Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 01/31/2020 | Report No: ESRSC01086
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Uganda</td>
<td>AFRICA</td>
<td>P171339</td>
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Project Name: Uganda: Roads and Bridges in the Refugee Hosting Districts Project

Practice Area (Lead): Transport

Financing Instrument: Investment Project Financing

Estimated Appraisal Date: 4/20/2020

Estimated Board Date: 6/23/2020

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

Implementing Agency(ies): Uganda National Roads Authority

Proposed Development Objective(s)

The Project Development Objective is to enhance transport connectivity to improve supply of goods and access to social services in the refugee hosting districts of Uganda and capacity enhancement of Uganda National Roads Authority.

Financing (in USD Million) Amount

Total Project Cost 130.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

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

Uganda has been generously hosting refugees and asylum seekers from 13 countries, many conflict-affected, in its neighborhood. The Government of Uganda is keen to improve transport connectivity in the refugee hosting areas to enhance access, facilitate delivery of supplies, and benefit both refugees and host communities. The 105 kilometers-long Koboko-Yumbe-Moyo road corridor, which is very close to many refugee settlements, is prioritized to upgrade from its current 6-7 m wide unpaved (gravel surfacing) configuration to 10 m wide paved (bituminous surfacing). The...
The proposed project components:

1. **Component 1: Road Upgrading Works**: The project will support the upgrading of the approximately 105 km-long Koboko-Yumbe-Moyo road corridor to 10 m wide bituminous paved road configuration (two lanes plus paved shoulders) and about 35 km of access roads and associated design, supervision, and safeguards management consultancies such as implementation of Resettlement Action Plans. These civil works will include a coterminous Defects Liability Period and Maintenance Period of 5 years post completion of construction of works adopting Bank’s guidelines and requirements with respect to the procurement, social and environmental safeguards.

2. **Component 2: Institutional Strengthening**: This component will support UNRA in management of social and environmental risks through acquiring new skill sets required.

3. **Component 3: Road Safety**: This component will support the UNRA in (a) completion of development and operationalization of a Road Accident Database Management System, and (b) training and awareness campaigns in the project influence area.

4. **Component 4: Contingency Emergency Response Component**: This component will support UNRA in accessing resources for eligible expenditures to provide immediate and effective response in case of an eligible emergency.

### D. Environmental and Social Overview

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

The project road is in the West Nile region of Uganda, with its terminus points in Koboko and Moyo districts approximately 105km apart traversing Yumbe district midway in a north easterly direction from Koboko to Moyo. The existing Koboko-Yumbe-Moyo road is traversing through rolling terrain and has steep sections in some locations - the maximum slope of the existing alignment is 6.5% with the average slope being 1.6%. Its geometry is poor in at least ten locations. The road is passing through a couple of low-lying areas and several seasonal swamps and Lodonga forest reserve (a plantation forest which is being majorly cultivated by tobacco farmers). The road with narrow cross-drainage structures is in the River Nile basin and the transport situation worsens during rainy season when some of the rivers and their tributaries flood and cut off accesses. The main rivers include Kochi, Newa and Ofua basins. The large part along the road corridor is predominantly occupied by subsistence agriculture; comprising the production of crops like maize, bananas, sorghum among others. There are several townships and peri-urban settings dotted along the project corridor like Lodonga, Lori, Baringo and Laufori in addition to the three main districts and a modified cross-section complete with service roads, pedestrian walkways and closed drains is being considered through these peri urban sections. Two major health centers, fourteen schools, and several trading centers exist along the Koboko-Yumbe-Moyo road.

The road corridor serves and runs through several refugee settlements and host communities. Currently, the West Nile region of Uganda accommodates more than 0.5 million refugees from South Sudan (UNHCR, 2019). Such a huge influx of people and the circumstances in which they come, has created extreme pressure on the existing natural resources and social services. The natural resources which are under pressure include, water, trees and land. The Social Services are schools and hospitals; land and natural resources. Besides the main civil works on the linear road sections, the project will also involve acquisition of construction materials which will entail acquisition and operation of facilities such as stone quarries, workers' camps, equipment storage yards, batching plants, gravel source areas,
and so on. Operation of such facilities pose significant environmental, social, health and safety risks to the host communities.

