



THE REPUBLIC OF UGANDA

MINISTRY OF LANDS, HOUSING AND URBAN DEVELOPMENT (MLHUD)

EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (EUFLA)

(P175732)

DRAFT

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

October 2022

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ACRONYMS

ALC	Area Land Committees
CCOs	Certificates of Customary Ownership
CEDP	Competitiveness and Enterprise Development Project
CLAs	Communal Land Associations
CPF	Country Partnership Framework
DPC	Data Processing Center
EUFLA	EU Financing for Land Administration in Uganda
GBV	Gender Based Violence
GDP	Gross Domestic Product
LMIs	Land Management Institutions
MDTF	Multi-Donor Trust Fund
MLHUD	Ministry of Lands, Housing and Urban Development
MZOs	Ministry Zonal Offices
NLIS	National Land Information System
PIT	Project Implementation Team
PCU	Project Coordination Unit
PSFU	Private Sector Foundation Uganda
RaPPA	Rapid Physical Planning Assessment
SEA	Sexual Exploitation and Abuse
SLAAC	Systematic Land Adjudication and Certification
UNGRF	Ugandan National Geodetic Reference Framework

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EXECUTIVE SUMMARY

Project Background

The Government of Uganda, through the Ministry of Lands, Housing and Urban Development has received a grant of USD 7.08 from the European Union (EU) through the World Bank Group, for Land Administration reform. Uganda experienced a rebound in economic growth and a widening of the current account deficit before the outbreak of COVID-19. Average real gross domestic product (GDP) growth accelerated to above 6 percent for fiscal year (FY)17/18¹ and the first half of FY18/19, up from the average of 4.5 percent for the five years before FY16/17. Given the very high population growth rate, the per capita growth was less than 3.1 percent. This growth acceleration has largely been driven by strong investment and export performance. Inadequate legal and institutional framework constitute a serious constraint to economic and social development. Insecure land tenure, outdated land laws, and slow or dysfunctional institutions of land administration can restrict private investment, undermine good governance, and reduce the ability of local authorities to raise taxes.²

The enhancement of the land administration system based on reliable, up-to-date accurate information contributes to land tenure security and is a source of information for policy making. It provides citizens access to secure title security that influence their long-term investment decisions.

This is relevant to Uganda where about 80 percent of the economic activities are agricultural and where off-farm opportunities are often limited. The economic gender gap is even wider given that norms around access to land tend to favour men, granting the rights of women to the husband or a male relative.

The World Bank Competitiveness and Enterprise Development Project (CEDP) was approved on 9th May 2013. It became effective on 6th June 2014 and is scheduled to close on May 30, 2024. An Additional Financing (AF) of US\$99.8 million has been approved by the Board and ratified by the Parliament of Uganda on March 2, 2020 and October 6, 2020, respectively. The development objective (DO) of CEDP is to (i) support measures that facilitate increased private sector investment in the tourism sector and (ii) strengthen effectiveness of the land administration system. The CEDP went through a Mid-Term review in 2016, which rated satisfactory the implementation of the land administration component, as the project has successfully built the core architecture of the land administration system within the Ministry of Lands, Housing and Urban Development (MLHUD).

Thereofre the funds provided by the EU (Project) will complement activities implemented under the Land Administration Reform Component of the on going CEDP Project. The funds of the EU will be used to finance systematic registration of land currently in customary ownership in the selected Project areas. The objective is to increase security of land rights and strengthen land administration and management systems in Eastern, Northern, West Nile and Western Regions of Uganda by consolidating the demarcation and documentation of individually and communally owned customary lands. The EU Financing for Land Adminstration in Uganda (EUFLA)Project will implement activities in a way to include vulnerable groups of both genders. The proposed activities will build on national pilots and initiatives and global and regional good practices. The proposed activities are:

- (i) Institutional strengthening and training,

¹ Uganda Economic Update 2019.

² Klaus Deininger. World Bank Land Policies

- (ii) Systematic adjudication in the the selected 32 districts in Eastern, Northern, West Nile and Western region,
- (iii) Project management, and monitoring and evaluation (M&E).

The Project will utilize in its activities the guidelines and procedures to regularize customary and communal lands and formalize Community Land Associations (CLA, and training materials prepared under CEDP.

ESMF Objectives

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

Project Development Objective

The Project Development Objective (PDO) is to increase security of land rights and strengthen land administration and management systems in select districts in West Nile, Western, Northern and Eastern Uganda..

Specific objectives are to:

- a) develop capacity of local land institutions
- b) increase the number of land parcels demarcated and registered; and
- c) reduce number of land disputes

Key results and Indicators

The following are the key development indicators for measuring project outcomes:

- a) Land parcels with use or ownership rights recorded in project areas (number);
- b) Target land area with use or ownership rights recorded as a result of the Project (gender-disaggregated) (ha);
- c) Certificates of Customary Ownership (CCOs) issued as a result of the Project (number);
- d) Certificates of Customary Ownership (CCOs) issued as a result of the Project, female (number);
- e) Communal land associations (CLAs) formalized; (number);
- f) Target population with use or ownership rights recorded as a result of the project (gender-disaggregated) (number);
- g) Target population with use or ownership rights recorded as a result of the project, female (number).

Project Location

The Project will be implemented in thirty-two (32) selected districts of Uganda, the majority of which are in the Eastern, Northern, West Nile and Western parts of the country due to the predominance of customary and leasehold land tenure systems. The districts are Omoro, Kitgum, Kwanja, Alebtong, Otuke, Kole, Buyende, Kaliro, Bugweri, Bugiri, Tororo, Budaka, Butebo, Kibuku, Pallisa, Busia, Kaberamaido, Yumbe, Zombo, Arua, Koboko, Terego, Madi Okollo, Nebbi, Kalaki, Ngora, Amuria, Kabarole, Bunyangabu, Kyenjojo, Kyegegwa and Masindi.

Potential Environmental and Social Risks and Impacts of the EUFLA Project

The proposed EUFLA Project is likely to result in both positive and adverse E&S impacts.

Potential Positive Impacts

- i. Establishment of a transparent and efficient land management and administration system will improve tenure security and facilitate investments in Uganda. The likely positive impacts and potential benefits of the project in the medium and long term include the following:
- ii. Increased security of land rights. The project will increase security of land rights by consolidating the demarcation and documentation of individually and communally owned customary lands.
- iii. Promotion of sustainable land use practices. The project is expected to result into strengthening security of tenure rights in the target areas, which in turn shall significantly contribute to long term positive environmental impacts. Secure land tenure helps to promote sustainable land use practices that can enhance the environment such as improved soil conservation practices, planting of perennial crops, preservation of trees, while insecure land tenure results are most likely to contribute to environmental degradation. The project will raise awareness of these potential environment benefits during the sensitisations of the communities and landowners.
- iv. Reduction in land disputes. The main objective is to increase security of land rights and strengthen land administration and management systems in selected geographic areas in Uganda. The project aims at; increasing the number of land parcels demarcated and registered; reducing land disputes; and develop capacity of local land institutions. The project is expected to consolidate the demarcation and documentation of individually and communally owned customary lands.
- v. Increased agricultural investment and productivity. Increased agricultural investment and productivity is expected from securing land tenure with 80 percent of the population relying on agriculture for income.
- vi. Long-term private investment decisions. Private investment decisions will become more long-term and sustainable with land becoming protected through ownership registration. Currently, financial institutions are constrained from scaling up private sector lending because only 20 percent of the land is surveyed/registered.
- vii. Increased tax collection. Strengthening the land administrative framework will provide grounds for an increased tax collection beyond tax and fee collection from first time registration and transfers.
- viii. Equitable tax collection from public services. Strengthening the cadastral maps will continue to help more equitable tax collection from public services such as water, electricity, sewerage and other public investments such as education and medical facilities. The updated information on land use will also contribute to better land and natural resources management.
- ix. Reduction in the costs to the poor of public land acquisition and resettlement processes.
- x. Other potential benefits would be of social nature. The pro-poor and pro-gender sensitive tenure regime which will ease conflicts about land. Setting up interventions already tested by

the Gender Lab will encourage households to register land under the name of both spouses. This action will particularly protect women's land rights and increase the percentage of women with formal land ownership.

Potential Negative Impacts/Risks and Mitigation measures

The likely negative E&S impacts/risks of the EUFLA project and mitigation measures are as follows;

Impact: **Potential for** Encroachment on protected areas/ecologically sensitive areas. The titling land tenure rights in the project's areas could include land parcels under agricultural cultivation located near forest areas/sensitive ecologically protected areas (e.g. wetlands/wildlife conservation areas/wetlands/lakes/rivers). In the long-term, this could potentially make such areas vulnerable to future encroachment and/or environmental degradation, if clear guidelines and procedures are not followed during the mapping and demarcation process and subsequent issuance of titles. Additionally, in cases where land parcels are issued in areas adjacent to protected areas, there is an underlying risk of exacerbating human-wildlife conflict in such areas.

Impact mitigation: A key requirement will be for the project not to support land registration activities in forest or other protected areas (gazetted under the National laws). A screening checklist has been developed and included in the ESMF for this purpose as **Annex 2**;

Where required, for customary certificates of land titles issued to land parcels in close proximity/close to the boundary of protected areas/ conservation, as defined under the relevant Laws, a Memorandum of Understanding (MoU) will be prepared/issued and enforced between the CCO holder and district local government, during project implementation to prevent future encroachment of any adjacent gazetted forest areas/protected areas.

Community intended messages shall be translated into all local languages and shared across on radios and print to ensure a wide outreach.

A Stakeholder Engagement Plan (SEP) has been prepared in a way that promotes reaching out to all identified stakeholders.

Impact: Land dispute and land grabbing. The country already suffers from rampant land disputes, wrangles, and land grabbing cases. If the project is not well managed, it might escalate wrangles, disputes, and land grabbing especially for lands that have been unutilized for a long period of time. The North has long suffered individual and communal land disputes which increased ever since the Lord's Resistance War period. Communities lived in camps for almost two decades and lost demarcation.

Impact mitigation: A SEP has been prepared and shall be implemented to facilitate a clear understanding of the project among the communities;

An effective Grievance Redress Mechanism (GRM) shall be enhanced for aggrieved parties to channel their issues for an appropriate resolution.

Impact: Loss of housing. During the demarcation of boundaries, some households might be affected in the process and as a result lose their, houses and other landed property. This might also cause evictions

of people as had been witnessed across the country by different individuals and groups leaving several people homeless.

Impact mitigation: A Resettlement Policy Framework (RPF) prepared has been updated to handle such emerging cases whenever they arise and lessons from the earlier implemented phase will inform the planning for this AF;

MHLUD has prepared a Stakeholder Engagement Plan (SEP) in a way that promotes reaching out to all identified stakeholders.;

A GRM will be enhanced and made known to stakeholders to report any issues and have them resolved.

Impact: Community health effects related to the spread of the Covid-19 virus. Covid-19 remains a major challenge posing a risk to the communities and workers involved in the process of the demarcation and even engagement and training of the community.

Impact mitigation: Teams involved in the project shall be required to adhere to strict Covid-19 standard operating procedures (SoP) as guided by the Ministry of Health (MoH) and World Health Organisation (WHO) <https://www.health.go.ug/covid/document/national-guidelines-for-management-of-covid-19/>

Impact: Gender Based Violence (GBV). The project stands a risk of creating Gender Based Violence (GBV) in the community if not well managed. Considering the widespread culture in Uganda where land and land related matters remain a male dominated area. This demarcation and land titling could result in GBV among the beneficiaries.

Impact mitigation: To help mitigate this, the environmental and social screening procedures and tools included in the ESMF (under **Annex 2**) have been designed to include a GBV risk screening and a clear plan on how this will be resolved;

The GRM will be established to take up and refer GBV related issues.

Impact: Disruption to religious/cultural sites and activities during demarcation. There is the potential for chance find of cultural or archeological significance during the demarcation exercise.

Impact mitigation: 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;

Chance find procedures have been prepared as part of this ESMF (see **Annex 3**) and shall be incorporated into project contracts.

Impact: Labor and working conditions. The project is not expected to involve any construction /civil works that would potentially bring an influx of labour to the project areas. However, the project will likely involve direct workers (i.e. civil servants from the MLHUD) contracted workers (i.e. surveyors, physical planners, lawyers and respective Area Land Committees to conduct participatory community mapping and demarcation). Community workers (i.e. community members to be trained as facilitators to support the process to ensure community participation and transparency) and other local villagers/community members who may volunteer to support the teams as volunteers in the land registration process. There could be other stakeholders on the project working in connection with the

project, other than the above workers. Potential risks are those related to labor and working conditions, such as occupational health and safety (OHS) risks.

Impact mitigation: Labor management procedures have been developed and included in this ESMF as **Annex 5**, to ensure that the project complies with national and international labor laws and policies including the World Bank's ESF, especially ESS2: Labor and Working Conditions.

Project Implementation Arrangements

The bulk of the operations will be implemented by the MLHUD, which has a substantial experience in project co-ordination and implementation including the land component of CEDP, Uganda Support to Municipal Infrastructure Development (USMID) project and Bank Grants under the Cities Alliance Program. MLHUD will lead preparation of all guidelines and strategies, procuring consultants where relevant. To implement the project, the project will be technically run by the existing technical committee comprising technical heads of the Lands Registration, Land Administration, Surveys, and Mapping, Director of Housing, Physical Planning, Urban Planning, Land Valuation, and Land Commission which was established for the Land component for CEDP. This committee will provide technical oversight to this project component. To support management of ESHS risks and impacts of the Project the PCU shall recruit a qualified Environment Specialist and a qualified Social Development Specialist

The Development Partners' working group (DPG) on land will be revitalized to: (i) ensure coordination between different DPGs involved into the land sector, (ii) undertake jointly broader sector-level work including mainstreaming inclusion (especially for women), (iii) foster agenda for land sector reforms including digital innovations and global good practices, and (iv) disseminating corresponding evidence (including the impact evaluation studies and recommendations conducted by the world Bank's Gender Innovation Lab). The multi-annual analytical and knowledge-sharing technical assistance initiative conducted by the Bank will advance land policy dialogue with the Government of Uganda aiming to enhance land legal, regulatory and operational framework by introducing good international practices and innovations like digital signature, etc. These analytical and technical assistance activities will be included under the Bank-executed trust fund component.

1 INTRODUCTION AND CONTEXT

1.1 Country Context

COVID-19 had a deep economic impact on Uganda and has stalled the pace of some key institutional reforms. The GDP growth rate was 2.9 percent in FY20, less than half the 6.8 percent recorded in FY19, due to the effects of the COVID-19 crisis. The 2021 growth rate is likely to be at a similar level. The lockdown cycles contributed directly to a slowdown in the economy which was compounded by border closures and disruptions in global demand and supply chains. This resulted in a sharp contraction in public investment and deceleration in private consumption, which hit the industrial and service sectors hard, particularly the informal service sector.

Before the outbreak of COVID-19, Uganda was experiencing some positive signs in the economic landscape. Average real gross domestic product (GDP) growth accelerated to above 6 percent for fiscal year (FY)17/18³ and the first half of FY18/19, up from the average of 4.5 percent for the five years before FY16/17. Given the very high population growth rate, the per capita growth was less than 3.1 percent. This growth acceleration has largely been driven by strong investment and export performance.

However, even before the outbreak of COVID-19, poverty reduction remained uneven in different regions of the country and job creation was failing to meet demand. After a sustained downward trend, the poverty head count in Uganda rose from 19.7⁴ percent to 21.4 percent between 2012–13 and 2016–17, partly due to climate-related factors (drought and pests). The private sector has generated 800,000 new jobs between 2012 and 2016; however, this is not enough to meet the demand for jobs from new entrants to the labor market as well as the transitions across jobs (including both transition from self-employment or unpaid jobs to private sector jobs for instance). According to the 2017 Labor Force Survey, unemployment reached 9 percent, with unemployment higher among women (13 percent) than men (6 percent), and the labor force participation rate fell from 60 percent in 2013 to 52 percent in 2017.⁵ These figures do not capture the situation in the informal sector which accounts for a significant share of employment in Uganda.⁶

1.2 Sectoral and Institutional Context

Land in Uganda is an underutilized economic and natural asset. Inadequate legal and institutional framework constitute a serious constraint to economic and social development. Insecure land tenure, outdated land laws, and slow or dysfunctional institutions of land administration can restrict private investment, undermine good governance, and reduce the ability of local authorities to raise taxes.⁷

The enhancement of the land administration system based on reliable, up-to-date accurate information contributes to land tenure security and is a source of information for policy making. It provides citizens access to secure title security that influence their long-term investment decisions. This is relevant to Uganda where about 80 percent of the economic activities are agricultural and where off-

³ Uganda Economic Update 2019.

⁴ Uganda Economic Update 2019.

⁵

https://www.ubos.org/onlinefiles/uploads/ubos/pdfpercent20documents/UNHS_VI_2017_Version_I_percent2027th_September_2017.pdf

⁶ Uganda: The Role of the Informal Economy in City Growth, Cities Alliance.

⁷ Klaus Deininger. World Bank Land Policies

farm opportunities are often limited. The economic gender gap is even wider given that norms around access to land tend to favour men, granting the rights of women to the husband or a male relative.

The World Bank is supporting the modernization and scaling up of land administration in Uganda through a combination of lending and technical assistance activities. The World Bank Competitiveness and Enterprise Development Project (CEDP) was approved on 9th May 2013. It became effective on 6th June 2014 and is scheduled to close on May 30, 2024. An Additional Financing (AF) of US\$99.8 million has been approved by the Board and ratified by the Parliament of Uganda on March 2, 2020 and October 6, 2020, respectively. The development objective (DO) of CEDP is to (i) support measures that facilitate increased private sector investment in the tourism sector and (ii) strengthen effectiveness of the land administration system.

The CEDP project has successfully built the core architecture of the land administration system within the Ministry of Lands, Housing and Urban Development (MLHUD). During the life of the project the World Bank has been supporting the decentralization of the land sector to ensure that communities and the vulnerable people have access to land services at lower costs. This strategy has three main pillars: institutional, legal and technical. The construction and operationalization of 22 Ministry Zonal Offices (MZOs) is the core of the institutional pillar while the technical pillar focuses on the design and development of the National Land Information System (NLIS), Systematic Land Adjudication and Certification (SLAAC), acquisition of the base map, and building of the Ugandan National Geodetic Reference Framework (UNGRF). Review and update of several laws is the core of the legal pillar. All 22 MZOs are already NLIS-compliant and fully operational. The main responsibilities of the MZOs are to revamp the functions of land registration, property valuation, physical planning and to modernize geodetic referencing and large-scale base-mapping. Other efforts include strengthening of the Institute of Survey and Land Management and creation of the Data Processing Center (DPC) in Entebbe, which are under the umbrella of the MLHUD. One of the challenges is to consolidate the gains made in land administration by developing institutional capacity and increasing sustainability of the institutions. Related benefits of CEDP include: (i) reduced days to register land from 52 in 2010 to 42 in 2021, (ii) reduced time to process mortgage from 50 days to 1 day, and (iii) increased annual land revenue collected by the government from US\$3 million to US\$30 million (between 2013 to 2019 total non-tax revenue collected by the government and recorded by the land information system was US\$192 million)⁸.

Land titling is a core activity of CEDP. One of the core technical activities included into the CEDP is SLAAC with a target to provide more than 2.6 million persons with land tenure rights, by issuing ownership rights documents for 800,000 parcels. As of June 23, 2021, CEDP already completed 1,172 titles, which will be issued to the owners after final verification by local land administration. Moreover, survey field works have been completed for 65,079 parcels, which are currently being processed by the DPC. The DPC is responsible for production of public display maps, data processing and quality control of SLAAC. Since its inception, DPC has produced 597 public display maps, verified all 65,079 parcels submitted by the Contractor and processed 23,251 out of that number for issuing titles.

However, much work remains to be done. The SLAAC guidelines and software for data collection in the field and processing will need to be further enhanced to improve efficiency of the field operations. It was also agreed with the MLHUD, that SLAAC implementation strategy will be modified moving forward to scale-up capacity of fieldwork and leverage performance-based contracting to enable multiple service

⁸ Source: National Land Information System, Ministry of Lands, Housing and Urban Development.

providers to work in parallel in different geographical areas. The DPC's capacity is also being further scaled up.

One of the key vehicles to support reform activities is the World Bank-administered Multi-Donor Trust Fund (MDTF). The MDTF mobilizes donor contributions and invests in strategic areas to promote an effective implementation of Uganda's national development plans and priorities to achieve the national Vision 2040.

1.3 Relationship to CPF

The project is fully aligned with the Country Partnership Framework (CPF, FY16–FY21) and the SCD update. This grant is directly relevant to the Strategic Focus Area A: Strengthening Governance, Accountability and Service Delivery and Strategic Focus Area B: Raising Incomes in Rural Areas. The CPF FY16–FY21 recognizes land issues as a constraint to improving economic conditions and stresses that access to and security of land is important for farmers' access to finance and investment in soil improvement and climate resilient technologies. Activities will focus on improving land-use flexibility (for example, systems for land registration and valuation and incentives for land owners to rent out land); addressing urban congestion; and enhancing skills and labor market readiness. Access to land and an efficient land administration system remain binding constraints across the strategic focus areas of the CPF.

The issuance of CCOs to individuals, will enhance their possession, ownership and land development capacities by providing land tenure security and enabling investments through mortgage mechanisms using land as collateral.

1.4 Rationale for the ESMF

An Environmental and Social Management Framework (ESMF) (including Labour Management Procedures (LMP)), Resettlement Policy Framework (RPF), Vulnerable and Marginalised Group Framework and a Stakeholder Engagement Plan (SEP) are supposed to be prepared as a set of the due diligence instruments required to address and manage the environmental and social risks and impacts associated with the EUFLA Project. The ESMF 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. MLHUD and the various other service providers will be responsible for implementing the provisions and recommendations outlined in the ESMF.

This ESMF has been prepared in compliance with the ESF established by 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.

1.5 Objective of this ESMF

Key objectives of the ESMF are to:

1. Provide a framework for integration of social and environmental aspects at all stages of project planning, design, execution and operation;
2. Guide in screening, assessment, and management of environmental and social risks and impacts of the project from an early stage in project planning to project implementation

3. Enhance positive social and environmental impacts of the project and avoid/minimize potential adverse impacts;
4. Enhance capacity building, knowledge and awareness for environmental and social risk management for all project stakeholders;
5. 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 activities/components. The ESMF provides guidelines and procedures for identifying, assessing and mitigating 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.

1.6 Methodology used to prepare the ESMF

The ESMF was prepared by a team from the Ministry of Lands, Housing and Urban Development (MLHUD) 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

1.6.1 Document review

In the process of preparing the ESMF, a number of documents were reviewed. The key documents that were consulted included the Project Concept Note, the Concept Environmental and Social Review Summary (ESRS) for the project, the ESMF for the CEDP-AF and the project's other ESF instruments especially the draft SEP. Other documents consulted were; Uganda's Vision 2040, the National Development Plan (NDPIII), newspaper articles, the World Bank's Environmental and Social Framework (ESF), international conventions ratified by Uganda, the Constitution of the Republic of Uganda and other relevant policies and laws.

1.6.2 Consultations with key stakeholders

ESS 10 recognizes the importance of inclusive and meaningful engagement between the Borrower and project stakeholders as an essential element of good international practice. Early and effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. In keeping with the requirements of ESS10, the MHLUD took cognizance of the existing World Bank (March 2020) and Ministry of Health 2020 guidelines in relation to stakeholder consultations and used both physical and online platforms such as Zoom, Google meet, Webex, WhatsApp, Telephone calls and Email exchanges to conduct extensive, meaningful and timely consultations. Online consultations held with the key stakeholders and institutions included: Ministry of Lands Housing and Urban Development (MHLUD), Ministry Zonal Offices, UIA, UN Habitat/Global land Tool Network, Participatory Land Use Management (PELUM) Uganda, Land and Equity Movement Uganda (LEMU), Uganda Community Based Association for Women and Children Welfare (UCOBAC),

IFDC, Competitiveness and Enterprise Development Project (CEDP), ZOA Uganda, District Local Governments and National Environment Management Authority (NEMA) among others.



Figure 1-1: Virtual meeting with MLHUD

Similarly, physical stakeholder engagements were carried out mainly with district administration, Local government leaders, and the local communities in their respective locations. The Consultations at district level were carried out at 2 levels; stakeholder workshops which were held at hotels and district and community consultations which were held at the district headquarters and in the respective communities. These stakeholder consultations were planned and carried out between 27th May to 24th June 2022 (see Table 7-1 below) and these will continue throughout the project cycle.



Presentation and feedback sessions of project objectives to the stakeholders at Kibuku district head quarters



Presentation and feedback sessions of project objectives to the stakeholders at Golden Courts Hotel- Arua

Figure 1-2: Some of the workshops held at Kibuku and Arua district



Meeting with CAO and Senior Lands officer of Kibuku District



Meeting with Sub-county Chief Kango Sub-county, Zombo District



Community meeting at Kango trading centre, Kango Sub County, Zombo district



Engagement wit women at Kibuku

Figure 1-3: Some of the community Engagements

Table 1-1: Stakeholders Identified and Consulted

Stakeholder	Key personnel consulted	Date	Method of Engagement	Gender		
				Male	Female	Total
Ministry of Lands, Housing and Urban Development (MLHUD)	SDS/USMID ESMS/USMID	27 th May 2022	Physical Consultation	1	1	2
CEDP PIU	Officer	31 st may 2022	Physical Consultation	11	5	16
Transparency International Uganda	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
Participatory Land Use Management (PELUM) Uganda	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
ZOA Uganda	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
UN Habitat/Global Land Tool Network	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
Uganda Community Based Association for Women and Children Welfare (UCOBAC)	Officer	1 st June 2022	Virtual Meeting (Zoom)	-	2	2
Shelters and Settlements Alternatives (SSA)	Officer	1 st June 2022	Virtual Meeting (zoom)	1	-	1
Participatory Land Use Management (PELUM) Uganda	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
ZOA Uganda	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	1	2
International Institute of Rural Reconstruction (IIRR)	Officer	1 st June 2022	Virtual Meeting (Zoom)	3	2	5
GIZ	Officer	1 st June 2022	Virtual Meeting (Zoom)	-	1	1
Africa Region, CADASTA	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
Land and Equity Movement Uganda (LEMU)	Officer	1 st June 2022	Virtual Meeting (Zoom)	-	1	1
ESSF	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
UIA	Officer	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
Consultant/ Land Expert	Consultant	1 st June 2022	Virtual Meeting (Zoom)	1	-	1
Ministry of Lands, Housing and Urban Development (MLHUD)	Officer	1 st June 2022	Virtual Meeting (Zoom)	15	-	15
Zombo District Stakeholder Workshop	Technical leadership, Political leadership, FBOs, CSOs, Opinion Leaders, Clan and cultural leaders	20 th June, 2022	Physical Consultation (Workshop)	22	9	31
Kibuku District Stakeholder Workshop	Technical leadership, Political	22 nd June, 2022	Physical Consultation (Workshop)	20	6	26

Stakeholder	Key personnel consulted	Date	Method of Engagement	Gender		
				Male	Female	Total
	leadership, FBOs, CSOs, Opinion Leaders, Clan and cultural leaders					
Ntoroko District Stakeholder Workshop	Technical leadership, Political leadership, FBOs, CSOs, Opinion Leaders, Clan and cultural leaders	24 th June, 2022	Physical Consultation (Workshop)	22	8	30
CDO – Zombo District	CDO	20 th June, 2022	Physical Consultation	1	-	1
Senior Probation and Welfare Officer (SPWO) – Zombo District	SPWO	20 th June, 2022	Physical Consultation	-	1	1
Women - Zombo district	Community women	20 th June, 2022	20 th June, 2022	-	20	20
District Councilor Zombo TC and chairperson Production and Natural Resources	District Councilor	20 th June, 2022	Physical Consultation	1	-	1
Technical staff of Kango	SAS	20 th June, 2022	Physical Consultation	1	-	2
Sub-county Chief (SAS) Kango Sub-county CDO – Kango Sub-county	CDO	20 th June, 2022	Physical Consultation	1	-	
Community consultation at Kango Sub-county (KAWULU village, Tongu village, Mbale village and Pakwala village) Nzombo District	Men, women and youth	20 th June, 2022	Physical Consultation	24	6	30
Technical staff – CAO kibuku	CAO	22 nd June, 2022	Physical Consultation	1	-	2
Senior Lands Management Officer (SLMO)	SLMO	22 nd June, 2022	Physical Consultation	-	1	
Consultations with women of Busikwe zone, kibuku town council, kibuku ward, kibuku district	Community dialogue with women-kibuku district	22 nd June, 2022	Physical Consultation	-	24	24
Consultations with women of Busikwe zone, kibuku town council, kibuku ward, kibuku district	Community dialogue with men-kibuku district	22 nd June, 2022	Physical Consultation	19	0	19
SAALA Environment Management Association	Members of SAALA Environment	22 nd June, 2022	Physical Consultation	9	1	10

Stakeholder	Key personnel consulted	Date	Method of Engagement	Gender		
				Male	Female	Total
	Management Association					
Technical staff Ntoroko	CAO Production Officer	24 th June, 2022	Physical consultation	2	-	2
Women of kasozi II Villag, Kibuku Town council, Ntoroko district	Community dialogue with women of Kasozi village, Ntoroko Town council	24 th June, 2022	Physical consultation	-	10	10
men of Kasozi village, Ntoroko Town Council	Community dialogue with men of Kasozi village, Ntoroko Town council	24 th June, 2022	Physical consultation	9	0	9
Community members of Itooyo Towncil, Ntoroko District	Former LC V Parish chief Sub county chief Community members	24 th June, 2022	Physical consultation	15	1	16
Total				188	100	288

1.6.3 Relation of the ESMF to other Safeguards Instruments/Documents

This ESMF will not be implemented in isolation. It will be complemented/used together with other environmental and social safeguards instruments for the EUFLA project which include; the Stakeholder Engagement Plan (SEP), Resettlement Policy Framework (RPF).

1.7 Project implementation arrangements

The bulk of the operations will be implemented by the MLHUD, which has a substantial experience in project co-ordination and implementation including the land component of CEDP, Uganda Support to Municipal Infrastructure Development (USMID) project and Bank Grants under the Cities Alliance Program. MLHUD will lead preparation of all guidelines and strategies, procuring consultants where relevant.

The Development Partners' working group (DPG) on land will be revitalized to: (i) ensure coordination between different DPGs involved into the land sector, (ii) undertake jointly broader sector-level work including mainstreaming inclusion (especially for women), (iii) foster agenda for land sector reforms including digital innovations and global good practices, and (iv) disseminating corresponding evidence (including the impact evaluation studies and recommendations conducted by the world Bank's Gender Innovation Lab). The multi-annual analytical and knowledge-sharing technical assistance initiative conducted by the Bank will advance land policy dialogue with the Government of Uganda aiming to enhance land legal, regulatory and operational framework by introducing good international practices and innovations like digital signature, etc. These analytical and technical assistance activities will be included under the Bank-executed trust fund component.

2 PROJECT DESCRIPTION

2.1 Project Development Objective

The Project Development Objective (PDO) is to increase security of land rights and strengthen land administration and management systems in select districts in West Nile, Western, Northern and Eastern Uganda..

Specific objectives are to:

- a) develop capacity of local land institutions
- b) increase the number of land parcels demarcated and registered; and
- c) reduce number of land disputes

2.2 Key results and Indicators

The following are the key development indicators for measuring project outcomes:

- a) Land parcels with use or ownership rights recorded in project areas (number);
- b) Target land area with use or ownership rights recorded as a result of the Project (gender-disaggregated) (ha);
- c) Certificates of Customary Ownership (CCOs) issued as a result of the Project (number);
- d) Certificates of Customary Ownership (CCOs) issued as a result of the Project, female (number);
- e) Communal land associations (CLAs) formalized; (number);
- f) Target population with use or ownership rights recorded as a result of the project (gender-disaggregated) (number);
- g) Target population with use or ownership rights recorded as a result of the project, female (number).

2.3 Description of Project Activities

The funds provided by the EU (Project) will complement activities implemented under the Land Administration Reform Component of the CEDP Project. The funds of the EU will be used to finance systematic registration of land currently in customary ownership in the selected Project areas. The objective is to increase security of land rights by consolidating the demarcation and documentation of individually and communally owned customary lands. The Project will implement activities in a way to include vulnerable people of both genders. The proposed activities will build on national pilots and initiatives and global and regional good practices. The proposed activities are:

- i. Institutional strengthening and training,
- ii. Systematic adjudication in the selected Project areas,
- iii. Project management, and monitoring and evaluation (M&E)

Component 1. Institutional strengthening and training

The overall objective of this component is to conduct public awareness and support systematic land adjudication activities to ensure issuance of CCOs for customary landowners in the 32 districts selected from West Nile, Western, Northern and Eastern Uganda regions. This objective will be realized through following sub-activities to: (i) determine the appropriate means to engage communities (from parish to district levels) into systematic land adjudication process, (ii) assess resources and training needs of the Area Land Committees (ALC), CSOs, and other locally involved stakeholders, that support land adjudication process, (iii) develop operational framework, build tools and capacities for implementation of land adjudication activities at local level, (iv) capacitate communities for use of the prepared tools and process to conduct participatory systematic adjudication process, (v) Identify and document possibilities for reaching scale and sustainability for customary land registration and assessment of risks,

and (vi) support technical and policy dialogue on regulatory and institutional frameworks, digitization/connectivity, integration of CCOs in NLIS.

All the sub-activities under Component 1 will be conducted by MoLHUD and consultants recruited by MoLHUD with support from MZOs and other local land stakeholders. The MoLHUD will be responsible for overall coordination of implementation of this activity working in close collaboration with the relevant MZOs, ALCs and local council structures within the districts and other relevant local stakeholders. Specific ToRs will be developed to guide MoLHUD's recruitment of consultants to undertake some of the sub-activities

- a. **Diagnostic study for civic and community participation:** The objective of this sub-activity is to assess, in selected districts, the governance structure of the land privately owned, either by individuals, families or by clans; what the decision-making structure is, the means of communication, the customary land laws and management systems concerning women, and the dispute resolution mechanisms used and how these are recorded on the ground. The assessment will determine what the most culturally appropriated way to inclusively consult, involve and sensitize the population. The objective is to ensure that citizens of Uganda receive accurate and culturally appropriated information to make well informed decisions regarding their lands.⁹
- b. **Develop strategic and operational documents, tools and capacities for community mapping and demarcation:** The objective of this sub-activity is to prepare tools and guidelines for SLAAC activities in the areas of predominantly customary ownership and build capacities within institutions in charge to conduct the participatory demarcation and mapping, including sensitising land owners on climate change mitigation and adaptation, like planting trees, constructing anti-erosion measures such as using trenches and check dams. To achieve this, the Project will coordinate with activities undertaken by Rapid Physical Planning Assessment (RaPPA) stakeholders, ALCs, and lawyers under the CEDP. This sub-activity will assess the resources and training that communities and local land institutions require. The sub-activities will include: (i) Preparation of guidelines and procedures for alternative dispute resolution; and (ii) Preparation of awareness and civic engagement strategy.
- c. **Village (parish) and community capacitation to conduct participatory systematic adjudication process:** The objective of this sub-activity is to engage the community in the demarcation and mapping process providing appropriated level of communication and awareness. Community members will be trained as facilitators who can accompany the process and ensure transparency and community participation. The training will include sessions on climate change mitigation and adaptation measures like planting trees, constructing anti-erosion measures such as using trenches. Training of facilitators will be tailored to the social characteristics of the village / community and to the educational level of the potential facilitators and would include; i) legal issues: description of the law (Constitution, Land Act and Land Policy); ii) options available to the population to register their land as a customary or freehold land tenure; iii) procedures to issue a CCO and create a CLA; and iv) best mechanisms to convey the messages to the population for ensuring they can make a well-informed decision. It is recommended to have focus groups, plenaries and interviews including members of the parish including dedicated outreach and sessions for women, and not only the

⁹ Culturally appropriated implies that information is provided in their own language, taken into consideration their level of educations; the gender composition and age structure of the community and that is provided timely – not in a rush. The assessment will indicate the best way to explain the rights according to the Constitution (1995) and the Land Act (1998) and the procedures. This assessment will identify community-members who can become facilitators. Procedures will need to be assessed.

leaders. The facilitators will help the community members to walk through the formation of the CCO and CLA. The cost of this process will be 100 percent subsidized by the Project, the trainings will be organized and performed by MoLHUD, MZO staff, Project Implementation Unit team members and recruited consultants.

