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MINISTRY OF AGRICULTURE, ANIMAL INDUSTRY AND FISHERIES

Uganda Climate Smart Agricultural Transformation Project (P173296)

<mark>Draft</mark>

Vulnerable and Marginalized Groups Plan (VMGP)

APRIL, 2022

Table of Contents

LIST OF TABLES

ACRONYMS

AI	Artificial Insemination
BMCT	Bwindi Mgahinga Conservation Trust
BRACED	Building Resilience and Adaptation of Climate Extremes and Disasters
CBO	Community Based Organisation
CDD	Community Driven Development
CSA	Climate Smart Agriculture
E&S	Environment and Social
ESF	Environment and Social Framework
ESIA	Environment and Social Impact Assessment
ESS	Environment and Social Safeguard
EWS	Early Warning System
FGD	Focused Group Discussion
FPIC	Free Prior Informed Consent
GBV	Gender Based Violence
GHG	Green House Gas
GRM	Grievance Redress Mechanism
HH	Households
IK	Indigenous Knowledge
ILO	International Labor Organization
IWGIA	International Work Group on Indigenous Affairs
LIPW	Labour Intensive Public Works
M&E	Monitoring and Evaluation
MAAIF	Ministry of Agriculture Animal Industry and Fisheries
MEBIO	Mt. Elgon Benet Indigenous Ogiek Group
MIS	Management Information Systems
MRGI	Minority Rights Group International
MRV	Monitoring Reporting and Verification
NARO	National Agricultural Research Organization
NGO	Non-Governmental Organisation
OVC	Orphans and Vulnerable Children
PAP	Project Affected Person
PES	Payment for Ecosystem Services
PSVGP	Project Specific Vulnerable Groups Plan
PWD	People with Disabilities
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SLM	Sustainable Land Management
SME	Small and Medium Enterprise
SWC	Soil and Water Conservation
TIMPS	Technology Innovations and Management Practices
UCSATP	Uganda Climate Smart Agriculture Transformation Project
UOBDIUM	United Organization for Batwa Development in Uganda
UNMA	Uganda National Meteorological Authority
VA	Vulnerability Assessment
VAC	Violence Against Children
VDPA	Vienna Declaration and Program of Action
VGs	Vulnerable Groups
VMGs	Vulnerable & Marginalized Groups
VMP	Vulnerable & Marginalized People
VMPP	Vulnerability Marginalized People's Plan
VMPPF	Vulnerable and Marginalized People's Planning Framework

INTRODUCTION/ PROJECT DESCRIPTION

The Uganda Climate Smart Agricultural Transformation Project interventions targets addressing the primary drivers of poverty in the 69 districts across the country. These sub-regions and agro-ecological zones are targeted because of increasing and high levels of poverty, and land and natural resource degradation; as well as low value production, which are anchored in low productivity from engaging in low value economic activities making communities more vulnerable to climate change shocks. The project supports investments in technology and market-driven productivity increases in climate smart value chains. These investments will contribute to reversing the effects of climate change thereby sustainably increasing agricultural productivity and household incomes while enhancing resilience to climatic shocks.

Project Development Objective - (PDO)

To increase the productivity, market access and resilience of select value chains in the project area and to response promptly and effectively to an eligible crisis or emergency.

PDO level indicators

The outcome indicators to measure achievement of the Project Development Objective (PDO) are as follows:

1. Project beneficiaries (Numbers), disaggregated by nationals, gender, host communities and refugees.
2. Land area under sustainable land management including climate smart practices because of project support (Hectares), disaggregated by nationals, host communities and refugees.
3. Percentage increase in yields of selected value chains in metric tons per production unit, disaggregated by commodity/value chain.
4. Percentage increase in volumes of agricultural products of selected value chains marketed by targeted beneficiaries, disaggregated by nationals, gender, host communities and refugees

Project Components

To achieve the aforementioned PDO, the project is structured around the following components:

