Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 09/07/2019 | Report No: ESRSC00726
# BASIC INFORMATION

## A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<td>Uganda</td>
<td>AFRICA</td>
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**Project Name**: Uganda Forests and Resilient Landscapes Project

**Practice Area (Lead)**: Environment, Natural Resources & the Blue Economy

**Financing Instrument**: Investment Project Financing

**Estimated Appraisal Date**: 11/18/2019

**Estimated Board Date**: 4/30/2020

**Borrower(s)**: Ministry of Finance, Planning and Economic Development

**Implementing Agency(ies)**: Ministry of Water and Environment, Uganda Wildlife Authority, National Forest Authority

**Proposed Development Objective(s)**

To improve management of forests and protected areas and increase access to benefits in target landscapes

**Financing (in USD Million)**

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<th>Amount</th>
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<tr>
<td>Total Project Cost</td>
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## B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?  
No

## C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project will support a landscape approach to improve management and economic productivity of forest ecosystems and will combine investments focusing on improving the management of forests and increasing livelihoods of the largely rural population, as well as making targeted investments in refugee-hosting districts. The project’s geographical focus is on selected priority areas in western and northwestern Uganda.
D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

More details, including the indicative set of activities under each component, can be found in Project Concept Note. The project’s geographical focus is on selected priority areas in western and northwestern Uganda. The project will focus on improving the management of forests and increasing revenues for sustaining forests and supporting resilient livelihoods. The project area includes the Albert Nile WMZ and West Nile. The Albert Nile WMZ contains the Albertine Rift, which supports the most carbon-dense forests remaining in Uganda and is also a global biodiversity hotspot. Many intact areas of forest remain in this landscape, but most are under high pressure and forest areas are becoming increasingly fragmented. As these forests fragment, they become increasingly vulnerable to forest fires - a trend exacerbated by longer dry periods being experienced countrywide and in the Albertine region. Fragmentation is also leading to biodiversity loss and, increasing Human Wildlife conflicts as wildlife, such as African elephant and chimpanzees which require large ranges, move between remaining blocks of habitat. In addition, the Batwa Indigenous Peoples indigenous people are present in the Mgahinga-Bwindi Conservation area landscape (in South West Uganda, on the border with Rwanda and Democratic Republic of the Congo).

Component 1: Investments to improve the management of forest protected areas. This component will provide support to National Parks, Wildlife Reserves and CFRs in the project area. The high biodiversity values of these forests have created an important incentive to improve their management and to generate jobs and revenues that can help sustain their conservation and increase benefits to local communities. Implementation will be led by the NFA and UWA. This component will finance physical investments in infrastructure and equipment and capacity building that will strengthen the management of state-managed forests. Component 2: Investments to increase revenues and jobs from forests and wildlife protected areas. This component will increase the economic contribution of forests through boosting revenue generation and job creation and in so doing, strengthen incentives for improved forest management. Building on the investments made under component 1, it will make further investment in tourism infrastructure to achieve continued development of nature-based tourism. In addition, it will make investments to increase forest industry-based jobs and incomes. Component 3: Improved tree cover, forest management and landscape resilience on private and customary land, including refugee hosting areas. This component will enhance the productivity of the landscape through improved tree cover, forest management and landscape resilience on private and customary land, including in refugee hosting districts (provisionally Arua, Adjumani, Hoima, Koboko, Kamwenge, Kikuube, Kiryandongo, Kyegyegwa, Madi Okollo, Moyo, Obongi and Yumbe). The GCF funding will be used for non-refugee hosting districts (Buliisa, Bundibugyo, Bungyanguabu, Kabarole, Kakumiro, Kagadi, Kibaale, Kyenjojo, Masindi, Ntoroko). Component 4: Project management support activities.

Project investments under Components 1, 2 and 3 pose environmental and social risks that could arise from the proposed forest restoration and management activities, infrastructure development in and around protected areas, and livelihoods support activities. The likely impacts shall be assessed in greater depth based on the finer details of project activities to be developed during project preparation.