Component 2. Systematic adjudication in the selected Project areas

- a) **Support organizing and formalizing communal groups into CLAs:** The objective of this activity is to support organization and formalization of communal groups in selected districts exclusive of CEDP coverage districts into CLAs. This involves mobilization and training of technical teams at district and lower local governments. Training of Land Management Institutions (LMIs) is carried out to equip them with techniques required in Registration of CLAs. The technical teams conduct sensitization programs in the selected sub regions at subcounty, parish and village levels. This will be followed by organization and formalization of CLAs.
- a. **Demarcating and registering individual and communal land:** This involves adjudication, demarcation and registration of the land parcels under ownership and historical use by the communities represented by the CLAs and individually owned parcels situated in the same selected Project areas. The activities will be coordinated with RaPPA undertaken in the same areas. The ~~Rappa~~ RaPPA is an approach for developing a preliminary qualitative understanding of a situation, triangulation and on spot analysis in order to come up with systematic land use plans that will enhance orderly settlement and optimal utilization of land as well as provision of social services and protection of Natural resources. The following activities will be undertaken:
 - i. Demarcation and registration of communal lands in said priority areas and issuance of the CCOs to the CLAs. This involves reconnaissance, mobilization from the district to lower government levels up to the target beneficiaries including dedicated outreach and sessions for women,, training of adjudication teams, systematic adjudication, demarcation, mapping and recordation, and issuance of CCOs; and
 - ii. Demarcation and registration of individually owned or used lands in rural areas including issuance of titles or CCOs to the individuals or groups (families) of individuals. This involves reconnaissance, mobilization from the district to lower government levels up to the target beneficiaries, training of adjudication teams, systematic adjudication, demarcation, mapping and recordation and issuance of individual titles.

Component 3. Project management, and monitoring and evaluation (M&E)

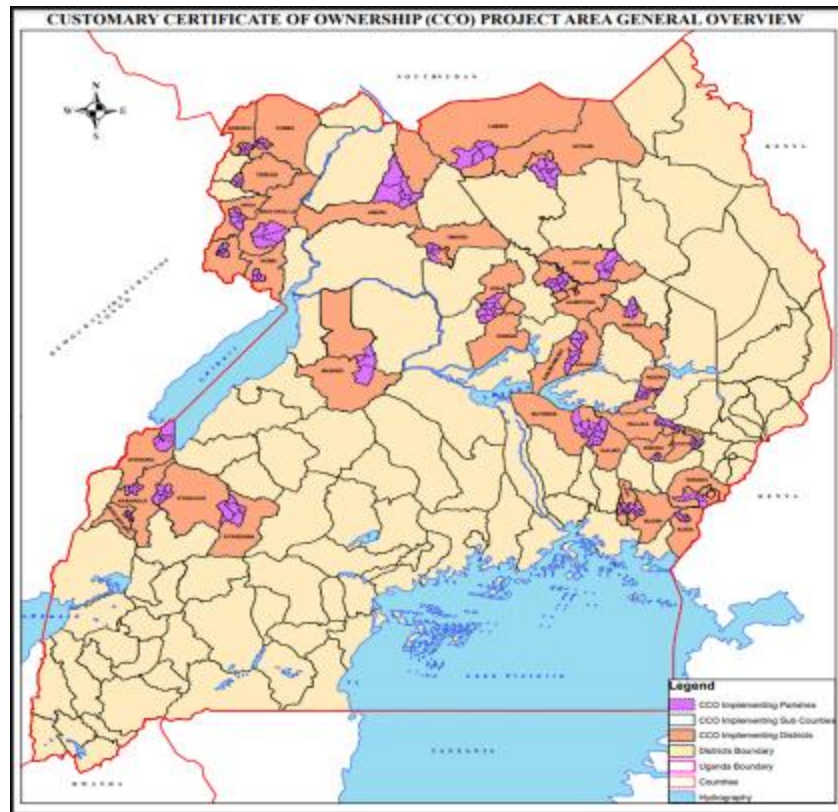
The objectives of this component are to: i) design and implement a M&E system to assess Project implementation progress in the ground; ii) explore sustainability strategies through estimation of registration and operational land administration costs and build district-based cost recovery models and/ options, and iii) administer the project. The M&E System will use quantitative and qualitative sources of information to measure civic engagement, participation and people's perception of the process, and quantitative information to measure number of records on CLA and CCOs, number of disputes resolved while conducting the demarcation and mapping; number of disputes properly documented and finally number of CCOs issued for CLAs and for individuals.

2.4 The Selected Project Areas

The Project will be implemented in thirty-two (32) selected districts of Uganda, the majority of which are located in the Eastern, Northern, West Nile and Western parts of the country due to the predominance of customary and leasehold land tenure systems. The districts are: Omoro, Kitgum, Kwanja, Alebtong, Otuke, Kole, Buyende, Kaliro, Bugweri, Bugiri, Tororo, Budaka, Butebo, Kibuku, Pallisa, Busia,

Kaberaido, Yumbe, Zombo, Arua, Koboko, Terego, Madi Okollo, Nebbi, Kalaki, Ngora, Amuria, Kabarole, Bunyangabu, Kyenjojo, Kyegegwa and Masindi

Figure 2-1: District Map of Uganda Showing Project Coverage by District (Source: MLHUD)



2.5 Project Beneficiaries

The primary direct project beneficiaries of the project will be owners of land, in the Eastern, Northern, West Nile and Western Regions, specifically individuals and communities that own customary lands. Deliberate measures will be put in place to include vulnerable of both genders. All entrepreneurs in the region will benefit from the increased access to land administration reforms. They will also have improved land security and will be able to transfer land in less than 30 days (for the stock of registered land). Up to 200 Communal Land Associations (CLAs) will be formalized and up to 100,000 Customary Ownership Certificates

3 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

In this section the Uganda policies, legal, regulatory and institutional frameworks for environmental and social management and the World Bank Environmental and Social Framework (ESF) are discussed. The frameworks reviewed were as summarised in the **Figure 2** below.

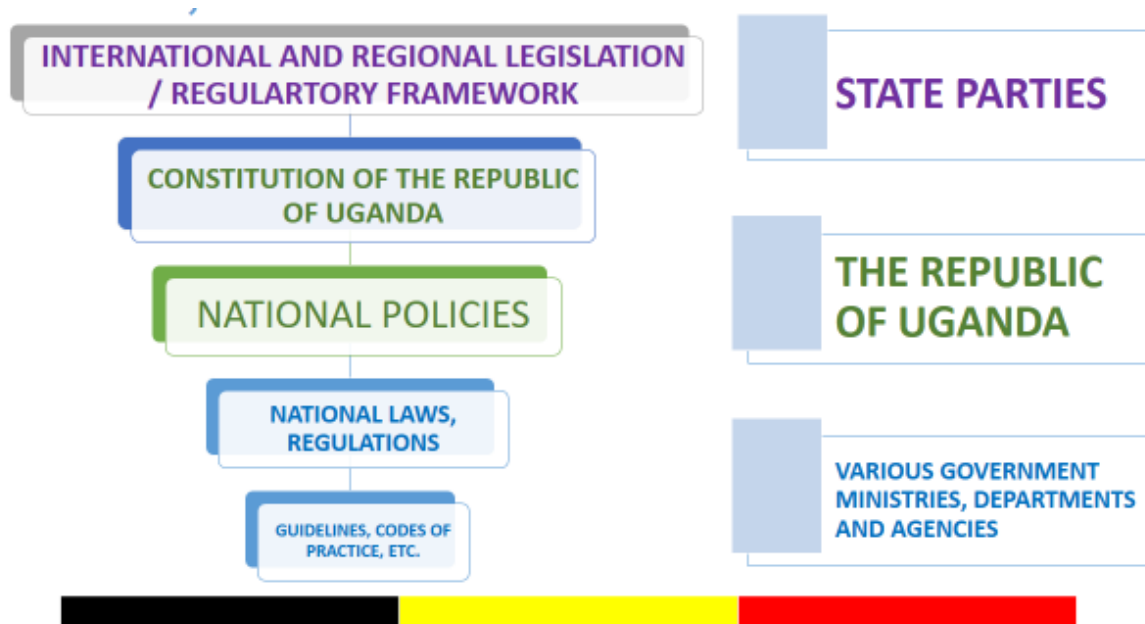


Figure 3-1- Legislative Framework in Uganda's Context

3.1 Relevant Policy Framework

The relevant policy framework to the EUFLA Project are discussed in **Table 3-1** below

Table 3-1: Relevant Policy Framework

Policy	Goal/Aim	Relevance to the EUFLA Project
The Uganda Vision 2040	The goal is to foster socio-economic transformation from a subsistence-based economy to an industrialized one.	The project is expected to strengthen security of tenure, ownership and management of land in the targeted areas. Secure land tenure helps to promote socio-economic transformation hence the project will contribute to the achievement of Uganda Vision 2040.
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 inequalities so that all women and men, girls and boys, are able to move out of poverty and to achieve improved and	The project supports gender equity in land registration. Civil society engagement and communication strategies will be developed aiming at enhancing public participation, including dedicated outreach and sessions for women, and transparency in the whole exercise of documenting land rights

	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.	
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 workplaces.	As required by this policy, it is important that MLHUD and PSFU as the project implementing agencies have adequate measures to mainstream HIV/AIDS into the proposed Project activities.
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 EUFLA 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. Cultural and opinion leaders in the project areas will be consulted to ensure that activities under the project do not negatively impact on the people's cultures.
The National Child Labour Policy, 2006	This policy is aimed at prohibiting employment of children.	Children may be enticed to participate in project activities especially as volunteers to support the teams in the land registration process. The project implementing agencies will ensure that child labour is not engaged in any of the project's activities.
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. This project is expected to tackle cases of land grabbing and rampant evictions which has on several occasions deprived older persons of their land.
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 and contribute to the achievement of Uganda Vision 2040.
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 are not left out of the EUFLA project interventions but rather, they should be

		encouraged to use the registered lands productively.
The Persons with Disability Policy, 2006	This policy aims at promoting the rights of persons with disabilities.	The rights of PWDs shall be upheld during the implementation of the project and throughout the project's life cycle.
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 EUFLA project shall target all categories of persons giving special consideration 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 EUFLA project shall address these aspects through its activities and the outcomes thereof.
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 EU safeguard tools developed including the ESMF, SEP and RPF and a VMGF will be prepared and enforced during the programme to achieve the Policy goal of poverty reduction, and overall social economic development.
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"	By promoting land registration, this project will be promoting sustainable and equitable socio-economic development through optimal utilisation of land.
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 Climate Change Policy 2013	The Climate Change Policy 2013 promotes harmonized and coordinated approach towards climate resilience and low carbon development for sustainable development. It promotes conservation of water, forests, wildlife and fisheries in climate change adaptation and mitigation measures.	The EUFLA project will be implemented in conformity with this policy. As part of efforts to ensure compliance with this policy, a screening checklist has been developed and included in the ESMF to inter alia, provide for protection of forest reserves which play a critical role in mitigating climate change.
The Forestry Policy, 2001	The Goal of the Policy is to ensure an integrated forest sector that achieves	This project will uphold the provisions of this

	sustainable increase in the economic, social and environmental benefits from forests and trees by all the people of Uganda, especially the poor and vulnerable.	<p>policy.</p> <p>Under this (EUFLA) project, for any titles issued to land parcels adjacent to the boundary of protected areas, an MoU/written agreement will be issued between the title holder(s) and the district local government and/or other relevant Government institution to ensure no future encroachment into the protected area(s) including forest reserves.</p>
National Wetlands policy, 1995	The policy promotes the protection of Uganda's wetlands in order to sustain their ecological and social economic functions.	All titles shall be screened to ensure that no title is issued on wetlands. A screening form has been prepared see Annex 2
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 affects 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 plus resultant GBV violations based on male dominance and male superiority tendencies.	<p>The EUFLA project will uphold the rights of both males and females during its implementation.</p> <p>Issues of GBV will be highlighted and addressed during sensitisation of the communities (as part of stakeholder engagement) about the project.</p>
The Occupational Health and Safety Policy, 2006	This policy will be especially relevant for Occupational Health and Safety (OHS) of the workers and the community in the implementation of the Project components. Its focus is on safety and wellbeing of the direct workers, contract workers and community workers in the work environment. These are all important considerations in the Project implementation activities in particular during the sensitization, community mapping, and demarcation exercises.

3.2 Relevant Legislative Framework

The key legislative framework relevant to the planning and implementation of the EUFLA Project is presented in **Table3-2** below.

Table 3-2: Legislative Framework Relevant to the EUFLA Project

Legislation	Objective/goal	Relevance to the EUFLA Project
The Constitution of the Republic of Uganda, 1995 – As amended	<p>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.</p> <p>The Constitution under Article 243 provides for land tribunals which is entrusted in Section (2) with jurisdiction over (a) “the determination of disputes relating to the grant, lease, repossession, transfer or acquisition of land by individuals, the Uganda Land Commission or other authority with responsibility relating to land”; and (b) “the determination of any disputes relating to the amount of compensation to be paid for land acquired.”</p>	The EUFLA project is consistent with the constitution and fulfils several articles including article 243.
Employment Act, 2006 and its associated regulations - Sexual Harassment Regulations, 2012, Employment (Employment of Children) Regulations	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.	<p>The project will likely involve direct workers (i.e. civil servants from the MLHUD) contracted workers (i.e. surveyors, physical planners, lawyers and respective Area Land Committees to conduct participatory community mapping and demarcation). Community workers (i.e. community members to be trained as facilitators to support the process to ensure community participation and transparency) and other local villagers/community members who may volunteer to support the teams as volunteers in the land registration process. Labour conditions and relations during the implementation of the project will be governed by the Employment Act.</p> <p>In accordance with the Act and World Bank ESS2, the EUFLA Project implementing partners shall ensure that children below the legal age</p>

Legislation	Objective/goal	Relevance to the EUFLA Project
		requirement are not employed.
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.	Whereas the project is not expected to involve any construction/civil works that would potentially bring an influx of labour to the project areas, there will still be direct workers (i.e. civil servants from the MLHUD) contracted workers (i.e. surveyors, physical planners, lawyers, respective Area Land Committees to conduct participatory community mapping and demarcation and other community workers). Potential occupational health and safety (OHS) risks may relate to the spread of the Covid-19 pandemic. Given that the project is not expected to involve civil works, the health and safety risks are considered to be minimal. Nonetheless, workers on the project will have to abide by Covid-19 SOPs/guidelines published by the Ministry of Health and the WHO.
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 Project shall have affirmative action for Persons with Disabilities to ensure that they benefit from the 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 during the implementation of the project.
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 during its implementation especially given that the project will have civil servants who will be mixing/interacting freely with the communities.
The HIV/AIDS Prevention and Control	This Act makes provisions for prevention and control by public and private institutions. It provides for the	During the implementation of the EUFLA Project, there will be a lot of interaction between the different teams (Civil servants, consultants, communities etc.). The project shall

Legislation	Objective/goal	Relevance to the EUFLA Project
Act, 2014	prevention of stigma and discrimination.	ensure that in the process of its implementation, does not expose anyone to HIV infections. Stigma and discrimination shall be avoided on the project.
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 the project areas are respected during the implementation of the project provided those traditional and cultural beliefs do not contravene the Constitution and/or infringe on the rights other groups especially vulnerable groups like Women, Children, PWDs etc.
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 during the implementation of the project. 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 EUFLA Project.
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.	Any resettlement under the project will be guided by the provisions of the Land Acquisition Act. The Resettlement Policy Framework (RPF) prepared for the CEDP AF will be updated to guide any resettlement cases on the project.
The National Environment Act, 2019 and its associated regulations. e.g The National Environment (Wetlands, Riverbanks and Lakeshore) Management Regulations	The objectives of the Act include: to provide for the management of the environment for sustainable development; to provide for strategic environmental assessment; and to provide for emerging environmental issues including climate change, the management of hazardous chemicals and biodiversity offsets, among others.	The Act through its respective Regulations addresses projects that may be subjected to environmental and social impact assessments. This to a large extent depends on the nature and scale of the projects. For project areas that are close/adjacent to protected areas with wildlife habitat, ESS6 will apply. Adequate mitigation measures have been included in the ESMF to minimise loss of biodiversity and ensure no future encroachment into the protected area(s).

Legislation	Objective/goal	Relevance to the EUFLA Project
2000		
The Public Health Act, Cap 281	The objective is to provide local authorities with administrative powers to take all lawful, necessary and reasonably practicable for preventing the occurrence of, or for dealing with any outbreak or prevalence of, any infectious, communicable or preventable disease and; to safeguard and promote the public health.	The EUFLA 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 are employed on the project and get injured or fall ill during the implementation of the EUFLA Project, will need to be compensated in accordance with 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 project areas will be consulted and involved in the implementation and monitoring of the project activities within their areas.
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 during participatory community mapping and demarcation. These shall be handled in line with the provisions of this Act. A chance finds procedure has also been included in the ESMF (Annex??) to manage chance finds.
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.	While the target areas are yet to be identified, there is a possibility that some of the lands that are registered might be close/adjacent to protected areas with wildlife habitat. For any titles issued to land parcels adjacent to the boundary of protected areas/wildlife conservation areas (as defined by National Laws), an MoU/written agreement will be issued between the title holder(s) and the district local government and/or other relevant

Legislation	Objective/goal	Relevance to the EUFLA Project
		Government institution to ensure no future encroachment into the protected area(s). The provisions of the Wildlife Act will be followed to ensure that the activities of project areas close/adjacent to protected areas are carried out 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.	Under the EUFLA Project, there may be cases of land tenure rights that are individually owned/customarily owned land parcels located in close proximity to protected areas/ecologically sensitive areas, which unintentionally could lead to possible future encroachment into such areas; Where required, for customary certificates of land titles issued to land parcels in close proximity/close to the boundary of protected areas/conservation areas, as defined under the relevant Laws, an MoU will be prepared/issued and enforced between the CCO holder and district local government, during project implementation to prevent future encroachment of any adjacent gazetted forest areas/protected areas.
The Local Government Act, Cap 243	The 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 local governments are responsible for the protection of the environment at the district level; this therefore implies that local governments shall be consulted on projects located within their jurisdiction and on matters that affect the environment.

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 Project are discussed in Table 3 below.

Table 3-3: Key International Conventions and Treaties Ratified by GoU that are Applicable to the EUFLA Project

Convention/treaty	Objective/Aim	Relevance to EUFLA Project
Convention on the Elimination of all forms of Discrimination Against Women (CEDAW) 1979	This Convention advocates for the rights of women everywhere, including their economic rights	The EUFLA project will contribute to the realisation of the economic rights of women.
Convention on the Rights of Persons With Disabilities, 2006	This Convention advocates for the rights of Persons With Disabilities, including the right to participate in economic activities and processes at all levels.	The EUFLA project will ensure that persons with disabilities (PWDs) 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 EUFLA project shall address the economic rights of all the people who will be employed on the project especially at the implementation stage. It will also enhance the economic, social and cultural rights of the project beneficiaries.
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 EUFLA 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.	<p>Under the EUFLA Project, there may be cases of land tenure rights that are individually owned/customarily owned land parcels located in close proximity to protected areas/ecologically sensitive areas, which unintentionally could lead to possible future encroachment into such areas;</p> <p>Where required, for customary certificates of land titles issued to land parcels in close proximity/close to the boundary of protected areas/conservation areas, as defined under the relevant Laws, an MoU will be prepared/issued and enforced between the CCO holder and district local government, during project implementation to prevent future encroachment of any adjacent gazetted forest areas/protected areas.</p>
Convention on International Trade in Endangered Species of	This convention seeks to ensure that international trade in species of wild fauna and flora does not	Subprojects that undermine CITES will not be funded under the EUFLA project. These will be screened off/out using the screening form

Convention/treaty	Objective/Aim	Relevance to EUFLA Project
Wild Fauna and Flora (CITES)	threaten their survival in the wilderness.	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.	Land parcels which are located in wetlands that are protected under the Ramsar convention will not be registered under the EUFLA 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 PIU will ensure that activities that are implemented under the EUFLA project are done in 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 EUFLA 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 screening form shall take of the social and environment safeguard sustainability during titling.
Bonn Convention, 1979	The objective of the Bonn Convention is the conservation of migratory species worldwide.	The EUFLA 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	All titles shall be screened for encroachment in river banks as per regulations and for the river Nile the 100 metre protection zones shall be respected as per the regulations.

Convention/treaty	Objective/Aim	Relevance to EUFLA Project
	of, and benefit from, the common Nile Basin water resources.	
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 and included in the ESMF.

The various ILO Conventions Consulted included:

1. ILO Convention Labor Inspection (C81), 1947
2. ILO Convention Labor Inspection in Agriculture (129)
3. ILO Convention on Equal Remuneration (C100), 1951
4. Fundamental principles and Right at Work Conventions
5. Freedom of association and effective recognition of the right to Collective Bargaining
6. Elimination of all forms of Forced or Compulsory Labor
7. Elimination of all forms worst forms of Child Labor, 1999
8. Effective abolition of Child Labor
9. 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 (ESSs) Applicable to the EUFLA 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. The following are the ESS applicable to the EUFLA project.

Table 3-4 World Bank Environmental and Social Standards (ESSs) relevant to the project

ESS	Objective	Relevant		REASON
		YES	NO	
ESS1 Assessment and Management of Environmental and Social Risks and Impacts	ESS1 requires Borrowers to: identify, evaluate and manage the environment and social risks and impacts of the project; adopt a mitigation hierarchy approach (avoid, minimise, reduce, mitigate, offset); 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; utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate; and to promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.	YES		there may be cases of land tenure rights that are individually owned/customarily owned land parcels located in close proximity to protected areas/ ecologically sensitive areas, which un-intentionally could lead to possible future encroachment into such areas
ESS1 Labour and Working Conditions	ESS2 requires Borrowers to: promote safety and health at work; promote the fair treatment, non-discrimination, and equal opportunity of project works, protect project workers, with emphasis on vulnerable workers; prevent the use of all forms of forced labor and child labor; support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and provide project workers with accessible means to raise workplace concerns.	YES		the project will likely involve direct workers (i.e. civil servants from the MoLHUD) contracted workers (i.e. surveyors, physical planners, lawyers and respective Area Land Committees to conduct participatory community mapping and demarcation). Community workers (i.e. community members to be trained as facilitators to support the process to ensure community participation and transparency) and other local villagers/community members who may volunteer to support the teams as volunteers in the land registration process. There could be other stakeholders on the project working in connection with the project, other than the above workers. Potential include occupational health and safety (OHS) risks. Labor Management Procedures (LMP) have been prepared as part of this ESMF. The LMP applies to all

				different categories of workers and it sets out how project workers will be managed and in line with the national labor laws and this ESS.
ESS3 Resource Efficiency and Pollution Prevention and Management	ESS3 requires Borrowers to promote the sustainable use of resources including energy, water and raw materials; avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities, avoid or minimize project-related emissions of short and long-lived climate pollutants, avoid or minimize generation of hazardous and non-hazardous waste; and to minimize and manage the risks and impacts associated with pesticide use.	YES		The ESMF screening procedure (Annex 2) will be used to identify any ESS3 related risks and impacts.
ESS4 Community Health and Safety	ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities. ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts during the project life cycle from both routine and nonroutine circumstances, with particular attention to people who, because of their particular circumstances, may be vulnerable. ESS4 requires Borrowers to apply the concept of universal access, where technically and financially feasible in projects that involve the provision of services to people.	YES		It is expected, that there will direct interactions with the communities/population in the project areas
ESS5 Land Acquisition, Restrictions on	ESS5 requires Borrowers to avoid involuntary resettlement or, when unavoidable, minimize involuntary	YES		land demarcation may lead to determination that some land that is currently used is state land and persons

Land Use and Involuntary Resettlement	resettlement by exploring project design alternatives; to avoid forced eviction; to mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use; 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; 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; and to ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.			may be required to vacate that land
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 requires Borrowers to protect and conserve biodiversity and habitats; to apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity; to promote the sustainable management of living natural resources; to support livelihoods of local communities, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	YES		<p>While the target areas are yet to be identified, the conservation of biodiversity will be key in project areas that are close/adjacent to protected areas with wildlife habitat.</p> <p>The project activities will be carried out in accordance with the existing National legislation on land registration, which currently excludes registration in areas designated as gazette /Government managed central and local forest reserves/wildlife conservation areas/protected areas and/or other ecologically sensitive areas</p> <p>The project activities will also follow ESS6 requirements, especially with regard to measures to assess and mitigate cumulative impacts on deforestation.</p>
ESS8 Cultural Heritage	ESS8 covers tangible cultural heritage (may be in urban or rural settings, be above or below land or under water,	YES		There is the potential for chance find of cultural or archeological significance during

	and includes natural features and landscapes) and intangible cultural heritage (includes practices, representations, expressions, knowledge, skills). It recognises the need for confidentiality and access. It includes specific provisions on archaeological sites and material, built heritage, natural features with cultural significance, and movable cultural heritage. It includes requirements where use of cultural heritage is for commercial purposes.			the demarcation exercise.
ESS9 Financial Intermediaries	ESS9 sets out how FIs will assess and manage environmental and social risks and impacts associated with the subprojects it finances. It promotes good environmental and social management practices in the subprojects the FI finances; and promotes good environmental and sound human resources management within the FI. It requires FIs to have an Environmental and Social Management System (ESMS), covering policy, procedures, organizational capacity monitoring and reporting and stakeholder engagement.		NO	The project does not involve the use of FIs.
ESS10 Stakeholder Engagement and Information Disclosure	ESS10 emphasizes stakeholder engagement throughout the project life cycle and requires a Stakeholder Engagement Plan (SEP). It encourages early identification of stakeholders, both project-affected parties and other interested parties. Under ESS10, engagement must be proportionate to the nature, scale, risks and impacts of the project, and appropriate to stakeholders' interests. It specifies process and criteria for information disclosure and meaningful consultation, and requires an accessible and inclusive grievance mechanism, proportionate to risks and impacts.	YES		The project will involve different groups of stakeholders from the national level to the village/parish levels. The Stakeholders are identified in the Stakeholder Engagement Plan (SEP)

3.5 Environmental and Social Risk Classification

3.5.1 Environmental Risk Rating

The project will increase security of land rights by consolidating the demarcation and documentation of individually and communally owned customary lands. By nature of the project activities, which majorly entail institutional training and capacity building, and demarcation and documentation of land, is not expected to pose any major direct negative impacts on the environment. Additionally, the project is not expected to involve any civil works/construction. Activities are limited to demarcation of land which entails surveying and physically marking land boundaries using natural markers that are locally recognised in the targeted project areas. In the case of the peri-urban areas, concrete mark-stones shall be used as boundary markers, basing on the specifications to be provided by the Department of Surveys and Mapping. The project is expected to result into strengthening security of tenure rights in the target areas, which in turn shall significantly contribute to long term positive environmental impacts. Secure land tenure helps to promote sustainable land use practices that can enhance the environment such as improved soil conservation practices, planting of perennial crops, preservation of trees, while insecure land tenure results are most likely to contribute to environmental degradation. The project will raise awareness of these potential environment benefits during the sensitizations of the communities and landowners. Nonetheless, the titling land tenure rights in the project's areas could include land parcels under agricultural cultivation located near forest areas/sensitive ecologically protected areas (e.g. wetlands/wildlife conservation areas/wetlands/lakes/rivers). In the long-term, this could potentially make such areas vulnerable to future encroachment and/or environmental degradation due to restrictions/displacement from areas currently in use, lack of adequate legal protection in some areas, resource scarcity among vulnerable groups if clear guidelines and procedures are not followed during the mapping and demarcation process and subsequent issuance of titles. Additionally, in cases where land parcels are issued in areas adjacent to protected areas, there is an underlying risk of exacerbating human-wildlife conflict in such areas. These risks have been assessed in the project ESMF with guidance on managing likely environmental risks. Additionally, the ESMF provides an E&S Screening checklist with exclusion criteria for activities that shall not be financed under the project i.e. activities that are likely to cause longterm/irreversible damage to natural habitats, negatively impact ecologically sensitive areas such as protected areas, and activities that may impact significantly on the land rights of the vulnerable groups. Therefore, whereas the project will not permit registration of gazetted land, it will not on the other hand, interfere with the continued access to natural resources by the protected area adjacent communities that are dependent on natural resources to meet their livelihood needs. Furthermore, the Rapid Physical Planning Appraisal (RAPPA) and SLAAC activities carried out under the CEDP, were conducted in conformity to the SLAAC Operational Manual that includes requirements for the project activities not to support land registration activities in gazetted areas under the National laws of Uganda and mass sensitization of project beneficiaries on the land laws, prior to the commencement of the SLAAC activities. The SLAAC Operational Manual has been updated to ensure compliance with the Bank E&S requirements. Although Covid-19 prevalence and spread has gone down globally and in the country, the project will adopt WHO and MoH Covid-19 Standard Operating Procedures (SOPs) during implementation to minimize the transmission of COVID-19 to project workers and communities during execution of some of the project activities including community awareness and trainings. In view of the above, the environmental risk rating is therefore, considered to be moderate at this stage.

3.5.2 Social Risk Rating

The main objective is to increase security of land rights and strengthen land administration and management systems in Northern and Eastern Uganda. The project aims at; increasing the number of

land parcels demarcated and registered; reducing land disputes; and develop capacity of local land institutions. The project is expected to consolidate the demarcation and documentation of individually and communally owned customary lands. However the project's overall objective is to improve land management and reduce land related disputes among others. The process of achieving this could pose social risk like; Exclusion. This could be at different levels as the project intends to start engagement from the Parish level which means most people at the village level where most communal land demarcations are could be left out. Women as a category that has always been long left out on land ownership and access could in this process be excluded if no deliberate effort is made to include them.. The project will be implemented in in 33 selected districts in the Northern and Eastern regions of the country. This might include districts with indigenous people (Batwa in Western and Tepeth, Iks in Karamoja Region) who's main source of livelihood is on land and who if not planned and systematically involved might suffer a loss to their lands. Communication related to the project and sensitization if not channeled through means that can reach the intended audience might exclude others. Community intended messages should also be translated into all local languages and shared across on radios and print to ensure a wide outreach. Land dispute and land grabbing. The country already suffers from rampant land disputes, wrangles, and land grabbing cases. The project if not well managed might escalate wrangles, disputes, and land grabbing especially for lands that have not been unutilized for a long period of time. The North has long suffered individual and communal land disputes which increased ever since the Lord's Resistance War period. Communities lived in camps for almost two decades and lost demarcation. A good SEP would facilitate a clear understanding among communities and an effective Grievance Redress Mechanism (GRM) put in place for aggrieved parties to channel their issues for an appropriate resolution. Loss of housing, during the demarcation of boundaries some households might be affected in the process and as a result lose their, houses and other landed property. This might also cause evictions of people as had been witnessed across the country by different individuals and groups leaving several people homeless.. Covid-19 prevalence and spread has gone down in the country but still remains a major challenge due to its recurring nature posing a risk to the communities and workers involved in the process of the demarcation and even engagement and training of the community.

3.6 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. MLHUD is in charge of land related aspects of projects. **Table** below summaries the key institutions and their relevance to environmental and social aspects of EUFLA.

TABLE 3-5: INSTITUTIONS, THEIR ROLES, RESPONSIBILITIES AND RELEVANCE TO THE EUFLA PROJECT

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the EUFLA Project
1	Ministry of Lands, Housing and Urban	The MLHUD is mandated to develop and manage policy and	MLHUD will be responsible for giving policy guidance during project

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the EUFLA Project
	Development (MLHUD)	<p>standards relating to land management, housing, and urban development.</p> <p>The Ministry (MLHUD) through its various departments shall be responsible for ensuring that good employment policies, good health and safety, cultural and gender practices are upheld in the workplaces and in the communities.</p> <p>As the implementing agency, MLHUD shall be expected to mainstream E&S aspects into all the project's activities.</p>	<p>planning and implementation, for any beneficiary sub projects.</p> <p>The MLHUD PIU will ensure smooth implementation of the EUFLA Project by the various implementing agencies under the project including CEDP and MZOs. The PIU unit will ensure that the required instruments for managing E&S risks are prepared and implemented, these include: ESCP, ESMF, RPF, VMGF, SEP, ESMPs, RAPs and LMPs.</p> <p>Apart from its overall functions, MLHUD shall undertake oversight role over the project and its sub projects to ensure compliance with E&S national laws and World Bank Standards. It shall also provide accountability to the WBG through the MoFPED.</p>
2	Ministry of Gender, Labour and Social Development (MGLSD)	<p>The MGLSD is responsible for ensuring that employers comply with the provisions of the Employment Act, 2006 and the Occupational Safety and Health Act, 2006.</p> <p>The Ministry through its Occupational Safety and Health (OHS) department is mandated to conduct periodic and regular OHS inspections at project sites.</p> <p>MGLSD also resolves disputes related to labor and working conditions and occupational health and safety.</p>	<p>The Ministry could intervene if issues related to labour and working conditions and occupational health and safety are not resolved by the PIU of MLHUD and are therefore, escalated to the MGLSD. Such cases may be reported the Senior Labour and/or Probation Officers of the beneficiary districts or directly to the ministry.</p> <p>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.</p> <p>The Ministry will also oversee management of child protection and gender activities to address Violence Against Children (VAC), Sexual Exploitation and Abuse (SEA), Gender</p>

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the EUFLA Project
			Based Violence risks and impacts.
3	Ministry of Finance, Planning and Economic Development (MoFPED)	<p>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.</p> <p>To this end, MoFPED shall ensure resource allocation for the mainstreaming and management of environmental and social risks and impacts into all project activities.</p>	<p>The Ministry will work closely with the World Bank to implement the bilateral financing modalities of the EUFLA Project, taking into consideration the E&S aspects of the project components.</p> <p>Ensure that the implementing agency (MLHUD) effects the Environmental and Social Commitments agreed upon in the financing agreement of the EUFLA Project.</p>
4	National Environment Management Authority (NEMA)	<p>NEMA is the principal government agency in charge of overseeing environment 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.</p>	<p>Project implementation should be able to take into consideration sustainable environment aspects such as avoiding the registration of sensitive ecological resources such as wetland buffers, river banks and lakeshores as private lands.</p> <p>The project shall ensure compliance to environmental requirements including avoidance of future encroachment on protected areas such as Central Forest Reserves (CFRs) and Game Parks/Game Reserves.</p> <p>The PIU will ensure compliance of the project with national and international laws and policies.</p>

SN	Agency / Institution	E&S Roles and Responsibilities	Relevance to the EUFLA Project
5	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 including the Covid-19 prevention guidelines and SOPs.	<p>The Ministry of health and its health facilities are key actors in the MLHUD GBV referral pathways.</p> <p>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.</p> <p>The PIU will ensure that the Health facilities provide any health services that may be required during the implementation of the project.</p>
6	Uganda Wildlife Authority (UWA)	UWA is mandated to; Conserve, economically develop and sustainably manage the wildlife and protected areas of Uganda in partnership with neighboring communities and other stakeholders for the benefit of the people of Uganda and the global community.	UWA could make an input in the MoU that shall be signed between project beneficiaries and local governments for subprojects that will be located within the proximity of protected areas (National Parks or Wildlife reserves) or witness the signing thereof.

4 ENVIRONMENTAL AND SOCIAL BASELINES

This chapter highlights the baseline of the environmental and social components in the project areas 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

The Project will be implemented in thirty-two (32) selected districts of Uganda, the majority of which are located in the Northern and Eastern parts of the country due to the predominance of customary and leasehold land tenure systems. The districts are: Omoro, Kitgum, Kwanja, Alebtong, Otuke, Kole, Buyende, Kaliro, Bugweri, Bugiri, Tororo, Budaka, Butebo, Kibuku, Pallisa, Busia, Kaberamaido, Yumbe, Zombo, Arua, Koboko, Terego, Madi Okollo, Nebbi, Kalaki, Ngora, Amuria, Kabarole, Bunyangabu, Kyenjojo, Kyegegwa and Masindi.

