization and collection; and

iv. Ensuring efficiency and effectiveness of Government through rationalization of public expenditure.

5. The key priorities to achieve the above objectives are detailed in the approved Budget for FY 2023/2024. For ease of reference, please follow the link **https//www.budget.finance.go.ug** to access the following key documents, among others:

i. The Budget Speech for FY 2023/2024;
ii. Approved Estimates of Revenue and Expenditure Volume I (Central Government Votes and Missions Abroad);
iii. Approved Estimates of Revenue and Expenditure Volume II (Local Governments); and
iv. Approved Estimates of Revenue and Expenditure Volume III for the State-Owned Enterprises and Public Corporations.

B. THE ANNUAL CASH FLOW PLAN FOR FY 2023/2024

6. In accordance with Section 36 (b) of the PFM Act 2015 (Amended), the Annual Cash Flow Plan for FY 2023/2024 has been generated off the Program Budgeting System (PBS) based on the quarterly projections in your respective Vote work plans for FY 2023/2024.

7. The purpose of the Cash Flow Plan is to guide and ensure that Government maintains sufficient liquidity to be able to sustain and make timely payments to meet service delivery requirements by aligning Vote cash inflows and outflows to your respective Program Implementation Action Plans (PIAPs).

8. In view of the above, and in line with Sections 15 and 21 (i) of the PFM Act, 2015 (Amended), all Accounting Officers are urged NOT to overcommit the vote budgets beyond the Annual Cash Flow Plan issued in this Circular. Furthermore, you should submit expenditure commitments, in line with the PIAPs, indicating the actual forecast commitments and the cash position of your respective Votes as per Section 16 (i) of the PFMA, 2015 (Amended) to inform decision-making on the subsequent quarterly expenditure releases.

C. POLICY DIRECTIVES, ADMINISTRATIVE AND OPERATIONAL GUIDELINES FOR IMPLEMENTATION OF THE BUDGET FOR FY 2023/2024

Policy Directives

9. The FY 2023/2024 Budget allocations directed resources to program areas meant for enhanced socio-economic transformation for all Ugandans through job and wealth creation, and increasing household incomes, by targeting the 39% of Ugandans still in the non-money economy. All Accounting Officers are urged to adhere to the following policy directives that guided the preparation of the Budget for FY 2023/24:

i. Fund key Government priorities to increase the momentum in socio-economic transformation, for example: the standard-gauge railway, the meter-gauge railway, solar-powered irrigation, PDM, *Emyooga*, road maintenance, coffee value addition, vaccines and pharmaceutical manufacturing etc.;
ii. Support development initiatives that drive private sector growth;
iii. Implement only ongoing projects and other multi-year commitments as approved in the Budget;
iv. Halt new non-concessional projects, except those already provided for in the fiscal framework, or those with no direct or indirect claim on the Consolidated Fund;
v. Hold back any recruitment plans in FY 2023/2024 except on a replacement basis where the resources are already available;
vi. No travel abroad, except for critical positions of the Executive, Legislature, Judiciary, security, diplomatic relations and resource mobilization; and
vii. **NO** purchase of new vehicles except hospital ambulances, tailored vehicles for medical supplies/distribution, and for agricultural extension services, security and revenue mobilization.

Non-Discrimination

10. Accounting Officers should ensure that all projects (whether Government of Uganda or externally funded) are implemented within the provisions of Article 21 (1) and (2) of the Constitution and Section 13 (11) (e) (i-ii) of the Public Finance Management Act, 2015 (Amended). This emphasizes equality of all persons in access to all opportunities and benefits presented by the above projects, without prejudice and discrimination on the ground of sex, race,

color, ethnic origin, tribe, birth, creed or religion, social or economic standing, political opinion or disability.

Advertising by Ministries, Agencies and Local Governments

11. In his letter of Ref. No. PO/3 dated 6th March 2023, H.E. The President directed that in FY 2023/2024, **"all Government advertising must be through the Uganda Broadcasting Corporation. Any Accounting Officer who deviates from this will be sanctioned including dismissal"**. Print media advertising should be done through the New Vision. I therefore urge all Accounting Officers to strictly adhere to this directive.

Contracting in Ugandan Shillings versus Foreign Currencies

12. I have received numerous requests from a number of Ministries, Departments and Agencies (MDAs) to undertake contracts in foreign currency, especially in United States Dollars and Euros. In line with the fiscal and monetary policies agreed with Bank of Uganda, I wish to reiterate this Ministry's position that no procurements should be undertaken in foreign currency as previously communicated in FY 2016/17, FY 2017/18 and FY 2018/19. Contracting in the local currency, is meant to preserve the sanctity and value of the Shilling since the budget is appropriated in the local currency which is easily convertible.