D. 2. Borrower’s Institutional Capacity

The project will largely follow the implementation arrangements that the Government of Uganda has anticipated for the implementation of its REDD+ Strategy. The Ministry of Water and Environment (MWE) is the lead institution for overall implementation and coordination. MWE will function through the Forest Sector Support Department (FSSD) and the National Forestry Authority (NFA). The FSSD will provide technical and coordination responsibility on behalf of the MWE. Activities targeting National Parks will be implemented by UWA (forests in wildlife conservation areas). Other institutions involved might include Ministry of Agriculture, Animal Industry and Fisheries (agroforestry) and
District Local Governments (Local Forest Reserves, forest outside protected areas, erosion control measures and household energy interventions). Risks related to institutional capacity and sustainability are assessed as high. MWE, MTWA, UWA, NFA currently lack dedicated environmental and social focal points and generally lack adequate financial resources to undertake implementation. In addition, they have not been introduced to the ESF and this could pose challenges to preparation and implementation phases. During implementation, the project will rely on district local governments (primarily via District Forest Officers) where human and operational resources are low. The project will explore alternative delivery models involving partnerships with non-state actors (NGOs, CSOs etc.) and the private sector, to complement government efforts, including considering the possibility of hiring service providers to address any capacity gaps. Detailed environmental and social risk management capacity assessment of all the implementing agencies shall be undertaken during project preparation and appropriate arrangements shall be developed before project appraisal and recorded in the Environmental and Social Commitment Plan.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Substantial

Environmental Risk Rating Substantial

Project investments under Components 1, 2 and 3 could pose environmental impacts arising from proposed forest restoration and management activities and infrastructure development in and around protected areas. Given the fact that these activities shall be undertaken in and around protected areas (National Parks, Wildlife Reserves, and Forest Reserves), the project activities will pose some negative environmental impacts to humans in the project host areas, wildlife within the National Parks, and the general physical environment. Health and Safety impacts to both the host community and wildlife will be significant too arising from the said project activities and labour influx (scale unknown at this stage) under project Components 1, 2, and 3. Environmental Safeguards Capacity of UWA, NFA and FSSD is uncertain at this stage and shall be assessed during project preparation, with the aim of recommending measures to strengthen the capacity. For the above reasons, the Environmental Risk Rating is considered Substantial at this stage.

Social Risk Rating Moderate

The main social impacts anticipated under the project will likely involve restriction of access to resources within protected areas that might impact on the livelihoods of some PAPs, including those from Vulnerable and Marginalized Groups such as the Batwas. Land acquisition is unlikely and construction activities will also be carried within these protected areas, and impacts associated with influx of labor (scale unknown at this stage), are expected to be manageable due to the fact that workers interactions with communities will likely be limited. These risks will be addressed through the implementation of appropriate instruments and sustained stakeholder engagement.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Project activities under component 1 (Investments to improve the management of forest protected areas) will include some level of civil works (grading and maintenance of tracks and trails within protected areas, boundary
demarcation, fencing, visitor facilities, ranger housing, canopy walkways, boardwalks, water and power supply and communications) for which potential environmental and social risks and impacts are predictable, expected to be temporary, low in magnitude, and site-specific. Risks of women’s exclusion from project benefits due to cultural norms, workloads, etc. and increased risk of loss of access rights or impacts from loss of access rights, for Batwa women specifically, have been noted. - A gender analysis will be carried out as part of the environmental and social assessment process to specifically identify and mitigate potential gender impacts. The project will apply the requirements of the Environmental Health and Safety Guidelines (EHSGs) to civil works’ activities and contractors will be required, as a condition of their contracts under the project, to implement and comply with requirements of Environmental and Social Management Plan (ESMP) prepared in line with ESS1. The Environmental and Social Commitment Plan (ESCP), the Process Framework (PF) and Environmental and Social Management Framework (ESMF), elaborated and agreed upon with the Borrower and disclosed before Project Appraisal, will underpin different measures and actions that will be required for the project to meet ESS requirements. An ESMF will include a differentiated approach for the preparation of different project activities proportionate to their respective likely risks. The ESMF shall be prepared given the fact that activities’ sites and engineering designs cannot be determined by project appraisal. During implementation stage, site specific ESIAs and ESMPs shall be developed based on the screening guidance and risk level of each specific activity. These measures shall be implemented and their status of implementation shall be reviewed as part of project monitoring and evaluation. Impacts of collaborative forest management and collaborative resource management are expected to be environmentally and socially beneficial.