1. Strengthening Climate-Smart Agricultural Research, Seed and Agro Climatic Information Systems
2. Promoting Adoption of Climate Smart Agriculture Technologies and Practices
3. Market Development and Linkages for Selected Value Chains
4. Contingent Emergency Response Component
5. Project Management, Coordination and Implementation

1.0 Overview of the VMGP

It is envisioned that the implementation of UCSATP sub projects will have some positive impacts that should be enhanced while the negative environmental and social impacts on the Vulnerable and Marginalized groups shall be avoided, minimized or mitigated at the implementation stage. This VMGP has been prepared in line with the Environmental and Social Standard 7 (ESS7) of the World Bank's Environmental and Social Framework (2018) and relevant Ugandan legal framework.

This VMGP sets out principles for management of social risks that may be occasioned to Vulnerable and Marginalised Groups (VMGs) during implementation of the UCSAT project. Vulnerable Groups in Uganda, according to ESS7 include traditional hunters and gathers' communities of: Batwa, also known as Twa or Pigmies who live primarily in south-western Uganda; Ik, who live on the edge of the Karamoja - Turkana region along the Uganda - Kenya border in Kaabong district, Karamoja; Benet, also known as Ndorobos, are 20,000 in number and live in Kween district on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, and Tepeth, also referred to as the Soo. They live in Mount Moroto and neighbour the Turkana and the Pokot of Kenya. They are also said to have been the original people of Moroto but due to ethnic wars with the Karimojong they were driven up the top of mount Moroto.

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1.1 The objectives of VMGMP

1. To provide a framework for integration of aspects of vulnerable and marginalized groups in all stages of the project.
2. To provide arrangements for avoiding potentially adverse impact on VMGs throughout the implementation of the project; where avoidance is not feasible, minimize, mitigate and compensate such effects;
3. To ensure that VMGs receive social and economic benefits that are culturally appropriate as well as gender sensitive; and
4. To provide procedures for ensuring full participation of VMGs in the entire project cycle.
5. To propose interventions and set out the roles of different stakeholders and actors in the implementation of the project towards addressing emerging negative impact.
6. To undertake free, prior and informed consent where required and recognize, respect and preserve the culture, knowledge and practices onh VGs as well as providing an opportunity to adapt to changing conditions in an acceptable manner and timeframe.

This VMGF will be used:
a. In conjunction with the ESMF, SEP, PF and RPF, address any adverse impacts on the livelihoods of VMGs and/or their assets or resources;
b. Propose measures to ensure that the VMGs have access to culturally appropriate benefits from relevant project interventions, and will thus contribute to the achievement of the mandate of the Equal Opportunities; and
c. Target the indigenous groups that are considered as ethnic minorities, internationally considered as indigenous peoples and these include the Batwa, Benet, Tepeth and Ik.

1.2 Definition of Key Concepts

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Indigenous Peoples
There is no universally acceptable definition of "Indigenous Peoples". Indigenous Peoples are defined differently from one country to another by such terms as "Indigenous ethnic minorities," "aboriginals," "hill tribes," "minority nationalities," "scheduled tribes," "first nations," or "tribal groups." In Uganda, the term "ethnic minorities" is used to refer to VMGs. For purposes of this plan, the World Bank's criterion for identifying VMGs will be used to distinguish them from the 65 ethnic groups in Uganda: that is, those people who have

historically suffered, and continue to suffer disempowerment and discrimination on economic, social and cultural grounds.

The term "Indigenous Peoples" is used in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees:
a. Self-identification as members of a distinct cultural group and recognition of this identity by others.
b. Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories.
c. Customary cultural, economic, social or political institutions that is distinct from those of the dominant society and cultures.
d. A language, often different from the official language of the country or region.
e. Generally vulnerable by their nature of life; the community they live in and highly susceptible to extinction.

As such, although the Ugandan Constitution does not expressly recognize indigenous peoples it makes provision for addressing some of the negative effects arising from ethnic imbalances. The Constitution, in the section on National Objectives and Directive Principles of State Policy, provides that every effort shall be made to integrate all peoples while at the same time recognizing the existence of, amongst others, their ethnic, religious and cultural diversity. In this regard, the Constitution requires that everything necessary be done to promote a culture of co-operation, understanding, appreciation, tolerance and respect for each other's customs, traditions and beliefs.

