



THE REPUBLIC OF UGANDA

**MINISTRY OF LANDS, HOUSING AND URBAN DEVELOPMENT
(MLHUD)**

**EU FINANCING FOR LAND ADMINISTRATION IN UGANDA
(P175732)**

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

November 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Uganda (GOU) (the Recipient) will implement the EU Financing for Land Administration in Uganda Project (P175732) (the Project) with the involvement of the Ministry of Lands, Housing and Urban Development, as set out in the Grant Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient and the Association shall agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient Accounting Officer of Ministry of Lands, Housing and Urban Development. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING:</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) in a form and substance acceptable to Association.</p>	<p>Consolidated quarterly Environmental and Social (E&S) reports shall be submitted to the Association throughout the project implementation starting 6 months after the Project effective date.</p> <p>Mid-term and completion reports shall be submitted during the Mid- Term review period as agreed in the financing agreement.</p>	MLHUD
B	<p>INCIDENTS AND ACCIDENTS:</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury Or significant conflict. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association Task Team Leader (TTL) not later than 48 hours of learning of incident or accident</p> <p>Provide subsequent report to the Association within 7 (seven) working days following the incident/accident. It shall also be reflected in the quarterly reports.</p> <p>Notification/reporting system shall be in place throughout the Project life cycle.</p>	MLHUD
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE:</p> <p>The project will be implemented through the Project Coordination Unit PCU at MLHUD, that is currently implementing the CEDP/CEDP AF project. The PCU shall recruit a qualified Environment Specialist and a qualified Social Development Specialist to support management of ESHS risks and impacts of the Project.</p>	<p>Specialists to be in place by Project effectiveness and thereafter maintain these positions throughout Project implementation</p>	MLHUD