Areas where “Use of Borrower Framework” is being considered:

The project will not rely on the Borrower’s E&S Framework in the assessment, development and implementation of project activities. However, the project will also comply with Uganda’s E&S legal and regulatory requirements which will be reflected in the ESMF.

ESS10 Stakeholder Engagement and Information Disclosure

As the project locations are not yet defined, the Borrower will prepare a stakeholder engagement framework (SEF) prior to appraisal that will outline the general principles and a collaborative strategy to identify stakeholders and plan for an engagement process that will be followed/implemented once project locations are known and during implementation. Thereafter, in consultation with the Bank and once project locations are known, the Borrower will prepare and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts identified. Stakeholder engagement will be an integral part of the preparation and overall project design process and will continue throughout preparation and implementation of the project. The key stakeholders who have been identified at this stage include Government Agencies involved in project preparation and eventually in implementation, including but not limited to the following: Ministry of Water and Environment (MWE), Ministry of Tourism, Wildlife and Antiquities (MTWA), Ministry of Local Governments (MoLGs), National Forestry Authority (NFA), Uganda Wildlife Authority (UWA), National Environment Management Authority (NEMA), District Local Governments, Office of the Prime Minister (OPM), Uganda Timber Grower’s Association, and NGOs / CBOs active in the environment sector (some of them are consolidated under the Environment CSOs Network headed by Environmental Alert). A Stakeholder Engagement Framework (SEF) will be prepared, consulted upon and disclosed prior to Project Appraisal, and Stakeholder Engagement Plans (SEPs) during project implementation. Both will include refugee population/host communities and potentially affected communities around the Protected Areas (including Batwas and job seekers). Given past GOU efforts, particular emphasis will be put on the need to mitigate the risk of exclusion of women’s voice throughout the process – other stakeholders will be identified early on in the
engagement process, including local NGOs and CBOs. The SEF/SEP will include differentiated measures to allow the effective participation of and communication with those identified as disadvantaged or vulnerable groups (refugees, Indigenous peoples, the elderly, persons with disabilities, female headed households, child headed households, orphans and vulnerable children). The Borrower will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are accessible, inclusive and are undertaken through suitable channels in the local context. The project will include appropriate institutional arrangements to carry out the stakeholder engagement process. Specific officers will be identified at the implementing agencies and the field level to coordinate and implement the SEP. The project will also include a grievance redress mechanism (GRM) to handle complaints by project-affected people regarding adverse temporary or permanent project impacts. The GRM will be responsive to the risk of Sexual Exploitation and Abuse (SEA), and the need to be accessible to a wide diversity of stakeholder groups. It will also serve as a platform for continuous feedback from project-affected communities, other interested stakeholders and implementing structures.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will likely involve direct workers, contracted workers and possibly community workers. The scale of labor influx into project areas remains unclear at this stage though is expected to be limited due to limited scope of civil works but the project will aim at hiring local labor, except for skilled workers who cannot be found in the project locations. Local contracts will be used for tree planting contracts within CFRs (this is standard practice at the NFA). During project preparation, the environmental and social assessment process will look closely at the potential labor-related risks – community labor, community relations, and impacts on environment. It will also adhere to Uganda's Labor Laws and the Bank's standards concerning labor conditions and Occupational Health and Safety (OHS), including child labor. To ensure health and safety of workers during the construction and operational phases of the project, the Borrower will develop a Health, Safety and Environmental (HSE) guidance plan as part of the ESMF, in line with World Bank Group Environment, Health and Safety (EHS) Guidelines. The project ESMF will also outline a workers' GRM as part of the Labor Management Plan (LMP), that will be part of SHE-plan. The standards explained in the ESMF will also be included in work-specific ESMPs including the Contractors' 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. The task team will ensure that the Borrower is also familiar with the World Bank's Environment and Social incident response toolkit (ESIRT) as a guide to report and manage incidents should they occur. Contracts for all workers will include a code of conduct, which will be signed when hired. Where there is use of community workers as part of project activities including where labour is provided by the community as a contribution to the subproject, the Borrower will ascertain whether such labor is provided on a voluntary basis or on individual/community agreement and ensure alignment to the requirement of ESS2. Moreover, mitigation measures to address risks of women’s exclusion from project benefits due to cultural norms, workloads, etc. will be proposed.