Ethnic Minority Groups
It is possible to argue endlessly about the meaning of the term 'minority' in the Ugandan context (and sub-Saharan Africa) and whether a particular group of individuals form a separate minority (MRG, 2001). Similarly, no definition of the term 'minority' has proved universally acceptable. However, the UN Human Rights Committee came up with a working definition as: "any disempowered group, regardless of its numerical size could be considered a minority" (Ibid). In Uganda, the term "ethnic minorities" is used to refer to VMGs.

Marginalized Groups
The term "Marginalization" generally describes the overt actions or tendencies of human societies whereby those perceived as being without desirability or function are removed or excluded (i.e., are "marginalized") from the prevalent systems of protection and integration, so limiting their opportunities and means for survival.

Vulnerable Groups
Vulnerability refers to the conditions determined by physical, social, economic and environmental factors or processes, which increase the susceptibility of a community to the impact of hazards. A vulnerable group is therefore a population with specific characteristics that put it at a higher risk of falling into poverty than others living in project areas. Vulnerable groups thus include the elderly, disabled people, HIV/AIDS infected and affected individuals and households, women, and orphans and vulnerable children (girl child, street children, children from extremely poor households, HIV/AIDS infected and affected children, children with disabilities, children living with elderly or disabled parents, and children in paid employment). On average, the Karamoja sub region is recognized as vulnerable, marginalized and poor. Therefore, there are very little differences between the persons identified as vulnerable/marginalized and the entire population of the region. The table below gives more information.

Table 1-6: Uganda vulnerable People groups

Conflict related	Demographic categories	Poverty related
❖ Refugees ❖ Internally displaced Persons ❖ War orphans ❖ Abductees ❖ Households living near conflict zones.	❖ Asset- less widows and widowers; ❖ Orphans and abandoned children; ❖ Female headed households; ❖ Child headed households; ❖ People with disabilities [PWD] ❖ The chronically sick; ❖ HIV/AIDS infected and affected persons; ❖ Victims of domestic violence; ❖ Ethnic minorities; ❖ Street children	❖ Urban and rural poor; ❖ Urban unemployed; ❖ Low paid workers ❖ Informal sector workers ❖ Beggars ❖ Squatters ❖ Landless ❖ Nomadic pastoralists Peasants ❖ Plantation workers ❖ Unemployed Youth

(Source: The National Equal Opportunities Policy, 2006, -MoGLSD-Kampala).

2.0 The Vulnerable and Marginalized Groups of Uganda

Uganda does not have an official definition of VMGs neither does it have a criterion for their identification. According to Uganda's 1995 Constitution, there are 65 ethnic groups referred to as indigenous communities as from the date of 1st February 1926. Ethnic diversity plays a major role in shaping the behaviours and ways of life of people as their cultural and social life differ from one ethnic group to another. The term 'indigenous' as referred to in the Constitution is used to describe the different ethnic groups that have historically resided within Uganda's borders. This understanding differs from the manner in which the term is used by international and regional organizations and by experts on VMGs' issues. Uganda uses ethnic minorities, to the exclusion of other factors, as the only method of identifying VMGs.

The African Commission on the 3rd periodic report (concluding observations) on the Republic of Uganda, observed that one of the factors restricting the enjoyment of the rights enshrined in the African Charter on Human and Peoples' Rights (ACHPR, 2009) is the apparent lack of political will to take measures to realize the rights of VMGs especially the Batwa, Ik, Tepeth and Benet as guaranteed under the Charter. The commission recommended that Uganda adopts measures to ensure the effective protection of the rights of VMGs especially of the Batwa people as guaranteed under the Charter by establishing laws that protect land rights and natural resources of VMGs (ibid). These groups are not recognized as Indigenous People (IPs) by the GoU which prefers to call them Vulnerable and Marginalized Groups or Ethnic Minorities.