D. 2. Borrower’s Institutional Capacity

UNRA is the implementing agency and has substantial experience implementing Bank supported projects, having completed and learnt lessons from the Transport Sector Development Project (TSDP) IP-Case and currently undertaking two major projects (Albertine Region Sustainable Development Project and NERAMP). UNRA has an Environmental Unit that has evolved and grown in terms of safeguards capacity, including and established Environmental and Social Management System (ESMS) which was set up with the Bank's support following safeguards capacity enhancement measures undertaken after the TSDP-IP Case. The ESMS, along with the Land Acquisition Management System (LAMS), including relevant staffing, have been strengthened substantially with support from the Bank and other development partners. The E&S department now has 43 staff (including 6 international Technical Assistants) from 2 staff in early 2016. The LAMS Unit now has 67 staff that includes lawyers, land valuers, sociologists, etc. UNRA has also computerized its Right of Way Management System up to the stage of grievance redress, and this system is now being used for all new UNRA-managed projects.

However, due to the ever increasing work load and number of projects supported/funded by various Development Partners, UNRA’s current Safeguards capacity is overstretched, and its adequacy to manage the proposed project shall be assessed as part of the project’s ESIA and RAP. It is likely that the project will be required to beef up capacity by hiring project Environmental, Social, and GBV/SEA Specialists dedicated to the project. As part of the ESIA, the functionality of the current ESMS shall also be assessed in order to identify and any gaps or areas that need to be strengthened or improved, particularly in ESF implementation readiness. This might include the establishment of a third party monitoring mechanism to support the implementing agency.

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

High

Environmental Risk Rating is High. The size and complexity of large civil works project in an area that was affected by civil war over two decades, with possibility of existing ordinances left behind by the twenty years insurgency, coupled with refugee influx, and the anticipated influx of labour force; clearly poses significant health and safety risks to the project host community, refugees, and the project workers. The project may require the use of security personnel during construction. This will be confirmed during the ESIA process and if necessary, a Security Management Plan shall be developed. The project road passes through a number of small-towns, schools and health centers, and if not well managed these could be affected by the construction works, posing impacts of noise emission from work machinery and equipment, dust pollution, oil-based spills which may pollute the soils, rivers and swamps in the project area. The road corridor traverses a challenging terrain featured with steep sections (maximum slope 6.5%) and poor geometry (e.g. sharp bend) in some locations. It passes through farmlands, several rivers, low-lying areas, seasonal swamps and a Lodonga forest reserve. Considering the physical characteristics, the project may pose significant environmental risks such as contamination of soils, rivers and swamps and loss of biodiversity and it also poses challenges for the design and implementation of mitigation measures. The engineering design shall take these aspects into consideration. In addition, there are risks posed by environmental management capacity at UNRA which needs to be assessed as part of the project ESIA. Detailed environmental risks and impacts shall be assessed during
the conduct of the Project ESIA to be completed before Project Appraisal, in line with the Environmental and Social Standards under the ESF.