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS: Adopt, disclose, and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>Develop, adopt, disclose and implement other environmental and social instruments, such as site-specific Environmental and Social Impact Assessments (ESIAs) and corresponding Environmental and Social Management Plans (ESMPs) consistent with the relevant ESSs</p>	<p>Adopt the ESMF prior to project negotiation and thereafter implement the ESMF throughout Project implementation.</p> <p>ESIAs/ESMPs where necessary in place prior to commencement of associated activities and implemented during the activities in accordance with the requirements set out in the ESMF.</p>	<p>MLHUD</p>
<p>1.3 MANAGEMENT OF CONTRACTORS: Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p> <p>Contractors’ Environmental and Social Management Plans, Codes of Conduct, Contracts for Workers, Labour Force Management Plans, Camps and Material Yards Establishment and Management Plans, HIV/AIDS Management Plans, sub project specific Health, Safety and Environment (HSE) Management Plans shall be developed in coordination with the service providers and Supervising Consultants once they have been selected.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p> <p>Prior to the start of sub-project activities and throughout the project life cycle.</p>	<p>Project (PCU/MLHUD) Environmental Specialist and Social Development Specialist</p>
<p>1.4 TECHNICAL ASSISTANCE: Ensure that the consultancies, trainings on gender and other Environmental and social risk Management and other capacity building, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>MLHUD</p>
<p>ESS 2: LABOR AND WORKING CONDITIONS</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES: Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health, and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>Project Consultants/contracted staff shall be managed in accordance with Contract terms and conditions. Contract terms and conditions shall be assessed for their compliance with the project labor management procedures. Overall project labor management procedures shall be integrated in the Project ESMF and Implementation Manual.</p>	Adopt the LMP in time for preparation of procurement documents, and thereafter implement the LMP throughout Project implementation.	MLHUD
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. This will include a framework and procedures to receive reports and complaints from Project workers and a response and accountability framework to handle such reports and complaints. Information about grievance mechanism must be disseminated to Project workers.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MLHUD
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN Relevant aspects of this standard shall be considered, as needed, under action 1.2-1.4 above, inter alia, measures to adequately manage and dispose any waste generated from the activities and use of resources in a sustainable manner.</p>	As part of the ESMF and throughout Project implementation.	MLHUD
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.2 and 1.3 above, and in the TOR for activities under 1.4 as applicable.</p>	Adopt the ESMF prior to project negotiation and thereafter implement the ESMF throughout Project implementation.	MLHUD
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY; Incorporate measures to manage traffic and road safety risks as required in the ESMF prepared under action 1.2 above.</p>	implement measures in the ESMF throughout Project implementation.	MLHUD-PCU
4.2	<p>COMMUNITY HEALTH AND SAFETY:</p>		MLHUD-PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from the Project, including but not limited to, behavior of workers, potential risks of disease transmission during boundary demarcation, including the transmission of HIV/AIDS, COVID-19 and other communicable diseases, response to emergency situations. All workers shall adopt a MLHUD Safeguard Management Policy and community Health and safety action plan as part of the contracting	Same timeframe for the preparation and implementation of the ESMF/ESMPs to incorporate measures to mitigate such risks and implement it throughout the project period	
4.3	SEA AND SH RISKS: MLHUD shall implement actions to further minimize GBV/SEA risk, including signing of enforceable Codes of Conduct by workers, sensitization activities for workers/communities by relevant Service providers and consultant staff and establishing GRM that provide pathways for reporting and referring GBV cases.	These measures will be implemented prior to the start of activities that involve workers and implemented throughout the Project life cycle.	MLHUD
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK: Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	Adopt the RPF prior to negotiation, and thereafter implement the RPF throughout Project implementation.	MLHUD
5.2	RESETTLEMENT PLANS: Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP as set out in the RPF and consistent with ESS5.	Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets or removing occupants/users from the land, if the demarcation and titling leads to such, full compensation has been provided and [as applicable] displaced people have been resettled and moving allowances have been provided.	MLHUD
5.3	GRIEVANCE MECHANISM: The grievance mechanism (GM) to address resettlement related complaints has been described in the RPF and will be included in the RAPs and SEP.	Throughout the Project implementation and where applicable RAP implementation period.	MLHUD
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS:		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Screen the project activities to avoid any activities that could result into long term/or irreversible impacts on natural habitats and/or activities in protected areas, in accordance with the project ESMF and ESS6.</p> <p>Integrate in ESMPs measures to avoid and mitigate potential harm to natural habitats in accordance with ESS6 in a manner satisfactory to the Association.</p>	<p>Screen project activities and integrate into ESMPs prior to commencement of the respective activities and thereafter throughout Project implementation</p>	MLHUD
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>INDIGENOUS PEOPLES FRAMEWORK: Assess the nature and degree of the expected direct and indirect economic, social, cultural, and environmental impacts on Indigenous Peoples who are present in, or have collective attachment to, the project area.</p> <p>Prepare and implement Vulnerable and Marginalized Groups Framework (VMGFs) as part of the design of subprojects likely to impact these groups (Iks, Tepeth and Batwas) and develop and implement a Vulnerable and Marginalized Groups Plans (VMGP) as required by the VMGF.</p>	<p>The VMGF developed and adopted ninety days after project effectiveness and before initiating any activities related to any area with presence of VMGs.</p> <p>The VMGP developed prior to implementation of activities in specific areas with Vulnerable and Marginalized Groups.</p> <p>And both VMGF and VMGP maintained and implemented throughout project implementation</p>	MOLHUD
7.2	<p>GRIEVANCE MECHANISM: The grievance mechanism (GM) to address resettlement related complaints has been described in the ESMF, RPF,SEP and will be covered in the VMGF and VMGP.</p>	Per timeline described in 7.1	MLHUD
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACT: Adopt and implement measures for safeguarding Cultural Heritage in accordance with the guidelines of the ESMF, and consistent with ESS8. Identify measures to address risks and impacts on cultural heritage that may occur during demarcation.</p>	Prior to implementation of activities and monitored throughout Project implementation period.	MLHUD
8.2	<p>CHANCE FINDS: Adopt, and implement the chance finds procedure described in the ESMF and ESMPs. MLHUD shall work with the Department of Museums and Monuments at the Ministry of Tourism, Wildlife and Antiquities (MoTWA) and the Department of Culture and Family</p>	Prior to implementation of activities and monitored throughout Project implementation period.	MLHUD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Affairs of MGLSD to implement the Chance Finds Procedure prior to implementation of activities in such locations and maintained throughout the project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.</p>	Adopt the SEP prior to appraisal and and thereafter implement the SEP throughout Project implementation.	MLHUD
10.2	<p>PROJECT GRIEVANCE MECHANISM Publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10, aAnd as elaborated in the ESMF and SEP building one MLHUD’s established GRM and tollfree line for reporting of grievances.</p> <p>The Project will leverage on the already established GRM, asses its functionality and strengthen it to take and resolve the project grievances and ensure that these systems are established at all levels, DLGs, Sub County, Parish and local communities as stipulated in the Project GRM, by commencement of activities.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>Strengthen existing mechanism at the Ministry and Regional levels and establish the grievance mechanism in all project areas at commencement of the project and thereafter maintain and operate the mechanism throughout Project implementation.</p> <p>At commencement of activities train GRCs on GBV/SEA related grievance recommended pathways and maintained this process throughout the project.</p>	MLHUD
CAPACITY SUPPORT			
CS1	Update and implement the SLACC operational manual and SLAAC training manual to incorporate Environmental and Social Risk Management related trainings in compliance with the World Bank Environment and Social Framework and the Country’s legislation. Capacity building will be required for respective groups of people such as Ministry personnel, district, other MDAs closely associated with project, communities among others. Specifically, the training should entail the following:	<p>The training manual adopted prior to project effectiveness and implemented throughout the project.</p> <p>Prior to the start of activities and throughout project implementation</p>	MLHUD