A number of ethnic minority groups in Uganda have been identified according to the World Bank's ESS7, on the identification of VMGs.
They include traditional hunters and gathers' communities of:

- ❖ Batwa, also known as Twa or Pigmies who live primarily in south-western Uganda;
- ❖ Ik, who live on the edge of the Karamoja - Turkana region along the Uganda - Kenya border in Kaabong district, Karamoja;

8

- ❖ Benet, also known as Ndorobos, are 20,000 in number and live in Kween district on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, and
- ❖ Tepeth, also referred to as the Soo. They live in Mount Moroto and neighbour the Turkana and the Pokot of Kenya. They are also said to have been the original people of Moroto but due to ethnic wars with the Karimojong they were driven up the top of mount Moroto.

The VMGs of Uganda are commonly characterised by:
- ❖ Historical and continued suffering, disempowerment and discrimination on economic, social, cultural and political grounds;
- ❖ Reliance on their land and environment to sustain themselves both physically (in terms of food, fuel and habitat) and culturally;
- ❖ Threatened livelihoods mainly due to dwindling access to land and natural resources on which they depend on as hunters and gatherers;
- ❖ Much lower health and education indicators than those of the dominant community, often due to difficult access. This means that they are particularly vulnerable to changes in their socio-economic and physical environments;
- ❖ Social exclusion, deprivation from mainstream government services, lack of participation in development processes that affect them, and in most cases uncertainty of land and natural resource tenure; and
- ❖ Their economic systems exist separately from that of the mainstream or dominant community, and tend to have minimal interaction (if any) with the socioeconomic and legal systems of national governments;

Some of the key factors that continue to affect and maintain the marginalization of VMGs communities include:
a. Dispossession of ancestral lands including lack of access and/or no control or legal recognition of such land and other natural resources;
b. A focus on modern agriculture versus preservation of livelihoods of hunter and gatherers and pastoralist groups;
c. Limited access to education, resulting in inability to compete for employment opportunities;
d. Ignorance and limited access to information on government programs and basic entitlements
e. Limited access to agricultural and other social services such as health, etc;
f. Unequal development of health care and other social infrastructure;
g. Limited access to justice and increased conflict and a deteriorating security situation and recurrent inter-ethnic conflicts; and
h. Limited access to livelihoods, financial, banking and credit facilities.

2.1 Preliminary Socio-Economic Baseline Characteristics of VMGs in Uganda

As earlier explained, the Ik, Batwa, Benet and Tepeth are considered the VMGs in Uganda. A desk review of the vulnerable and marginalized Peoples and Sub-Saharan African Historically Underserved Traditional Local Communities shows that there are varying socio-demographic

characteristics that any development intervention should consider. Most of the features demonstrate limited opportunities to access basic development opportunities. Below is the baseline for the VMGs in Uganda.

Table 2.1-1: Some basic social-economic profiles for the VMGs

Variable	VMGs Baseline Profiles
Poverty	High poverty levels in these communities caused by highly undependable climate, low produce and low market prices, for their produce **Batwa:** Batwa people face extreme poverty in their everyday life. Once known to live in the depths of the African forests as one of the oldest indigenous tribes in the continent, they now reside in town slums. **Tepeth:** These Tepeth are mainly pastoralists and practice hunting. They rear some animals on the slopes but come down to graze them. Although they rear livestock, they do not believe in selling their animals. Animals are kept mainly for milk and marriage. They were fruit gatherers and do not believe in cutting down trees. They harvested honey from the forests. **The IK and Benet** just like the above groups experience food insecurity, limited access to basic social services, and poor economic and livelihood opportunities
Inadequate land for settlement	The Ik, Batwa, Benet and Tepeth are mobile due to land tenures systems, their social life or various uncertainties. They move when their lands are acquired from them or when they need to grow crops, away from where animals threaten to destroy them. When they are not assured of permanent settlement, they construct temporary shelters. They do not own land; they have a common experience state induced landlessness and historical injustices caused by the creation of conservation area in Uganda. They have experienced various human rights violations, including continued forced eviction and /exclusion from ancestral lands without community consultation, consent.
Economic activities	Similarly, these indigenous groups such as the **Batwa**, face challenges that limit their participation in economic activities for example cultural practices that limit their survival to particular areas, social exclusion by the majority groups and their cultural lifestyle is not based on cash economy. However, there have been some efforts to improve their self-reliance. Kanungu District, for instance, has persistently provided various crop seeds through their agricultural initiatives but the Batwa have in turn sold such agricultural inputs. Although they are known as hunters, they also do other forms of labour at low pay. Some do basic jobs or agriculture, while others make handicrafts and jewellery for sale to locals and tourists. They also do singing and dancing as form of entertainment for payment by visitors. Tourists pay some money to the dancing groups to be entertained. For the