13. Therefore, this is to guide all Accounting Officers as follows:

i. **That all contracts for works, goods and services shall be awarded in Ugandan Shillings to hedge against cost overruns due to global forex rates fluctuations that impact on the stability of the Shilling; and**

ii. **All contracts, including those that follow international competitive bidding procedures, shall be quoted in Ugandan Shillings. The only exemption will be where it is clearly expressed in the financing agreements with Development Partners to use other currencies in the bidding process, if necessary. This should be strictly the exception and not the norm. I request the Honorable Attorney General's chambers to take note and enforce this guideline while approving agreements.**

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IN ANY CORRESPONDENCE ON

Ministry of Health
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KAMPALA
UGANDA

THIS SUBJECT PLEASE QUOTE NO. **ADM:180/01**

THE REPUBLIC OF UGANDA

5th June 2023

Circular

All Hospital Directors, National and Regional Referral Hospitals
All District Health Officers
All Medical Superintendents
All Health Facility In-charges
Executive Directors of Implementing Partners
Executive Directors of Faith Based Medical Bureaus
The Executive Director Uganda Healthcare Federation

PROVISION OF SERVICES TO ALL PEOPLE WITHOUT DESCRIMINATION

The constitution of the republic of Uganda recognises that health is a fundamental right and guarantees access to health care services for all. The Ministry of Health is mandated to provide Preventive, Promotive, Curative and Rehabilitative Health Services to all people in Uganda in their diversity **without any form of discrimination**. Furthermore, all services should be provided in a manner that ensures **Safety, Privacy and Confidentiality to all clients that seek health services in all facilities, both Public and Private.**

The Ministry of Health therefore reminds all health care workers and stakeholders about the above National commitments, and reiterates the following;

- **Not to deny services to ANY client who present themselves for services.**
- **Not to discriminate or stigmatize any individual who seeks health care services, for any reason – gender, religion, tribe, economic status, social status or sexual orientation.**
- **Patient rights and ethical values – Confidentiality, Privacy, Patient Safety as stipulated in the Patient's Charter should be upheld each time a patient seeks health care services at your facility**

Your cooperation in this matter is of great importance to improving access to service delivery for all our people.

Dr. Henry G. Mwebesa
DIRECTOR GENERAL HEALTH SERVICES

cc. Hon. Minister of Health
Hon. Minister of State for Health (GD)
Hon. Minister of State for Health (PHC)
Permanent Secretary, Ministry of Health
All UN Agencies
PEPFAR Coordinator
Head Country Team Global Fund, Geneva
Country Manager, World Bank
Country Director – CDC, USAID, DOD
Director General, Uganda AIDS Commission
Directors, Ministry of Health
All Chief Administrative Officers
Registrars, Health Professional Councils

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THE REPUBLIC OF UGANDA

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Website: www.education.go.ug
Kampala, Uganda

18th August 2023

All Heads of Education Institutions

PROVISION OF EDUCATION SERVICES TO ALL PEOPLE WITHOUT DISCRIMINATION

The Government of Uganda recognizes the Constitutional social objective to ensure all Ugandans enjoy rights, opportunities and access to education. Under our education objectives, the State is obligated to promote free and compulsory basic education, afford every citizen equal opportunity to attain the highest educational standard possible, and facilitate individuals, religious bodies and other non-governmental organizations to found and operate educational institutions if they comply with the general educational policy of the country and maintain national standards.

The Ministry is implementing the Gender in Education Policy which provides for equitable access to education for all without discrimination. To operationalize the Policy a number of policy strategies and guidelines exist including the National Strategy of Elimination of Violence Against Children, the Life Skills Toolkit, manuals on growth and sexual maturation. In addition, the Ministry has incorporated Sexuality Education into the curriculum to ensure age-appropriate information to enable young people to maneuver through the different challenges of life.

The purpose of this Circular, therefore, is to reiterate Article 21 (1) of our constitution with states that "All persons are equal before and under the law in all spheres of political, economic, social and cultural life and in every other respect and shall enjoy equal protection of the law". The Ministry does not condone any forms of discrimination and exclusion of any persons, in delivery of education services, programs and projects.

You are, therefore, called upon to observe and ensure the above standards in the delivery of education services, programmes and projects.

Ketty Lamaro
PERMANENT SECRETARY

Cc: First Lady and Hon Minister of Education and Sports
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THE REPUBLIC OF UGANDA

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Our Ref: ADM 12/01
Your Ref:

Date: 25th August, 2023

CIRCULAR NO.18/2023

All Prosecutors,
Office of the Director of Public Prosecutions.

RE: MANAGEMENT OF CASES WITH CHARGES PREFERRED UNDER THE ANTI-HOMOSEXUALITY ACT 2023.

The Anti-Homosexuality Act (AHA) came into force on 30th May 2023. It has come to the attention of management that a number of charges of Homosexuality and Aggravated Homosexuality are now being preferred by some officers without internalizing some crucial aspects of the act.

It is important to note that the AHA only criminalises offences where a sexual act has been performed. The term "*sexual act*" is defined under Section **1** of the Act.

It is also important to note that Sections **2 (5)** and **3 (5)** of the AHA provide that "*for the avoidance of doubt, a person who is alleged or suspected of being a homosexual, who has not committed a sexual act with another person of the same sex, does not commit the offence of homosexuality under this section*".

Officers are therefore advised to peruse files with offences under the AHA cautiously while taking into account the abovementioned provisions.

You are hereby directed to ensure that all files with charges preferred under the AHA should first be submitted to Headquarters with a written legal opinion for further guidance before a decision to charge is made.

Management will soon organize sensitization meetings for all officers on the key aspects of the AHA.

Jane Frances ABODO
DIRECTOR OF PUBLIC PROSECUTIONS