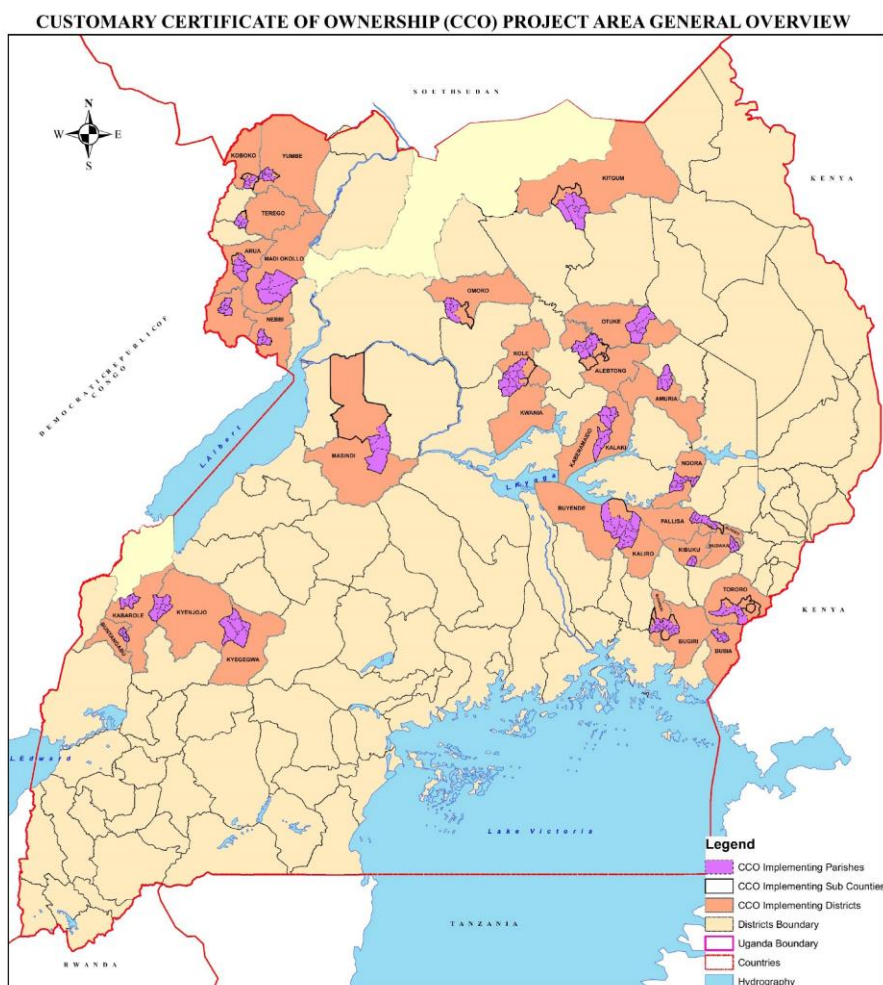


Figure 4-1: District Map of Uganda Showing Project Coverage by District (Source: MLHUD)

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. Under the EUFLA Project, there may be cases of land tenure rights that are individually owned/customarily owned land parcels located in close proximity to protected areas/ ecologically sensitive areas, which un-intentionally could lead to possible future encroachment into such areas. Where required, for customary certificates of land titles issued to land parcels in close proximity/close to the boundary of protected areas/conservation areas, as defined under the relevant Laws, an MoU will be prepared/issued and enforced between the CCO holder and district local government, during project implementation to prevent future encroachment of any adjacent gazetted forest areas/protected areas.

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 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 on protected land in a bid 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.

4.2.4 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).

Under the EUFLA Project, there may be cases of land tenure rights that are individually owned/customarily owned land parcels located in close proximity to protected areas/ ecologically sensitive areas, which un-intentionally could lead to possible future encroachment into such areas;

Where required, for customary certificates of land titles issued to land parcels in close proximity/close to the boundary of protected areas/conservation areas, as defined under the relevant Laws, an MoU will be prepared/issued and enforced between the CCO holder and district local government, during project implementation to prevent future encroachment of any adjacent gazetted forest areas/protected areas.

4.2.5 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).

4.3 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 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).

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 EUFLA Project will uphold women’s rights to ownership of land thus allowing them to use their lands more productively.

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 5 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 4-1: 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 Child Labor 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 children¹⁰. 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

¹⁰ National Child Labour Policy (2006), MoGLSD, Uganda

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 4-2: Child Labor Statistics

	Before 20 th March 2020					After 20 th 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.

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.

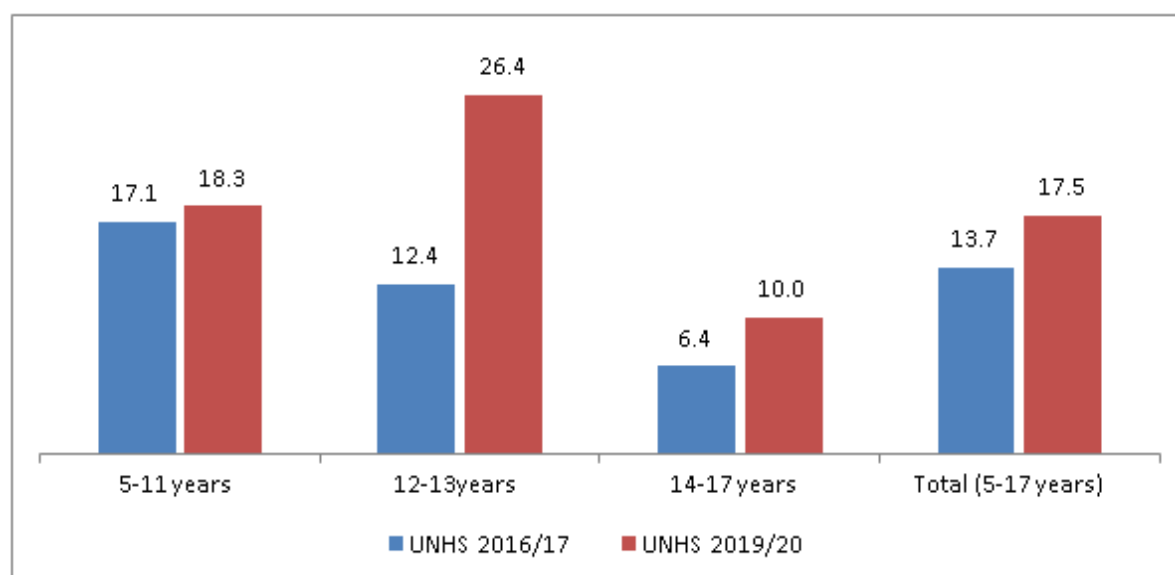


Figure 4-2- UBOS Statistical Abstract 2020

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.

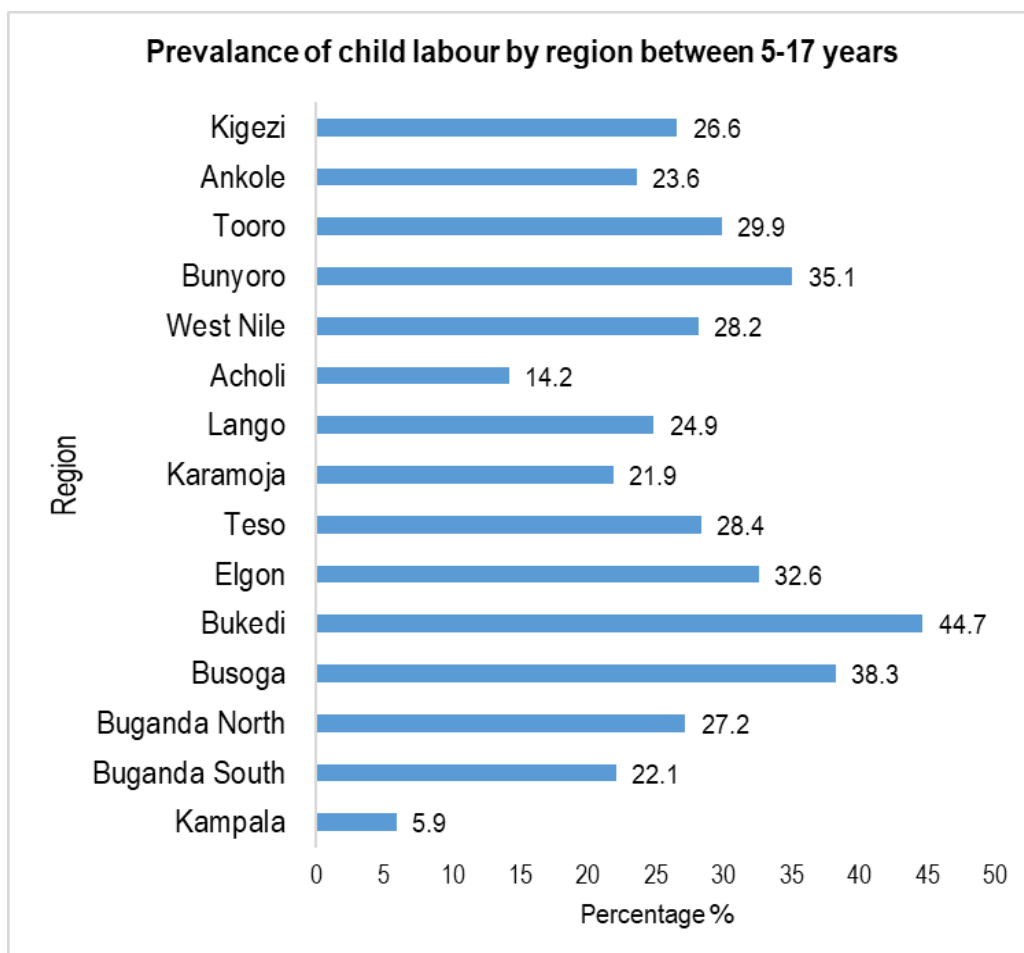


Figure 4-3- Prevalence of child labor by region

4.3.5 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 4-3: 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 reported such not spoken about or reported Ignorance of the dangers of sexual violence on the side of the girls	Shame Problem of rape and defilement is frequently hidden and solved traditionally.
	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

4.3.6 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 children¹¹. 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 childhood¹². 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.

4.3.7 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 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 EUFLA Project that women's right to access to, ownership of and titling of land shall be promoted. The EUFLA 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.

¹¹ <https://www.who.int/news-room/fact-sheets/detail/violence-against-children>

¹² Uganda Violence Against Children Survey Findings from A National Survey. Ministry of Gender, Labour and Social Development August 2018

Relation to the project: The EUFLA project will be implemented in areas which are predominantly under the customary and freehold land tenure system. Therefore, information on land tenure systems in different parts/regions of the Country is very important for smooth implementation of the project.

4.3.8 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 (BTNET) 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 BTNET 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 BTNET. 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.

5 ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS, AND MITIGATION

The proposed EUFLA Project is likely to result in both positive and adverse Environmental and Social risks and impacts.

5.1 Potential Positive Impacts

Establishment of a transparent and efficient land management and administration system will improve tenure security and facilitate investments in Uganda. The likely positive impacts and potential benefits of the project in the medium and long term include the following:

- i** Increased security of land rights. The project will increase security of land rights by consolidating the demarcation and documentation of individually and communally owned customary lands.
- ii** Promotion of sustainable land use practices. The project is expected to result into strengthening security of tenure rights in the target areas, which in turn shall significantly contribute to long term positive environmental impacts. Secure land tenure helps to promote sustainable land use practices that can enhance the environment such as improved soil conservation practices, planting of perennial crops, preservation of trees, while insecure land tenure results are most likely to contribute to environmental degradation. The project will raise awareness of these potential environment benefits during the sensitisations of the communities and landowners.
- iii** Reduction in land disputes. The main objective is to increase security of land rights and strengthen land administration and management systems in selected geographic areas in Uganda. The project aims at; increasing the number of land parcels demarcated and registered; reducing land disputes; and develop capacity of local land institutions. The project is expected to consolidate the demarcation and documentation of individually and communally owned customary lands.
- iv** Increased agricultural investment and productivity. Increased agricultural investment and productivity is expected from securing land tenure with 80 percent of the population relying on agriculture for income.
- v** Long-term private investment decisions. Private investment decisions will become more long-term and sustainable with land becoming protected through ownership registration. Currently, financial institutions are constrained from scaling up private sector lending because only 20 percent of the land is surveyed/registered.
- vi** Increased tax collection. Strengthening the land administrative framework will provide grounds for an increased tax collection beyond tax and fee collection from first time registration and transfers.
- vii** Equitable tax collection from public services. Strengthening the cadastral maps will continue to help more equitable tax collection from public services such as water, electricity, sewerage and other public investments such as education and medical facilities. The updated information on land use will also contribute to better land and natural resources management.
- viii** Reduction in the costs to the poor of public land acquisition and resettlement processes.

Other potential benefits would be of social nature. The pro-poor and pro-gender sensitive tenure regime which will ease conflicts about land. Setting up interventions already tested by the Gender Lab will encourage households to register land under the name of both spouses. This action will particularly protect women's land rights and increase the percentage of women with formal land ownership.

5.2 Potential Negative Impacts/Risks and Mitigation measures

The likely negative E&S impacts/risks of the EUFLA project and mitigation measures are as follows;

Impact: Encroachment on protected areas/ecologically sensitive areas. The titling land tenure rights in the project's areas (yet to be identified) could include land parcels under agricultural cultivation located near forest areas/sensitive ecologically protected areas (e.g. wetlands/wildlife conservation areas/wetlands/lakes/rivers). In the long-term, this could potentially make such areas vulnerable to future encroachment and/or environmental degradation, if clear guidelines and procedures are not followed during the mapping and demarcation process and subsequent issuance of titles. Additionally, in cases where land parcels are issued in areas adjacent to protected areas, there is an underlying risk of exacerbating human-wildlife conflict in such areas.

Impact mitigation: A key requirement will be for the project not to support land registration activities in forest or other protected areas (gazetted under the National laws). A screening checklist has been developed and included in the ESMF for this purpose as **Annex 2**;

Under the CDP project, the Rapid Physical Planning Appraisal (RAPPA) and SLAAC activities were conducted in conformity to the SLAAC Operational Manual that includes requirements for the project activities not to support land registration activities in gazetted areas under the National laws of Uganda and mass sensitization of project beneficiaries on the land laws, prior to the commencement of the SLAAC activities. The SLAAC Operational Manual has been updated to ensure compliance with the Bank E&S requirements;

Where required, for customary certificates of land titles issued to land parcels in close proximity/close to the boundary of protected areas/ conservation, as defined under the relevant Laws, a Memorandum of Understanding (MoU) will be prepared/issued and enforced between the CCO holder and district local government, during project implementation to prevent future encroachment of any adjacent gazetted forest areas/protected areas.

To address the potential indirect and induced impacts that may remain on critical natural habitats as well as risks for water sources and areas important for water generation, there is need to establish a committee among different parties at national and local level to adopt land planning tools and to promote environmental protection practices within a strategic action plan.

Impact: Exclusion. This could be at different levels as the project intends to start engagement from the Parish level which means most people at the village level where most communal land demarcations are could be left out. Women as a category that has always been long left out on land ownership and access could in this process be excluded if no deliberate effort is made. Since the project has a national coverage the indigenous groups (Batwa in Western and Lks in Karamoja) who's main source of livelihood is on land if not planned for engaged and systematically involved might suffer a loss to their lands. Furthermore, communication related to the project and sensitization if not channeled through means that can reach the intended audience might exclude others.

Impact mitigation: A Vulnerable and Marginalized Group's Framework (VGMF) will be prepared as part of the project's ESF instruments to ensure inclusion and integration of the marginalized groups. This VGMF will guide the preparation of a Vulnerable and Marginalized Group's Management Plan (VMGMP) where necessary, to address issues of VMGs during project implementation.

Community intended messages shall be translated into all local languages and shared across on radios and print to ensure a wide outreach. Special need groups like the indigenous groups should also be reached in an appropriate manner;

A Stakeholder Engagement Plan (SEP) shall be prepared in a way that promotes reaching out to all identified stakeholders.

Impact: Loss of housing. During the demarcation of boundaries, some households might be affected in the process and as a result lose their, houses and other landed property. This might also cause evictions of people as had been witnessed across the country by different individuals and groups leaving several people homeless.

Impact mitigation: A Resettlement Policy Framework (RPF) prepared for the CEDP AF has been updated to handle such emerging cases whenever they arise and lessons from the earlier implemented phase will inform the planning for this AF;

A SEP has been prepared, and the PIU will ensure that all stakeholders are involved as indicated under ESS10;

A GRM will be enhanced and made known to stakeholders to report any issues and have them resolved.

Impact: Community health effects related to the spread of the Covid-19 virus. Covid-19 remains a major challenge posing a risk to the communities and workers involved in the process of the demarcation and even engagement and training of the community.

Impact mitigation: Teams involved in the project shall be required to adhere to strict Covid-19 standard operating procedures (SoP) as guided by the Ministry of Health (MoH) and World Health Organisation (WHO).

Impact: Gender Based Violence (GBV). The project stands a risk of creating Gender Based Violence (GBV) in the community if not well managed. Considering the widespread culture in Uganda where land and land related matters remain a male dominated area. This demarcation and land titling could result in GBV among the beneficiaries.

Impact mitigation: To help mitigate this, the environmental and social screening procedures and tools included in the ESMF (under **Annex 2**) have been designed to include a GBV risk screening and a clear plan on how this will be resolved;

The GRM will be established to take up and refer GBV related issues.

Impact: Disruption to religious/cultural sites and activities during demarcation. There is the potential for chance find of cultural or archeological significance during the demarcation exercise.

Impact mitigation: 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;

Chance find procedures have been prepared as part of this ESMF (see **Annex 3**) and shall be incorporated into project contracts.

Impact: Labor and working conditions. The project is not expected to involve any construction /civil works that would potentially bring an influx of labour to the project areas. However, the project will likely involve direct workers (i.e. civil servants from the MLHUD) contracted workers (i.e. surveyors, physical planners, lawyers and respective Area Land Committees to conduct participatory community mapping and demarcation). Community workers (i.e. community members to be trained as facilitators to support the process to ensure community participation and transparency) and other local villagers/community members who may volunteer to support the teams as volunteers in the land registration process. There could be other stakeholders on the project working in connection with the project, other than the above workers. Potential risks are those related to labor and working conditions, such as occupational health and safety (OHS) risks.

Impact mitigation: Labor management procedures have been developed and included in this ESMF as **Annex 5**, to ensure that the project complies with national and international labor laws and policies including the World Bank's ESF, especially ESS2: Labor and Working Conditions.

6 PROCEDURES TO ADDRESS ENVIRONMENTAL AND SOCIAL ISSUES

This section defines steps, actions and responsibilities for identifying, assessing and managing environmental and social risks and impacts of the EUFLA project activities in line with the national legislation and World Bank Environmental and Social standards.

6.1 Integrating Environmental and Social aspects into the EUFLA Project

In compliance with the National Environment Act (NEA), 2019 and the Bank Environment and Social Standards, particularly ESS1, environmental and social aspects have been integrated during the design of the EUFLA project and these will continue during the implementation phase 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.

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. EUFLA project activities/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 and where required site specific Environmental and Social Management Plans. Screening will be undertaken for each subproject at identification stage and by its proponents, review and cleared by the PIU of the MLHUD.

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 the National Environment (Environmental and Social Assessment) Regulations S.I. No. 143 of 2020.

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 the 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 (EUFLA) E&S Risk Classification is Moderate. 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.

In light of the project's current risk classification and given the nature of the project, subprojects or project activities will not necessitate environmental and social impact assessments (EIAs) and Project Briefs. Nevertheless, an exclusion criteria and a Screening tool (**see Annex 2**) have been included in the ESMF to enhance conservation of the natural environment. **See Box 1** for further 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 for example wetland/swamps or protected areas such as national parks, wildlife reserves, community wildlife reserves, forest reserves etc..
- 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 Groups.
- Activities that may involve significant involuntary resettlement or land acquisition.
- Activities that impact have significant impacts on cultural heritage.

6.1.2 Environmental and Social Management Plan

Notwithstanding that the EUFLA project and subprojects/activities under the project may not require ESIA's and Project Briefs, an Environmental and Social Management Plans (ESMP) has been included in this ESMF to guide in the management/mitigation of the identified environmental and social risks. This section provides guidance and format for the development of site specific ESMPs where shall be required.

ESMP for EUFLA 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 8** 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) Roles and Responsibilities of key stakeholders in the implementation of the ESMP
- e) Allocation of resources and responsibilities for plan implementation;
- f) Schedule of the actions to be taken;
- g) Program for surveillance, monitoring and auditing; reporting and
- h) 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 An Environment and Social Commitment Plan, ESCPs, has been developed to provide the foundation for meeting this requirement.

Table 6-1: Components of ESMP

Components of ESMP	
ESMP Component	How to address
Summary of impacts	The predicted adverse environmental and social, health and safety risks and 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	The monitoring program should clearly indicate the linkages between

programme	impacts identified, measurement/monitoring 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 and reporting requirements 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

6.1.3 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 ESMF and ESMPs.

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 feasible and implemented satisfactorily; and
- d) Assist in identifying additional mitigation efforts needed or where alteration to the adopted management approach may be required/where emerging E&S risks not initially foreseen have been identified

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 ESMF. 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 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 MLHUD will develop a standard set of indicators applicable to all subprojects, and some optional ones that may be apply to only specific subprojects. Some indicators that may be considered include:

1. Approved titles do not include land under protected land or natural resources e.g. forests, game reserves, parks, wetlands, rivers/river banks or lakes/lakeshores.
2. Stakeholder engagement plan developed and implemented in each target area
3. Grievance Redress Committees set up in all the target areas at all levels.
4. All grievances recorded are resolved and reported
5. The ESMF, RPF, VMGF, SEP disseminated to all stakeholders
6. Reduced number of persons displaced due to land parcel identification.

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. As seen under the ESS10, Stakeholder Engagement and Information Disclosure under the ESF recognizes the importance of open and transparent engagement with project stakeholders. The 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 Plan (SEP) has been prepared as part of the Project's ESF instruments. The ESF will complement the ESMF for the project. Under this (EUFLA) project, stakeholder consultations will continue even during the implementation of the project. GoU through the MLHUD has committed to implement the project in compliance with the World Bank's Environmental and Social Framework (ESF).

7.2 Objectives of Stakeholder Consultations

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

- a. provide information about the project and to tap stakeholder information on key environmental and social baseline information in the project areas;
- b. provide opportunities to stakeholders and project beneficiary communities including VMGs and Persons with disabilities 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 enhancement measures;
- e. identify specific interests of and to enhance the participation of the poor and vulnerable 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

Extensive stakeholder consultations were done for this project. The consultations commenced with a planning meeting between the Consultants (STCs) and the Environmental and Social Specialists (Environmental Specialist and Social Development Specialist) of the MLHUD on 27th May 2022 at the Ministry's offices (USMID-AF unit) located along Yusuf Lule Road, Kampala. During this meeting, the stakeholders to be consulted were identified and a tentative programme for consultations was agreed upon. This was followed by physical consultations with the MLHUD on 31st May 2022 in the CEDP-AF unit at the Ministry offices located along Yusuf Lule Road, Kampala. This particular consultative meeting inter alia, expanded and refined the list of stakeholders to be consulted. This was followed by virtual consultations with the Academia, Non-governmental Organisations (NGOs) and Civil Society Organisations (CSOs) on 10th June 2022 and, Government Ministries and Departments and Development Partners on 11th June 2022. The Consultants (STCs) also carried out (side) consultations with some stakeholders mainly through telephone conversations. Finally, physical stakeholder consultations were carried out between Monday 20th and Friday 24th June 2022 in the districts of Zombo in West Nile region, Kibuku in Eastern region and Ntoroko in Western region. The Consultations at district level were carried out at 2 levels; stakeholder workshops which were held at Hotels and district and community consultations which were held at the district headquarters and in the communities. The matrices of stakeholders consulted, information obtained from them and, attendance records are included in this ESMF under **Annex 1**.

The stakeholders raised concerns and key issues related to EUFLA project and as summarised in Table below.

Table 7-1: Key Stakeholder Issues Raised

Stakeholder	Issues/Concerns	Response/Action Plan
Participatory Land Use Management (PELUM) Uganda	Looking at the time prior to submission of the ES safeguards instruments, the project might not have adequate time to consult all stakeholders.	Stakeholder consultation is a continuous process. More detailed consultations will be carried out across all the 32 districts and the target will be to reach out to all key stakeholders both direct and indirect beneficiaries including communities. Also, based on limited timelines needed for the preparation of the ES safeguard instruments, you should give us and the consulting team pointers on some of the ES issues that might arise so that the team can prepare the tools.
	As PELUM, we have been working with the MLHUD on land and Legal issues on land and issuance of land titles, there are peculiar issues coming from Karamoja region i.e. cross boarder movement of pastoralists.	We are having discussions with MAAIF to have a range land policy put in place. We are also working with cultural institutions on land related issues and finding mitigation measures
	As PELUM, we are expanding to Acholi – Amuru and Gulu, we are piloting land registration which is supported by government.	Noted
	As PELUM, we developed a module where community comes together to register land under the participatory community initiative. We encourage communities to register their land	This will be an added advantage to the Project as some communities will be well equipped with information.
	When it comes to gender issues, dual ownership of property by women, women are entitled to property both at their paternal homes and where they have been married.	Noted. The EUFLA project will ensure that women are involved as much as possible. There will be continuous sensitization of communities on the importance of family cohesion and importance of joint family property registration and ownership.
	There are some instances where women have been denied access to credit using the documents, they used to register the land by their own brothers	Noted, Need for continued advocacy and inclusion of women
	Our experience on wetlands and natural resources has majorly been with wetlands, they physical planning committees have been of great help on this, they go ahead	As partners, we need to capacitate these committees.

Stakeholder	Issues/Concerns	Response/Action Plan
	and demarcate these areas. Also the cultural land committees have been of great help in preventing wetland encroachment. There are some cases in court and we have hope of recovering some wetlands and natural resources.	
	Regarding wetland, some being seasonal and others permanent, there is lack of information on the buffers of wetlands and data on the same	We have engaged communities to develop wetland management plans. It clearly explains which parts can be used and those not to be used by communities Also, continuous sensitization of communities
	A lot of abuse and encroachment in the communities has gone on for so long and this is the reason why it is hard to determine the original boundaries. Thus, there is need for re-identification of these boundaries. There is need to engage communities in re-identification of boundaries	We have engaged communities to develop wetland management plans. It clearly explains which parts can be used and those not to be used by communities
	Environment and Social risks in Acholi region are a very sensitive matter. Politicians might use this as capital for themselves.	The MLHUD will ensure that that the National Laws are followed as well as ensuring that WB guidelines on environmental and social safeguards are followed. Need to work hand in hand with cultural institutions that handle land management issues.
	Land owners can now lease out their land under the cultural ownership registration but this comes with impacts, some big farmers use chemicals and fertilizers that might degrade the soils.	Measures should be put in place to regulate use of chemicals
	When internally displaced people were returning from IDP camps, cultural and political leaders allocated land based on availability of big chunks of land but not historical ownership.	Need for continuous sensitization of communities on their land rights
International Institute for Rural Reconstruction (IIRR)	In the South West and Elgon areas there is a cultural bias where there is reluctance in including women on the land titles during land registration.	MLHUD will carry out stakeholder and community engagements before and during project implementation. There will be advocacy on this and there is increasing joint ownership for customary land ownership
	How would you cater for polygamous marriages and for all the women/wives	Need for continued advocacy and

Stakeholder	Issues/Concerns	Response/Action Plan
	being included in the customary land registration?	inclusion of women
ZOA - Uganda	We work in the West Nile region, an environment where we have refugees. Sometimes, people want to register all their land yet we have refugees in the area. Refugees have no right to register land; the issue of refugees should therefore be looked into in this program	This is noted, registration of land owners will be based on proof ownership in line with Uganda National Laws.
	The customary owners by registration of their land will acquire legal documentation and this should allow them to have guests in their land.	Refugees are a vulnerable group and its important to include and work with them and this will be looked into
	In the West Nile region, there is hesitance of men including women in land registration documents	There will be continuous sensitization of communities on the importance of family cohesion and importance of joint family property registration and ownership
	High bride prices are responsible for women being excluded and this should be looked into	Need for continuous community sensitization
Ministry of Lands Housing and Urban Development (MLHUD)	In terms of natural resources in the areas we are undertaking registration of land, how have we been handling issues of registration? What is the experience on the ground?	One of the things the Ministry has done is that, it has developed a policy on integrating gender into land registration
MLHUD Consultant Land Officer Agago/MLHUD	- One issue that might arise in dry season is that wetlands usually dry up and if the exercise is carried out in this season, then these areas might be claimed and registered by some individuals	Noted. Recommendations will be given to see to it that the exercises are carried out both during dry and wet seasons.
	In Acholi region, the men are considered household heads, so the women will have to consult the men on any land issues even if they are widows.	For polygamous families, we encourage them to register all the women. This is because in polygamous marriages, land is pre-divided, every woman is given land to cultivate so as to take care of her children so in this same way, they should all be registered. Each woman can be registered on the land that she cultivates on There is need for mindset changing. Ministry has developed a policy on integrating gender into land registration.
	Most customary laws are not documented and interpretation is based on the different	Need to standardize as well as document customary laws to avoid

Stakeholder	Issues/Concerns	Response/Action Plan
	individuals and most of which is biased towards women ownership of property	alterations and biases that usually causes conflict
	Some people have never taken interest in knowing or demarcating their boundaries, they are contented by the fact that they own land; these should be reminded to register their land	Noted. There is need for mindset changing through sensitization for people to take interest in demarcating boundaries and register their lands.
Uganda Community Based Association for Women and Children Welfare (UCOBAC)	In Butaleja district, there is an issue of legalization of marriages. In most cases, you find that some couples have lived together for long periods of time, produced children but have never legalized their marriages and this usually becomes a challenge when it comes to joint registration of property	There is need for mindset changing through sensitization.
	In some instances, men have fear for what their wives (women) might do with their land after they die, they fear that they might remarry and their property is given away.	There is need for mindset changing through sensitization.
	Women are usually left out and those that attend meetings are timid and do not speak out	Need to bridge the gender gap by including women to participate in the project at all stages of the project cycle to avoid women exclusion and disadvantaging them further
	Clan and cultural leaders really undermine women the reason most women do not own land and property.	There is need for mindset changing through sensitization.
	Disputes on wetlands owners because of the misconception people have that they own them.	We usually sensitize communities that government holds these resources in trust for the people.
GIZ	The capacity of some of these leaders at the sub county might not be adequate especially in the new districts might be a challenge	Need to build capacity of LGs in handling land related matters
	A policy should be put in place to address the issues of post transactions	Noted
Transparency International Uganda	Transparency International: we run a project that looks at the realization of people's rights through identifying red flags in the land tenure system in Uganda. Customary land was one of them where issues of corruption were identified for instance, connivance between individuals with interest in a particular land with investors against some community people.	Sensitization of citizens so that they can fully participate Information disclosure issues, lets mainstream these issues.
	Limited access to information in land related issues is a form of corruption	There should be a deliberate effort to engage all stakeholders as this creates

Stakeholder	Issues/Concerns	Response/Action Plan
		ownership of the project and participation. The better sensitization we have, the better implementation
	In terms of gender, when you bring men and women together, women will not contribute to the dialogue. Most decisions made on land are made by men and they do not favor women.	We separate women and men to get views of women.
MLHUD CEDP Project Implementation Team	We may not go to all the 32 districts for this initial visit but we will have regional representation and the stakeholder engagements are going to be a continuous process throughout the project cycle. The initial districts with regional representation will be; West Nile region – Zombo, Northern region - Amuru, Eastern region – Kibuku and Western region – Ntoroko. These have been carefully chosen because of the land wrangles going on in these regions so as to ascertain the level of impact and establish mitigation measures in advance	Noted
	There is a big challenge when it comes to reaching out to the ethnic minorities mainly due to transport related challenges and most of them are located in hard to reach areas yet they are grappling with many social issues. It would be good to reach out to them.	The project has considerations for VMGs and so this will be looked into
	Culture and information disclosure, there is difficulty in accessing information. It takes long for the people to buy into the project especially on issues to do with land.	Need for continuous sensitization Sometimes, one has to go through/perform some of the rituals within those conservative communities in order to be admitted for instance, drinking animal blood.
	There is a challenge in accessing PWDs; these are hidden in the community	Special measures will be put in place to ensure PWDs are accessed and participate in the project
	Women too are hard to reach because they are taken up with home chores and other responsibilities	Sometimes it important to consult women a lone because sometimes when you consult them with their spouses, they just agree with what their spouses will say in public There is need for a lot of sensitizations

Stakeholder	Issues/Concerns	Response/Action Plan
		for them to attend meetings and benefit from them.
	Grievances are many and are usually social, environmental and legal related. The legal related grievances usually take a long time to be solved. In one month, you can only address four (4) grievances. Some examples of legal grievances include wrongful registration of names, issues of boundaries etc the timelines for conclusion differ from case to case.	There is need to expedite the handling of these grievances. A grievance redress mechanism will be established at district, sub-county and community levels and also accelerated to courts of law.
	In districts, one of the biggest challenges is lack of documentation and this complicates work	We have a procedural manual for the district and the training manual on grievance handling There is also statistics documented on cases resolved, we try to handle these and especially at family level
	Political leaders are sometimes the biggest causes of trouble for instance Members of Parliament (MPs) for Amuru district, might politicize things making life hard for us to implement the project simply because the issues of land grabbing is still a very sensitive issue in the area	The EUFLA project will follow both Uganda laws and World Bank guidelines. The project will be closely monitored to ensure compliance. There will be monthly and quarterly reporting to the Bank on progress of the project.
	Knowledge of cultures is very important prior to the stakeholder engagements	Noted. Cultural leaders and institutions are part of the stakeholders to be engaged.
	New districts have been created - detailed consultations and sensitization is needed.	A detailed stakeholder engagement plan will be developed to help guide on which stakeholders to engage including newly established districts created districts. Prior and well-informed consultations will be carried out to all stakeholders throughout project implementation. We also choose to hold meetings in the nearby parishes to the conflicting parties to prevent violence and confrontation. This is because we have previously had some of our team members seriously wounded and most of these were as a result of politicizing issues. We usually pack and go away when things are very critical but we ensure there is continuous sensitization.