	Tepth, while they are traditionally hunters and gatherers, the Tepeth have also embraced agriculture. The main crops that they grow include maize and sorghum among the staple foods they consume. They also grow and consume pumpkins and other local vegetables. For food, they mainly grow and eat maize and sorghum, with beans and pumpkins as their main relish dish. They have their original type of maize that is very sweet and also a special type of sorghum that is sweet and liked by birds so much. Because of the disturbance from the birds, they are slowly adopting growing other varieties of sorghum that are not liked by the birds that much. They have also adopted growing of "Sukuma wiki" which sometimes floods the Moroto town market to the detriment of the Mbale vegetable sellers. They have also borrowed the practice of keeping cattle from the Karimojong. They keep livestock but do not believe in selling their livestock. Animals are kept mainly for milk and marriage. They rear some animals on the slopes but come down to graze them. They were fruit gatherers and do not believe in cutting down trees. They harvested honey from the forests.
Education	For most ethnic these groups, (Ik, Batwa, Benet and Tepeth), access to education remains a challenge. This is attributed to their unique social cultural practices such as their nomadic lifestyle, scarce school facilities in their localities, discrimination and stigma, and fear of the unknown. Yet education would allow for social transformation, self-sufficiency and promote self-esteem. Education offers the potential to undertake training in technical skills or to access employment, all of which would help these ethnic groups overcome the poverty they live in.
Health service access	Access and utilization of health care services remains a challenge for most of the Ik, Batwa, Benet and Tepeth. Factors such as limited awareness and acceptance of modern medicine, stigmatization by health workers, distance from health centers, over reliance on traditional medicine as well as high costs associated with access to health care. This has exposed them to the risk of high disease burden, high levels of infant and maternal mortality, high HIV prevalence etc.
Social dynamics	Women participation in social and community management activities is minimal compared to men. There are small numbers of women that participate in community meetings and this reflects the power dynamics in society; few women among them have the level of education needed to take up positions in local governance or obtain government employment.
Poor road network and other services:	Further still, the Ik, Batwa, Benet and Tepeth tend to live in areas characterised by very bad terrain and poor road network which renders them hard to reach. As such accessibility to them is a problem mainly due to the mountainous nature of their locations. This limits access to markets and other social services.
Socio-cultural issues	It is also pertinent to note that the communities where these ethnic minorities live are characterized by social problems such as extreme and abject poverty, child marriages, alcohol/substance abuse and domestic violence. The relationship between the marginalised and vulnerable groups and their dominant neighbours is characterised by 'discrimination,