ESS3 Resource Efficiency and Pollution Prevention and Management
To minimize pollution risks, the project will require environmental rules for civil works contractors regarding the proper disposal of all liquid and solid waste (including plastic trash) and construction waste, sanitation management, including management of any associated dust emission, potential pollution of water sources, noise impacts during construction and operation. Efficient use of natural resources will include the restoration of any newly-created borrow pits as either permanent or seasonal ponds, or with contours similar to pre-project conditions. The Project is not expected to procure any pesticides, nor to promote pesticides use. For these reasons, preparation of a specific Pest Management Plan is not expected. Nonetheless, the ESMF will emphasize the promotion of Integrated Pest Management where relevant; it will also provide criteria and procedures intended to minimize any possible pesticide use and (if needed) promote the safe storage, application, and disposal of any agro-chemicals. Further discussions shall be held with the Borrower during project preparation to determine if pesticides use will be anticipated during implementation and/or operation phase.

**ESS4 Community Health and Safety**

The Borrower will evaluate the risks and impacts of the project activities on the health and safety of persons in the project areas. Since the project’s civil works will mainly be undertaken in protected areas, the number of affected communities is expected to be limited. However, project activities under Component 3 shall be in Refugee host areas and thus direct interaction with the communities is likely. Thus the health and safety of the refugees and host Community remains critical. Construction can disrupt certain activities through dust emission, noise, and increased generation of solid waste, although the scale of such works, limited to small infrastructure such as local construction of gabions, small buildings, installation of boundary markers and road grading would mean such impacts would be rather limited. Adverse social impacts such as displacement, sexual exploitation and abuse, the transmission of communicable diseases such as HIV/AIDS on affected communities may also occur as a result of project activities, including labor influx. The potential risks and mitigation measures for impacts on beneficiaries will be analyzed in the ESMF, site specific ESIAs and will be detailed in work specific ESMPs, in line with this standard, as applicable. In their day-to-day operations, UWA and NFA use armed staff and cooperate with the Environmental Protection Force to protect staff and visitors from wild animals and encroachers. The project will not support hiring/recruitment or arming of these forces but will support provision of monitoring equipment (such as GPS, Communications equipment) and training. The project will not finance enforcement activities.

**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Although land acquisition is not anticipated, some of the planned activities (fencing and demarcation) however might restrict access to some areas and affect the livelihoods of some PAPs. This is particularly relevant to women, and specifically Batwa whom might be at increased risk of loss of access rights or impacts from loss of access rights. As such, the Borrower will be required to develop a Process Framework (PF) to address these risks by project's appraisal and to incorporate relevant measures in design of any activities related to boundary demarcation.

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Most of the project activities shall be implemented in Protected areas including National Parks, Wildlife Reserves) and Forest Reserves; activities would also involve management of invasive plant species and thus the relevance of ESS6. The proposed project activities shall in general positively contribute to biodiversity conservation and sustainable
management of living natural resources. Other project interventions (including civil works) will be carefully screened to avoid any significant loss or degradation of natural habitats and to avoid damaging any protected areas or critical habitats. The ESMF will specifically include criteria and procedures to ensure that project investments are designed and implemented in ways that avoid damage to protected areas or critical habitats, including description of appropriate methods of managing invasive plant species in selected forests and park areas. An inventory of protected areas (national parks and wildlife reserves) and forest reserves covered by the project, including their legal status based on National Laws and internationally recognized areas of significance, shall be developed during project preparation. Planning, design and implementation of all project activities in Protected Areas shall be in line with their Management Plans and led and supervised by the respective Agencies (UWA, NFA, District Local Governments), in close collaboration and consultation with stakeholders.

**ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

Some project’s activities (component 1 - grading and maintenance of tracks and trails within protected areas, boundary demarcation, fencing, visitor facilities, ranger housing, canopy walkways, boardwalks, water and power supply and communications) will be implemented in areas of Western Uganda that are known to host members of Vulnerable and Marginalized Groups, more specifically the Batwa in the Bwindi-Mgahinga Conservation Area and Echuya CFR. Sufficient details are unavailable at this stage but if applicable, the Borrower will be required to draft a Vulnerable and Marginalized Group Framework (VMGF) that will provide guidelines on how to avoid adverse impacts of the project on this group, and ensure their access to potentially participation in labor intensity works and other project benefits but also on the preparation of a consultation strategy with VMGs and the process for the development of actions to include the groups in project design and implementation.

**ESS8 Cultural Heritage**

At this stage in project preparation it is unknown if there is any presence of culturally significant sites associated with the project. Chance find procedures will be included in the ESMF and subsequent ESMP (and contractors’ contracts) but attention will given to the potential impact of civil works on other cultural heritage aspects, such as sacred groves and intangible resources. The Cultural Heritage assessments will provide a better understanding of the potential impacts and if necessary, the ESMF screening process will be designed to avoid impacts on them. During project implementation, site specific ESIAs shall take into consideration the ESS8 requirements.

**ESS9 Financial Intermediaries**

Applicability of this ESSS is to be Determined. The project is looking into use of grant / loan schemes to support value-chains for forest / timber products and nature-based tourism. These will be reviewed during project preparation to ascertain whether ESS9 applies.

### C. Legal Operational Policies that Apply

**OP 7.50 Projects on International Waterways**

No
OP 7.60 Projects in Disputed Areas

No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

For now the decision is TBD, since “the project is looking into use of grant / loan schemes to support value-chains for forest / timber products and nature-based tourism. These will be reviewed during project preparation to ascertain whether there will be other Financing Partners. TBD during project preparatory meetings with the client.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

- Preparation, consultation and disclosure of a Stakeholder Engagement Framework (SEF) - Prior to Project Appraisal and preparation of SEP/s as an implementation-stage action
- Preparation, consultation and disclosure of a Process Framework (PF) - Prior to Project Appraisal.
- Preparation, consultation and disclosure of an Environmental and Social Management Framework (ESMF) prior to project appraisal.
- Preparation and disclosure of Environmental and Social Commitment Plan - Prior to Project Appraisal.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

MONITORING AND REPORTING

- Regular reporting, including monthly and quarterly reports
- Reporting of incidents and accidents, including maintaining their log

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

- Organizational Structure - Specifying additional staff assigned/hired to work on the Project to support E&S risk management.
- Undertaking Environmental and Social Screening, Assessments, development of ESMPs, including Contractors' ESMPs and incorporation of ESHS in procurement processes for construction works.

ESS 2: LABOR AND WORKING CONDITIONS

- Labour Management Procedures: Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project
- Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2

ESS4 COMMUNITY HEALTH AND SAFETY

- Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs
- Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA)

ESS8 CULTURAL HERITAGE
- Prepare, adopt, and implement the chance finds procedure described in the ESMP developed for the Project

ESS10 STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE
- Update, adopt, and implement Stakeholder Engagement Plan (SEP)
- Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP

OTHERS
- Capacity building of implementing partner institutions, stakeholders, communities, Project workers.

THE LIST SHALL BE UP-DATED IN THE APPRAISAL ESRS.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS: 15-Nov-2019

IV. CONTACT POINTS

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<td>Borrower: Ministry of Finance, Planning and Economic Development</td>
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Implementing Agency(ies)
- Implementing Agency: Ministry of Water and Environment
- Implementing Agency: Uganda Wildlife Authority
- Implementing Agency: National Forest Authority

V. FOR MORE INFORMATION CONTACT
VI. APPROVAL

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<td>Task Team Leader(s)</td>
<td>Nigel Ross Hughes, Nathalie Weier Johnson</td>
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<tr>
<td>Practice Manager (ENR/Social)</td>
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<td>Safeguards Advisor ESSA</td>
<td>Nathalie S. Munzberg (SAESSA) Cleared on 07-Sep-2019 at 08:09:30 EDT</td>
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