Stakeholder	Issues/Concerns	Response/Action Plan
	Need to translate messages to local languages	Noted
	Some communities' for instance the Karimojong come to meetings while naked.	The is noted and the consultation or implementing teams shall have to be informed about the culture of the Karamojong. That is to manage and control their emotions.
	Find out in every community people who matter and who people listen to i.e. opinion leaders and consult with them.	As part of stakeholder engagements, all key stakeholders such as local leaders, elderly, cultural and religious leaders are always included and involved. And for this project, these are included as part of the SEP that has been developed.
	In some places like Karamoja, land is passed on to the boys through their mothers' since the Karimojong are polygamous i.e., this is important to note because most of the people who come and sit in meetings to deliberate on issues of land will be men but the ones with the decision making power on land are the women who are usually at home and rarely attend meetings/consultations, so it is very important to consult with the women.	This is Noted. More detailed consultations will be done and recommendations will be made to ensure that women are included through FGDs.
United Nations Capital Development Fund (UNCDF)	This is a scale up of the project and there are many things that need to be looked into for instance the issue of subsequent transactions there is still need on how to work better.	Deliberate affirmative action for women to be included on land registration
	CCOs need to be structured and mainstreamed into the government system.	
	The aspect of traditional resolution courts should be strengthened so as to reduce the burden on the courts of law that usually have to deal with big number of cases	
	We have done model registries and are piloting them in Maracha district, Agago and Aparc districts however, these have gaps we realized that these have gaps and we need to remodel these issues	
	There is a very big gap when it comes to land registration between women and men, in Maracha district, the gap stands at 26% Vs 74% of men who have registered land. Initially when we were just starting our program here, there were no women at all	

Stakeholder	Issues/Concerns	Response/Action Plan
District Community Development Officer (DCDO) – Zombo District	Our land tenure is customary and thus, land is hereditary. Land is inherited through the male lineage from grandfather to son and passed on to the grandsons. Roughly 90% of the land is customary even for the few people who have acquired land (bought) recently, it's not yet registered	Noted
	Land in Zombo District is very fertile for agriculture however; the same land is also highly fragmented as a result of very high population, every HH has an average of 6 children and the community is highly polygamous in nature with most men having an average of 3 wives each with each of them having about 6 children others even have up to 10 children consequently resulting into the several land conflicts amongst wives, children and other family members.	There is increased need for mindset change on good practices on utilization of land through continuous sensitization
	Marginalization of women and girl children in terms of access and control of land is very evident because land is passed on through the male lineage; It is therefore male controlled despite the fact that women are the major HH providers of food and basic needs. Men rarely provide for the family and most of them have resorted to over consumption of alcohol. However, the same land is limited due to the high population number.	There is need to bring women to the center of production since they are the ones that till the land to provide for the HH. In addition to mindset change on the importance of women inclusion
	Commercialization of land has increased, land is being sold, moreover cheaply. Land as a social commodity turned economic /commercial has brought about many conflicts since most people buy to sale and make profit.	Noted
	Customary land is being sold by one or two conniving family member without the knowledge of the rest of the family members. Consequently, buyers usually get resistance at the time of trying to develop the land	Need to involve all family members in land transactions as well as community leaders to avoid conflict
	Some pieces of land are communally owned under clan leadership and management, these are jointly used by the community examples are community grazing land and it is held in trust for the people by the by the clan leadership.	Noted
	Although chiefdoms and kingdoms are	Need to further engage the cultural

Stakeholder	Issues/Concerns	Response/Action Plan
	<p>meant to hold land in trust for the people, they now also own land. This has brought a lot of problems when the kingdoms start claiming for land, it is viewed as mainly grabbing land which they own in trust for the people thus abusing their responsibility.</p> <p>People usually go to the courts of law to seek legal redress</p>	leaders on their role, mandate and responsibility to the masses
	Land on which most schools, churches and hospitals are found were taken away from the people by the colonialists through their allies the local chiefs, however, some locals have started to claim these lands.	Need to encourage all government institutions to acquire titles of ownership as evidence of ownership for instance documentation through registration of land
	There is a lot of encroachment on forest reserves planted by government as well as natural reserves under the NFA. The community suspects the NFA workers to be the ones cutting down these trees so they do the same thing, cut down trees and sell.	We are involving government institutions in charge of UWA and NFA to ensure issues of protection are taken care of
	Most of the government forests are deforested and government has failed in its management and oversight role, they cannot even re-forestate.	We are involving government institutions in charge of UWA and NFA to ensure issues of protection are taken care of
District Community Development Officer (DCDO) – Zombo District	In relation to VMGs, it is common people grab from the orphans.	Need for detailed consultation and sensitization on the rights of the orphans and the need to support PWDs
	Access and utilization of land for PWDs is a challenge, they grapple with inferiority complex issues consequently, and they turn to begging most times.	Need for detailed consultation and sensitization and ensure that PWDs are involved and their needs are taken care of
	Religious sects especially the emerging ones might raise issues to discourage the communities not to participate and this is an opportunistic act for their own selfish interest which they can exploit.	Need for detailed consultation and sensitization
	We also have land previously owned by missionaries (Comboni missionaries), these church lands were given to the missionaries by the elders long ago however, and locals have started claiming for it for instance, in WARR Sub County, there is a conflict between an individual and the church	Need to encourage all religious institution, hospitals and schools to acquire titles of ownership in a genuine manner as evidence of ownership for instance documentation through registration of land to a void suspicion and mistrust from the community
PIMER Colleens - Senior Probation and Social	Land is the most valued resource in Zombo district and much of it is customarily owned and it is fragmented as a result of over	Noted. The process of customary land registration will improve the value of the land and ensure security of tenure

Stakeholder	Issues/Concerns	Response/Action Plan
Welfare Officer (SPSWO)	population	in Zombo district
	The hilly tertian of this place may not permit mechanized as well as commercial agriculture	Noted
	Women have access but not control over land because the Alur culture has it that land belongs to the boy child and the men	This program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the good of all family members in each family in regards to land access and management is concerned. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period
	It is worse for widows, upon death of her husband; she is always chased away by the man's relatives	The project will support all the vulnerable including widows to ensure that they are not marginalized further by this project. the project has good intensions for both men and women, ensuring security of their land through land registration while involving both men and women
	The situation is worse for barren women and those that have given birth to only girl children – this hampers ownership because inheritance is through the male lineage	There is need for change of attitude and perceptions of the people through continued sensitization during implementation phase
	People think that land is now the only source of wealth and want to sell the land	There is need for community sensitization on alternative sources of livelihood and earning as opposed to selling off of land
	In the magistrate's office, most of the cases are land related – people no longer want to dialogue	Noted, Grievance Redress Committees (GRCs) at village level will be formed to help address any grievances arising from this project. In addition, sensitization and empowerment of community leadership structures on conflict resolution will be enhanced
	We have not popularized the land act in the Management of land	There is need to popularize the land act across all the selected 32 districts implementing this program so as to reduce on the land conflicts
	We tend to focus on women in our meetings yet the men wield a lot of power thus, need for male inclusion in all our sensitization programs	There is need for a deliberate inclusion of men in all community based activities that impact women and the family at large through sensitization programs in order to bring women onboard as well as empower them in many ways

Stakeholder	Issues/Concerns	Response/Action Plan
	Conflict of interest from cultural institutions who make biased decisions and rulings in favor of some individuals which have sometimes caused fights and even death for instance, some houses have previously been burnt in our community during the night when families were asleep and led to loss of lives	Noted, cultural leader will be consulted and sensitized about the proposed project as a way of mitigating any conflicts
	We usually involve security in such instance of conflict especially the office of the Resident District Commissioner (RDC)	Noted
	The cost of titling land is very costly and communities cannot afford – need to cut costs of registration	This project is going to be funded by World Bank through a grant from European Union (EU) and its main purposes is to support communities with customary and free hold land tenure to get their land registered
	Work with CSOs like ACTION AID to create mass awareness	Noted
Women from Zombo Town Council	Limited land for agricultural cultivation due to over population. Most families have eight children and so we end up hiring other people's gardens for cultivate	Noted
	In our traditional culture, women do not own or inherit land	This program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the good of all family members in each family in regards to land access and management is concerned. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period
	A few women have been able to buy pieces of land but they cannot afford the cost of titling it because it is very expensive	The Project's main purpose is to support communities with customary and free hold land tenure to get their land registered. Women as well as VMGs who include PWDS will be given adequate support to ensure they benefit from the project
	There is a lot of fear amongst women of "if our fathers die, uncles and relatives will push us out of the land". Thus, we have to rent. houses because we cannot construct on our fathers land	Noted. There is need for change of attitude and perceptions of the people through continued sensitization during implementation phase.
	When your husband dies, the women is pushed out, becomes homeless and she has to go back to her parents home with	There is need for change of attitude and perceptions of the people through continued sensitization during

Stakeholder	Issues/Concerns	Response/Action Plan
	children where she is also faced with resistance and segregation.	implementation phase.
	Most widows and divorcees end up in the trading centers because they are not accepted back home, women have no land	Noted: there is a need for a deliberate move by the district technical offices in charge of community and family affairs to sensitize the masses especially the male species on the importance of supporting women in land access and control since women are the major HH providers of food and basic needs
	For the few women who buy land, even their children face challenges upon their death, most relatives chase the diseased children away thus, women are disadvantaged both at their place of birth and marital homes, they face segregation.	Noted, there is need for sensitization
	Your own brother can kill you with a machete over land - Government should consider girls in the inheritance law because girls are so disadvantaged.	Noted. There is need to popularize the land act
	Land is one of the biggest curses for women, you cannot inherit land even when you buy, it will be grabbed from your children	There is need for a deliberate inclusion of men in all community based activities that impact women and the family at large through sensitization programs in order to bring women onboard as well as empower them. The PIU will liaise with the CDO's to sensitize communities against negative cultural practices and norms
	There are many broken marriages and we have nowhere to go when marriages break. So we have to fend for our children, we start hawking and selling things on the streets	Noted There is project will have continuous sensitization to unlearn negative attitudes, perceptions as well as negative practices against women
	Women cannot afford process land titles because it is very expensive, so one can buy land and it resorts to someone else especially the men who can afford and process the title	The project will support all the vulnerable groups including women, widows to ensure that they are not marginalized further by this project. the project has good intensions for both men and women, ensuring security of their land through land registration while involving both men and women
	Some of our brothers sell land just to drink alcohol and this has caused a lot of conflicts, homelessness and even death as most drunk people have often taken match sticks and lit grass thatched houses of their sisters or sisters' in-law. Women have died with their	There will be sensitization of the community and most of these issues will be handled

Stakeholder	Issues/Concerns	Response/Action Plan
	children in this way.	
	Alcoholism is very rampant in Zombo.	It was recommended that Mondays are not good day to hold meetings in Zombo Municipality, this is because, discos and market days are held on Sundays and thus, people will still be having hangover
District Councilor Zombo Town Council and Chairperson for Production and Natural resources	Land grabbing is very rampant. Land is inherited following the male lineage however, because families have grown, most relatives grab from each other.	A grievance redress committee will be established during the implementation phase to hand all the land related grievances.
	Sometimes, programs like roads construction grab land from locals, they ask people to hand over their land and will be compensated later but hey end up not compensating	Noted, the Project has good intentions and its aim is not to grab land but to empower community to protect their land security through registration of customary land so that they can obtain certificates of ownership.
	In Alur, land belongs to the men and this disadvantages women with development ideas who want to develop land to earn an income.	Noted, Women will be supported and included in the whole process
	Government is currently sensitizing communities to give land to women and girls	Noted
	PWDs have access to land.	Noted
	Important to cater for and support women in land registration because they are also human	Noted, this project intends to support women throughout the process of land registration till the conclusion of the project life. There will be a lot of sensitization to ensure the process goes on smoothly.
	Land registration is not common in this area because people are not sensitized coupled with the fear that land registration is very expensive	Noted, all people who own land under customary ownership will be encouraged to register their land in the next four years and the Project will support the process financially during the land registration exercise
	Multiple sale of land is very rampant one person resale's the same piece of land to several people consequently causing conflict	There is need for community sensitization so as to reduce these types of conflicts
	Local Councils (LCs) leaders are one of the people who confuse the buyers and cause fraud. They partner with the owners of the land to defraud unsuspecting buyers.	Noted, need for continued sensitization of the local leaders as well as the communities to get rid of negative vices like fraud and theft.
Technical Leaders of Kango Sub county, Zombo district;	Land registration is difficult here for instance, we want to get a tile for our seed	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
Sub County Chief (SAS) and Community Development Officer(CDO) of Knago Sub-county - Zombo district	school (Kango Seed Secondary School) but the process is too tasking This intervention is very timely for us.	
	In our communities, legislation of land is not a priority simply because they know, the land is customarily owned and thus, it belongs to them.	Noted, however, in case of any grievances related to land, GMCs will be set up to manage them to avoid escalation of issues.
	Land acquisition is not compulsory so the community is not bothered	Noted. However, this process is for the benefit of all the community who have long lived without registration of their land. This process helps secured the land through registration and acquisition of certificates of ownership in their names. This will also reduce on the rampant conflicts
	Some community members are beginning to challenge churches, schools and hospitals to bring back their land that was given freely by their fore father ages ago	Noted. This will be addressed during sensitization meetings. There is also need to popularize the land act among the community
	Traditionally, most people think that women do not own land, and that they can only access it through a male custodian and when he passes away, women are sent away from the land	This program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the for the good of all family members in each family in relation to land access and ownership. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period
	Men think that women marry a way and it's in their marital homes that they should get land	Need for sensitization to curb negative perceptions, attitudes and norms that have for long disadvantaged women in favor of men consequently relegating women to the periphery. Discussions on equity will be flagged off considering that women are the ones who till the land to provide for their families basic needs livelihoods
	For women, the only security for you to own land after your husband is diseased is to have a male child, less of that, you are sent away	Noted, there is need for detailed consultations and sensitization of communities
	For women who have land, they are quick to sell it to avoid land grabbing by their brothers	Noted, this will not be so after most people have received their title deeds women inclusive. This will cushion them and give them protection from land grabbers because the land will be

Stakeholder	Issues/Concerns	Response/Action Plan
		registered in their names
	Most women have no courage to consult on land matters at the sub county because they also believe that, culture is right and they have no land	Noted, there is need for detailed consultations and sensitization of communities and women especially since they have faced exclusion and marginalization for a long time
	Mondays is not a good day to hold meetings in Zombo Municipality, this is because, discos and market days are held on Sundays and thus, people will still be having hangover	Noted
	Most locals do not believe that the forest reserves belong to NFA, they believe that it's for the community thus, they need sensitization	Noted, the government holds the nations reserves and all the protected areas in trust on behalf of the population. There will community sensitization on this
Community consultation/dialogue with men, women and youth Kango Community villages of Mbale, Tongu and Pakwala	Will we have to pay money to get these documents?	No you do not have to pay money; EU through the WBG has provided a grant to support communities to carry out this exercise Most of the fees will be taken care of by the Project, however, the beneficiaries will have to cooperate and provide the necessary requirement like identification documents and you might require to do some photocopying of these documents.
	I surely appreciate this program, when my father died, the elders subdivided our land and I have my own share now so I need a land title to iron out some small land wrangles	Noted, in addition, communities will be sensitized to fully understand and appreciate the benefits of this project
	I appreciate the project because part of our land was grabbed, had we the documents then, then this couldn't have happened	Noted
	When is this project starting?	We are currently in the preparatory stage for the development of the Environment and Social safeguards instruments after which, based on our report, after which, MLHUD will communicate to each district and communities, when they will be consulted
	Our father left land for the 10 of us (brothers) so I think that the 10 of us should sit down and agree how our title should be given to us, whether as a family or as	Noted, family cohesion is very important in this process, as families will make decisions to benefit each member of the HH. This will reduce on

Stakeholder	Issues/Concerns	Response/Action Plan
	individuals	the number of grievances between family members and between community members at large
	This projects comes timely because of the many land wrangles	Noted
	Need for further and continuous sensitization on this project	Noted
	The timing for this meeting is not good, most people by this time (afternoon) are already drunk, we should hold meetings in the mornings	Meetings should be held in the mornings
	When will this project start?	This stage is for preparation of the Social and Environmental systems/frameworks for guiding this project till 30 th June 2022, after that, MLHUD will communicate the dates for each community to be communicated and reached out to and the actual implementation plan for all the 32 districts
	I grew up in my mother's home, our father had deserted us for a long time and when he returned, he never gave us land so we are worried that we may not benefit when the process of land registration starts	Noted, both men and women will be sensitized to reduce on these kinds of tension
	Very few families consider girls while distributing land, such a family is ours, we have 3 sisters but we have allocated each of them land and we will support them to get land titles.	Noted
CAO Senior Land Management Officer – kibuku district	We are very great full for this program and it is very welcome to our district	Noted
	However, the issue of timing is key and should be put into consideration; we are closing the financial year by Friday 24 th , 2022. All the heads of departments are engaged because they are part of the payment system so they have to conclude with the end of the financial year activities thus, some of them may not be able to be part of this engagement exercise	Noted
Women Of Kibuku Town Council, Kibuku Ward, Kibuku District	When is this project starting? And what are the funding modalities? We have to know because if the money has to come to us, we have to indicate it in the system otherwise; we will not be able to spend it.	This stage is for preparation of the Social and Environmental systems/frameworks for guiding this project till 30 th June 2022, after that, MLHUD will communicate the dates for each district and communities to be communicated and reached out to and

Stakeholder	Issues/Concerns	Response/Action Plan
		the actual implementation plan for all the 32 districts
	<p>We have limited land yet many children consequently, redistribution of land to the children is always a challenge as they need space for cultivation and construction of houses</p> <p>Women have no power and control over land, land is owned and controlled by the men</p>	Noted. This program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the for the good of all family members in each family. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period.
	We are 5 children 4 girls and 1 boy who is the last born but after our father passed a way, the elders made the last born by the heir to our family however, he now wants to chase us the girls out of the land, according to him, girls do not inherit land.	Noted, communities will be sensitized on gender related issues, negative culture that undermines and under looks women through negatives perceptions and norms. They will also be sensitized on the importance of women inclusion since they are the major HH providers of food and basic need which they do through tilling of the land.
	We are immigrants in addition, we are 'Balalo' (pastoralists) so this is not our original village, our father who bought land around here has passed away our close relatives want to chase us away from our fathers land.	Noted, need for continuous sensitization and dialogue, also GRCs will be established to handle any grievances arising from this project to prevent any escalation of grievances and conflict.
	Most people have limited space of land to cultivate due to over population.	Noted
	I am 78 years old and have 8 children with limited land to cultivate, can government assist me to acquire land to cultivate.	Government does not give land, what governments intend to do is to support those with customary land tenure ownership to secure their land through the titling process of their land.
	My husband has 4 wives and we all have many children, there is now limited land for cultivation consequently, we now have to rent land for cultivation, each garden goes for 20,000 shillings and above per season. Lately, the last two seasons have been bad with drought so we are suffering.	Noted
	In the past, our forefathers owned land and even the grand children knew where their land was, this has been so for many generations, so why is government coming up its policies of trying to register our land?	Government has good intentions for the people and it is only trying to support the community in securing their land so that all families and individuals have their land registered and documented in their names. This process is not by force however; all community members are encouraged

Stakeholder	Issues/Concerns	Response/Action Plan
		to participate so as to secure their land.
	I own the land, so when registration begins, and I want to subdivide the land for my children, what do I do?	Family cohesion is key, have a discussion with your family so that everyone knows the piece of land they have been allocated so that during registration, you will only have to verify that those are their pieces of land
	What if I want to lease my land, what do I do?	Leasing land after the land has been registered is much easier since it will be in your names, this process will reduce on cases of land grabbing.
	How long will this process take?	The land registration process will take a period of four years from the time it is approved. So people should take advantage of this period to get their land secured
	In which regions are you working in?	This project is spread across 32 districts mainly located in the North and Eastern parts of Uganda and a few in the Western part all of which are characterized by customary and freehold ownership tenure
Members Of SAALA Environment Management Association - Kibuku Town Council, Kibuku District	Why has World Bank together with the government come down to Kibuku district to help us register our land?	World Bank specifically has supported government over a long period of time and has supported communities in development projects which include among others, water, power, roads, agriculture etc. so this is not unique.
	Is this process by force or one has a choice to register their land?	This process is absolutely by choice, no one is going to be forced, however, every community member who owns customary land is encouraged to participate since the project is going to facilitate the costs of titling. Those who will miss the opportunity will do it on their own in future and at their personal cost
	Is it individual or group registration?	Families are encouraged to dialogue prior to the registration exercise and make informed choices whether they want to register as a group or as individuals. Family cohesion and joint decision making is important for such projects.
	If we register now, how long will it take for us to get the land title?	This information will be provided to the community by MLHUD once project implementation kicks off

Stakeholder	Issues/Concerns	Response/Action Plan
	We have a fear that the kind of land grabbing happening in central region might extend to our community after land registration.	This process is actually intended to reduce on the land grabbing by issuance of land documents to the bonafide owners
	Is this program already under law or its consultations?	It is still at design stage but it is governed by the existing land laws like the land act
	What are the requirements for registration?	One should be a customary land owner, their neighbors and local leaders should be able to verify if they are the true owners and they should have identification documents and perhaps purchase agreements
	What size of land can be registered?	All pieces of land big or small as long as in the category of customary and has never been formerly registered
	When government has its own intentions, it convinces us like this and later when we have given in, it becomes a problem.	Government has good intentions for the people, this program is meant to reduce land related wrangles and secure the land for them by titling it
	Will that money for land registration not be required to be refunded to the Bank in future?	It's a grant from the European Union (EU) through the World Bank Group (WBG), it is not a loan so it will not be refunded
	Previously, this region had kingdoms which latter disintegrated during President Iddi Amin's regime. These kingdoms included Toro kingdom, Rwenzori/Rwenzururu kingdom	Noted
	We have the mountainous area which is specifically for crop farmers	Noted
	The plains mainly located on the Western arm is mainly occupied by pastoral farmers and the game reserve	Noted
	Settlements are special, the Batuku tribes are the dominant tribe and they are the cattle keeping tribe while the Batoro and Bakonzo are the minority tribes and mainly are crop farmers. The lake is the metropolitan since it attracts people from different places that include even the Alur of Uganda and those of Congo	Noted
	Because the Batuku are dominant, the reason to as why the district was named as Ntoroko	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
	There used to be a lot of poaching in the game reserve but government has put some enforcement that has bared people from poaching	Noted
	We are also bordered by River Semeliki and Lake Albert and fishing is the main economic activity here	Noted
	Land use: Ntoroko by 1985 was still communally owned however, some individuals wanted to take advantage and individualize land by creating ranches but this was resisted by the majority of people.	Noted
	Consequently, the district has since then transitioned into customary land ownership	Noted
	Communal land ownership ended in Ntoroko about 6 years ago and some people have titled their pieces of land to freehold tenure but most of it is customary	Noted
	Those who titled have since fenced off their land Most subsistence households are customary	Noted
	National Forestry Authority (NFA) also took over some parts of the land and has since gazette it	Noted
	NFA planted a lot of Pine trees but ended up conflicting with the community which wanted to use the same land for agriculture and grazing grounds. Consequently, as a response, the community frequently burnt the NFA trees which caused a lot of looses and in response, the game rangers also killed many people in return	Noted
	Pastoralism /grazing and keeping of animals (cows and goats) is the main economic activity and crop farming is secondary	Noted
	There are many land wrangles since some people who wanted to grab land registered fake titles. They have the titles, but the people have the land. They have failed to chase away the people.	Noted. This will be verified by the MLHUD
	Many people came to scrambling for land and registering it after they realized that there were minerals discovered in Ntoroko for instance the Gypsum being mined and many others	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
	Pastoralists also encroach on the river banks and the lake shows as well as in most protected areas consequently destroying the eco system. There is therefore need for especially NEMA to protect these areas	Noted
	Some time back, River semeliki and Lake Albert settlers were requesting government to give them space for burial space since most of them are immigrants from Congo and therefore have no burial land	
	The people at the lake are managed by National Environment Management Authority (NEMA) and these do not have many outstanding land wrangles. These fishermen normally want to be close to the water. NEMA cares about the Banks of the lake	Noted
	Gender, land Access and user rights: These communities are patriarchal in nature so the men own and control the land while women are sidelined since they are married away to other communities	Noted
	However, now days, we have rich women who own land and cattle but this is a very small percentage	Noted
	Because of the land demarcations coming up, the population of cows is being affected because of the rampant putting up of fences by the community	Noted
	We have streams and the lake which has dry banks however; famers graze and take their animals to the water zones. In addition, swamps are also not protected and gazette.	Noted
	People have fenced off up to the swamps and up to the river banks.	Noted
	The district should have a role in protecting the wetlands, lake and river; they should play the role of NEMA at the district on ground	Noted
	There are interventions through NGOs that are trying to protect the river banks through sensitization Poor management of river banks is a major issue	Noted
	River banks were fence but communities	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
	destroyed in order to access water for their animals	
	Traps for water/deep wells have been erected for the animals to avoid destruction of the river banks	Noted
	CAO – How are conflicts on land resolved since land is communally owned?	<p>Many people now take cases to court if they fail to resolve amicably</p> <p>Most of the cases are as a result of access denial to places/ land resulting from rampant fencing</p> <p>Local leaders usually try to resolve but if it fails, they usually go to court</p> <p>Similarly, cases of animals eating up people crops are many since the majority of the people living in the plains initially were pastoralists but they have been joined by the crop farmers. Consequently, most of the crop farmers lose cases because the cattle farmers are rich and have money to sustain a case for long periods of time unlike crop farmers who are poor</p> <p>Initially, NFA used to allow crop farmers to grow crops within the forest reserve but they were stopped then the communities started burning trees. Now NFA has changed its approach, the ask people to come and grow trees so that they can be harvested at the sometimes by both parties</p> <p>Community members are also encouraged to do eco tourism</p>
	Community members poisoned all the lions because when there was drought, lions descended on their animals consequently, most lions were killed	Noted
	There is also an issue of human life/wildlife conflict	Now Uganda Wildlife Authority (UWA) gives communities bee hives so that farmers get honey but at the same time, bees chase away elephants from crops and animals. This is done at the boundaries of the national reserves
	Someone processed a land title from the lands office and came and started planting a fence over big chunks of land however, the community chased him away, he has the land title but the land has been taken away	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
	from him because it was a ghost title	
	We welcome the process and we will participate and support the project	
	Where are they going to register us from, we have an issue of distance between the villages and the sub counties	This information will be disclosed by the MLHUD at the onset of implementation
	Parish chief: land registration in our area has been a demand and we welcome this project and will support you	Noted
	During the construction of Fort-portal Bundibujo road, people were compensated little simply because the land was not registered so the valuation process undervalued the MAMIA road project	Noted
Women Of Ntoroko District	The wife to the late Mr. Vincent is claiming for the whole of Kibuku district that it belonged to her late husband and that she has a land title for it. We had a very big security meeting in which the Resident District Commissioner (RDC) was invited.	Noted
	Most men buy land but they do not include their wives in the purchase agreements as co-owners	Noted. Inclusion of women is part of this project. All the women who own land will be encouraged and supported to register and married couples will be sensitized and encouraged to include women in this process. In addition, this program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the good of all family members in each family. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period
	We have no access roads because people are fencing all the land even at the town councils, not even space for a foot path is spared	Noted
	We have pastoralists and food crop farmers however; animals destroy the food crops but the pastoralists bribe their way out and they are left	Noted
	If one has no money, they cannot take the case to the authorities, food can never be compensated yet both farmers are working so as to get income and food for their	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
	families	
	Need to establish a buffer zone where animals pass and end	Noted
	Most agricultural officers are men and they over under look women; they do not consider our issues we suggest that governments recruit a female agricultural officer to attend to our issues	Noted The project will ensure that women are given all the support they need to access and benefit from this program. It will also put in place GRMs to address all conflicts arise from the project so as to minimize any social and environmental impacts that might impact on the population
	If we can handle the issue of animals eating our crops first is very important	This is noted
	Secondly, we are thankful to EU and World Bank for recognizing and consulting us women, this gives us trust and hope and it empowers us too	Noted. Adequate supported will be provided for women to ensure that you participate and that you are not left out.
	It is important to have a land title because without it, anyone can claim your land	Noted This will also reduce conflicts on land grabbing because peoples land will be secured
	Is it Government that has sent you or just World Bank and EU?	We are here on behalf of Government, World bank and EU. EU offered a grant to the government of Uganda through the World bank to increase security of land rights and strengthen local land administration and management of land.
	We have plots of land that vary in sizes, as you come to give titles are you only giving those with big pieces of land or even some of us with smaller pieces of land?	All pieces of land big or small as long as it is in the category of customary and has never been formerly registered
CSO representative	The project is long overdue and its roll out is going to help resolve land wrangles, and land grabbing within the local communities in the selected project areas.	Noted
	If demarcation of a land parcel is done and a property/structure is affected, how will this be resolved?	The project envisages very minimal impact properties and structures. However, where is applies, cash compensation for affected land/structure based on market value will be awarded in line with national laws and World Bank ESF standards

Stakeholder	Issues/Concerns	Response/Action Plan
		specifically ESS5. The compensation will be fair, adequate and promptly paid to the respective affected person.
	There is need to strengthen the capacity of the district land offices in the region to ensure that they're able to handle land related matters expeditiously.	One of the objectives of this project is to prepare tools and guidelines for SLAAC activities in the areas of predominantly customary ownership and build capacities within institutions in charge to conduct the participatory demarcation and mapping.
Deputy Administrative Zombo district	Chief Officer- This project has come timely and if well implemented it will go a long way in resolving land conflicts in the selected areas where there is customary and communal land ownership.	Noted
	The planned training targeting different stakeholders will indeed help to build capacity of communities in conflict resolution and awareness raising. With the increasing population, there is a lot of pressure on land and therefore the project will also need to conduct awareness raising in the communities where the project is going to be implemented.	The project is developing a Stakeholder engagement framework which underpins the strategies that will guide the consultations and sensitization of relevant stakeholders in an extensive, meaningful and proportionate manner. This will serve to ensure, that all stakeholders are on boarded for successful project implementation
	This project will positively impact on the Parish Development model since it will help increase land rights in communities that use it as a factor of production.	Noted
	The project will also increase the awareness about the land rights of women/widows/children in the communities, safeguarding their interests regarding access and ownership of land.	The project intends to support gender equity in land registration. Civil society engagement and communication strategies will be developed aiming at enhancing public participation, including dedicated outreach and sessions for women and transparency in the whole exercise of documenting land rights.
	The project needs to lay emphasis of communal land ownership and special attention needs to be paid to the individuals that will be registered on communal land as it can be a source of a lot of conflicts.	This project will involve adjudication, demarcation and registration of the land parcels under ownership and historical use by the communities represented by the CLAs and individually owned parcels situated in the same selected Project areas. This will be augmented with a RaPPA which will be undertaken in a respective area to develop the qualitative understanding of the situation.

Stakeholder	Issues/Concerns	Response/Action Plan
District Natural Resources Officer-Zombo	There is a lot of conflict on protected areas as many people have encroached on them and as such their boundaries have been lost.	Through the RaPPA , there is going to be triangulation and on spot analysis in order to come up with systematic land use plans that will enhance orderly settlement and optimal utilization of land as well as provision of social services and protection of Natural resources from being encroached on. Similarly, the project will not support land registration activities in forest or other protected areas (gazetted under the National laws)
	Processing of land titles is a very tedious process; is there a way this process can be streamlined and be taken to the grassroots level?	The aim of the project is to ensure that members of the community are well served and will strive to increase dedicated outreaches to onboard communities in the process of land registration. Plan are also underway to ensure that SLAAC implementation strategy is modified moving forward to scale-up capacity of fieldwork and leverage performance-based contracting to enable multiple service providers to work in parallel in different geographical areas
	Can this project help to ensure that titling of land is more affordable by the poor and vulnerable groups?	Exactly, that's the aim of this project, to sport the poor and VMG as well as all identified communities to register their land at minimal costs
	There is willingness to register land and the communities are positive and therefore the project will experience limited resistance save for places that have existing land wrangles.	Noted
	What is the smallest area that can be titled?	All persons with customary land ownership in the selected districts will be given the opportunity to register their land irrespective of the size of the land
Prime Minister of Alur Kingdom-Zombo	There are many advantages of having customary land title as it provides documentary evidence of ownership of land rights under customary land tenure. It also helps to increase security of land rights and strengthen land administration and management systems.	Noted
	Customary tenure system is secure since is difficult to sell and more importantly protects the interests of people who in	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
	many cases depend on natural resources for their basic livelihoods.	
	As away of sensitizing the communities, the Kingdom Prime Minister is going to formulate task committees to follow up on this issue and help in future project implementation activities. The Alur King is going to be updated on this matter and once the issue is absorbed at that level, then on boarding communities will be made easier.	Noted, the project also plans to conduct sensitizations of the communities and landowners before ,during and after implementation of the project.
	The project will need to work with cultural institutions to ensure that sensitization of communities becomes easier. This will also help to empower communities about their rights on land especially the women.	Noted. The technical teams will work together with the cultural leaders to conduct sensitization programs in the selected sub regions at sub-county, parish and village levels
	Project will need to pay special attention to the peculiar land management and administrations systems of the different geographical locations for example systems in Arua and Zombo differ as well as those from the West differ from the Eastern region.	Noted. Noted, reconnaissance will be made to fully understand the land management and administrations systems of the different geographical locations
	The issue of land wrangles and lack of tenure security has implications on government initiatives such the PDM since land as a factor of production is threatened.	Noted
	This project activities especially the demarcation of land, could also potentially trigger land wrangles and also exacerbate the already existing conflicts and such issues related to demarcation of parcels should be carefully managed.	Reconnaissance, mobilization from the district to lower government levels up to the target beneficiaries, training of adjudication teams, systematic adjudication, demarcation, mapping and recordation, and issuance of CCOs will done to ensure that the risk of exacerbating land conflicts is minimized during project implementation The land administration component of this project will support gender equity in land registration. Civil society engagement and communication strategies will be developed aiming at enhancing public participation, including dedicated outreach and sessions for women, and transparency in the whole exercise of documenting land rights. This operation will also support activities geared to reducing land disputes and to incentivizing joint titling and land titles for women in the

Stakeholder	Issues/Concerns	Response/Action Plan
		<p>respective project areas</p> <p>On the issue of gender mainstreaming - The project needs to ensure that they interrogate the socio-cultural dynamics of land access and ownership by widows and divorced women since they're socially ostracized in the communities and denied their right over land by family members especially when their husbands pass away.</p>
Fr Walter, Parish Priest, Zombo	There has been a lot on encroachment on land owned by religious institutions and therefore, there is need to engage and consult the different heads of the churches such as the Catholic church, Anglican church who are big land owners in project areas. There is also need to consult with the Episcopal conference and capture their views and input in relation to this project.	Noted, the project will continuously, extensively and meaningfully engagement all stakeholders to inform the procedure and process of land demarcation.
	The project should consider subsidizing the cost of registration and acquiring a Certificate of title.	From the previous pilot project under CEDP, during the life of the project, the World Bank supported the decentralization of the land sector to ensure that communities and the vulnerable people have access to land services at lower costs and this will be benchmarked to ensure that vulnerable groups on the Project benefit from the services.
Principal Assistant Secretary -Kibuku District	As the population grows land is going to become a scarce resource since it is fixed, therefore this project will potentially help to solve the challenges that emanate from this trend	Noted
	All land is under customary and most of it was acquired through inheritance, therefore, the project will need to work with local authorities and elders to identify who the rightful owners are.	Noted
	Most of the land parcels are very small owing to land fragmentation and therefore we need to know the smallest land parcel that can be registered and given a certificate of title	The MLHUD will clarify on this on the onset of implementation
Reverend Anglican Church	This project has come timely and if well implemented it will go a long way in	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
- Kibuku district	resolving land conflicts in the selected areas where there is customary and communal land ownership.	
	However, there are many lands related disputes in the community which might exacerbate the already existing tensions /conflicts. The project will need to be safeguarded from political interference and risks of elite capture	Need to keep away from politics
	There is a lot of pressure on land and therefore the project will also will need to conduct awareness raising in the communities where the project is going to be implemented.	The project is developing a Stakeholder engagement framework which underpins the strategies that will guide the consultations and sensitization of relevant stakeholders in an extensive, meaningful and proportionate manner. This will serve to ensure, that all stakeholders are onboarded for successful project implementation
	There has been a lot on encroachment on land owned by religious institutions and therefore, there is need to engage and consult the different heads of the churches such as the Catholic church, Anglican church who are big land owners in project areas. There is also need to consult with the Board of Trustees of the respective religious institutions and capture their views and input in relation to this project.	Noted, the project will continuously, extensively and meaningfully engagement all stakeholders to inform the procedure and process of land demarcation.
District Environment Officer, Kibuku	There is a lot of conflict on protected areas as many people have encroached on them and as such their boundaries have been lost especially in the low lands where people have resorted to growing rice.	Through the RaPPA , there is going to be triangulation and on spot analysis in order to come up with systematic land use plans that will enhance orderly settlement and optimal utilization of land as well as provision of social services and protection of Natural resources from being encroached on. Similarly, the project will not support land registration activities in forest or other protected areas (gazetted under the National laws)
	There is a recommended distance from the natural resources such as rivers, wetlands and therefore the project should be mindful of these boundaries that since been eroded because of human activity such as rice growing in Kibuku	Noted
	Can this project help to ensure that titling of land is more affordable by the poor and vulnerable groups, many women and	From the previous pilot project under CEDP, during the life of the project, the World Bank supported the