Social Risk Rating

High

The Social Risk Rating is High. Despite UNRA’s recent strengthening of its social risk management systems as part of its response to the recent Inspection Panel Case (TSDP), the project which will involve significant civil works along a 105 km corridor crossing several Districts and a wide range of socio-economic settings/stakeholders is likely put additional strain on its already stretched E&S and Land Acquisition Departments. The scope of land acquisition is unknown at this stage, but it is anticipated that a significant number of persons and institutions will be directly impacted by the planned works (road widening and upgrading. Moreover, a significant influx of labor is also to be expected in the project area (Urban, Semi-Urban, Rural, Refugee Hosting, and Refugee settlements) that hosts a wide array of PAPs that would include vulnerable persons which may include refugees, some children/women, persons with disabilities etc. Project related risks include (i) delayed/inadequate compensation processes, (ii) inadequate stakeholder engagement, (iii) PAPs/workers and other stakeholders’ lack of access to functioning Grievance Redress Mechanisms, (iv) social exclusion, and Gender Based Violence (GBV)/Sexual exploitation and Abuse (SEA) of minors. Specifically, funds to compensate PAPs might not be available to the implementing agency (UNRA) during RAP implementation because of the cyclical nature of their release by the Ministry of Finance. Moreover, District compensation rates for crops might not be adequate, as they do not always reflect market rates. Stakeholder might suffer from the project short preparation time and some stakeholders might be missed as a result. Although UNRA has established an online system to systematically record and address grievances from PAPs and Workers (through the contractor) during project implementation, experience in other Bank funded project has shown that the necessary personnel to manage it is not always available. Moreover, the institution does not have a framework to address issues of social exclusion, and recent experiences in other Bank Funded have shown that despite improved capacity within the agency to address GBV/SEA, risks remain high in road construction projects. The project will mitigate these risks primarily by implementing relevant standards from the ESF and by recruiting consultants/service providers (managed by relevant UNRA staff) to carry out the necessary safeguards’ implementation and supervision activities.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The recommended project Environmental Risk Rating is High, since the proposed project activities may pose significant adverse environmental or social risks and/or impacts that are diverse, and/or unprecedented. The project is expected to widen and realign in certain locations an existing road that traverses a challenging terrain and upgrade its gravel surface to bituminous paved road. Road construction and construction material sourcing, transport, laydown, temporary storage, on-site processing of aggregate, asphalt and bitumen, and disposal of wastes are expected to bring about a wide range of environmental, health and safety risks, which will be thoroughly assessed in the ESIA. The key potential risks and impacts of the project during construction stage include: (i) health & safety of workers, host communities, refugees, and other disadvantaged and vulnerable groups along the road corridors where works will be carried out but also along transport routes of construction supplies, materials and equipment; including risks of un-exploded ordinances (UXO) which may have been left behind by the two decades insurgency war
that affected Northern part of Uganda (1986 - 2006) (ii) cutting of trees during construction, especially through Lodonga Central Forest Reserve area and at bends that may require re-alignment; (iii) exposure of population along the ROW and transport routes to noise, dust, vibrations, air pollution and traffic-related risks; (iv) siltation and sedimentation of waterways close to the construction works; (v) land acquisition along the ROW; (vi) physical and economic displacements along the ROW; (vii) increase risks of gender-based violence from labor influx and social issues that come with it may pose a serious risk to the project. It is worth noting that the Bank team has conducted ES screening based on the preliminary engineering design and ES Risk Assessment Report. “The process of identifying the access roads which will be included in the Project is ongoing and depending on their inclusion in the Project, they will be subjected to ESIA/RAP process”.

The project shall also entail acquisition and operation of supporting facilities such as workers’ camps, borrow pits, rock quarries, disposal sites, asphalt plants, etc. The contractor will be required to carry out relevant site specific studies (ESIA/RAP/ESMP/Project Briefs) as part of their acquisition, operation and restoration, once their locations are confirmed. These instruments will require prior approval by relevant national authorities and the Bank. During project preparation, a preliminary assessment of possible material source sites will be undertaken as part of the project ESIA. A guideline on the preparation, review and clearance of any needed site specific ESIA/ESMP/RAPs will be included in the project ESIA/RAP as well. In addition, induced commercial and land use change along the project road are normally expected in this type of project and as such, there’re likely other development activities overlapping with those of the project. Thus induced and cumulative impacts should be assessed as part of the ESIA study. During the operation phase of the road, anticipated positive impacts will be associated with improved connectivity to enhance economic activities and installation of safety features of the widened road. Anticipated negative impacts may include traffic related dust, exhaust, noise and accidental spills. Increased traffic flow and speed due to improved road conditions may also lead to more traffic accidents.

The ESIA and RAP for the KYM Road will be prepared in line with the requirements of the ESF, and disclosed before project Appraisal. UNRA will ensure that the environmental and social assessment takes into account in an appropriate manner all issues relevant to the project, including: (a) the country’s applicable policy framework, national laws and regulations, and institutional capabilities (including implementation) relating to environment and social issues; variations in country conditions and project context; and obligations of the country directly applicable to the project under relevant international treaties and agreements; (b) applicable requirements under the ESSs; and (c) the EHSGs, and other relevant Good International Industry Practice (GIIP). The environmental and social assessment will apply a mitigation hierarchy, which will: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigate; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible. During construction phase, the Contractor/s shall be required to prepare Contractor's ESMP to guide implementation of various project activities. The project will also have a Contingency Emergency Response Component (CERC). A CERC-ESMF shall be developed following the Bank Guidance on CERC”. The CERC-ESMF will describe potential emergencies and the types of activities likely to be financed, evaluate the potential risks and mitigation measures associated with them. It will identify likely vulnerable locations and/or groups and include, where needed, some social assessment to guide emergency responses. It will include a screening process for the potential activities, the institutional arrangements for environmental and social due diligence and monitoring. The CERC-ESMF will also include any additional safeguard instruments that might be required. Other documents will also be prepared and disclosed such as the Environmental and Social Commitment Plan, the Stakeholder Engagement Plan, and Labor Management Procedures. The need to make use of a Third Party
Monitoring mechanism will be assessed and determined by project appraisal. The following instruments/documents will be prepared and completed prior to project appraisal:
- Preparation, consultation and disclosure of ESIA/ESMP for KMY Roads including E&S Capacity Assessment of and Capacity Building Program for UNRA.
- Preparation, consultation and disclosure of RAP (including Livelihood Restoration Plan) for KMY Road;
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP);
- Preparation and disclosure of Labor Management Procedures (LMP);
- Preparation and disclosure of the additional ESIA for 35Km Gravel Access Roads, if identified and included in the project;
- Preparation and disclosure of the CERC-ESMF;
- Preparation and disclosure of Environmental and Social Commitment Plan (ESCP).