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1. The Environmental, Social, and relevant staff at MLHUD - PCU must be trained on all of the following areas that relate to their duties:</p> <ul style="list-style-type: none"> • World Bank ESSs • Implementation of Stakeholder Engagement Plan (SEP) including stakeholder mapping, and its monitoring and evaluation • Implementation of Labour Management Procedures (LMP) • Implementation of Grievance Redress Mechanisms (GRM) • Occupational health and safety management, including First Aid courses to employees and Environment and Social Incident reporting procedures (ESIRT) under the project • Emergency preparedness and response procedures • Implementation of Environmental and Social risks management practices identified by Project actors during Project implementation. • SEA/SH and GBV • Implementation of the VPMF and VMPP (FPIC, grievance Management) • Child labor and child protection restrictions. <ul style="list-style-type: none"> • Sensitization on National land legislation, and Environmental Management. <p>2. District and Sub-county Liaison personnel in respective Project districts will be trained on: (Labour Officers, CDOs, Commercial officers)</p> <ul style="list-style-type: none"> • General ESF requirements. • Implementation of SEP, LMP and GRM, and oversight • ESMP Checklist preparation, updates, and oversight • Gender and GBVs aspects in the project. • SEA/SH and GBV • Child labor and child protection. • Procedures for identifying project beneficiaries • Monitoring and reporting on ESMP implementation and project activities <ul style="list-style-type: none"> • Sensitization on National land legislation and Environmental Management. <p>3. Communities and other stakeholders will be trained on:</p> <ul style="list-style-type: none"> • Emergency preparedness and response • Community health and safety, including First aid courses to interested community members • Grievance Redress Mechanism (GRM) procedures • Sensitize the community on Uganda land tenure (rights and responsibilities) 		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> • Sensitize the community on land rights and women’s rights to land. • sensitization of the community on natural resource conservation, protection, and regulated use of ecologically sensitive ecosystems. 		