Stakeholder	Issues/Concerns	Response/Action Plan
	orphans are powerless when it comes to land access and ownership in Kibuku district?	decentralization of the land sector to ensure that communities and the vulnerable people have access to land services at lower costs and this will be benchmarked to ensure that vulnerable groups on the Project benefit from the services.
	There are widespread reports of land grabbing in the country and there the communities will need extensive consultations to mitigate the risk the resistance which is borne out of fear	Noted, the project plans to conduct massive sensitization to ensure that the communities and all other stakeholders have a full understanding of the project objectives before project commencement.
	What is the smallest area that can be titled; the parcels of land in this area are very small and might be very difficult to survey and issue certificates of title?	According to MoHLUD guidelines the smallest area that can be titled is 25.2mx30.45m (11.5 decimals). However, sometimes exceptions are made depending on the recommendations of the Areas land Committee and Physical Planning Committee of a given area
Mayor-Kibuku Town council	Land in Kibuku is entirely Customary and there are many advantages of having customary land title as it provides documentary evidence of ownership of land rights under customary land tenure. It also helps to increase security of land rights and strengthen land administration and management systems.	Noted
	Most of the existing land conflicts in the project are intra-family and will need to be resolved at a community and clan level	The project is developing a SEP which will facilitate a clear understanding among communities and an effective Grievance Redress Mechanism (GRM) put in place for aggrieved parties to channel their issues for an appropriate resolution.
	The project will need to work with cultural institutions to ensure that sensitization of communities becomes easier. This will also help to empower communities about their rights on land especially the women.	Noted. The technical teams will work together with the cultural leaders to conduct sensitization programs in the selected sub regions at sub-county, parish and village levels
	On the issue of gender mainstreaming -The project needs to ensure that they interrogate the socio-cultural dynamics of land access and ownership by widows, divorced and nulliparous women since they're socially ostracized in the communities and denied their right over	The land administration component of this project will support gender equity in land registration. Civil society engagement and communication strategies will be developed aiming at enhancing public participation, including dedicated outreach and

Stakeholder	Issues/Concerns	Response/Action Plan
	land by family members especially when their husbands pass away.	sessions for women and transparency in the whole exercise of documenting land rights. This operation will also support activities geared to reducing land disputes and to incentivizing joint titling and land titles for women in the respective project areas
	The project will need to strengthen the existing institutions to ensure that the project is successfully implemented	The project will ensure that it carries out a needs assessment to strengthen institutions and mechanisms to resolve land disputes.
LC5 -Chairperson -Ntoroko	Ntoroko is witnessing a lot of rising cases of illegal settlers on privately land and this issue will need to be addressed when the demarcation and registration of land commences to avoid land conflicts.	This is noted, the registration exercise will help to resolve some of these issues since it will involve, reconnaissance, mobilization from the district to lower government levels up to the target beneficiaries, training of adjudication teams, systematic adjudication, demarcation, mapping and recordation, before the issuance of CCOs is done.
	There is need to strengthen the land protection framework, training and capacitation of the existing Area Land Committees and District Land Board.	The project intends to develop an operational framework, build tools and capacities for implementation of land adjudication activities at local level, and also capacitate communities for use of the prepared tools and process to conduct participatory systematic adjudication process.
	There is Oil exploration in the area by Armour Energy Uganda, which is a subsidiary of Armour Energy Australia which has raised anxiety and speculation within the community about security of tenure.	Noted, sensitization and awareness creation of the targeted communities will be carried out to ensure ensure transparency and community participation.
	There is need to have religious co-opted in the process and activities of land adjudication	Noted
Elder Ntoroko district	Ntoroko district is a disaster prone area and therefore, land is a very scarce resource owing to occasional flash floods which displace households for example the recent increase in the water levels of lake Albert displaced about 20,000 people in the areas of Katanga, Kanara, Kacawampuma	Noted
	Communal land parcels where people previously used to migrate during periods of severe drought have since been fenced off by unknown people which is affecting the source of livelihood for the community	Noted

Stakeholder	Issues/Concerns	Response/Action Plan
	members since the majority are pastoralists.	
	There is also a very common practice, where some members of the community fence off communal roads and communally used natural resources such as water points, plans to demarcate these areas will definitely trigger conflict within the community.	Demarcating and registering individual and communal land are going to be done and this will involve adjudication, demarcation and registration of the land parcels under ownership and historical use by the communities represented by the CLAs and individually owned parcels situated in the same selected Project areas
	There is need to take the project to the grassroots level to ensure that there is stakeholder buy-in.	Noted, through sensitization and engagement with communities, political leaders and other relevant stakeholders, Demarcating and registering individual and communal land are going to be done and this will involve adjudication, demarcation and registration of the land parcels under ownership and historical use by the communities which will help solve some of these issues.
RDC Ntoroko district	There is need to protect family land and protects the interests of women on land during the registration process	Noted
	Vulnerable and poor people need to be protected from exploitation during land registration especially the women.	The Project will implement activities in a way to include vulnerable people of both genders. The proposed activities will build on national pilots and initiatives and global and regional good practices.
	The ministry needs to have a mediation framework of land related issues in the district and around the country to help resolve the ever-increasing cases of land conflicts.	Noted through on-going consultations the project will develop a good SEP which will facilitate a clear understanding among communities and an effective Grievance Redress Mechanism (GRM) put in place for aggrieved parties to channel their issues for an appropriate resolution.
	The project needs to capacitate the committees to the extent possible in terms of facilitation and logistical support to insulate them from the potential risk of bias by members of the community who might	

Stakeholder	Issues/Concerns	Response/Action Plan
	want to facilitate the process of land adjudication.	
	To the extent possible the project will provide the requisite resources to enable committees discharge their duties in the shortest time possible .	
	Government agencies such as NEMA and MWE have failed to enforce the law where issues related to land boundaries in protected areas are concerned.	National legislation on land registration, which currently excludes registration in areas designated as gazette /Government managed central and local forest reserves/wildlife conservation areas/protected areas and/or other ecologically sensitive areas will be enforced in this project to ensure that there is no further encroachment on these protected areas.
District Senior Lands Officer	There is need to demystify and explain to the people/communities the laws related to land ownership, security and rights for example the law of adverse possession	Noted, sensitization and awareness creation of the targeted communities will be carried out to ensure ensure transparency and community participation.
	There is need to have a Grievance Redress Mechanism for the project.	The project will put in place a Grievance Redress Mechanism (GRM) with a clear referral pathway for aggrieved parties to channel their issues for an appropriate resolution.
	There is need to take stock of the land use pattern of both the low land and highland of Ntoroko district and then make informed decisions about land demarcation and issuance of certificated of title. For example in Karugutu TC,Kibuku TC,Butangama and Kanara SC.	Through the RaPPA , there is going to be triangulation and on spot analysis in order to come up with systematic land use plans that will enhance orderly settlement and optimal utilization of land as well as provision of social services and protection of Natural resources from being encroached on. Similarly, the project will not support land registration activities in forest or other protected areas (gazetted under the National laws)
	The project needs to be cognizant of the issues of communal ownership and communal user rights. Similarly, demarcation and registration of communal land in the names of certain entities (personality) needs to be done after carefully assessing the registration status of these organizations	Noted

8 GRIEVANCE MANAGEMENT STRUCTURES/COMMITTEES

8.1 Introduction

ESS 10 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..

The objective of the grievance mechanism is to resolve and remedy complaints that may result from direct and indirect consequences of the 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 all complaints arising from the activities and implementation of the proposed Project as well as the losses and damages caused by technical/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/sensitized 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.

8.2 Anticipated Grievances

Anticipated grievances arising from the Project will entail those related to:

- Recent change of asset ownership;
- Names missed out of beneficiary register during registration;
- Encumbrances related to the process of land registration and formalization of ownership;
- Disputes over rightful ownership of land, including encumbrances such as squatters on land, poor record-keeping, non-availability of the necessary documents, etc.;
- Land boundary issues, including names missed out of RAP register;
- Delays in issuance of land titles;
- Cancellations of land titles;
- Challenges associated with middlemen/imposters/fraudsters;
- Family wrangles over land;
- Wrongly recorded personal or community details;
- Wrongly recorded assets including land details and/or affected land area or errors in land titles or CCOs;
- Crop or property damage;
- Occupation, health and safety issues;
- Sexual exploitation and abuse and gender-based violence (GBV) or violence against children (VAC);
- Dissatisfaction with outcomes of GRM processes; and
- Training and other special needs.

The Implementing Agency (MLHUD) will establish an effective GRM at the national, district, sub-county and community levels to ensure that the project-affected communities are availed the option of having their grievances outside the regular 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 Redress 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 final say on whether to seek redress from the judicial system

at any time. GBV and SEA cases will be handled through GBV referral pathways established by MLHUD and a GRM for PAPs will be established to deal with such incidences and grievances.

8.2.1 Prevention of grievances

The above grievances and any other issues that shall be experienced during the sub-project design and implementation can be solved proactively before they even become grievances. The implementing agencies should be aware and accept that grievances do occur, that dealing with them is part of the work, and that they should be considered in the project implementation work plan.

The following can be done by the project implementers to prevent grievances or handle them successfully:

- Provide sufficient and timely information to communities

Conduct meaningful community consultations

- Build capacity for project staff, particularly community facilitators and other field-level staff or Contractors (as well as the GRM committees)

8.3 Composition of the Grievance Redress Committee (GRC) Process

Local GRCs will be established at the parish, sub-county and district levels with offices at each level. A committee of 6 persons elected from four different categories shall comprise the following:

- i) A Representative from the implementing agency (MLHUD)/A Representative of the local community;
- ii) Grievance Officer or CDO;
- iii) A female Representative;
- iv) The Local Councilor 1 Chairperson/Representative;
- v) Chairperson/or Cultural Leader; and
- vi) VMG coordinator for locations having VMGs.

The Committee will be constituted through a participatory, transparent, democratic and gender sensitive electoral process where participants (stakeholders present/proposed beneficiaries) shall be nominated, seconded and shall be voted for to respective office positions. Since women are often underrepresented in public affairs and decision-making, emphasis will be put on the Committee including women in its executive/leadership positions, ideally with the same number of slots as men. The composition should apply to all the activities of the Project to ensure that all forms of grievances, including exclusion and inadequate delivery of trainings are addressed through a formal structure.

8.4 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.

8.4.1 Receipt of Grievances

Any community member from the affected communities can lodge a grievance or complaint verbally or in writing. Grievances will be logged with a designated Grievance Officer, an LC1 official, elected GRM members or a Project's Liaison Officer at the district and sub county levels by completing a written grievance registration form that will be available at designated sites at community (village or parish), sub county, district and national levels, particularly at Liaison Centres, district land offices, Project/MLHUD website(s), 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 Liaison 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, websites, e-mails, in-person, anonymous, suggestion box, among others.

All the grievances received be recorded by the Grievance Officer on the grievance registration form ([See Annex 6](#) of the ESMF) 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 organized in each project beneficiary areas at the time of ESIA, RAP, project briefs, VMGPs preparations, the Project Team (Social Safeguard, PIU) working together with the local leaders and 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 be advertised on billboards/posters in each district/sub-county offices, clearly visible to the public. Information material on GRM will also be made available at the information desks in districts/sub-counties covered by the project.

To ensure that all grievances are captured, the implementing agency (MLHUD) will explain how the grievances received by district GRC members may be channelled 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.

8.4.2 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 the reoccurrence of similar grievances. The status number and trends of grievances will be discussed during weekly E&S meetings during project implementation.

8.4.3 The Grievance Redress Committee Hearing Procedure

A local GRC will be established at village/parish, sub-county, 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 8.3](#) above.

The LC 1 official or Grievance Officer will act as secretary of the GRC and shall be responsible for creation, coordination, and documentation of grievances. 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.

8.4.4 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.).

8.4.5 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 PIU may "close" a grievance even if the complainant is not satisfied with the outcome.

8.4.6 Grievance Records and Documentation

MLHUD will nominate a GRM Focal Point who will be responsible for managing a grievance database for keeping the record of all grievances received. The database will contain the name of the individual or organization 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 Providers in their monthly monitoring reports will provide information on grievance management. Grievance monitoring and reporting will occur in quarterly, annual reports.

8.4.7 Monitoring of GRM

The Project GRM focal point will also be responsible for documenting (recording), logging the grievances received and addressed (both anonymous and non-anonymous), and reporting on a regular basis to the grievance committee members. To ensure that the identity of non-anonymous complainants is protected, grievance log books and reports should not include identifying information on individuals.

8.4.8 Disclosure of the 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 local languages in respective districts in a format that is understandable to all affected communities, stating the following information:

- i) Anyone can raise complaints, grievances, concerns, ask questions or make comments or suggestions related to the Project;
- ii) Anyone can contact the GRM focal point using the GRM focal point's contact details provided;
- iii) 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;
- iv) 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
- v) 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 endeavor to answer the complaint, grievance, concern, question, comment, suggestion and engage with the complainant 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 has been included in this ESMF as [Annex 6](#).

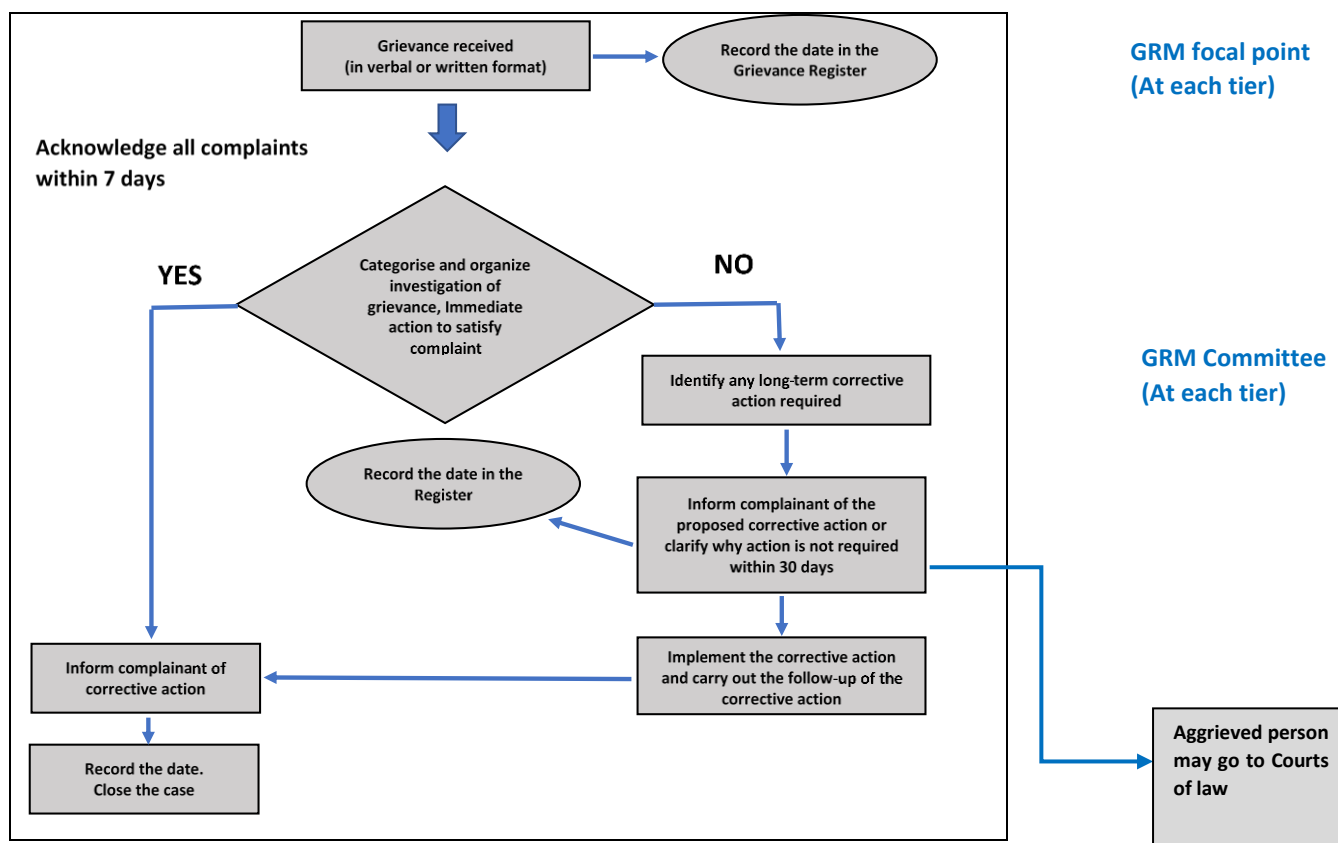


Figure 6: The Process Flow Chart of Grievance Redress Mechanism

8.4.9 BANK BASED GRIEVANCE REDRESS SERVICE (GRS)

The World Bank based Grievance Redress System (GRS) ensures that complaints received are promptly reviewed in order to address project-related concerns. The GRS provides an accessible way for individuals and communities to complain directly to the World Bank if they believe that a World Bank financed project has or is likely to cause harm to the community and the environment which may have adverse effects. The GRS seeks to ensure that grievances are promptly reviewed and responded to, and resolution sought at the earliest of time. Project-level grievance mechanisms remains the primary means through which complaints will be raised and addressed. The WB GRS will facilitate resolution of issues that cannot be resolved at the project level. The GRS also provides opportunity to WB Management Level to provide guidance on how some project issues can be resolved before being forwarded to the Inspection Panel. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

9 MONITORING AND REPORTING OF THE IMPLEMENTATION OF THE ESMF

9.1 Regular Monitoring and Inspection of Compliance

The PIU will put in place adequate institutional arrangements, systems and resources to ensure effective monitoring of the ESMF and the relevant plans associated with the different activities under the project. 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 whether further interventions (such as mitigation) are required or enhance the monitoring.

The goal of inspection activities is to ensure that project activities and sub-activities comply with the plans and procedures laid out in the ESMF. Monitoring responsibilities and inspection activities will be carried out by PIU of the implementing agency (MLHUD) which will administer the overall project-related environmental and social monitoring and implementation as laid out in this ESMF through its Environment and Social Specialists and/or Consultants hired by the Ministry.

Environment and Social safeguard specialists of the Ministry (MLHUD) 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 PIU's 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 PIU Project Coordination (PC). Third party monitoring will be undertaken by lead agencies such as NEMA, NFA, UWA in line with their mandate. The ministry (MLHUD) will perform its role through the PIU. The World Bank will undertake project implementation support and supervision missions at intervals that shall be determined by the bank.

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 like suspension of project until issues are addressed.

9.2 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 PIU and sent to the PS, MLHUD for review, validation, compilation and onward submission to the bank. The PIU 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 PIU, will be consolidated by the Environmental Specialist at the PIU to cover ESHS activities of the PIU 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 Coordinator. 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.

EUFLA Project and sub-projects are required to report all environmental and social incidents to the PIU 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 PIU will report all the environmental and social incidences to the PC 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, GBV 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.

9.3 Contingent Emergency Response Component (CERC)

The CERC is designed to provide swift response in the event of an Eligible Crisis or Emergency 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 occurrence/incidence, it is not anticipated that a re-allocation of project funds will cause serious disruption to project implementation.

Activities under the EUFLA Project will be governed by the World Bank Directive Contingent Emergency Response Component (CERC) (October, 2017). The PIU 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 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 that 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.

9.4 Emergency Reporting

The PIU will be responsible for reporting the environmental and social incidences whenever such incidences occur. The PIU will compile and report incidences to the World Bank within 48 hours for major incidences such as fatalities, HSE incidences, GBV 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.

9.5 Reporting procedure

Initial communication

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

GBV related cases will be rated using the World Bank's assessment tool. MLHUD's PIU 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 MLHUD's GBV Specialist or a Consultant hired by the Ministry, 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 PIU 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 PIU on a monthly basis except for the major accidents which must be reported (to the PIU) within 12 hours of occurrence. The Format for reporting incidents and accidents is attached as **Annex 4**

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 PIU 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.

9.6 Roles and Responsibilities

The PIU at MLHUD will assume the overall implementation of the project. The Project Coordinator, Environmental Specialist, Social Safeguards Specialist, and other technical officers at the Ministry shall constitute the PIU. The PIU 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 PIU of the implementing agency (MLHUD) which includes the Environment Specialist, Social Safeguards Specialist and Consultants Employed by the Ministry to support the implementation of the project will be responsible for overseeing the monitoring of the ESMF.

Furthermore, the PIU Environment and Social staff (with support from the Consultants) will oversee the implementation of the monitoring plan. The PIU Environment and Social Staff will conduct field quarterly supervision visits to the different project sites.

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 objective is realised.

10 CAPACITY BUILDING AND TRAINING

10.1 Introduction

The MLHUD has the responsibility of implementing the proposed project. As part of this project, EUFLA will move towards the establishment of a PIU with specialists dedicated to the implementation and the effective coordination of the project.

The measures adopted under the project's institutional capacity will continue into the proposed EUFLA Project and directly benefit Project implementation, ensuring that the MLHUD staff's capacity for implementing the EUFLA Project will be strong from the beginning of the project notwithstanding that the ministry has considerable capacity and experience in implementing World Bank funded projects having implemented projects like CEDP for a long. In spite of the capability and experience of the ministry in implementing World Bank funded projects, it would be necessary to recruit and integrate additional staff into the EUFLA Project's PIU.

The MLHUD has a substantial experience in project co-ordination and implementation including the land component of CEDP, Uganda Support to Municipal Infrastructure Development (USMID) project and Bank Grants under the Cities Alliance Program. MLHUD will lead preparation of all guidelines and strategies, procuring consultants where relevant.

Although the implementing agency (MLHUD) has managed environmental and social risks and impacts on previous and/current World Bank funded projects such as CEDP and USMID as stated earlier, a systematic capacity building of the relevant staff in the PIU 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 EUFLA Project, it is important for staff from the PIU of the MLHUD 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 funded projects as well as the WB Environment and Social Incident reporting requirements.

10.2 Environmental and Social Capacity Building Plan

10.2.1 Personnel from: MLHUD and other MDAs closely associated with the EUFLA Project

It is also recommended that prior to commencement, a 2-3-day workshop is held in Kampala targeting MLHUD 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 MLHUD (being the implementing agency) with support from the World Bank.

The details of the capacity building needs and the Training Format are presented in **Table 9** and **Table 10** respectively.

Table 10-1: 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: MLHUD's PIU and other MDAs closely associated with EUFLA Project.	MLHUD	Prior to commencement of project activities and once the relevant staff are in place.
	Land Legislation including National Environmental Legislation		District Technical officials, Area land Committees, Community, Volunteers etc.		
EHS	ESHS requirements, including those specified in ESMPs and project contracts as well WB ESIRT requirements	Training	Service providers, supervision/ verification consultants and Volunteers from the community to support project implementation	MLHUD	During project implementation
Good International Industry Practices (GIIPs)	Improve knowledge on GIIPs in ESHS Safeguards	Training	Senior Managers and other staff of the PIU	MLHUD	During project Implementation

Table 10-2: 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 including the requirements in the Environment and Social Commitment Plan (ESCP) d. Baseline Environmental and Social Conditions e. Structure and role of the Project Implementation Unit and relevant governmental authorities	1
Day 2	1

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

10.2.2 Training of Service Providers, Contractors, 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), environmental and social due diligence, Labour 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 11** below

Table 10-3: Awareness Training for Service Providers, Contractors, 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	1.5 days

Technical training <ul style="list-style-type: none"> a. Development/Implementation & scope of Service providers' ESMPs b. Environmental, Health & Safety Management onsite c. Grievance Redress Mechanism, Process and Committees d. Implementation of the ESMP (contract clauses) e. Monitoring and Reporting of ESMPs, SEPs, RAPs, and VMGMP f. Climate change g. Biodiversity 	
Total	2 days

10.2.3 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 specialists undergo the World Bank ESF training and the following internationally recognised trainings: -

- a. ISO 14001: Environmental Management System (Lead Implementer).
- b. ISO 14001: Environmental Management System (Lead Implementer).
- c. Quality Management System 9001 (Lead Implementer and Auditors).
- d. Labour Management practices by ILO.
- e. SEA, GBV and VAC training
- f. Stakeholder engagement related training.

11 ESMF IMPLEMENTATION SCHEDULE AND BUDGET

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

11.1 ESMF Budget

The budget, implementation timing and responsibilities are presented in **Table 12** below.

Table 11-1: ESMF Implementation Schedule and Budget Estimates

Environment and Social Management Measure	Implementation stage or phase	Timing and Frequency	Budget in USD		
			MLHUD (PIU)	MLHUD (MZOs)	TOTAL
1. Training and Capacity Building of Technical Teams Training, capacity building and technical assistance to training of technical teams at district and lower local governments and Land Management Institutions (LMIs) on ESMS/ESF instruments.	Prior to Project effectiveness	Monthly	100,000	25,000	125,000
2. 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		300,000		300.000
	One year on obtaining ESIA	Once	150,000		
	Project effectiveness	Twice	50,000		
	Project				

Environment and Social Management Measure	Implementation stage or phase	Timing and Frequency	Budget in USD		
			MLHUD (PIU)	MLHUD (MZOs)	TOTAL
	effectiveness	Quarterly	50,000		
		Once	50,000		
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 at MLHUD PIU (4)	Before project implementation	To be conducted once before project implementation	200,000		200,000
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 - (SEP, ESMPs GBV, SEA, GRM, RAP, stakeholder Plans and VMGP) Incorporate relevant aspects of any E&S commitments made, including any Environmental and Social Management Plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the	Before project implementation	To be conducted before the project implementation	50,000		50,000

Environment and Social Management Measure	Implementation stage or phase	Timing and Frequency	Budget in USD		
			MLHUD (PIU)	MLHUD (MZOs)	TOTAL
<p>ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p> <p>Regularly update Environmental and Social Management Plans, Stakeholder Engagement Plan or other instruments based on updated guidance by WHO on COVID19.</p>					

This ESMF describes the proposed EUFLA project activities, 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 risks and impacts of the project shall be assessed and managed. This notwithstanding, at a general level, potential impacts of project activities have been discussed and possible mitigation provided.

Specific measures shall be implemented by Service providers, Contractors etc. and such measures shall form part of the Service providers' and Contractor's ESMPs. Socioeconomic impacts such as those associated with involuntary resettlement and compensation and issues of vulnerable groups, shall be dealt with through the RAP and VMGF accordingly. Relevant guidance will be available within the RPF and prepared in parallel to this ESMF.

An assessment of the institutional capacity of MLHUD undertaken during the preparation of this ESMF indicates that, the ministry has a substantial experience in project co-ordination and implementation including the land component of CEDP, Uganda Support to Municipal Infrastructure Development (USMID) project and Bank Grants under the Cities Alliance Program. The ministry has a fully-fledged CEDP unit with all the required staff led by a Project Coordinator. The unit (CEDP) also has Environmental and Social Specialists and a Project Implementation Specialist all of whom have years of experience on projects. Further to these, the MLHUD has the USMID-AF unit which has very experienced Environmental and Specialists who have been spearheading the preparation of the ESF instruments (ESMF, VMGF, SEP and RPF) for this EUFLA project. These staff have rich experience in establishing environmental and social management systems (ESMS) for Bank funded projects.

The above notwithstanding, it would be necessary to recruit and integrate additional staff into the EUFLA Project's PIU.

Further, although the implementing agency (MLHUD) has managed environmental and social risks and impacts on previous and/current World Bank funded projects such as CEDP and USMID as stated earlier, a systematic capacity building of the relevant staff in the PIU 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.

It is expected that there is adequate environmental and social 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 EUFLA Project will have immense positive benefits to the project's beneficiaries, their communities and the surrounding environment.

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ANNEX 1: STAKEHOLDER CONSULTATIONS AND ENGAGEMENT REPORT

MINUTES FOR STAKEHOLDER CONSULTATIONS - PHYSICAL ENGAGEMENTS (NATIONAL LEVEL)

WITH STAKEHOLDERS FROM MLHUD_ CEDP FACILITATED BY THE CONSULTANTS¹³

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)				
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project				
Information/Consultation:	Increase security of land rights and strengthen local land administration and management				
How & when was this meetings organized/agreed upon by the Stakeholder	Meeting was agreed upon in a physical meeting held between representative from MLHUD and the Consultants (STCs) at the MLHUD on 27 th May 2022. Physical meeting held at the CEDP Offices on Yusuf Lule Road, Kampala.				
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming				
Activity:	Physical Consultative Meeting (National level)				
Date & Time:	Date:	31 st May, 2022	Time: From:	9:00am	To: 11:00am
Stakeholder (s):	MLHUD staff, CEDP PIU team				
Location:	District:	Kampala	Sub County:	Parish:	Village& Coordinates: Park/Forest:
Total no of Participants	Male:	12	Female:	6	
Facilitator (s):	Judith Ikiring obore and Godwin Anguyi Asiku				

¹³ Ministry of Lands Housing and Urban Development (MLHUD), Competitiveness and Enterprise Development Project(CEDP), USMID

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
MLHUD CEDP Project Implementation Team	We may not go to all the 32 districts for this initial visit but we will have regional representation and the stakeholder engagements are going to be a continuous process throughout the project cycle. The initial districts with regional representation will be; West Nile region – Zombo, Northern region - Amuru, Eastern region – Kibuku and Western region – Ntoroko. These have been carefully chosen because of the land wrangles going on in these regions so as to ascertain the level of impact and establish mitigation measures in advance	Noted
	There is a big challenge when it comes to reaching out to the ethnic minorities mainly due to transport related challenges and most of them are located in hard to reach areas yet they are grappling with many social issues. It would be good to reach out to them.	The project has considerations for VMGs and so this will be looked into
	Culture and information disclosure, there is difficulty in accessing information. It takes long for the people to buy into the project	Need for continuous sensitization Sometimes, one has to go through/perform some of the rituals within those conservative communities in order to be admitted for instance, drinking animal

	especially on issues to do with land.	blood.
	There is a challenge in accessing PWDs; these are hidden in the community	Special measures will be put in place to ensure PWDs are accessed and participate in the project
	Women too are hard to reach because they are taken up with home chores and other responsibilities	Sometimes it important to consult women a lone because sometimes when you consult them with their spouses, they just agree with what their spouses will say in public There is need for a lot of sensitization for them to attend meetings and benefit from them.
	There are communities where women who were married with less than one hundred (100) cows cannot speak in public and are they are considered less valued than those with a higher bride price	in this case, it is important to separate the women from men in these engagements
	The timing for the consultations is very important, women are usually constrained with several activities	You have to target a good time and they must understand the importance.
	Grievances are many and are usually social, environmental and legal related. The legal related grievances usually take a long time to be solved. In one month, you can only address four (4) grievances. Some examples of legal grievances include wrongful registration of names, issues of boundaries etc. the timelines for conclusion differ from case to case.	There is need to expedite the handling of these grievances
	Physical planning versus land ownership, we have often received resistance from what is planned and	This takes detailed consultations

	what the community expectations are	
	In districts, one of the biggest challenges is lack of documentation and this complicates work.	<p>We have a procedural manual for the district and the training manual on grievance handling</p> <p>There is also statistics documented on cases resolved, we try to handle these and especially at family level</p>
	Political leaders are sometimes the biggest causes of trouble for instance Members of Parliament (MPs) for Amuru district, might politicize things making life hard for us to implement the project simply because the issue of land grabbing is still a very sensitive issue in the area.	Keep away from politics
	Knowledge of cultures is very important prior to the stakeholder engagements	Noted
	New districts have been created - detailed consultations and sensitization is needed.	We also choose to hold meetings in the nearby parishes to the conflicting parties so as to prevent violence and confrontation. This is because we have previously had some of our team members seriously wounded and most of these were as a result of politicizing issues. We usually pack and go away when things are very critical but we ensure there is continuous sensitization.
	People do not respect administrative boundaries	Need for continued consultation
	Translate messages to local languages	Noted
	Some communities' for instance the Karimojong come to meetings while naked.	The consultation or implementing teams have to manage and control their emotions; do not show that you are surprised

	Find out in every community people who matter and who people listen to i.e. opinion leaders and consult with them.	Noted
	In some places like Karamoja, land is passed on to the boys through their mothers' since the Karimojong are polygamous i.e. this is important to note because most of the people who come and sit in meetings to deliberate on issues of land will be men but the ones with the decision making power on land are the women who are usually at home and rarely attend meetings/consultations, so it is very important to consult with the women.	Noted
	Communities in the Northern region are usually very violent in the consultations. This is mainly as a result of drunkenness. Thus, time for consultations matters, mornings are better before the people get high on alcohol	Note
	Some communities' for instance the Karimojong come to meetings while naked.	The consultation or implementing teams have to manage and control their emotions; do not show that you are surprised
	Find out in every community people who matter and who people listen to i.e. opinion leaders and consult with	Noted

	them.	
	The issue of land management institution, these are appointed as a result of their experience and popularity in the society. But most of these loose popularity with time mid their term of office mainly as arrest of craftiness. When community members see you consulting with the, then you are also grouped with them.	Need for consultations
Consultant	How are natural resources handled?	Cultural leaders are important while handling issues of natural resources because they are well informed about these resources. Examples include; in Acholi land, we deal with 'Rwot kwer' and 'Rwot Okoro' while in Lango, we deal with 'Awitong' Buffer areas are demarcated together with the clan chiefs
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Successful Meeting

Pictures of the Engagement



Attendance Must be attached (Name I institutions or Community I Sex I Contact I Signature)

CONSULTATIONS WITH STAKEHOLDERS FROM THE ACADEMIA, CSOs, NGOs AND DEVELOPMENT PARTNERS (Virtual) HELD ON 10TH AND 11TH JUNE 2022

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)			
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, SEP, VMGF, RPF & VMGF) for the EUFLA Project			
Information/Consultation:	Increase security of land rights and strengthen local land administration and management			
How & when was this meetings organized/agreed upon by the Stakeholder	Meeting was agreed upon in a physical meeting between MLHUD and the consultants first on the 31 st of May, 2022 and later confirmed vide email. An invitation was then sent to the stakeholders by the ministry (MLHUD).			
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming			
Activity:	Virtual Meeting interviews (National level)			
Date & Time:	Date: 10 th 06, 2022	Time: From:	9:00am	To: 11:00am
Stakeholder (s):	PELUM Uganda, IIRR, UCOBAC, ZOA, TRANSPERENCY INTERNATIONAL, MLHUD, CEDP AND FACILITATED BY THE CONSULTANTS			
Location:	District: Kampala	Sub County:	Parish:	Village& Coordinates: Park/Forest:
Total no of Participants	Male: 31	Female: 9		
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku			