No Associated Facilities have been identified at this stage. The ESIA will screen and include any other investments being made by other financiers on the project corridor or which would qualify as Associated Facilities.

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

The use of Borrower Framework will not be considered for this project although the project will meet both the requirements of Government of Uganda and the relevant World Bank Standards.

**ESS10 Stakeholder Engagement and Information Disclosure**

A Stakeholder Engagement Plan (SEP) will be developed, to guide the consultation processes and stakeholder engagement throughout the life cycle of the project, starting from preparation down to implementation. During the ESIA exercise, stakeholder mapping will be conducted to identify stakeholders along the ROW and transport routes of the project, including various local and national stakeholders, both Government and Non-Governmental Organizations. The mapping will also analyze the influence of these stakeholders to the project design and implementation and the project’s impacts to them. Special attention will be given to inclusion of women, vulnerable, disabled, refugees, disadvantaged groups, and project affected people, as well as other interested groups.

Based on the stakeholder mapping, the Borrower/UNRA will prepare Stakeholder Engagement Plan (SEP) which will include a detailed schedule of planned engagement activities for the various stakeholders during the project cycle and will specify format and frequency of these engagement. The SEP will ensure all consultations are inclusive and accessible.

The draft of SEP will be prepared and disclosed as early as possible but prior to the project appraisal. Since the project is rated as "high" risk project that will be implemented in socially sensitive areas with a high presence of refugees, it is needed to carry out as early as possible a thorough and meaningful stakeholder engagement that will ensure all stakeholders are involved to avoid exacerbating tension between refugee and host communities. An independent consultant will be hired to assist the stakeholder mapping, SEP preparation, and its implementation. In general, UNRA has already initiated some stakeholder engagement as part of the ongoing assessments and studies. These activities will be reflected/document in the final SEP.

The project is likely to involve a broad range of stakeholders at local, regional, national levels and even international with heightened concern on project’s impacts on refugees and host communities. This will not only include the project beneficiary communities at the grassroots level but also NGOs (local, national, international), civil society, media organizations etc. Local stakeholders, civil society, and local governments may seek changes in road alignment selection and interventions. To ensure adequate Stakeholder Engagement (especially given the relatively short
preparation timeline), the project will ensure sustained and inclusive stakeholder engagement throughout the project.

There’s a risk of inadequate Stakeholder Engagement due to the fast-tracked project preparation. The project is likely to involve a broad range of stakeholders at local, regional, national levels and even international with heightened concern on project’s impacts on refugees and host communities. This will not only include the project beneficiary communities at the grassroots level but also NGOs (local, national, international), civil society, media organizations etc. Local stakeholders, civil society, and local governments may seek changes in road alignment selection and interventions. The project will mitigate this risk through sustained and inclusive stakeholder engagement throughout the project.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

The proposed project will involve direct workers, contracted workers and primary supply workers. The Primary Supply workers will include those employed at materials sites such as stone quarries, gravel areas, and/or sand mining areas. A significant number of labor/contracted workers during construction is expected to be employed by the project. For non-skilled labour, the Contractors shall be encouraged to hire such labour from the host community and refugees – including females to provide job-opportunities and reduce on labour influx by external labour-force - These workers shall be regarded as contracted workers and no community laborers as defined by the standard are expected to be used in the project. In addition, Workers/Labor camps are anticipated. The ESIA will assess major labor risks including risks of child labor and forced labor, labor influx and gender based violence (GBV), OHS risks, possible accidents or emergencies taking into account the sensitive project context.

Labor Management Procedures (LMP) will be developed and disclosed by project appraisal and a standalone worker specific grievance mechanism (for direct and contracted workers) established. The LMP will identify main labor requirements (how different categories of workers will be managed, in accordance with the requirements of national laws and ESS2) and labor risks associated with the project and determine the resources necessary to address labor issues, including risks of GBV for female workers.

To ensure H & S of workers during the construction and operational phases of the project, UNRA will require contractors to prepare and implement their Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction, including protocol of handling any UXO as part of OHSP with guidance from the Ministries of Defense and Internal Affairs. The OHSP will also include procedures on incident investigation and reporting in line with the World Bank’s Environmental and Social Incident Response Toolkit (ESIRT), recording and reporting of non-conformances, emergency preparedness and response procedures and continuous worker training/awareness.

ESS3 Resource Efficiency and Pollution Prevention and Management
During construction, requirements for construction materials to cover the 105KM road will be significant. Water requirements will also be significant but the project area has three rivers which may meet the construction requirements without affecting waterways and water sources. Energy use will be associated with construction machinery and equipment. The ESIA will assess uses of the resources and propose technically and financially feasible measures for their efficient use. Measures specified in the WBG EHSGs and GIIP will be adopted where applicable. Pollution during construction may include air emissions such as exhaust from heavy vehicles and machinery, noise emission and fugitive dust generated during operation of material sites, transportation of materials, and road construction. Those most likely to be affected are people living within the proximity of the construction sites and along the corridor and transport routes. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration.

Construction activities will generate solid and liquid waste which will primarily include excavated soil and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. The waste generated by the construction works will be reused where feasible or disposed of at approved sites according with the national laws and regulations. As the road crosses farmland and rivers, soil contamination and water pollution is a concern. The ESIA will assess the impacts and risk and mitigation measures will be included in the ESMP to avoid or mitigate such impacts.

The project ESIA shall take into consideration any likely pollution impacts during project operation phase. It is expected that improved road conditions will help reduce exhaust emissions from vehicles. However, the noise, dust, exhaust and accidental spills associated with road transportation are also anticipated and will be assessed in the ESIA. While greenhouse gas emissions from the project are expected to be not substantial given the rehabilitation nature of the works, GHG emissions will be calculated to meet the requirements of this standard but also corporate commitment.

Widening of the road and bush clearing shall be undertaken mechanically and will NOT involve use of herbicides.

ESS4 Community Health and Safety

The road works expose communities to health and safety risks during construction and operation in the vicinity of material sites, along the road corridor and transport routes, including the refugees in the West-Nile region. Notably, quarrying and excavation works may impose risks to house structure and life safety of communities; labor influx may lead to the spreading of communicable diseases and a number of other safety and health risks to communities; road construction and operation may impact irrigation, drainage and pollute water sources that are critical for communities. Road safety is a major concern (see below). In addition, community access to business, social services (e.g. education, hospital), will also be affected. This disruption in movement would cause inconvenience to the local communities albeit temporarily. The ESIA will thoroughly assess these community health and safety risks during construction and operation, taking into account the project context and vulnerable groups. The project engineering design is expected to incorporate safety considerations adequately.

For all the construction work and sites, the ESMP will require contractors to install a safety system around the project sites (fences and safety guards) during the entire construction period. When works take place on open roads, equipment and vehicles will be brought together to one single well-secured area during the night to ensure both community and worker’s safety. In addition, the road design will also consider improving accessibility for people with
disabilities. A Community Health & Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and community awareness raising activities, including reporting any UXO finds for attention by the project.

Road safety: Given the nature of the project, road safety needs to be addressed throughout design, construction and operation stages. During construction, transportation of materials, use of construction vehicles pose traffic risks to communities. During operation, road safety are anticipated to improve with the installation of safety features on widened roads. However, upgrading the road from gravel to paved will also lead to an increase in traffic speeds and likelihood of accidents. Concrete measures need to be developed on how safety will be improved given the linear settlements along the corridor. Therefore, a Road Safety Audit is part of the detailed engineering studies, which is being undertaken. The details are expected to be available by the appraisal and will be included as part of appraisal documentation. The engineering design will consider inclusion of walk-ways in sections of the road where there are public places such as peri-urban areas, schools, hospitals, administration units, etc. This is to segregate pedestrians from vehicles, and thus reduce traffic risks. A road safety assessment for each phase of the project and mitigation measures will be included in the project ESIA and ESMP. A Road Safety Audit, as part of the detailed engineering studies, is being undertaken. The details are expected to be available by the appraisal and will be incorporated into the road safety assessment.