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Participatory Land Use Management (PELUM) Uganda	Looking at the time prior to submission of the ES safeguards instruments, the project might not have adequate time to consult all stakeholders.	<p>More consultations are going to be carried out across all the 32 districts and the target will be to reach out to all stakeholders both direct and indirect beneficiaries as were as interested parties.</p> <p>Also , based on limited timelines needed for the preparation of the ES safeguard instruments, you should give us and the consulting team pointers on some of the ES issues that might arise so that the team can prepare the tools, consultations are going to be continuous</p>
	As PELUM, we have been working with the MLHUD on land and Legal issues on land and issuance of land titles, there are peculiar issues coming from Karamoja region i.e. cross boarder movement of pastoralists.	<p>We are having discussions with MAAIF to have a range land policy put in place.</p> <p>We are also working with cultural institutions on land related issues and finding mitigation measures</p>
	There are aspects of subsequent transactions in relation to CCOs	Noted
	As PELUM, we are expanding to Acholi – Amuru and Gulu, we are piloting land registration which is supported by government.	Noted
	As PELUM, we developed a module where community comes together to register land under the participatory community initiative. We encourage communities to register their land	This will be an added advantage to the EUFLA project as some communities will be well equipped with information
	When it comes to gender issues, duo ownership of property by women, women are entitled to property both	Noted, government intends to have consultations with all community members from the selected 32 districts and will also have continuous sensitization on gender related issues from a rights based perspective and the importance of family

	at their paternal homes and where they have been married.	cohesion in land registration.
	There are some instances where women have been denied access to credit using the documents they used to register the land by their own brothers.	Need for continuous sensitization on gender related issues from a rights based perspective and the importance of family cohesion.
International Institute for Rural Reconstruction (IIRR)	In the South West and Elgon areas there is a cultural bias where there is reluctance in including women on the land titles during land registration.	We have done advocacy on this and there is increasing joint ownership for customary land ownership
	How would you cater for polygamous marriages and for all the women/wives being included in the customary land registration?	Need for continued advocacy and inclusion of women
ZOA – Uganda	We work in the West Nile region, an environment where we have refugees. Sometimes, people want to register all their land yet we have refugees in the area. Refugees have no right to register land; the issue of refugees should therefore be looked into in this program.	We train communities in alternative resolution systems in case of any land related conflicts. Refugees are a vulnerable group and its important to include and work with them, this will be looked into.
	How best can we package information based on the low education of refugees?	This will be looked into
	The customary owners by registration of their land will acquire legal documentation and this should allow them to have guests in their land.	Refugees are a vulnerable group and its important to include and work with them and this will be looked into
	In the West Nile region, many men	ZOA has been sensitizing and encouraging the men to include their women on land

	are hesitant to include women on land registration documents.	registration documents. Need for continuous sensitization of communities on the importance of family cohesion and importance of joint family property registration and ownership.
	High bride prices are responsible for women being excluded and this should be looked into	Need for continuous community sensitization
	In Acholi area the issue of subsequent transactions where you have CCOs and one family member wants to sell off all the land, these kind of conflicts are becoming less.	Need for continuous sensitization
MLHUD	In terms of natural resources in the areas we are undertaking registration of land, how have we been handling issues of registration? What is the experience on the ground?	One of the things the ministry has done is that, it has developed a policy on integrating gender into land registration.
PELUM	Our experience with natural resources has mainly been with wetlands, the physical planning committees have been of great help on this, they go ahead and demarcate these areas. Additionally, the cultural land committees have been of great help in preventing wetland encroachment. There are some cases in court and we have hope of recovering some wetlands and natural resources.	As partners, we need to build the capacities of these committees.
	Regarding wetland, some being seasonal and others permanent, there is lack of information on the buffers of wetlands and data on the	We have engaged communities to develop wetland management plans. It clearly explains which parts can be used and those not to be used by communities Continuous sensitization of communities is also needed.

	same	
	A lot of abuse and encroachment in the communities has gone on for so long and this is the reason why it is hard to determine the original boundaries. Thus, there is need for re-identification of these boundaries. There is need to engage communities in re-identification of boundaries	We have engaged communities to develop wetland management plans. It clearly explains which parts can be used and the purposes and, those that cannot be used by communities.
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Successful and informative stakeholder engagement

Attach Pictures of the Engagement

Virtual interview

Attendance Must be attached (Name | institutions or Community | Sex | Contact | Signature)

Participants	Organisation	Designation
1) Mukaaga Johnson	MLHUD/CEDP	PC - CEDP (Meeting Chair)
2) Moses Onen	PELUM Uganda	Officer
3) Godwin Anguyi Asiku	WBG	STC - World Bank
4) Wilfred Erima Babanga	ZOA	Program Manager
5) Pamela Nyamutoka	International Institute of Rural	Officer

Katooro	Reconstruction (IIRR)	
6) Caroline Kayanja	UCOBAC	Senior Program Officer
7) Maureen Nakaayi	IIRR	M& E Officer
8) Odella Brian	Shelters and Settlements Alternatives (SSA)	Programme Officer
9) Gerald Padde Auku	Transparency International Uganda	Officer
10) Oyet Alex Labeja	Land Officer Agago/MLHUD	Land Officer
11) Simon Peter Mwesigye	UN Habitat/Global Land Tool Network	Officer
12) Besigwa Emmanuel	MLHUD /Land Officer HQ	Land Officer
13) Nanyonga Linda	GIZ	Technical Advisor on Land Management, Awareness Raising and Communication – ILGU – RELAPU of GIZ
14) Zzinga James	CEDP/MLHUD	CCO/CLA Secretariat Policy analyst
15) Ojambo Emmanuel	IIRR	Project IT Officer, International Institute for Rural Reconstruction
16) Dennis Kidega	MLHUD	Principal Physical Planner
17) Dramani Santos	Housing /MLHUD	Officer
18) Henry Opyene	MLHUD	Communications
19) Murungi Bruce	MLHUD	Communications
20) Ibrahim Mageseso	MLHUD	Surveys and Mapping
21) Justus Wambayi	Africa Region, CADASTA	Regional Manager/CADASTA

22) Kyomukama Jenina	MLHUD	Economist
23) Margaret Lwanga	MLHUD USMID	Senior Environmental Specialist
24) Ronald Baggaga	ESSF	ESSF
25) Harrison Irumba	MLHUD	Policy Dept
26) Hamza Galiwango	Uganda Investment Authority (UIA)	Officer
27) Elaine Stamhuis	ZOA Uganda	Officer
28) Abdulla Hassan Byantalo	MLHUD	Officer
29) Edson Ndagijumana	IIRR	Officer
30) Jesse Maurice	MLHUD	Officer
31) Jordana Wamboga	UCOBAC	Officer
32) Doreen Natamba	IIRR	Officer
33) Willie Epalitali	World Bank Group	ST - Consultant
34) Toko Godfrey	MLHUD	Cartographer
35) Samuel Segawa	World Bank Group	ST - Consultant
36) Judith Ikiring Obore	World Bank Group	ST - Consultant
37) Judie Adoko	LEMU	ED
38) Phillip Adonga	Gulu MZO/MLHUD	Officer
39) Robert Opio	Land Expert	Freelance Consultant on Land
40) Dennis Obbo	Ministry of Lands, Housing and Urban Development	PS (Moderator)

ENGAGEMENT WITH A STAKEHOLDER FROM UNCDF AND FACILITATED BY THE CONSULTANTS

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	Interview was agreed on with the participant through a phone call and participant was selected from the list of proposed stakeholders
Relevant Component:	Stakeholder views
Activity:	Virtual Meeting interviews (National level)
Date & Time:	Date: 14 th June, 2022 Time: From: 9:30 am To: 10:00am
Stakeholder (s):	UNCDF Officer - Joel Mundua
Location:	District: Kampala Sub County: Parish: Village& Coordinates: Park/Forest:
Total no of Participants	Male: 1 Female: 0
Facilitator (s):	Judith

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
UNCDF	This is a scale up of the project and there are many things that need to be looked into for instance the issue of subsequent transactions there is still need on how to work better	This project specifically addresses issues of land administration and specifically registration of customary land tenure in the 32 selected districts

	CCOs need to be structured and mainstreamed into the government system. The aspect of traditional resolution courts should be strengthened so as to reduce the burden on the courts of law that usually have to deal with big number of cases.	Noted
	The customary owners by registration of their land will acquire legal documentation and this should allow them to have guests on their land.	This is true, however, there is need for continuous consultations and sensitization for communities to appreciate this.
	We have done model registries and are piloting them in Maracha district, Agago and Apaa. However, we realized that these have gaps and we need to improve these model registries.	Noted
	There is a very big gap when it comes to land registration between women and men, in Maracha district, the gap stands at 26% vs 74% of men who have registered land. Initially, when we were just starting our program here, there were no women at all.	There is need for deliberate affirmative action for women to be included in land registration.
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Participant emphasized the need for continuous engagement

Attendance

Participants	Organization	Designation
41) Joel Mundua	UNCDF	Officer

DISTRICT LEVEL STAKEHOLDER CONSULTATIONS

ZOMBO DISTRICT

Project:	EU FINANCING FOR LAND ADMINISTRATION
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meeting organized/agreed upon by the Stakeholder	Written official invitation letter from Ministry of Lands, Housing and Urban Development
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Workshop
Date & Time:	Date: 20/06/22 Time: From: 10A.M To: 4.00P.M
Stakeholder (s):	District and sub-county technical staff, Parish chiefs, Cultural and religious leaders
Location:	District: Arua Town: Arua City
Total no of Participants	Male: 22 Female:9
Facilitator (s):	Segawa Samuel and Willie Epalitali

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
CSO representative	<p>The project is long overdue and its roll out is going to help resolve land wrangles, and land grabbing within the local communities in the selected project areas.</p> <p>If demarcation of a land parcel is done and a property/structure is affected, how will this be resolved?</p>	<p>Noted</p> <p>The project envisages very minimal impact properties and structures. However, where is applies, cash compensation for affected land/structure based on market value will be awarded in line with national laws and World Bank ESF standards specifically ESS5. The compensation will be fair, adequate and promptly paid to the respective affected person.</p>

	<p>There is need to strengthen the capacity of the district land offices in the region to ensure that they're able to handle land related matters expeditiously.</p>	<p>One of the objectives of this project is to prepare tools and guidelines for SLAAC activities in the areas of predominantly customary ownership and build capacities within institutions in charge to conduct the participatory demarcation and mapping.</p>
<p>Deputy Chief Administrative Officer-Zombo district</p>	<p>This project has come timely and if well implemented it will go a long way in resolving land conflicts in the selected areas where there is customary and communal land ownership.</p> <p>The planned training targeting different stakeholders will indeed help to build capacity of communities in conflict resolution and awareness raising.</p> <p>With the increasing population, there is a lot of pressure on land and therefore the project will also will need to conduct awareness raising in the communities where the project is going to be implemented.</p> <p>This project will positively impact on the Parish Development model since it will help increase land rights in communities that use it as a factor of production.</p>	<p>Noted</p> <p>Noted</p> <p>The project is developing a Stakeholder engagement framework which underpins the strategies that will guide the consultations and sensitization of relevant stakeholders in an extensive, meaningful and proportionate manner. This will serve to ensure, that all stakeholders are onboarded for successful project implementation.</p> <p>The project intends to support gender equity in land registration. Civil society engagement and communication strategies will be developed aiming at enhancing public participation, including dedicated outreach and sessions for women, and transparency in the whole exercise of documenting land rights.</p> <p>This project will involve adjudication, demarcation and registration of the land parcels under ownership and historical use by the communities represented by the CLAs and</p>

	<p>The project will also increase the awareness about the land rights of women/widows/children in the communities and also safeguard their interests regarding access and ownership of land.</p> <p>The project needs to lay emphasis of communal land ownership and special attention needs to be paid to the individuals that will be registered on communal land as it can be a source of a lot of conflicts.</p>	<p>individually owned parcels situated in the same selected Project areas. This will be augmented with a RaPPA which will be undertaken in a respective area to develop the qualitative understanding of the situation.</p> <p>Noted</p> <p>Noted</p>
District Natural Resources Officer-Zombo	<p>There is a lot of conflict on protected areas as many people have encroached on them and as such their boundaries have been lost.</p> <p>Processing of land titles is a very tedious process; is there a way this process can be streamlined and also be taken to the grassroots level?</p>	<p>Through the RaPPA, there is going to be triangulation and on spot analysis in order to come up with systematic land use plans that will enhance orderly settlement and optimal utilization of land as well as provision of social services and protection of Natural resources from being encroached on. Similarly, the project will not support land registration activities in forest or other protected areas (gazetted under the National laws)</p> <p>The aim of the project is to ensure that members of the community are well served and will strive to increase dedicated outreaches to onboard communities in the process of land registration. Plan are also underway to ensure that SLAAC implementation strategy is modified moving forward to scale-up capacity of fieldwork and leverage performance-based contracting to enable multiple service providers to work in parallel in different geographical areas.</p>

	<p>Can this project help to ensure that titling of land is more affordable by the poor and vulnerable groups?</p> <p>There is willingness to register land and the communities are positive and therefore the project will experience limited resistance save for places that have existing land wrangles.</p> <p>What is the smallest area that can be titled?</p>	<p>From the previous pilot project under CEDP, during the life of the project, the World Bank supported the decentralization of the land sector to ensure that communities and the vulnerable people have access to land services at lower costs and this will be benchmarked to ensure that vulnerable groups on the EUFLA project benefit from the services.</p> <p>Noted</p> <p>According to MHLUD guidelines the smallest area that can be titled is 25.2mx30.45m (11.5 decimals). However, sometimes exceptions are made depending on the recommendations of the Areas Land Committee and Physical Planning Committee of a given area</p>
Prime Minister of Alur Kingdom-Zombo	<p>There are many advantages of having customary land title as it provides documentary evidence of ownership of land rights under customary land tenure. It also helps to increase security of land rights and strengthen land administration and management systems.</p> <p>Customary tenure system is secure since is difficult to sell and more importantly protects the interests of people who in many cases depend on natural resources for their basic livelihoods.</p> <p>As a way of sensitizing the</p>	<p>Noted</p> <p>Noted</p> <p>Noted, the project also plans to conduct sensitizations of the communities and</p>

	<p>communities, the Kingdom Prime Minister is going to formulate task committees to follow up on this issue and also help in future project implementation activities. The Alur King is going to be updated on this matter and once the issue is absorbed at that level, then onboarding communities will be made easier.</p> <p>The project will need to work with cultural institutions to ensure that sensitization of communities becomes easier. This will also help to empower communities about their rights on land especially the women.</p> <p>Project will need to pay special attention to the peculiar land management and administrations systems of the different geographical locations for example systems in Arua and Zombo differ as well as those from the West differ from the Eastern region.</p> <p>The issue of land wrangles and lack of tenure security has implications on government initiatives such the PDM since land as a factor of production is threatened.</p> <p>This project's activities especially the demarcation of land, could also potentially trigger land wrangles and</p>	<p>landowners before ,during and after implementation of the project.</p> <p>The technical teams will work together with the cultural leaders to conduct sensitization programs in the selected sub regions at sub county, parish and village levels</p> <p>Noted, reconnaissance will be made to fully understand the land management and administrations systems of the different geographical locations</p> <p>Noted</p> <p>Reconnaissance, mobilization from the district to lower government levels up to the target beneficiaries, training of adjudication teams, systematic adjudication, demarcation, mapping and recordation, and issuance of CCOs will done to ensure that</p>
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	<p>also exacerbate the already existing conflicts and such issues related to demarcation of parcels should be carefully managed.</p> <p>On the issue of gender mainstreaming - The project needs to ensure that they interrogate the socio-cultural dynamics of land access and ownership by widows, divorced and nulliparous women since they're socially ostracized in the communities and denied their right over land by family members especially when their husbands pass away.</p>	<p>the risk of exacerbating land conflicts is minimized during project implementation.</p> <p>The land administration component of this project will support gender equity in land registration. Civil society engagement and communication strategies will be developed aiming at enhancing public participation, including dedicated outreach and sessions for women, and transparency in the whole exercise of documenting land rights. This operation will also support activities geared to reducing land disputes and to incentivizing joint titling and land titles for women in the respective project areas.</p>
Fr Walter-Parish Priest –Zombo	<p>There has been a lot on encroachment on land owned by religious institutions and therefore, there is need to engage and consult the different heads of the churches such as the Catholic church, Anglican church who are big land owners in project areas. There is also need to consult with the Episcopal conference and capture their views and input in relation to this project.</p> <p>The project should consider subsidizing the cost of registration and acquiring a Certificate of title.</p>	<p>Noted, the project will continuously, extensively and meaningfully engagement all stakeholders to inform the procedure and process of land demarcation.</p> <p>From the previous pilot project under CEDP, during the life of the project, the World Bank supported the decentralization of the land sector to ensure that communities and the vulnerable people have access to land services at lower costs and this will be benchmarked to ensure that vulnerable groups on the EUFLA project benefit from the services.</p>

General Comments or Observations

The project is long overdue, and it is expected to solve the land question in Zombo but will require extensive sensitization especially at community level.

Pictures of the Engagement



Presentation and feedback sessions of project objectives to the stakeholders at Golden Courts Hotel- Arua

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the WBG and the MLHUD through a written communication
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas,Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (District level)
Date & Time:	Date: 20 th 06, 2022 Time: From: 10:00am To: 10:30 am
Stakeholder (s):	Ocaki Samuel – District Community Development Officer (DCDO) – Zombo district
Location:	District: Zombo District HQ Sub County: Parish: Village& Coordinates: Park/Forest:
Total no of Participants	Male: 1 Female:
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
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District Community Development Officer (DCDO) – Zombo district	Our land tenure is customary and thus, land is hereditary. Land is inherited through the male lineage from grandfather to son and passed on to the grandsons. Roughly 90% of the land is customary even for the few people who have acquired land (bought) recently, it's not yet registered	Noted
	Land is male owned and male inherited, women do not own land.	Given the sensitivity of land matters in Zombo district, there is need for detailed consultation, and continuous sensitization and engagement of the masses on the importance of female inclusion and the benefits of family cohesion in land registration.
	Land in Zombo district is very fertile for agriculture however; the same land is also highly fragmented as a result of very high population, every HH has an average of 6 children and the community is highly polygamous in nature with most men having an average of 3 wives each with each of them having about 6 children others even have up to 10 children consequently resulting into the several land conflicts amongst wives, children and other family members.	There is increased need for mind-set change on good practices on utilization of land through continuous sensitization.
	Marginalization of women and girl children in terms of access and control of land is very evident because land is passed on through	There is need to bring women to the center of production since they are the ones that till the land to provide for the HH. In addition to mind-set change on the importance of women inclusion.

	the male lineage; It is therefore male controlled despite the fact that women are the major HH providers of food and basic needs. Men rarely provide for the family and most of them have resorted to over consumption of alcohol. However, the same land is limited due to the high population number.	
	Commercialization of land has increased, land is being sold and moreover cheaply. Land as a social commodity turned economic /commercial has brought about many conflicts since most people buy to sale and make profit.	Noted
	Customary land is being sold by one or two conniving family member without the knowledge of the rest of the family members. Consequently, buyers usually get resistance at the time of trying to develop the land.	Need to involve all family members in land transactions as well as community leaders to avoid conflict.
	Some pieces of land are communally owned under clan leadership and management, these are jointly used by the community examples are community grazing land and it is held in trust for the people by the by the clan leadership.	Noted
	Although chiefdoms and kingdoms are meant to hold land in trust for	Need to further engage the cultural leaders on their role, mandate and responsibility to the masses.

	<p>the people, they now also own land. This has brought a lot of problems when the kingdoms start claiming for land, it is viewed as mainly grabbing land which they own in trust for the people thus abusing their responsibility.</p> <p>People usually go to the courts of law to seek legal redress.</p>	
	<p>Land on which most schools, churches and hospitals are found were taken away from the people by the colonialists through their allies the local chiefs, however, some locals have started to claim these lands.</p>	<p>Need to encourage all government institutions to acquire titles of ownership as evidence of ownership for instance documentation through registration of land.</p>
	<p>There is a lot of encroachment on forest reserves planted by government as well as natural reserves under the NFA. The community suspects the NFA workers to be the ones cutting down these trees so they do the same thing, cut down trees and sell.</p>	<p>We are involving government institutions in charge of UWA and NFA to ensure issues of protection are taken care of.</p>
	<p>Most of the government forests are de-forested and government has failed in it's in its management and oversight role, they cannot even re-forested.</p>	<p>We are involving government institutions in charge of UWA and NFA to ensure issues of protection are taken care of.</p>
	<p>In relation to VMGs, it is common people grab from the orphans.</p>	<p>Need for detailed consultation and sensitization on the rights of the orphans and the need to support PWDs</p>

	Access and utilization of land for PWDs is a challenge, they grapple with inferiority complex issues consequently, and they turn to begging most times.	Need for detailed consultation and sensitization and ensure that PWDs are involved and their needs are taken care of.
	Religious sects especially the emerging ones might raise issues to discourage the communities not to participate and this is an opportunistic act for their own selfish interest which they can exploit.	Need for detailed consultation and sensitization
	We also have land previously owned by missionaries (Comboni missionaries), these church lands were given to the missionaries by the elders long ago however, and locals have started claiming for it for instance, in WARR Sub County, there is a conflict between an individual and the church.	Need to encourage all religious institution, hospitals and schools to acquire titles of ownership in a genuine manner as evidence of ownership for instance documentation through registration of land to a void suspicion and mistrust from the community.
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Very insightful and informative dialogue

Attendance

- 1) Ocaki Samuel – District Community Development Officer (DCDO) – Zombo district

2) Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the WBG and the MLHUD through a written communication
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (District level)
Date & Time:	Date: 20 th 06, 2022 Time: From: 11:00am To: 11:30 am
Stakeholder (s):	PIMER Colleens - Senior Probation and Social Welfare Officer (SPSWO) – Zombo district
Location:	District: Zombo Sub County: Parish: Village& Coordinates: Park/Forest:
Total no of Participants	Male: Female: 1
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
PIMER Colleens - Senior Probation and Social Welfare Officer (SPSWO)	Land is the most valued resource in Zombo district and much of it is customarily owned and it is fragmented as a result of over-	Noted The process of customary land registration will improve the value of the land and

	population.	ensure security of tenure in Zombo district .
	The hilly tertian of this place may not permit mechanized as well as commercial agriculture.	Noted
	Women have access but not control over land because the Alur culture has it that land belongs to the boy child and the men.	This program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the good of all family members in each family in regards to land access and management is concerned. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period.
	It is worse for widows, upon death of her husband; she is always chased away by the man's relatives.	The project will support all the VMGs including widows to ensure that they are not marginalized further by this project. the project has good intensions for both men and women, ensuring security of their land through land registration while involving both men and women.
	The situation is worse for barren women and those that have given birth to only girl children – this hampers ownership because inheritance is through the male lineage.	There is need for change of attitude and perceptions of the people through continued sensitization during implementation phase.
	People think that land is now the only source of wealth and want to sell the land.	There is need for community sensitization on alternative sources of livelihood and earning as opposed to selling off of land.
	In the magistrate's office, most of the cases are land related – people no longer want to dialogue.	Noted, Grievance Redress Committees (GRCs) at village level will be formed to help address any grievances arising from this project. In addition, sensitization and empowerment of community leadership structures on conflict resolution will be enhanced.
	We have not popularized the land act	There is need to popularize the land act across all the selected 32 districts

	in the Management of land.	implementing this program so as to reduce on the land conflicts.
	We tend to focus on women in our meetings yet the men wield a lot of power thus, need for male inclusion in all our sensitization programs	There is need for a deliberate inclusion of men in all community based activities that impact women and the family at large through sensitization programs in order to bring women on board as well as empower them in many ways.
	Conflict of interest from cultural institutions who make biased decisions and rulings in favor of some individuals which have sometimes caused fights and even death for instance, some houses have previously been burnt in our community during the night when families were asleep and led to loss of lives.	Noted, cultural leader will be consulted and sensitized about the proposed project as a way of mitigating any conflicts.
	We usually involve security in such instance of conflict especially the office of the Resident District Commissioner (RDC).	Noted
	The cost of titling land is very costly and communities cannot afford – need to cut costs of registration.	This project is going to be funded by World Bank through a grant from European Union (EU) and its main purposes is to support communities with customary and free hold land tenure to get their land registered.
	Work with CSOs like Action Aid to create mass awareness.	Noted
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Very insightful and informative dialogue

Pictures of the Engagement



Interview with the - Senior Probation and Social Welfare Officer (SPSWO)

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the CDO of Zombo district through a phone call on 20 th 06, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (Community level)
Date & Time:	Date: 20 th 06, 2022 Time: From: 1:30am To: 2:00 am
Stakeholder (s):	Hon. Anyolidtho Joram Mike , District Councilor for Zombo Town Council & Secretary for Production and Natural resources
Location:	District: Zombo Sub County: Zombo TC Parish: Village& Coordinates: Park/Forest:
Total no of Participants	Male: 1 Female:
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
District Councilor for Zombo TC & Secretary for Production and	Land grabbing is very rampant. Land is inherited following the male lineage however, because families have	A grievance redress committee will be established during the implementation phase to hand all the land related grievances.

Natural resources	grown, most relatives grab from each other	
	Sometimes, programs like roads construction grab land from locals, they ask people to hand over their land and will be compensated later but they end up not compensating	Noted, the EUFLA project has good intentions and its aim is not to grab land but to empower community to protect their land security through registration of customary land so that they can obtain certificates of ownership
	In Alur, land belongs to the men and this disadvantages women with development ideas who want to develop land to earn an income	Noted, Women will be supported and included in the whole process
	Government is currently sensitizing communities to give land to women and girls	Noted
	PWDs have access to land	Noted
	Important to cater for and support women in land registration because they are also human	Noted, this project intends to support women throughout the process of land registration till the conclusion of the project life. There will be a lot of sensitization to ensure the process goes on smoothly.
	Land registration is not common in this area because people are not sensitized coupled with the fear that land registration is very expensive	Noted, all people who own land under customary ownership will be encouraged to register their land in the next four years and the EUFLA project will support the process financially during the land registration exercise

	Multiple sale of land is very rampant one person resale's the same piece of land to several people consequently causing conflict	There is need for community sensitization so as to reduce these types of conflicts
	Local Councils (LCs) leaders are one of the people who confuse the buyers and cause fraud. They partner with the owners of the land to defraud unsuspecting buyers	Noted, need for continued sensitization of the local leaders as well as the communities to get rid of negative vices like fraud and theft
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Land grabbing and exclusion of women stood out from this dialogue

Pictures of the Engagement



Meeting with **Hon. Anyolidtho Joram Mike**, District Councillor for Zombo TC & Secretary for Production and Natural resources

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the CDO of Zombo district through a phone call on 20 th 06, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting with Women of Zombo Town Council (coming from different villages)
Date & Time:	Date: 20 th 06, 2022 Time: From: 12:00pm To: 1:30 am
Stakeholder (s):	Women of Zombo Town Council, Zombo District
Location:	District: Zombo Town Council Sub County: Parish: Village& Coordinates: Park/Forest:
Total no of Participants	Male: Female: 20
Facilitator (s):	Judith Ikiring Obore

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Women of Zombo Town Council	Limited land for agricultural cultivation due to over population.	Note

	<p>Most families have eight children and so we end up hiring other people's gardens for cultivate</p> <p>In our traditional culture, women do not own or inherit land.</p>	<p>This program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the good of all family members in each family in regards to land access and management is concerned. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period.</p>
	<p>A few women have been able to buy pieces of land but they cannot afford the cost of titling it because it is very expensive.</p>	<p>its main purpose is to support communities with customary and free hold land tenure to get their land registered. Women as well as VMGs who include PWDS will be given adequate support to ensure they benefit from the project.</p>
	<p>There is a lot of fear amongst women of "if our fathers die, uncles and relatives will push us out of the land" thus, we have to rent houses because we cannot construct on our fathers land.</p>	<p>There is need for change of attitude and perceptions of the people through continued sensitization during implementation phase.</p>
	<p>When your husband dies, the women is pushed out, becomes homeless and she has to go back to her parents' home with children where she is also faced with resistance and segregation.</p>	<p>There is need for change of attitude and perceptions of the people through continued sensitization during implementation phase.</p>
	<p>Most widows and divorcees end up in the trading centers because they are not accepted back home, women have no land.</p>	<p>Noted: there is a need for a deliberate move by the district technical offices in charge of community and family affairs to sensitize the masses especially the male species on the importance of supporting women in land access and control since women are the major HH providers of food and basic needs.</p>
	<p>For the few women who buy land, even their children face challenges</p>	<p>Noted, there is need for sensitization</p>

	upon their death, most relatives chase the diseased children away thus, women are disadvantaged both at their place of birth and marital homes, they face segregation.	
	Your own brother can kill you with a machete over land - Government should consider girls in the inheritance law because girls are so disadvantaged.	Noted. There is need to popularize the land act
	Land is one of the biggest curses for women, you cannot inherit land even when you buy, it will be grabbed from your children.	There is need for a deliberate inclusion of men in all community based activities that impact women and the family at large through sensitization programs in order to bring women on board as well as empower them. The PIU will liaise with the CDO's to sensitize communities against negative cultural practices and norms.
	There are many broken marriages and we have nowhere to go when marriages break. So we have to fend for our children, we start hawking and selling things on the streets.	Noted There is project will have continuous sensitization to unlearn negative attitudes, perceptions as well as negative practices against women.
	Women cannot afford process land titles because it is very expensive, so one can buy land and it resorts to someone else especially the men who can afford and process the title.	The project will support all the VMGs including women, widows to ensure that they are not marginalized further by this project. the project has good intensions for both men and women, ensuring security of their land through land registration while involving both men and women.
	Some of our brothers sell land just to drink alcohol and this has caused a lot of conflicts, homelessness and even death as most drunk people have often taken match sticks and lit grass thatched houses of their sisters or sisters' in-law. Women have died	There will be sensitization of the community and most of these issues will be handled.

	with their children in this way.	
	Alcoholism is very rampant in Zombo.	It was recommended that Mondays are not good day to hold meetings in Zombo Municipality, this is because, discos and market days are held on Sundays and thus, people will still be having hangover.
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Over population has resulted to land fragmentation consequently leading to many land conflicts among families. Most men have an average of 3 wives with each having an average of 8 children.

Pictures of the Engagement



Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the CDO of Zombo district through a phone call on 20 th June, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (Community level)
Date & Time:	Date: 20 th 06, 2022 Time: From: 30:00pm To: 4:00 pm
Stakeholder (s):	Stakeholder Engagement with Technical staff of Kango Sub County, Zombo district; Komaketch Ephraihim (Sub County Chief) and Felix Jacuuicongeo (Community Development Officer)
Location:	District: Zombo Sub County: Kango Sub County Parish: Village& Coordinates: Park/Forest:
Total no of Participants	Male: 2 Female:
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Technical Leaders of Kango	Land registration is difficult here for	Noted

<p>Sub county, Zombo district; Komaketch Ephraihim (Sub County Chief) and Felix Jacuuicongeo (Community Development Officer)</p>	<p>instance, we want to get a tile for our seed school (Kango Seed Secondary School) but the process is too demanding.</p> <p>This intervention is very timely for us</p>	
	<p>In our communities, registration of land is not a priority simply because they know the land is customarily owned and thus, it belongs to them.</p>	<p>Noted. With continuous sensitisation especially during the implementation of this (EUFLA) project, the communities will appreciate the benefits of having their lands registered.</p>
	<p>Land acquisition is not compulsory so the community is not bothered.</p>	<p>Noted. However, this process is for the benefit of all the communities who have long lived without registering their lands. This process helps secure their lands through registration and acquisition of certificates of ownership in their names. This will also reduce the rampant conflicts over land ownership.</p>
	<p>Some community members are beginning to challenge churches, schools and hospitals to give back their lands that were given freely by their fore fathers ages ago.</p>	<p>Noted. This will be addressed during sensitization meetings. There is also need to popularize the land act among the communities.</p>
	<p>Traditionally, most people think that women do not own land and that, they can only access it through a male custodian and when he passes on, women are sent away from the land.</p>	<p>This program will support the issue of family cohesion where families i.e. women and men, boys and girls sit together and make informed choices for the good of all family members in relation to access to and ownership of land. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period.</p>
	<p>Men think that women marry a way and it's in their marital homes that they should get land.</p>	<p>Need for sensitization to curb negative perceptions, attitudes and norms that have for long disadvantaged women in favor of men consequently relegating women to the periphery. Discussions on equity will be flagged off considering that women are the ones who till the land to provide for their families basic needs livelihoods</p>
	<p>For women, the only security for you</p>	<p>Noted, there is need for detailed consultations and sensitization of communities</p>

	to own land after your husband is deceased is to have a male child, short of that, you are sent away.	about women's rights to ownership of land.
	For women who have land, they are quick to sell it to avoid land grabbing by their brothers when their father dies.	Noted, this will not be so after most people have received their title deeds, women inclusive. This will cushion them and give them protection from land grabbers because their portion of the land will be registered in their names.
	Most women have no courage to consult on land matters at the sub county because they also believe that they will not get justice since culture has sealed their fate, that they have no land.	Noted, there is need for detailed consultations and sensitization of communities and women especially since they have faced exclusion and marginalization for a long time.
	Mondays is not a good day to hold meetings in Zombo district, this is because Sundays are days for discos and market days in the district and therefore, people will still be having hangover.	Noted
	Most locals do not believe that the forest reserves belong to NFA, they believe that it's for the community thus the need for sensitization.	Noted, the government holds the nation's forest reserves and all the protected areas in trust on behalf of the population. There will community sensitization on this.
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Women exclusion stood out and the fact that most youth consume a lot of alcohol. Like in Zombo Town Council, it was recommended that most of the

Mondays are not a good day to hold meetings in Zombo Municipality, this is because, discos and market days are held on Sundays and thus, people will still be having hangover It was recommended that Mondays are not good day to hold meetings in Zombo Town Council, this is because, discos and market days are held on Sundays and thus, people will still be having hangover.

Attach Pictures of the Engagement



Meeting with the Sub County Chief (SAS) and the CDO of Kango Sub County, Zombo district

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the CDO of Kango Sub County through a phone call on 20 th June, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (Community level)
Date & Time:	Date: 20 th 06, 2022 Time: From: 04:00pm To: 05:30 pm
Stakeholder (s):	Community Consultation/Dialogue with men, women and youth of Kawulu village, Pakwala village, Tongu village, mbale village– Kango Sub County, Zombo district.
Location:	District: Zombo Sub County: Kango Parish: Village& Coordinates: Kawulu Park/Forest:
Total no of Participants	Male: 17 Female: 3
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Community Consultation/Dialogue with Men, Women and Youth	Will we have to pay money to get these documents?	No, you do not have to pay money; EU through the WBG has provided a grant to support communities to carry out this exercise. Most of the fees will be taken care of by the EUFLA project, however, the beneficiaries will have to cooperate and provide the necessary requirement like

		identification documents which might require them to spend on photocopying.
	I surely appreciate this program, when my father died, the elders subdivided our land and I have my own share now, so I need a land title to sort out some small land wrangles.	Noted, in addition, communities will be sensitized to fully understand and appreciate the benefits of this project.
	I appreciate the project because part of our land was grabbed, had we had the documents by then, this would not have happened.	Noted
	When is this project starting?	We are currently in the preparatory stage for the development of the Environment and Social safeguards instruments after which, based on our report, MLHUD will communicate to each district when they will be consulted.
	Our father left land for the 10 of us (brothers) so I think that the 10 of us should sit down and agree on how our title should be processed, whether as a family or as individuals.	Noted, family cohesion is very important in this process, as families will make decisions to benefit each member of the household. This will reduce on the number of grievances between family members and community members at large.
	This project comes timely because of the many land wrangles.	Noted
	Need for further and continuous sensitization on this project.	Noted
	The timing for this meeting is not good, most people by this time (afternoon) are already drunk, we should hold meetings in morning hours.	Meetings should be held in morning hours.
	When will this project start?	This stage is for preparation of the Social and Environmental systems/frameworks for guiding this project till 30 th June 2022, after that, MLHUD will communicate the

		dates for each community to be communicated and reach out to and the actual implementation plan for all the 32 districts.
	I grew up in my mother's home, our father had deserted us for a long time and when he returned, he never gave us land so we are worried that we may not benefit when the process of land registration starts	Noted, both men and women will be sensitized to reduce these kinds of tension.
	Very few families consider girls while distributing land, such a family is ours, we have 3 sisters but we have allocated each of them land and we will support them to get land titles/ certificates of ownership.	Noted
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Alcoholism, women exclusion from access to and control of land and land wrangles stood out

Pictures of the Engagement



Community meeting at Kango trading centre, Kango Sub County, Zombo district

KIBUKU DISTRICT

Project:	EU FINANCING FOR LAND ADMINISTRATION
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	Written official invitation letter from Ministry of Lands, Housing and Urban Development
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas,Monitoring and Evaluation and Gender mainstreaming
Activity:	Workshop
Date & Time:	Date: 22/06/22 Time: From: 10A.M To: 3.00P.M
Stakeholder (s):	District and sub-county technical staff, Parish chiefs, Cultural and religious leaders
Location:	District: Kibuku district headquarters Town: Kibuku Town council
Total no of Participants	Male: 20 Female:6
Facilitator (s):	Segawa Samuel and Willie Epalitali

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Principal Assistant Secretary - Kibuku District	As the population grows land is going to become a scarce resource since it is fixed, therefore this project will potentially help to solve the challenges that emanate from this trend	Noted
	All land is under customary and most of it was acquired through inheritance, therefore, the project will need to work with local authorities and elders to identify who the rightful owners are.	Noted

	<p>Most of the land parcels are very small owing to land fragmentation and therefore we need to know the smallest land parcel that can be registered and given a certificate of title.</p>	<p>According to MHLUD guidelines the smallest area that can be titled is 25.2mx30.45m (11.5 decimals). However, sometimes exceptions are made depending on the recommendations of the Areas Land Committee and Physical Planning Committee of a given area.</p>
Reverend Anglican Church	<p>This project has come timely and if well implemented it will go a long way in resolving land conflicts in the selected areas where there is customary and communal land ownership.</p> <p>However, there are many lands related disputes in the community which might exacerbate the already existing tensions /conflicts. The project will need to be safeguarded from political interference and risks of elite capture</p> <p>There is a lot of pressure on land and therefore the project will also will need to conduct awareness raising in the communities where the project is going to be implemented.</p> <p>There has been a lot on encroachment on land owned by religious institutions and therefore, there is need to engage and consult the different heads of the churches such as the Catholic church, Anglican church who are big land</p>	<p>Noted</p> <p>Noted</p> <p>The project is developing a Stakeholder engagement framework which underpins the strategies that will guide the consultations and sensitization of relevant stakeholders in an extensive, meaningful and proportionate manner. This will serve to ensure, that all stakeholders are onboarded for successful project implementation.</p> <p>Noted, the project will continuously, extensively and meaningfully engagement all stakeholders to inform the procedure and process of land demarcation.</p>

	owners in project areas. There is also need to consult with the Board of Trustees of the respective religious institutions and capture their views and input in relation to this project.	
District Environment Officer-Kibuku	<p>There is a lot of conflict on protected areas as many people have encroached on them and as such their boundaries have been lost especially in the low lands where people have resorted to growing rice.</p> <p>There is a recommended distance from the natural resources such as rivers, wetlands and therefore the project should be mindful of these boundaries that since been eroded because of human activity such as rice growing in Kibuku.</p> <p>Can this project help to ensure that titling of land is more affordable by the poor and vulnerable groups, many women and orphans are powerless when it comes to land access and ownership in Kibuku district?</p> <p>There are widespread reports of land grabbing in the country and there the communities will need extensive consultations to mitigate the risk the resistance which is borne out of fear.</p>	<p>Through the RaPPA, there is going to be triangulation and on spot analysis in order to come up with systematic land use plans that will enhance orderly settlement and optimal utilization of land as well as provision of social services and protection of Natural resources from being encroached on. Similarly, the project will not support land registration activities in forest or other protected areas (gazetted under the National laws).</p> <p>Noted</p> <p>From the previous pilot project under CEDP, during the life of the project, the World Bank supported the decentralization of the land sector to ensure that communities and the vulnerable people have access to land services at lower costs and this will be benchmarked to ensure that vulnerable groups on the EUFLA project benefit from the services.</p> <p>Noted,the project plans to conduct massive sensitization to ensure that the communities and all other stakeholders have a full understanding of the project objectives before project commencement.</p>

	<p>What is the smallest area that can be titled, the parcels of land in this area are very small and might be very difficult to survey and issue certificates of title?</p>	<p>According to MHLUD guidelines the smallest area that can be titled is 25.2mx30.45m (11.5 decimals). However, sometimes exceptions are made depending on the recommendations of the Areas Land Committee and Physical Planning Committee of a given area.</p>
Mayor-Kibuku Town council	<p>Land in Kibuku is entirely Customary and there are many advantages of having customary land title as it provides documentary evidence of ownership of land rights under customary land tenure. It also helps to increase security of land rights and strengthen land administration and management systems.</p> <p>Most of the existing land conflicts in the project are intra-family and will need to be resolved at a community and clan level.</p> <p>The project will need to work with cultural institutions to ensure that sensitization of communities becomes easier. This will also help to empower communities about their rights on land especially the women.</p> <p>On the issue of gender mainstreaming - The project needs to ensure that they interrogate the socio-cultural dynamics of land access and ownership by widows, divorced and nulliparous</p>	<p>Noted</p> <p>The project is developing a SEP which will facilitate a clear understanding among communities and an effective Grievance Redress Mechanism (GRM) put in place for aggrieved parties to channel their issues for an appropriate resolution.</p> <p>The technical teams will work together with the cultural leaders to conduct sensitization programs in the selected sub regions at sub county, parish and village levels</p> <p>The land administration component of this project will support gender equity in land registration. Civil society engagement and communication strategies will be developed aiming at enhancing public participation, including dedicated outreach and sessions for women, and transparency in the whole exercise of documenting land rights. This operation will also support activities geared to reducing land disputes and to</p>

	<p>women since they're socially ostracized in the communities and denied their right over land by family members especially when their husbands pass away.</p> <p>The project will need to strengthen the existing institutions to ensure that that the project is successfully implemented</p>	<p>incentivizing joint titling and land titles for women in the respective project areas.</p> <p>The project will ensure that it carries out a needs assessment to strengthen institutions and mechanisms to resolve land disputes.</p>
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General Comments or Observations

The project is long overdue, and it is expected to solve the land question in Kibuku but will require extensive sensitization especially that community level. Encroachment on protected areas such as wetlands is very rampant which is attributed to rice growing which is the main economic activity in the project area

Pictures of the Engagement



Presentation and feedback sessions of project objectives to the stakeholders at Kibuku district head quarters

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project

Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the WBG and the MLHUD through a written communication
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas,Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Meeting interviews (District level)
Date & Time:	Date: 22 nd 06, 2022 Time: From: 10:00am To: 10:20 am
Stakeholder (s):	CAO – Kibuku District, Mr. Kaidja Samuel and Kataike Beatrice - Senior Land Management Officer
Location:	District: Kibuku Sub County: Parish: Village& Coordinates: Park/Forest:
Total no of Participants	Male: 1 Female: 1
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
CAO Senior Land Management Officer	We are very grateful for this project and it is very welcome to our district.	Noted
	However, the issue of timing is key and should be put into consideration; we are closing the financial year by Friday 24 th , 2022 and therefore, all the heads of departments are engaged because they are part of the payment system, so they have to conclude their end of the financial year activities hence, some of them	Noted

	may not be able to be part of this engagement exercise.	
	When is this project starting? And what are the funding modalities? We have to know because if the money has to come to us, we have to indicate it in the system otherwise; we will not be able to spend it.	This stage is for preparation of the Environmental and Social Management System (ESMS)/Frameworks for guiding the project and it will continue up to 30 th June 2022, after that, MLHUD will communicate the dates for each beneficiary district and communities about the actual implementation plan for the project.
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

This was more of a Cutesy call for the team going to the field for the community consultations.

Pictures of the Engagement



Meeting with the CAO Kibuku district and the Senior Land Management Officer

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the CDO of Kibuku district through a phone call on 22 nd June, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Meeting interviews (Community level)
Date & Time:	Date: 22 nd 06, 2022 Time: From: 11:00am To: 12:00 am
Stakeholder (s):	Women of Kibuku Town Council, Kibuku Ward, Kibuku District
Location:	District: Kibuku Sub County: Parish: Village& Coordinates: Busikwe Park/Forest:
Total no of Participants	Male: Female: 24
Facilitator (s):	Judith Ikiring Obore

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Women of Kibuku Town Council, Kibuku Ward, Kibuku District	We have limited land yet many children consequently, redistribution of land to the children is always a challenge as they need space for cultivation and construction of houses	Noted This program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the for the good of all family members in each family. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period

	Women have no power and control over land, land is owned and controlled by the men	
	We are 5 children 4 girls and 1 boy who is the last born but after our father passed a way, the elders made the last born by the heir to our family however, he now wants to chase us the girls out of the land, according to him, girls do not inherit land.	Noted, communities will be sensitized on gender related issues, negative culture that undermines and under looks women through negatives perceptions and norms. They will also be sensitized on the importance of women inclusion since they are the major HH providers of food and basic need which they do through tilling of the land.
	We are immigrants in addition, we are 'Balalo' (pastoralists) so this is not our original village, our father who bought land around here has passed away our close relatives want to chase us away from our fathers land	Noted , need for continuous sensitization and dialogue, also GRCs will be established to handle any grievances arising from this project to prevent any escalation of grievances and conflict
	Most people have limited space of land to cultivate due to over population	Noted
	I am 78 years old and have 8 children with limited land to cultivate, can government assist me to acquire land to cultivate.	Government does not give land, what governments intends to do is to support those with customary land tenure ownership to secure their land through the titling process of their land
	My husband has 4 wives and we all have many children, there is now limited land for cultivation consequently, we now have to rent land for cultivation, each garden goes for 20,000 shillings and above per season. Lately, the last two seasons have been bad with drought so we	Noted

	are suffering	
	In the past, our forefathers owned land and even the grandchildren knew where their land was, this has been so for many generations, so why is government coming up its policies of trying to register our land?	Government has good intentions for the people and it is only trying to support the community in securing their land so that all families and individuals have their land registered and documented in their names. This process is not by force however, all community members are encouraged to participate so as to secure their land
	I own the land, so when registration begins, and I want to subdivide the land for my children, what do I do?	Family cohesion is key, have a discussion with your family so that everyone knows the piece of land they have been allocation so that during registration, you will only have to verify that those is their pieces of land
	What if I want to lease my land, what do I do?	Leasing land after the land has been registered is much easier since it will be in your names, this process will reduce on cases of land grabbing
	How long will this process take?	The land registration process will take a period of four years from the time it approved. So people should take advantage of this period to get their land secured
	In which regions are you working in?	This project is spread across 32 districts mainly located in the North and Eastern parts of Uganda and a few in the Western part all of which are characterized by customary and freehold ownership tenure
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Women exclusion, over population and fear for their land being grabbed by the government after it has been registered stood out

Pictures of the Engagement



Meeting with women of Kibuku Town Council, Kibuku Ward, Kibuku District

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the DCDO of Kibuku district through a phone call on 22 nd June, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (Community level)
Date & Time:	Date: 22 nd 06, 2022 Time: From: 11:00am To: 12:10 pm
Stakeholder (s):	MEN OF KIBUKU WARD, KIBUKU TOWN COUNCIL, KIBUKU DISTRICT
Location:	District: Kibuku Sub County: Kibuku TC Parish: Kibuku Ward Village& Coordinates: Busikwe Park/Forest:
Total no of Participants	Male: 19 Female: 0
Facilitator (s):	Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Men of Kibuku ward, Kibuku Town Council, Kibuku District	There is a lot of land grubbing in Kibuku district. This project should help to address this problem.	Noted
	The Uganda National Roads Authority	Noted

	(UNRA) tends to take people's land for road construction without compensation. If people have certificates of ownership, it will compel UNRA to compensate people.	
	The registered lands will belong to the government. When the government wants to do a project on the land, people will have no say, government will just chase people away from their land.	The lands will be registered in the names of the land owners and not government or any government institution (e.g. the District HQs, Sub County HQs, Schools etc.) unless it owns that particular piece of land. Government does not and will not chase people away from their land.
	Why has Bukedi sub region been selected for the project and not other areas? Why is the project only starting in the Eastern region?	It's not only Bukedi sub region that has been selected for this project. There are other sub regions like West Nile, Acholi, Lango, Busoga, Tooro, and parts of Bunyoro sub region where the customary and freehold land tenure systems are predominant. The project will be implemented in 32 districts of Uganda covering the Northern, Eastern, and Western regions of Uganda. It's not only starting in the Eastern but in all the regions where it will be implemented.
	After registering the lands, when the government wants to do a project on the land, will people be compensated?	Yes, people will definitely be compensated. Government does not take people's lands without compensation though in some cases, there may be delays in payment due to various reasons.
	Some people may come claiming to be from the Ministry of Lands and yet they are land grubbers. How shall we safeguard ourselves from this kind of situation?	If any person or group of persons comes to the communities claiming to be from the MLHUD, people have a right to ask the persons to identify themselves and demand that they should visit the communities with their leaders (both technical and political) from the district. There should be a representation from the district leadership.
	The Ministry of Lands should have participated in these consultations, why are they not participating? Why is it only the World Bank? Their absence creates a lot of suspicion.	The MLHUD is participating in the consultations through the MZO for Bukedi sub region located in Tororo. Some of their staff are currently attending the stakeholder workshop at Kibuku district HQs which is part of the consultations.
	There was a program called Nkusubo which was introduced in Kibuku district by a group of people and	Noted. In the future, when somebody comes to the communities asking them to pay money in order to benefit from a project, people should not rush to participate in such a project. The office of the President represented at the district by the

	supported by the LCV Chairman, the Area MP, and Police. Under this program, people were asked to contribute UGX 1m and they were told that they would receive UGX 10m in return. However, after people gave their money, those people (proponents of the program) disappeared. This has created fear in the communities. Ironically, this LCV Chairman was re-elected in the last elections.	Resident District Commissioner (RDC) should be informed about such projects so that it can carry out investigations and advise the communities accordingly.
	After my land has been surveyed and I am waiting for the certificate of ownership, am I allowed to sell part of my it or I must first consult the Ministry?	You are allowed to sell part of your land after it has been surveyed. However, after receiving the certificate of ownership, you will be required to submit it back to the Lands office/MLHUD so that the part which you have sold can be cut-off and transferred to the name of the person(s) who has bought it. This particular transfer will likely be at cost since it will be outside the scope of this (EUFLA) project.
	In Kibuku district, women are allowed to own land. The Bagwere culture does not deny women their rights to own land.	Noted and highly commendable.
	The Bagwere cultural institution has been intervening to resolve land conflicts mainly through the clan chiefs. Their role has generally been positive.	Noted
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Anxiety and fear due to the history of fake projects and fear of their land being grabbed by the government after it has been registered stood out. These

notwithstanding, the community (men) welcomed the project to their area.

Pictures of the Engagement



Meeting with men of Kibuku Town Council, Kibuku District

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the CDO of Kibuku Sub County (rural) through a phone call
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (Community level)
Date & Time:	Date: 22 nd 06, 2022 Time: From: 12:30am To: 02:30 am
Stakeholder (s):	MEMBERS OF SAALA WETLANDS MANAGEMENT ASSOCIATION (SAWESA) OF KIBUKU SUB-COUNTY, KIBUKU DISTRICT
Location:	District: Kibuku Sub County: Kibuku (rural) Parish: Village& Coordinates: Park/Forest:
Total no of Participants	Male: 9 Female: 1
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Members of Saala Wetlands Management Association	Why has World Bank together with the government come down to Kibuku district to help us register our	World Bank specifically has supported government over a long period of time and has supported communities in development projects which include among others,

(SAWESA) of Kibuku Sub-County, Kibuku District	land?	water, power, roads, agriculture etc., so this is not unique.
	Is this process by force or one has a choice to register their land?	This process is absolutely by choice, no one is going to be forced, however, every community member who owns customary land is encouraged to participate since the project is going to facilitate the costs of titling. Those who will miss the opportunity will do it on their own in future and at the personal cost
	Is it individual or group registration?	Families are encouraged to dialogue prior to the registration exercise and make informed choices whether they want to register as a group or as individuals
	If we register now, how long will it take for us to get the land title?	This information will be provided to the community by MLHUD once project implementation kicks off
	We have a fear that the kind of land grabbing happening in central region might extend to our community after land registration.	This process is actually intended to reduce on the land grabbing by issuance of land documents to the bonnafide owners
	Is this program already under law or its consultations?	It is still at design stage but it is governed by the existing land laws like the land act
	What are the requirements for registration?	One should be a customary land owner, their neighbors and local leaders should be able to verify if they are the true owners and they should have identification documents and perhaps purchase agreements
	What size of land can be registered?	All pieces of land big or small as long as in the category of customary and has never been formerly registered
	When government has its own intentions, it convinces us like this and later when we have given in, it becomes a problem.	Government has good intentions for the people, this program is meant to reduce land related wrangles and secure the land for them by titling it
	Will that money for land registration not be required to be refunded to the Bank in future?	This is a grant from the European Union (EU) through the World Bank Group (WBG), it is not a loan so it will not be refunded.

	There are very many fraudsters, how will we distinguish fraudsters from genuine people?	MLHUD will work hand in hand with the local leaders to curb this vice throughout the land registration process and community members are encouraged to verify from their leaders.
	We welcome the process and we will participate since it is not by force but by personal will	Noted
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

The members had a lot of suspicion and scepticism over government registration of their land. Despite this, they welcomed the EUFLA project.

Pictures of the Engagement



Community consultation at the offices of SAWESA, Kibuku Sub County, Kibuku district

NTOROKO DISTRICT

Project:	EU FINANCING FOR LAND ADMINISTRATION
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	Written official invitation letter from Ministry of Lands, Housing and Urban Development
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Workshop
Date & Time:	Date: 24/06/22 Time: From: 11A.M To: 5.00P.M
Stakeholder (s):	District and sub-county technical staff, Parish chiefs, Elders and religious leaders
Location:	District: Kalya Courts Hotel Town: Fort Portal City
Total no of Participants	Male: 22 Female: 8
Facilitator (s):	Segawa Samuel and Willie Epalitali

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
LC5 -Chairperson -Ntoroko district	<p>Ntoroko is witnessing a lot of rising cases of illegal settlers on privately land and this issue will need to be addressed when the demarcation and registration of land commences to avoid land conflicts.</p> <p>There is need to strengthen the land protection framework, training and capacitation of the existing Area Land Committees and District Land</p>	<p>This is noted, the registration exercise will help to resolve some of these issues since it will involve, reconnaissance, mobilization from the district to lower government levels up to the target beneficiaries, training of adjudication teams, systematic adjudication, demarcation, mapping and recordation, before the issuance of CCOs is done.</p> <p>The project intends to develop an operational framework, build tools and capacities for implementation of land adjudication activities at local level, and also capacitate communities for use of the prepared tools and</p>

	<p>Board.</p> <p>There is Oil exploration in the area by Armour Energy Uganda, which is a subsidiary of Armour Energy Australia which has raised anxiety and speculation within the community about security of tenure.</p> <p>There is need to have religious co-opted in the process and activities of land adjudication.</p>	<p>process to conduct participatory systematic adjudication process.</p> <p>Noted, sensitization and awareness creation of the targeted communities will be carried out to ensure ensure transparency and community participation.</p> <p>Noted.</p>
Elder Ntoroko district	<p>Ntoroko district is a disaster prone area and therefore, land is a very scarce resource owing to occasional flash floods which displace households for example the recent increase in the water levels of lake Albert displaced about 20,000 people in the areas of Katanga, Kanara, and Kacawampuma.</p> <p>Communal land parcels where people previously used to migrate during periods of severe drought, have since been fenced off by unknown people which is affecting the source of livelihood for the community members since the majority are pastoralists.</p> <p>There is also a very common practice, where some members of the community fence off communal roads and communally used natural</p>	<p>Noted</p> <p>Demarcating and registering individual and communal land are going to be done and this will involve adjudication, demarcation and registration of the land parcels under ownership and historical use by the communities represented by the CLAs and individually owned parcels situated in the same selected Project areas</p> <p>Noted, through sensitization and engagement with communities, political leaders and other relevant stakeholders, Demarcating and registering individual and communal land are going to be done and this</p>

	<p>resources such as water points, plans to demarcate these areas will definitely trigger conflict within the community.</p> <p>There is need to take the project to the grassroots level to ensure that there is stakeholder buy-in.</p>	<p>will involve adjudication, demarcation and registration of the land parcels under ownership and historical use by the communities which will help solve some of these issues.</p>
RDC Ntoroko district	<p>There is need to protect family land and protects the interests of women on land during the registration process</p> <p>Vulnerable and poor people need to be protected from exploitation during land registration especially the women.</p> <p>The ministry needs to have a mediation framework of land related issues in the district and around the country to help resolve the ever-increasing cases of land conflicts.</p> <p>The project needs to capacitate the committees to the extent possible in terms of facilitation and logistical support to insulate them from the potential risk of bias by members of the community who might want to facilitate the process of land adjudication.</p>	<p>Noted</p> <p>The Project will implement activities in a way to include vulnerable people of both genders. The proposed activities will build on national pilots and initiatives and global and regional good practices.</p> <p>Noted through on-going consultations the project will develop a good SEP which will facilitate a clear understanding among communities and an effective Grievance Redress Mechanism (GRM) put in place for aggrieved parties to channel their issues for an appropriate resolution.</p> <p>To the extent possible the project will provide the requisite resources to enable committees discharge their duties in the shortest time possible .</p>

	Government agencies such as NEMA and MWE have failed to enforce the law where issues related to land boundaries in protected areas are concerned.	National legislation on land registration, which currently excludes registration in areas designated as gazette /Government managed central and local forest reserves/wildlife conservation areas/protected areas and/or other ecologically sensitive areas will be enforced in this project to ensure that there is no further encroachment on these protected areas.
District Senior Lands Officer	<p>There is need to demystify and explain to the people/communities the laws related to land ownership, security and rights for example the law of adverse possession</p> <p>There is need to have a Grievance Redress Mechanism for the project.</p> <p>There is need to take stock of the land use pattern of both the low land and highland of Ntoroko district and then make informed decisions about land demarcation and issuance of certificated of title. For example, in Karugutu TC, Kibuku TC, Butangama and Kanara SC.</p> <p>The project needs to be cognizant of the issues of communal ownership and communal user rights. Similarly, demarcation and registration of communal land in the names of certain entities (personality) needs to be done after carefully assessing the registration status of these organisations.</p>	<p>Noted, sensitization and awareness creation of the targeted communities will be carried out to ensure ensure transparency and community participation.</p> <p>The project will put in place a Grievance Redress Mechanism (GRM) with a clear referral pathway for aggrieved parties to channel their issues for an appropriate resolution.</p> <p>Through the RaPPA, there is going to be triangulation and on spot analysis in order to come up with systematic land use plans that will enhance orderly settlement and optimal utilization of land as well as provision of social services and protection of Natural resources from being encroached on. Similarly, the project will not support land registration activities in forest or other protected areas (gazetted under the National laws).</p> <p>Noted</p>

General Comments or Observations

The project is long overdue, and it is expected to solve the land question in Ntoroko but will require extensive sensitization especially that community level. Encroachment on protected areas such as wetland, seasonal rivers and is very rampant which is attributed to grazing of animals (pastoralism which is the main economic activity in the project area

Pictures of the Engagement



Presentation and feedback sessions of project objectives to the stakeholders at Kalya Courts Hotel, Fort portal City

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)				
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project				
Information/Consultation:	Increase security of land rights and strengthen local land administration and management				
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the WBG and the MLHUD through a written communication				
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming				
Activity:	Physical Consultative Meeting (District level)				
Date & Time:	Date: 24 th 06, 2022 Time: From: 10:00am To: 11:30 am				
Stakeholder (s):	CAO - Ntoroko District - Otai Charles and DR. Patrick Bagonza (Production Officer)				
Location:	District: Ntoroko	Sub County:	Parish:	Village& Coordinates:	Park/Forest:
Total no of Participants	Male: 2 Female:				
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku				

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
CAO & Production Officer, Ntoroko District	I am new in office; I have spent about one and half week's in office, let's have this meeting together with the production officer, most of the technical people have gone for this	Noted

	same workshop on land administration organize in Fort-portal	
	Previously, this region had kingdoms which latter disintegrated during President Iddi Amin's regime. These kingdoms included Tooro kingdom, Rwenzori/Rwenzururu kingdom	Noted
	Ntoroko district was cut out from Rwenzori/Rwenzururu kingdom but one of the terms and conditions was for it not to indulge in kingdom issues	Noted
	Ntoroko total land area is 1360 square miles but only 40% of this land is arable	Noted
	In the past, till up to 1985, this place was communal whereby no one specifically owned any piece of land but people leaved together	Noted
	We have the mountainous area which is specifically for crop farmers	Noted
	The plains mainly located on the Western arm is mainly occupied by pastoral farmers and the game reserve	Noted
	Settlements are special, the Batuuku tribe is the dominant tribe and they are the cattle keeping tribe, these are followed by the Bakonzo while the Batooro are the minority tribe. The Bakonzo and Batooro are mainly are	Noted

	crop farmers. The lake is the metropolitan since it attracts people from different places that include even the Alur of Uganda and those of DRC.	
	Because the Batuuku are dominant, the reason to as why the district was named as Ntoroko	Noted
	There used to be a lot of poaching in the game reserve but government has put some enforcement that has bared people from poaching	Noted
	We are also bordered by River Semliki and Lake Albert and fishing is the main economic activity here	Noted
	Land use: Ntoroko by 1985 was still communally owned however, some individuals wanted to take advantage and individualize land by creating ranches but this was resisted by the majority of people.	Noted
	Consequently, the district has since then transitioned into customary land ownership	Noted
	Communal land ownership ended in Ntoroko about 6 years ago and some people have titled their pieces of land to freehold tenure but most of it is customary	Noted

	<p>Those who titled have since fenced off their land</p> <p>Most subsistence households are customary</p>	Noted
	National Forestry Authority (NFA) also took over some parts of the land and has since gazetted it.	Noted
	NFA planted a lot of Pine trees but ended up conflicting with the community which wanted to use the same land for agriculture and grazing grounds. Consequently, as a response, the community frequently burnt the NFA trees which caused a lot of losses and in response, the game rangers also killed many people.	Noted
	Pastoralism /grazing and keeping of animals (cows and goats) is the main economic activity and crop farming is secondary	Noted
	There are many land wrangles since some people who wanted to grab land registered fake titles. They have the titles, but the people have the land. They have failed to chase away the people.	Noted
	Many people came to scrambling for land and registering it after they realized that there were minerals discovered in Ntoroko for instance	Noted

	the Gypsum being mined and many others	
	Pastoralists also encroach on the river banks and the lake shows as well as in most protected areas consequently destroying the eco system. There is therefore need for especially NEMA to protect these areas	Noted
	Some time back, River Semliki and Lake Albert settlers were requesting government to give them space for burial space since most of them are immigrants from Congo and therefore have no burial land	
	The people at the lake are managed by National Environment Management Authority (NEMA) and these do not have many outstanding land wrangles. These fishermen normally want to be close to the water. NEMA cares about the Banks of the lake	Noted
	Gender, land Access and user rights: These communities are patriarchal in nature so the men own and control the land while women are side-lined since they are married away to other communities	Noted
	However, now days, we have rich women who own land and cattle but	Noted

	this is a very small percentage	
	Because of the land demarcations coming up, the population of cows is being affected because of the rampant putting up of fences by the community	Noted
	We have streams and the lake which has dry banks however; farmers graze and take their animals to the water zones. In addition, swamps are also not protected and gazetted.	Noted
	People have fenced off up to the swamps and up to the river banks.	Noted
	The district should have a role in protecting the wetlands, lake and river; they should play the role of NEMA at the district on ground	Noted
	There are interventions through NGOs that are trying to protect the river banks through sensitization Poor management of river banks is a major issue	Noted
	River banks were fenced but communities destroyed in order to access water for their animals	Noted
	Traps for water/deep wells have been erected for the animals to avoid destruction of the river banks	Noted

	<p>CAO – How are conflicts on land resolved since land is communally owned?</p>	<p>Many people now take cases to court if they fail to resolve amicably</p> <p>Most of the cases are as a result of access denial to places/ land resulting from rampant fencing</p> <p>Local leaders usually try to resolve but if it fails, they usually go to court</p> <p>Similarly, cases of animals eating up people crops are many since the majority of the people living in the plains initially were pastoralists but they have been joined by the crop farmers. Consequently, most of the crop farmers lose cases because the cattle farmers are rich and have money to sustain a case for long periods of time unlike crop farmers who are poor.</p> <p>Initially, NFA used to allow crop farmers to grow crops within the forest reserve but they were stopped then the communities started burning trees. Now NFA has changed its approach, the ask people to come and grow trees so that they can be harvested at the sometimes by both parties</p> <p>Community members are also encouraged to do echo tourism</p>
	<p>Community members poisoned all the lions because when there was drought, lions descended on their animals consequently, most lions were killed</p>	<p>Noted</p>
	<p>There is also an issue of human life/wildlife conflict</p>	<p>Now Uganda Wildlife Authority (UWA) gives communities bee hives so that farmers get honey but at the same time, bees chase away elephants from crops and animals. This is done at the boundaries of the national reserves</p>
	<p>Someone processed a land title from the lands office and came and started planting a fence over big chunks of land however, the community chased him away, he has the land title but the land has been taken away from him because it was a ghost title</p>	<p>Noted</p>

	We welcome the process and we will participate and support the project	
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

Very informative and insightful dialogue. A detailed history of land ownership in the district i.e. it evolved over the years was provided together with challenges related land. Women exclusion from land ownership and land grabbing were some of the outstanding issues.

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the Production Officer of Ntoroko district through a phone call on 24 th June, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (Community level)
Date & Time:	Date: 24 th 06, 2022 Time: From: 12:3pm To: 02:00 pm
Stakeholder (s):	WOMEN OF NTOROKO DISTRICT
Location:	District: Ntoroko Sub County: Kibuuku TC Parish: Village& Coordinates: Kasozi II Park/Forest:
Total no of Participants	Male: 0 Female: 12
Facilitator (s):	Judith Ikiring Obore

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
WOMEN OF NTOROKO DISTRICT	The wife to the late Mr. Vincent is claiming for the whole of Kibuuku district that it belonged to her late husband and that she has a land title	Noted

	for it. We had a very big security meeting in which the Resident District Commissioner (RDC) was invited.	
	Most men buy land but they do not include their wives in the purchase agreements as co-owners	<p>Noted</p> <p>Inclusion of women is part of this project. all women who own land will be encouraged and supported to register and married couples will be sensitized and encouraged to include women in this process.</p> <p>In addition, this program will support the issue of family cohesion where families, women and men, boys and girls sit together and make informed choices for the good of all family members in each family. Thus, there will be continuous sensitization and engagement of both women and men during the implementation period.</p>
	We have no access roads because people are fencing all the land even at the town councils, not even space for a foot path is spared	Noted
	We have pastoralists and food crop farmers however, animals destroy the food crops but the pastoralists bribe their way out and they are left	Noted
	If one has no money, they cannot take the case to the authorities, food can never be compensated yet both farmers are working so as to get income and food for their families	Noted
	Need to establish a buffer zone where animals pass and end	Noted

	Most agricultural officers are men and they over under look women; they do not consider our issues we suggest that government recruits a female agricultural officer to attend to our issues.	Noted The project will ensure that women are given all the support they need to access and benefit from this program. It will also put in place GRMs to address all conflicts arise from the project so as to minimize any social and environmental impacts that might impact on the population.
	If we can handle the issue of animals eating our crops first is very important.	This is noted
	Secondly, we are thankful to EU and World Bank for recognizing and consulting us women, this gives us trust and hope and it empowers us too.	Noted. Adequate supported will be provided for women to ensure that you participate and that you are not left out.
	It is important to have a land title because without it, anyone can claim your land	Noted This will also reduce conflicts on land grabbing because peoples land will be secured
	Is it Government that has sent you or just World Bank and EU?	We are here on behalf of Government, World bank and EU. EU offered a grant to the government of Uganda through the World bank to increase security of land rights and strengthen local land administration and management of land.
	We have plots of land that vary in sizes, as you come to give titles you only giving those with big pieces of land or even some of us with smaller pieces of land?	All pieces of land big or small as long as it is in the category of customary and has never been formerly registered.
	We welcome this project	Noted
Issues not responded to during SE and plans on how and when they will be addressed.		
If we can handle the issue of animals eating our crops first	NA	NA

is very important		
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General Comments or Observations

Women exclusion, land grabbing, conflict between pastoralists and crop farmers and the general fear that their land might be taken away from them

Pictures of the Engagement

	
Consultation with Women of Kibuuku Town Council, Ntoroko District	

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the Production Officer of Ntoroko district through a phone call on 24 th June, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (Community level)
Date & Time:	Date: 24 th 06, 2022 Time: From: 12:30pm To: 01:50pm
Stakeholder (s):	Men of Kasozi II village, Kibuuku Town Council, Ntoroko District
Location:	District: Ntoroko Sub County: Kibuuku Town Council Parish: Village& Coordinates: Kasozi II Park/Forest:
Total no of Participants	Male: 9 Female: 0
Facilitator (s):	Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Men of Kasozi II village, Kibuuku Town Council, Ntoroko District	If you own land individually and it's not a family land, can you be supported to get a certificate?	Yes, you can be supported to get a certificate. The project will support both individuals and groups to have their lands registered and obtain certificates of ownership.
	Some people have been on this land	Noted. The MLHUD will follow up this matter.

	for a long time but when they tried to process titles for the land, they failed because the system indicated that the area already had a Title .	
	If someone is from Ntoroko and has land elsewhere (within Tooro sub-region), can he be helped to get his/her land registered?	Yes, provided the land is within the districts that are going to benefit from the project.
	The whole of Kibuku TC has been affected by the problem of a fraudulent title which was acquired by a person from Kabarole district. There are so many fake land titles in Ntoroko district including the one of one of the people with a fake land title is called Baguma .	Noted. The MLHUD will follow up this matter with the possibility of investigating it.
	There are cases where the rich claim ownership of big chunks of land in some areas. How will you help communities in such areas get justice?	The MLHUD will share this information with other government agencies who can help the communities. Such cases should also be reported to the RDC who represents the office of the president at the district and heads the District Security Committee.
	This project will help people get certificates of ownership but there are people who do not have the capacity to develop or productively utilize their lands. Are there programs to support such people to make better use of their lands?	After getting their lands registered, such people can benefit from government programs like the Parish Development Model (PDM).
	Is the project going to benefit everybody or there will be some criteria for selecting the beneficiaries?	The MLHUD will develop the criteria for selecting the beneficiaries.
	Will people who settle on land that belongs to the Kingdom be	This is only possible if the Kingdom allows it since the land belongs to the Kingdom. This may require discussions between the leaders of the community and the

	allowed/supported to get certificates of ownership?	Kingdom before the project can support such people.
	In Ntoroko, land is inherited by children irrespective of whether they are male or female. The community has regard for gender issues.	Noted.
	The World Bank has partnered with government to support many projects. Why has the World Bank decided to come on ground in this case?	The World Bank has always come on ground to consult the communities about projects. Sometimes it does it through the implementing agencies.
	Will WB/MLHUD establish an office at the district for implementation of the project?	The MLHUD will put in place a proper structure/team for implementing the project at the districts. The Ministry will work with some district officials and the MZO located in Fort Portal City.
Issues not responded to during SE and plans on how and when they will be addressed.		
None	NA	NA

General Comments or Observations

The issue of fake land titles and attempts to grab people's land dominated the discussions. Their concerns notwithstanding, the community welcomes the project to Ntoroko district.