SEA/GBV: Communities (Host and refugees) will also be exposed to risks of Sexual Exploitation and Abuse (SEA) and Violence and Against Children (VAC) associated with the anticipated influx of labor. A GBV Risk Assessment will be carried out as part of the ESIA and will inform an eventual GBV Action Plan detailing specific measures (Recruitment of Service Provider to carry out, relevant mapping exercises, sensitization activities, and establish response mechanisms) to be implemented as part of the project and prior to contractor’s deployment into the project area. A preliminary GBV Action Plan will be prepared prior to appraisal. It is also worth noting that UNRA has, with support from the Bank and as part of the Management Action Plan to the Inspection Panel Case, established under the other IDA funded projects (ARSDP and NERAMP), GBV/SEA prevention, reporting, and response mechanisms managed by third party service providers that have thus far proved efficient. Additionally, the project’s Grievance Redress Mechanism will adapted to take into account GBV/SEA related complaints.

Security Personnel: The contractor will likely procure the services of security firms with armed personnel to secure its personnel, equipment and installations. The management of risks and impacts associated with their use will be assessed during project implementation and a security management plan drafted and implemented prior to their deployment. As part of the project ESIA, a preliminary Security Risk Assessment shall be undertaken and general guidance provided following the Bank’s Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel, in line with Good Practice Handbook – Use of Security Forces: Assessing and Managing Risks and Impacts; Guidance for the Private Sector in Emerging Markets, IFC Feb. 2019. This will require development of project specific Security Risk Management Plan. The preliminary assessment shall include engagement with stakeholders, considerations of the project contextual factors, requirements for procurement of the security personnel, which will consider management aspects such as use of code of conduct, training and monitoring of security personnel), grievance mechanism and SEA/GBV issues, etc.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The proposed upgrade from the roads’ current 6-7 m wide unpaved (gravel surfacing) configuration to 10 m wide paved (bituminous surfacing) will require land acquisition. The proposed upgrading will require road-widening which will impact on built structures mostly in urban centers and encroach on the agricultural land in rural areas. Grazing and cropland of cassava, maize, beans, groundnuts, sweet potatoes, and tobacco gardens will be changed to road land use. Loss of farmland is likely to have a large negative impact because most of the population depend on subsistence farming as their main source of livelihood. The Resettlement Action Plan (RAP), which will include a Vulnerability Assessments will propose specific measures to support eligible PAPs during RAP implementation, will be developed in reference to ESS5 and by project appraisal. Taking into account that project preparation timelines are relatively short, there will be particular attention to ensure adequate quality of the Resettlement Action Plan (RAP) especially in terms of (i) designing Livelihood Restoration Plans, (ii) appropriate measures to support PAPs from vulnerable groups and those with disabilities, and (iii) carrying out a comprehensive census. Project Affected Persons (PAPs) will continue to be engaged throughout the RAP processes and particularly during its implementation to address any issues that might have been missed out in earlier studies. Additional measures may include thorough screening at project preparation, the project proponent’s commitment to monitoring, implementing agreed measures and institutional strengthening measures. All affected properties will be subjected to a transparent valuation process and will be promptly and adequately compensated. A Livelihood Restoration Plan will be developed as part of the RAP, implemented and monitored throughout the project cycle. Additionally, a Grievance Redress Mechanism will be put in place to record and solve grievances associated with land acquisition.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