Pictures of the Engagement



Consultative meeting with men of Kasozi II village, Kibuuku TC, Ntoroko District

Project:	EU FINANCING FOR LAND ADMINISTRATION IN UGANDA (P175732)
Meeting Objective:	Stakeholder Consultations for the ESF instruments (ESMF, VMGF, SEP & RPF) for the EUFLA Project
Information/Consultation:	Increase security of land rights and strengthen local land administration and management
How & when was this meetings organized/agreed upon by the Stakeholder	This meeting was organized by the Production Officer of Ntoroko district through a phone call on 24 th June, 2022
Relevant Component:	Institutional strengthening and training, Systematic adjudication in the selected Project areas, Monitoring and Evaluation and Gender mainstreaming
Activity:	Physical Consultative Meeting (Community level)
Date & Time:	Date: 24 th 06, 2022 Time: From: 03:00pm To: 05:00 pm
Stakeholder (s):	Community of Itojo village, Karugutu Sub County, Ntoroko District
Location:	District: Ntoroko Sub County: Karugutu Parish: Village& Coordinates: Itojo Central Park/Forest:
Total no of Participants	Male: 15 Female: 1
Facilitator (s):	Judith Ikiring Obore and Godwin Anguyi Asiku

Meeting Details

Stakeholder	Issues Raised	Response/Mitigation
Community consultation	What are the qualifications and procedures for accessing this land registration program is it for free or is it for paying?	<p>The first qualification is ownership of customary land.</p> <p>All pieces of land big or small as long as in the category of customary and has never been formerly registered.</p> <p>Additional qualification is verification and approval by all neighbors that you are the rightful owner.</p> <p>Identification documents like identity card or purchase agreements of the land might be a requirement during the verification exercise.</p>
	My comment goes to the district leadership, we have no proper demarcated boundaries within the 3 sub counties and you find that each district is claiming for the same resource like game reserve, swamps, this may bring issues during this registration program	The project is going to work closely will all the 3 town councils so as to avoid any friction and avoidable conflicts, they will also use available documentations that clearly shows the map of the area
	People perceive information differently; many are going to ask why you people have come here telling us about registering our land. There is going to be need for a detailed consultation and sensitization	<p>Noted, surely a detailed consultation and sensitization are going to be part of this exercise throughout the project life</p> <p>Ntoroko technical and political leadership are attending a workshop at Kalya Courts on the same issue and they will come and sensitize the community. In addition, MLHUD will carry out further consultations in all the select 32 districts during project implementation.</p>
	My fear is that last year, there was a rumour that MLHUD wanted to tax people who had idle land, wont this make government to come and tax	We are not aware of this rumour. Government has good intentions for this project and for the people.

	us?	
	As a community, we have even failed to facilitate the sub county land board to go and inspect our land so we realize that government wants to secure for us our own land	Noted
	We need a lot of community sensitization	Noted
	Another challenge we have is that we have no officials recruited at the district for instance the surveyor people privately hire these services from the nearby districts which makes it very costly	The project will be going to be equipped with all the specialists needed and they will work hand in hand with the local governments of these areas.
	Engage land committees, cultural leaders, opinion leaders and local leaders to act as foot soldiers in the sensitization program.	Noted
	Ntoroko has a lot of natural resources and much of the land about 60% is under government control e.g., forest reserves, Lake Albert, River Semliki etc., the reason most people end up encroaching on protected areas.	Noted
	Our climate is not favorable, because of the rift valley; we are 1,000 meters below sea level so we usually experience extreme weather conditions, severe heat and drought	Noted

	and during dry season and during rainy season, we also experience serious flooding, that is why most people end up encroaching the forest reserves for survival especially for grazing.	
	If the game reserve is reserved, who is it reserved for? If it's for the people, then let it be given to the people.	The government holds the protected areas like game parks and game reserves, swamps, rivers banks, lakeshores etc. in trust for the people.
	Land ownership, it is usually men who own land, it is only independent women who can buy land and register it in their names.	Need for community sensitization on gender and inclusion of women in land ownership.
	Some literate women now days when buying property with their spouses register property in both their names	Noted
	None of us sited here has a land purchase agreement written jointly with the women's names	Noted, however, it is important for you to bring women on board since they are your wives, sisters, daughters and your mothers. Women are the basic providers of food as already mention earlier in this meeting and the till the land to do so. It is high time you brought women on board.
	Conflicts are usually handled at family level but if the fail, then they move it to the Local council (LC) courts and to the magistrate's court	Noted, also GRM and GRCs will be established to deal with conflicts and avoid escalation of issues.
	Some men marry women and when these women fail to give birth to children, the man gets another woman and sometimes he tells the woman not to touch his land so how	The project will offer support to all VMGs, women and PWDS inclusive, to participated in this project to avoid being excluded.

	can such women be helped?	
	In Ntoroko, the only office handling family and child protection issues is in Karugutu town council so everyone has to travel to Karugutu.	Noted, support will be given to community member, this will be communicated on the onset of implementation
	There is need for the Community Development Officer (CDO) to support communities and families.	Noted, the project is going to work closely with the Community development department at the district level.
	When is this project starting?	This stage is for preparation of the Environmental and Social framework instruments for guiding this project and this will continue up to 30 th June 2022, after that, MLHUD will communicate to each beneficiary district the actual plan and program for implementation of the project.
	Where are they going to register us from, we have an issue of distance between the villages and the sub counties?	This information will be disclosed by the MLHUD at the onset of implementation.
	Parish chief: land registration in our area has been a demand and we welcome this project and will support you	Noted
	During the construction of Fort-portal – Bundibugyo road, people were compensated little simply because the land was not registered so the valuation process undervalued the Bundibugyo – Lumia (Fort-portal – Bundibugyo) road project.	Noted
Issues not responded to during SE and plans on how and when they will be addressed.		

If we can handle the issue of animals eating our crops first is very important	NA	NA
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General Comments or Observations

Women exclusion, land grabbing, conflict between pastoralists and crop farmers and the general fear that their land might be taken away from them

Pictures of the Engagement



Community meeting in Itojo Central village, Karugutu SC, Ntoroko district

ANNEX 2: 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 PIU and the project proponents/beneficiaries.

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.

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 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: Government staff, Consultants,	During Implementation	After Implementation
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Community volunteers		
FULL-TIME		
PART-TIME		

3) DESCRIPTION OF PROCESS THAT COULD BE IMPLEMENTED

3.1 Briefly describe the nature of the subproject.

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. wetlands/lakes shores/river banks etc.):

- 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 area?
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:

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.

Issue	Potential for Adverse Impacts				
	None	Low	Medium	High	Unknown
Number of stream on the land					
Wildlife habitats or populations on land					
Environmentally sensitive areas on the land					
Cultural or religious sites on land					
Economic or physical resettlement required					
New settlement pressures created					
Other (specify):					

	Potential for Adverse Impacts				
	None	Low	Medium	High	Unknown
Existing water sources supply/yield depletion					
Existing water users disrupted					
Downstream water users disrupted					
Increased numbers of water users due to new settlers					
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 ____

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

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 the risk of HIV/AIDS? _____
- How will the project minimize the risk of spread of the Covid-19 virus?

-
- 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:

How will the sub-project minimize the risk of GBV? How will cases of GBV be resolved when they do occur?

Note: ESIA's will not be necessary for the subprojects under this project, only ESMPs may be required. Other instruments that will be required include SEP, RAP and VMGMP.

CERTIFICATION

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

Reviewer:

Name:

Signature:

Date:

I therefore recommend /do not recommend titling of the land.

Is an Environmental and Social Management Plan (ESMP) required? YES _____ NO _____

ANNEX 3: CHANCE FIND PROCEDURES

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

A Chance Find Procedure to guide management of any accidental discoveries of physical-cultural resources (PCRs) in the process of implementing the project's sub-activities like **demarcating and registering individual and communal land which involves** excavation/digging. The procedure will be as follows:

- a. Stop all activities 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 Project Implementation Unit (PIU) who will in turn 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 implementation, the PIU or its representative on Site shall monitor the above regulations relating to the management of any chance find encountered are observed;
- i. Project activities at the affected site 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 4: INCIDENT & ACCIDENT REPORTING FORM FOR SUBPROJECTS

Note: This form is to be used by subprojects for reporting all incidents during the implementation of project activities.

(Note: It is important that incidences of child abuse and sexual harassment and severe criminality / social risks/ accidents(minor or fatal) that may involve Project staff or the community are documented and brought to attention of MLHUD and the Bank within 12 hours 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/worker 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) – <i>if written attach report.</i>	
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 MLHUD	
	Name / position of MLHUD staff incident was reported	
	Comments / Recommendations for MLHUD staff for which Incident was first reported	
	2 nd Name/Position / Department for which incident was reported in MLHUD / Follow up Action Recommended.	.

ON-SITE ACCIDENT RECORD FORM

Instructions:

- Please promptly fill this form to record the incidents including near misses
- The third person such as the foreman, line supervisor or staff contact should immediately fill this form
- Where more than one person is involved in the accident/incident, a separate form shall be completed for each individual.

- The information provided shall/should be captured in the separate accidents log book by the Safety Officer

Ref. No.	PARTICULARS	DETAILS					
	Kind of the accident/ incident	Injury		Equipment		Environmental	
Hazard			Damage/loss		Social		
Near Miss			Fire				
1	Who was involved Information on the Person involved in the accident	Name:			Occupation:		
		Address:			Tel:		
2	Full details about the accident	Describe the project site and/or location where the accident happened:					
		Date of the incident: Date / /					
		Time of the incident:					
		Describe how the accident occurred					
		If the person involved in the accident suffered an injury, state the nature of the injury					

3	What first Aid was provided?	Treatment details:
	In Case of Referral	Name of Health Unit: Date and time of Arrival: Receiving Health worker: Health Unit Contact:
	Notification of respective authorities by date and time	MLHUD: World Bank:
4	Details and Signature of the person completing this form	Please sign the record and provide the date as at the time of preparing this record Name: Position: Date / / / Telephone contacts Signature:
5	Details of the witness at the time of the incident	Please sign the record and provide the date as at the time of preparing this record Name: Position: Date / / / Telephone contacts Signature:

6	For Official use only	<p>This is to confirm that the accident record has officially been received by the responsible Occupational Health and Safety Officer _____, on thisDay, of201.....</p> <p>Name:</p> <p>Position</p> <p>Signature</p>
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ANNEX 5: LABOR MANAGEMENT PROCEDURES (LMP)

Note: Management of Labor issues on the EUFLA project. The development of the Labor Management Plan, shall follow these procedures and shall be used by all employers on the EUFLA project 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 LMP 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 Bank'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 Plan include:

1. Overview of Labour on the project
2. Assessment of Key potential labour risks
3. Brief Overview of Labour Legislation: Terms and Conditions
4. Brief Overview of Labour 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

1 OVERVIEW OF LABOUR USE ON THE PROJECT

The project will involve direct workers, contracted workers, primary supply workers, and community workers who will mainly participate as volunteers.

The Labour Management Plan (LMP) applies to project workers including full-time, part-time, temporary, migrant workers¹⁴ etc. The LMP is applicable, per ESS2 to the project in the following manner:

1. people employed or engaged directly by the Contractor (including the project proponent and the project implementing agencies) to work specifically in relation to the project (*direct workers*);
2. people employed or engaged through third parties to perform work related to core of the project, regardless of location (contracted workers).

¹⁴ A "migrant worker" is a person who either migrates within their home country or outside it to pursue work.

This section describes the following, based on available information:

1. **Number of Project Workers:** This includes the total number of workers to be employed on the project, and the different types of workers: direct workers, contracted workers and community workers. The number of staff at each site where the EUFLA project/subproject operations will be executed is currently not known.
2. **Characteristics of Project Workers:** To the extent possible, a description and an indication of the likely characteristics of the project workers e.g. local workers, national or international migrants, female workers, workers between the minimum age and 18.
3. EUFLA project activities will be handled by qualified staff and Consultants hired by MLHUD
4. Construction and/or rehabilitation works required at project sites will be undertaken by Contractors and subcontractors.
5. **Timing of Labor Requirements:** The timing and sequencing of labor requirements in terms of numbers, locations, types of jobs and skills required. The timing of labor requirements will correspond to timing of implementation of activities under the different project components;
6. **Contracted Workers:** The anticipated or known contracting structure for the project, with numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor. If it is likely that project workers will be engaged through brokers or agents, this should be noted together with an estimate how many workers are expected to be recruited in this way.
7. **Migrant Workers:** If it is likely that migrant workers (either domestic or international) are expected to work on the project, this should be documented.

HEALTH AND SAFETY

a) General

The Contractors, Sub-Contractors and Service providers will be committed to the safety of their employees and non-employee workers at the project sites and will operate in collaboration with and to the requirements of the local health authorities. They will have to comply with the Government of Uganda's Workers' Compensation Act, 2000 which outlines the compensation to workers for injuries suffered and Scheduled diseases incurred during the course of employment.

MLHUD recognizes that a workplace must be safe and without risk of injury to employees. Ugandan regulations require basic protective clothing for visibility and identification including proper foot protection, overalls where needed, protective gloves, and raincoats for wet weather work.

MLHUD (represented by the PIU) together with Contractors and/or Service providers will comply with applicable provisions of the Ugandan Occupational Safety and Health Act, 2006, as well as applicable ILO clauses C155-Occupational Health and Safety 1981; C167-Safety and Health in Construction 1988, and ILO Code of Practice on Safety and Health in Construction 1992 which covers safety and health planning, co-ordination and compliance.

b) Clothing and Personal Protective Equipment

In accordance with Section 19 of the Uganda Occupational Safety and Health Act, 2006, the contractor will provide and equip all employees with the appropriate personal protective equipment (PPE) to adequately protect them from hazards associated with their specific occupation. The Contractor or his sub-contractor will ensure that all PPE including protective clothing and equipment purchased for use by its employers is manufactured to such a nationally and internationally recognized standard as to ensure adequate protection against injury and accident. The contractor will also ensure that any sub-contractors involved on the project provide the appropriate level of PPE to their employees.

a) First Aid

In accordance with Section 55(1-8) of the Uganda Occupational Health and Safety Act of 2006, the contractor will provide and maintain adequate first aid facilities appropriate to the conditions of work being undertaken for the BIP. Scale of first aid facilities will be related to the size of the job. In the event of a medical emergency, the contractor will also make arrangements to evacuate injured persons to a health centre.

b) Epidemics

In the event of any outbreak of illness of an epidemic nature, the project will comply with and carry out such regulations, orders and requirements as may be made by the Government, World Health Organization or the local medical or sanitary authorities, for the purpose of dealing with and overcoming the epidemic.

c) Accident or Injury to Workers

The OHS measures will be designed and implemented to address remedies for adverse impacts such as occupational injuries, deaths, disability and disease

d) Reporting of Accidents

The Contractor will ensure any sub-contracts established with non-employee workers for the EUFLA project will outline the responsibilities to report to appropriate project staff the details of any accident as soon as possible after its occurrence. In the case of any fatality or serious accident, contractor would ensure that the sub-contractors are aware of the importance to notify the contractor immediately by the quickest available means following an accident (Ref. to HSMP).

e) f. Records of Safety and Health

The contractor will maintain safety and health records and make reports concerning safety, health and welfare of persons and damage available to the appropriate authorities.

f) g. Amenities

In accordance with Section 50 of the Uganda OSHA, 2006, contractor will in so far as is reasonably practicable, having regard to local conditions, provide on the worksite an adequate supply of potable and non-potable drinking water for the use of his employees and non-employee workers.

In accordance with Section 49 of the Uganda OSHA, 2006, the contractor will provide and maintain adequate sanitary latrine accommodation for the use of the employees and non-employee workers for the interconnection project and shall keep the whole of the facility and latrines in a clean and sanitary condition in accordance with the requirements of the Health Authorities of the Government.

In accordance with Section 54 of the Uganda OSHA, 2006, contractor shall provide suitable facilities appropriately furnished for the consumption of food.

g) h. Engagement of Labour

The contractor's preference is to employ local staff where possible and with the required qualifications and experience. The Contractor will comply with the applicable provisions of ILO policies regarding avoidance of forced labor. The contractor may from time to time employ casual/temporary labour for the project. Contractor will keep records to include information on casual/temporary labour and intends to avoid long term status of casual workers.

h) No Employment of Children

The ILO definition of a child is a person of 14 years of age or under. If hazardous work is involved, then the minimum age is 18 years. Applicable conventions adopted by the ILO to be applied include C138 -Minimum Age 1973; and C182-Worst Forms of Child Labour 1999.

In accordance with the Ugandan Employment Act (2006) Section 32, contractor will forbid the employment of anyone under the age of 18. Ugandan Law forbids the employment of any child under the age of 12 or under the age of 14 unless it is light work, does not interfere with schooling and only under the direct supervision of a person age 18 or over.

i) Records

Section 18 of the Minimum Wages Advisory Boards and Wages Councils Act, Cap. 221 established by the Government of Uganda addresses record and notice requirements for employers where a wages regulation order applies. Section 21 of this act addresses penalties for false entries or records. Section (50) of the Ugandan Employment Act stipulates the requirement of the employer to provide pay statements.

The Contractor will keep proper records of the time worked by every employee engaged on the project irrespective of the employee's method of payment (hourly or salary), the class of work on which employed and the wages paid. The project (MLHUD_PIU) will also keep proper records for every employee engaged, their gender, the class of work in which employed, whether as a casual or permanent employee, and the wages (and allowances if any), paid in accordance with Ugandan regulations. These records will be available at any time for inspection by authorized lender representative or authorised representative of the government. The Contractor will produce, if required, other records that may be necessary to provide evidence of their compliance with the requirements of this paragraph.

j) Grievance Mechanism

Where project-affected communities are anticipated have grievances on the project and its activities, the Project is required to "establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances.

OTHER SAFETY MEASURES

a) No Alcoholic Liquor, Drugs, and Firearms

The contractor will not import, sell, give, barter or otherwise dispose of any alcoholic liquor or illegal drugs, or permit or suffer any such importation, sale, gift, barter or disposal by its employees, labour or contractors. The Contractor will not give, barter or otherwise dispose of any arms or ammunition of any kind or permit or suffer any such action by its employees, labour or contractors.

b) Festivals and Religious Customs

In all dealings with his staff and labour, the Contractor will have due regard to all recognised festivals, days of rest and religious or other customs. It is recognized that some form of construction activities will be required during these times and will managed as described in the section on Working Hours.

c) Disorderly Conduct

The Contractor will at all times take all reasonable precautions to prevent any unlawful, riotous or disorderly conduct by or amongst his staff and labour and for the preservation of peace and protection of people and property in the neighbourhood of the EUFLA project sites.

d) Illegal Hunting

To avoid illegal hunting, the Contractor will:

Prohibit project workers from hunting bush meat during working hours or on project work sites.

Prohibit project workers from possessing firearms, snares and other hunting equipment when on project work sites.

e) Prohibit transport of bush meat on project vehicles.

Pay workers an adequate wage so that they can buy their food without augmenting it with illegally obtained bush meat.

f) HIV/ AIDS POLICY

The ILO's Code of Practice on AIDS recognizes HIV/AIDS as a workplace issue and goes beyond raising awareness to include non-discrimination, confidentiality, care and support. UNAIDS and other agencies produce guidelines of employer good practice with regard to HIV/AIDS. The EUFLA project contractor will also follow applicable Ugandan national policy on HIV/AIDS.

The contractor will arrange for its employees to attend an HIV awareness programme provided in accordance with the HIV/AIDS Policy and UNAID guidelines by a third party organisation such as The Aids Support Organisation (TASO). The programme will take place during its employee's normal working hours. HIV/AIDS management programmes will be subject to the normal monitoring process of the project. Further information about the HIV awareness programme is provided below.

The EUFLA project contractor will:

- Retain services of a Nominated Service Provider to provide an HIV/AIDS Awareness Program to Employees and the Local Community;
- Give any representative of the Nominated Service Provider all reasonable access to the worksite in connection with the HIV/AIDS Awareness Program;
- Instruct Employees to attend the HIV/AIDS Awareness Program in the course of their employment and during their normal working hours or any period of overtime provided for in the relevant employment contracts and uses all reasonable endeavors to ensure this instruction is followed;
- Provide suitable space for delivery of the HIV/AIDS Awareness Program; and,
- Referral to testing, counselling and advice on HIV/AIDS in compliance with UNAIDS guidelines.

The EUFLA project implementation and management unit will treat HIV/AIDS the same as other life-threatening illnesses and handicaps in terms of our policies and benefits where they apply. The project will not discriminate against a qualified individual with regard to job application, hiring, advancement, discharge, compensation, training, or other terms, conditions or privileges of employment. It is recognized that an employee with HIV/AIDS or another life-threatening illness may wish to continue in as many of his/her normal pursuits as his/her illness allows, including work. As such, the Contractor will be supportive of and make reasonable accommodation for the employee who is medically able to perform his/her job. An employee's medical information is personal and will be treated as confidential.

While accommodating employees with life-threatening diseases and other disabilities, however, it is recognized that, obligation to provide a safe work environment for all employees will rest with the Contractor. The Contractor ought to be sensitive and responsive to co-worker's concerns and will emphasize employee education. The Contractor will continue efforts to be adequately informed about HIV/AIDS and will make this information available to employees on a regular basis.

People with AIDS or HIV infection are entitled to the same rights, benefits and opportunities as people with other serious or life-threatening illnesses;

Employment practices comply with local laws and regulations and/or the practices of the parent company, whichever is greater, and where applicable;

Employment practices are based on the scientific and epidemiological evidence that people with AIDS or HIV infection do not pose a risk of transmission of the virus to co-workers through ordinary workplace contact;

Senior management unequivocally endorses non-discriminatory employment practices and education programs or information about HIV/AIDS, the contractor will communicate policies and practices to employees in simple, clear, and unambiguous terms;

The contractor will provide employees with sensitive, accurate and up-to-date information about risk reduction in their personal lives;

The contractor will protect the confidentiality of employee's medical insurance information.

To prevent work disruption and rejection by co-workers of an employee with HIV/AIDS or STI/STD infections, the contractor will undertake education for all employees before such an incident occurs and as needed thereafter; and

The EUFLA project management will not require HIV/AIDS screening as part of pre-employment or general workplace physical examinations.

2 ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

The project presents occupational health and safety risks that may arise from the implementation of project activities especially **Activity 1. Institutional strengthening and training** and **Activity 2. Systematic adjudication in the selected Project areas**. These include: 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 the risk of infection with or spread of the Covid-19 virus, Health risks of labour relating to HIV/AIDS and other sexually transmitted diseases Discrimination and denial of equal opportunity in hiring and promotions/incentives/training opportunities (contracted workers) among others

MANAGEMENT/MITIGATION OF KEY POTENTIAL LABOUR RISKS


i. Policies and Procedures

Measures that should be followed during project implementation to address labour risks are provided below:

- a) All employers on this project shall develop and implement procedures to establish and maintain safe workplaces;
- b) All parties involved in employing or engaging project workers shall make sure to provide full information to workers, and conduct training for them about OHS requirements.
- c) Personal protective equipment should be provided to workers without expense to them.
- d) Clear processes and procedures shall be available to workers to enable them to report work situations that they believe are not safe or healthy, and accordingly remove themselves.
- e) Facilities appropriate to the circumstances of the works will be provided to the project workers.
- f) A system of regular review of OHS performance and the working environment will be put in place.
- g) A safety Plan shall be provided before the beginning of works on the project.
- h) Insurance of project workers.

3 APPLICATION OF LABOUR LEGISLATION RELATED TO OCCUPATIONAL HEALTH AND SAFETY

Managing occupational health and safety procedures will be based on Uganda's Occupational Safety and Health Act, 2006; Employment Act, 2006, and World Bank's Environmental and Social Standards: ESS2 on Labour and Working Conditions and ESS4 Community Health and Safety. Key OHS measures are as follows:

-  Procedures to ensure establishing and maintaining safe working conditions.

- ✚ Reporting channels for workers to report work situations that they see are not safe or healthy.
- ✚ Compliance to requirements of the OHS Act by employers (contractor and sub-contractors).
- ✚ A system for continual review of OHS performance and conditions in workplace environment.

2 CHILD LABOUR AND AGE OF EMPLOYMENT

- ✚ Persons under the age of 18 will not be employed or engaged in connection with this project.
- ✚ Age of workers will be verified from their national identity documents.
- ✚ If an underage worker is found on the project, the contractor who employed such workers shall be stopped from working and be given a notification to change such workers.

5 TERMS AND CONDITIONS OF EMPLOYMENT

- ✚ Wages shall be paid to the project workers by the contractors according to Ugandan laws.
- ✚ Maximum number of hours that can be worked on the project is 8 hours a day. Any extra hours worked will be counted as overtime and paid for in accordance with the Employment Act, 2006.
- ✚ All other terms and conditions specified in the Ugandan labor laws and World Bank's OHS requirements applicable to the project.

6 GRIEVANCE MECHANISM

The project will continue to strengthen and revise the Grievance Redress Mechanism (GRM) established during project implementation through the appropriate institutional structures for Project management at national, district and community levels. Notifications about the grievance mechanism will be carried out through sensitization during the community and worker sessions. A wide range of project-affected people: community members, members of vulnerable groups, project implementers, civil societies, and the media shall register grievances. Grievances will also continue to be received through established MLHUD communication channels.

The project will establish a Grievance Mechanism System as a formal process for receiving, evaluating and resolving program-related grievances from affected communities and the public. Grievances may be reported in form of claim, complaint or issue related to participation in works, benefit-sharing, compensation benefits etc. Various stakeholders will be sensitized on how to lodge a grievance during project implementation.

In implementing an effective grievance, management system consideration shall be given to the resulting from the following:

- Disciplinary action
- Individual grievances
- Collective grievances and negotiation of collective grievances
- Gender-based violence, sexual exploitation and workplace sexual harassment.

a) Disciplinary Procedure

The starting point for all disciplinary action is rules. These rules may be implied or explicit. Some rules are implied in the contract of employment (e.g. rule against stealing from the employer, sexual harassment, use of drugs etc.), it is recommended that even implied rules be included in the disciplinary code or code of conduct.

b) Grievance Procedure

It is recommended that contractor(s) who will be engaged for the project provide their grievance procedure as a requirement for tender which at a minimum should comply with MLHUD requirements.

c) Gender-based Violence, Sexual Exploitation and Workplace Sexual Harassment

It is recommended that a Code of Conduct be developed to address workplace issues. MLHUD will, with support from local area NGOs/CBOs and District, identify institutions and service providers actively engaged in prevention of gender-based violence, sexual exploitation and workplace sexual harassment. The already existing National and local GBV Prevention and Response strategies will provide guidance on how to handle such issues. In cases of grievances related to gender-based violence, they will be reported through the project/contractor and the nature of the complaint will be recorded along with the age of the complainant and their relation to the project.

d) Responsibilities

The Table below shows entities and their roles in managing workers or staff of this project. This table can be updated as project circumstances deem necessary. The LMP will be updated with standard template of contracts.

Table: Entities and roles in managing project workers or staff

Activity	Responsible entity
Engagement and management of project workers	Contractors who will be supervised by the PIU of MLHUD
Engagement and management of contractors/subcontractors	Consulting Firms/Companies who will be supervised by the MLHUD
Occupational health and safety (OHS)	Contractors, MLHUD
Training of project staff	MLHUD
Addressing workers' grievances	MLHUD

7 CONTRACTOR MANAGEMENT

The contractor shall be required to manage , keep records and report on terms and conditions related to labour management. Records should include:

- Labor conditions:** records of workers engaged under the Project, including contracts, induction of workers including code of conduct, hours worked, remuneration and deductions (including overtime) etc.
- Safety:** recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
- Workers:** number of workers, indication of origin (expatriate, local, non-local nationals), gender, age with evidence that no child labor is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- Training/induction: dates, number of trainees, and topics.**
- Worker grievances:** details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

LIST OF ANNEXES

ANNEX 1: STATUS OF RATIFICATION OF INTERNATIONAL LABOUR ORGANIZATION (ILO) CONVENTIONS

Conventions	Countries								
	Kenya	Uganda	Tanzania	Rwanda	Burundi	Ethiopia	DRC	The Sudan	South Sudan
ILO Convention 87 on Freedom of Association and Protection of the Right to Organize	Not Ratified	Date of Ratification : 02 Jun 2005 Status: In Force	Date of Ratification : 18 Apr 2000 Status: In Force	Date of Ratification : 08 Nov 1988 Status: In Force	Date of Ratification : 25 Jun 1993 Status: In Force	Date of Ratification : 04 Jun 1963 Status: In Force	Date of Ratification : 20 Jun 2001 Status: In Force	Not Ratified	Not Ratified
ILO Convention 98 on the Right to Organize and Collective Bargaining	Date of Ratification : 13 Jan 1964 Status: In Force	Date of Ratification : 04 Jun 1963 Status: In Force	Date of Ratification : 30 Jan 1962 Status: In Force	Date of Ratification : 08 Nov 1988 Status: In Force	Date of Ratification : 10 Oct 1997 Status: In Force	Date of Ratification : 04 Jun 1963 Status: In Force	Date of Ratification : 16 Jun 1969 Status: In Force	Date of Ratification : 18 Jun 1957 Status: In Force	Date of Ratification : 29 Apr 2012 Status: In Force
ILO Convention 29 on Forced Labour	Date of Ratification : 13 Jan 1964 Status: In Force	Date of Ratification : 04 Jun 1963 Status: In Force	Date of Ratification : 30 Jan 1962 Status: In Force	Date of Ratification : 23 May 2001 Status: In Force	Date of Ratification : 11 Mar 1963 Status: In Force	Date of Ratification : 02 Sep 2003 Status: In Force	Date of Ratification : 20 Sep 1960 Status: In Force	Date of Ratification : 18 Jun 1957 Status: In Force	Date of Ratification : 29 Apr 2012 Status: In Force
ILO Convention 105 on the Abolition of Forced Labour	Date of Ratification : 13 Jan 1964 Status: In Force	Date of Ratification : 04 Jun 1963 Status: In Force	Date of Ratification : 30 Jan 1962 Status: In Force	Date of Ratification : 18 Sep 1962 Status: In Force	Date of Ratification : 11 Mar 1963 Status: In Force	Date of Ratification : 24 Mar 1999 Status: In Force	Date of Ratification : 20 Jun 2001 Status: In Force	Date of Ratification : 22 Oct 1970 Status: In Force	Date of Ratification : 29 Apr 2012 Status: In Force

ILO Convention 138 on Minimum Age (of Employment)	Date of Ratification : 09 Apr 1979 Min Age: 16 years Status: In Force	Date of Ratification : 25 Mar 2003 Min Age: 14 years Status: In Force	Date of Ratification : 16 Dec 1998 Min Age: 14 years Status: In Force	Date of Ratification : 15 Apr 1981 Min Age: 14 years Status: In Force	Date of Ratification : 19 Jul 2000 Min Age: 16 years Status: In Force	Date of Ratification : 27 May 1999 Min Age: 14 years Status: In Force	Date of Ratification : 20 Jun 2001 Min Age: 14 years Status: In Force	Date of Ratification : 07 Mar 2003 Min Age: 14 years Status: In Force	Date of Ratification : 29 Apr 2012 Min Age: 14 years Status: In Force
ILO Convention 182 on the Worst Forms of Child Labour	Date of Ratification : 07 May 2001 Status: In Force	Date of Ratification : 21 Jun 2001 Status: In Force	Date of Ratification : 12 Sep 2001 Status: In Force	Date of Ratification : 23 May 2000 Status: In Force	Date of Ratification : 11 Jun 2002 Status: In Force	Date of Ratification : 02 Sep 2003 Status: In Force	Date of Ratification : 20 Jun 2001 Status: In Force	Date of Ratification : 07 Mar 2003 Status: In Force	Date of Ratification : 29 Apr 2012 Status: In Force
ILO Convention 100 on Equal Remuneration	Date of Ratification : 07 May 2001 Status: In Force	Date of Ratification : 02 Jun 2005 Status: In Force	Date of Ratification : 26 Feb 2002 Status: In Force	Date of Ratification : 02 Dec 1980 Status: In Force	Date of Ratification : 25 Jun 1993 Status: In Force	Date of Ratification : 24 Mar 1999 Status: In Force	Date of Ratification : 16 Jun 1969 Status: In Force	Date of Ratification : 22 Oct 1970 Status: In Force	Date of Ratification : 29 Apr 2012 Status: In Force
ILO Convention 111 on Discrimination (Employment and Occupation)	Date of Ratification : 07 May 2001 Status: In Force	Date of Ratification : 02 Jun 2005 Status: In Force	Date of Ratification : 26 Feb 2002 Status: In Force	Date of Ratification : 02 Feb 1981 Status: In Force	Date of Ratification : 25 Jun 1993 Status: In Force	Date of Ratification : 11 Jun 1966 Status: In Force	Date of Ratification : 20 Jun 2001 Status: In Force	Date of Ratification : 22 Oct 1970 Status: In Force	Date of Ratification : 29 Apr 2012 Status: In Force

ANNEX 6: GUIDELINE ON CODE OF CONDUCT

1. A satisfactory code of conduct will contain obligations on all project workers (including sub-contractors) that are suitable to address the following issues, as a minimum. Additional obligations may be added to respond to particular concerns of the municipality, the location and the project sector or to specific project requirements.

2. The Code of Conduct will be written in plain language (translated into the main local languages) and signed by each worker to indicate that they have:

- received a copy of the code;
- had the code explained to them;
- acknowledged that adherence to this Code of Conduct is a condition of employment; and
- understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

3. The Contractor will conduct awareness raising and training activities to ensure that workers abide by the Code of Conduct (such as through toolbox talks). The Contractor will also ensure that local Project-affected local communities are aware of the Code of Conduct and enable them to report any concerns or non-compliance.

4. The issues to be addressed include:

1. Compliance with applicable **laws, rules, and regulations** of the jurisdiction
2. Compliance with applicable **health and safety requirements** (including wearing prescribed personal protective equipment (PPE), preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)
3. The use of **illegal substances**
4. **Non-Discrimination** (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability, or political conviction)
5. **Interactions with community members** (for example to convey an attitude of respect and non-discrimination)
6. **Sexual harassment** (for example to prohibit use of language or behavior, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
7. **Violence or exploitation** (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior)
8. **Protection of children** (including prohibitions against abuse, defilement, or otherwise unacceptable behavior with children, limiting interactions with children, and ensuring their safety in project areas)
9. **Sanitation** requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)
10. Avoidance of **conflicts of interest** (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection)
11. **Respecting reasonable work instructions** (including regarding environmental and social norms)
12. **Protection and proper use of property** (for example, to prohibit theft, carelessness or waste)
13. Duty to **report violations of this Code**
14. **No retaliation against workers** who report violations of the Code, if that report is made in good faith.
15. **Disturbing wildlife or bush meat hunting** workers prohibited under any circumstances from engaging in any disturbance of wildlife or bush meat hunting during the entire duration of their employment/engagement for the Project.

ANNEX 3: SAMPLE CONTRACT

The GROW Project Work Contract has been concluded between the Employer and the Employee whose names and addresses are written with their own free will and with the conditions stated below.

EMPLOYER'S Name Surname:

ID Number:

Address:

WORKER'S

Name Surname:

ID Number:

Address:

A. EMPLOYER OBLIGATIONS

The management of the work and the workers is the responsibility of the Employer. The Employer and his/her representative shall apply the contract in all its provisions. The Employer evaluates and responds to complaints of workers regarding the implementation of the contract or other issues; corrects if the application has errors.

1- WAGE

Wage to be given to the worker by the Employer (based on Turkey Minimum Wage);

- a) Daily / weekly / monthly TL
- b) Piece work basis TL
- c) Other..... TL

2- DAILY WORKING AND REST PERIODS

In accordance with the time based working conditions, the working hours, weekly start and end times and legal break periods are determined by the Employer by taking into account. the local working hours, local customs and traditions, provided that the working hours remain constant for 40 hours per week, and maximum 10 hours per day including overtime. These are announced to the workers by the Employer and timesheets are provided. Exceeding the 40-hour weekly working time determined by this agreement is overtime. Overtime periods are paid by increasing the amount of the daily wage per hour by 50%.

3- OTHERS The Employer;

- shall / shall not pay the workers in advance.
- shall / shall not pay the workers for the days not working due to climatic conditions, disasters and similar reasons.
- shall take the measures of occupational health and safety of workers and all kinds of measures against occupational accidents and diseases.
- shall keep a record of the employee's payroll and the salary paid to the employee.

- shall employ each worker formally and render social security premium payments
- shall keep a record of timesheets for working days of the employee
- shall comply with this contract and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and wellbeing of all employees any other person
- shall maintain a safe working environment
- shall not employ persons below the age of 18 years
- shall treat all workers equally and fairly. Men and women will receive equal wages for equal work.

B. OBLIGATIONS OF WORKERS:

- The person shall work as a casual worker with experience and professional knowledge in accordance with the mission and vision determined by the Employer.
- The worker accepted this.
- The working places to be indicated by the employer or his representative are the working place in accordance with the employer's decision within the boundaries of the hydromet station.
- Workers will start working on.... /.... /
- Workers shall show due diligence and participate in OHS trainings in order to prevent damage to land, crops, agricultural vehicles and equipment.
- Workers shall not quit the job and work in another workplace without valid excuse as long as the subject of this contract continues by the employer.
- Workers shall comply with this contract and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person
- The provisions of the Labour Law shall apply to other matters not included in the contract (working hours, leaves etc.)

This contract is arranged in three / four copies and if one of the parties does not fulfil one of its obligations the courts / enforcement offices are authorized.

EMPLOYER'S:

Name Surname:

Date:

Signature:

WORKER'S:

Name Surname:

Date:

Signature.....

ANNEX 7: GRIEVANCE REGISTRATION FORM

Note: This form is to be used for recording and tracking of grievances on the EUFLA project. It will be used by the subprojects for reporting grievances to the PIU, the PIU 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: <i>Please provide mailing address</i> By Telephone: By Email:
TYPE OF GRIEVANCE:	Individual: Group: Cultural:
DESCRIPTION OF INCIDENCE OR GRIEVANCE:	<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>
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 <i>[Add details of contact]</i>	
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:	