A high number of trees of various species are likely to be cut during road expansion. Trees are refugee sites for birds, reptiles and small mammals. They support the carbon dioxide sequestration process especially in this era of Global warming and climate change. Additionally, during grabbing and site clearance, the project area is likely to be exposed to invasive species especially species which respond positively to fire and habitat disturbances. Based on the initial screening by UNRA, it is noted that there are dotted/degraded forest plantations/modified habitats along the road, including Lodong Central Forest Reserve (CFR), seasonal swamp and rivers. Lodong is a plantation CFR under cultivation by Tobacco Farmers. Being virtue of being a CFR, Lodong CFR is protected under Uganda’s National Forestry and Tree Planting Act 2003, the National Forestry and Tree Planting Regulations 2016 and ESS6. The preliminary assessment further cited and recorded presence of three (3) tree species of conservation concern (IUCN Red-List) along the proposed road corridor on various occasions. These include Melicia excelsa (Muvule) Termarindus indica (Tamarinds) and Vitellaria paradoxa (Shea butter). A total of 95 Muvule and 78 Shea butter trees were counted and potentially to be affected by the proposed road works. The tree species are protected by the constitution of Uganda because they are threatened by communities through charcoal burning and timber production. Biodiversity assessment of these habitats shall be undertaken as part of the project ESIA and accordingly inform the engineering design depending on the extent of the likely impacts. Stakeholder consultations shall be undertaken including the Local communities, District Local Governments along the project road, National Forest Authority, Wetlands...
Management Department, and Directorate of Water Resources Management, and their respective guidance taken into consideration during the development of the ESMP. The NFA, ESIA Consultants, and UNRA will take into consideration provisions of Lodong CFR Management Plan while developing the ESMP. NFA will provide guidance on the requirements to be implemented by the project during ESIA consultations, for the section of the road passing though Lodong CFR. The main road construction materials include gravel and stone aggregates, which will mainly come from the physical environment. The preliminary assessment of such sites has been included under ESS-1. and if necessary, a Biodiversity Management Plan (BMP) will be developed as part of the ESMP in accordance with ESS6. Avoidance of Tree-cutting will be emphasized as far as possible.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
There are no African Historically Underserved Traditional Local Communities as defined by ESS7 in the project area. The project will be implemented in Northwest Uganda; a region not known to host any - Batwas have settlement in the southwest, Benets, Iks and Karamajongs in the Northeast.

ESS8 Cultural Heritage
The preliminary E&S assessments carried out by UNRA indicate the presence of Mosques, Churches and graveyards along the proposed project corridor. A complete inventory of cultural heritage within the ROW will be conducted as part of the ESIA and the mitigation hierarchy will be applied on the management of the project's potential risks and impacts. Graves structures and other cultural heritage along the ROW, which may be affected and have to be relocated and will be included in the RAP to be prepared for the project. “Chance Find Procedures” will be included in the ESMP and chance find clause will be included in works contracts requiring contractors to stop construction if cultural heritage are encountered during construction and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries
The proposed project will not involve financial intermediaries.

B.3 Other Relevant Project Risks
N/A

C. Legal Operational Policies that Apply

| OP 7.50 Projects on International Waterways | No |
| OP 7.60 Projects in Disputed Areas | No |

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE
A. Is a common approach being considered?  

No

Financing Partners

The project will be financed by World Bank and no other partners are expected to participate during project preparation or implementation.

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

Actions to be completed prior to Bank Board Approval:

Documents and actions prepared and completed prior to Appraisal:
- Preparation, consultation and disclosure of ESIA/ESMP for KMY Roads and E&S Capacity Assessment of and Capacity Building Program for UNRA.
- Preparation of a preliminary GBV Action Plan
- Preparation, consultation and disclosure of RAP (including Livelihood Restoration Plan) for KMY Road;
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP);
- Preparation and disclosure of Labor Management Procedures (LMP);
- Preparation and disclosure of Environmental and Social Commitment Plan (ESCP).

Documents and actions prepared and completed prior to Board Approval:
Preparation of ESMF and RPF for the 35Km Gravel Access Roads Works, (if decided to be included in the project).
- Preparation of CERC-ESMF.

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

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

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS
- Organizational Structure - Specifying additional staff assigned/hired to work on the Project to support E&S risk management.
- Undertaking Environmental and Social Screening, Assessments, development of ESMPs, including Contractors’ ESMPs and incorporation of ESHS in procurement processes for construction works.
- Preparation of additional ESIs for any Access Roads works (if applicable) and ancillary facilities determined during project implementation.

ESS 2: LABOR AND WORKING CONDITIONS
- Labour Management Procedures: Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.
- Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.

ESS4 COMMUNITY HEALTH AND SAFETY
- Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs.
- Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).
ESS6 BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES
- Prepare and implement a Biodiversity Management Plan (BMP)

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

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

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

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 28-Feb-2020

IV. CONTACT POINTS

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VI. APPROVAL

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