	marginalisation and stereotyping'. For some of these ethnic minorities, the concept of patriarchy and gender segregation is dominant, as is the case in most other tribes in Uganda.
	a. Eviction of VMGs from their homelands (Natural Forests) has limited their access to food, medicine, and shelter. As a result, some of them are plagued by starvation, sickness and exposure. For instance, the number of Batwa in Bundibugyo and Kisoro Districts are said to be reducing and therefore on the verge of total extinction due to the HIV/AIDS, which they have acquired as a result of integration with other communities who believe that one can get cured of the infection after canal knowledge with a Mutwa woman (Kabananukye, 2016).
	b. As traditional hunters/gatherers, the Ik have witnessed the depletion of wild game in their areas due to cutting down of trees and the widespread use of illegal guns; Timu forest which is a center for their rituals and traditions is slowly becoming depleted causing gathering methods to be more difficult and greatly affecting the performance of their rituals and traditions. The Dodoth and Turkana graze in Ik lands during which they cut down trees for fencing their homestead and kraal; Frequent attacks from hostile ethnic groups especially the Tepeth in Moroto are attacked by the Pokot and Turkana from the Kenya. The Ik are attacked by other Karamojong ethnic groups.
	c. The Benet, also known as Ndorobos, are 20,000 in number and live in Kween district on the margins of and inaccessible parts on the slopes of Mt. Elgon in the north-eastern part of Uganda, are on the verge of extinction due to takeover of Mt. Elgon by Uganda Wildlife Authority as a protected area for wildlife.
Leadership	Since the ethnic minorities lack numeric advantage, their participation in leadership at all levels is minimal. For example, it was only in 2015 that the Ik community were given affirmative action constituency and they got their first representation in Parliament of the Republic of Uganda in the 10th Parliament. Local leadership is optimistic that such representation can help to advocate for further recognition of such groups to ensure the effective participation in leadership, governance and the achievement of the NDP III goal.

According to International Work Group for Vulnerable and Marginalized Affairs (IWGIA), a global human rights organization dedicated to promoting, protecting and defending vulnerable and marginalized peoples' rights, dispossession of traditional lands and territories is one of the major problems faced by VMGs in Africa. Development paradigms in the Sub-Saharan region tend to perceive VMGs' modes of production (pastoralist, hunting, and gathering), as primitive, non-productive and unaligned with today's modernization aspirations of African States. Therefore, many development policies are either directly or indirectly unfavourable to VMGs' modes of production.

2.2 Challenges Facing Vulnerable Groups

It is quite clear that these different communities have distinct lifestyles and differences in the way they go about their businesses. However, they still share some common challenges when it comes to the way they live their lives, access to land and other basic requirement, and also when it comes to the challenges associated with climate change. Some of the challenges faced include:

a. Very harsh climatic conditions which has affected animal production in areas predominantly pastoral like Karamoja region. This has affected natural resources including agricultural land and water.
b. Some of them are being faced with evictions, for example the Benet living on Mount Elgon.
c. Government laws prohibit hunting without a license and restrict hunting (and grazing) in national parks which restrict the possibility of hunting as the cost of the licenses is prohibitively expensive for these groups.
d. Their land is being highly encroached by other ethnic groups. As a result, VGs face scarcity of land for practicing their traditional activities, pastoralists or as hunter-gatherers, something which contributes to a shift in their economic activities to small-scale farming or casual labor to survive.
e. Hunter-gatherers have tended to be more isolated from communities and decision making. This is due in part to their lifestyle.

Most of these areas still struggle to access basic services like health and Education. Most of the children have to move several kilometres to access schools and the same applies to patients who have to move long distances to the nearest health facility.

2.3 Potential risks and impacts on the Vulnerable/Marginalised Groups

Climate-smart agriculture (CSA) is an integrated approach to managing landscapes—cropland, livestock, forests and fisheries that addresses the interlinked challenges of food security and accelerating climate change. The planned CSA interventions is expected to simultaneously achieve the following potential positive impacts and potential risks and impacts:

Table 2.3-1:Potential Positive and Negative risks and impacts of the project to the VMGs

Component	Positive & negative impact	Enhancement/mitigation measure
	Positive impacts	
Component 1: Strengthen Climate-Smart Agricultural Research, and Seed Systems	On farm, production intensified through use of improved inputs complemented with good agricultural practices	Conduct FPIC with the VMG communities, their cultural leaders and representatives in relation to the benefits of adopting improved farming practices and sensitize them about the benefits of CSA before project commencement and during project implementation.
Component 2: Promoting Adoption of Climate Smart Agriculture Practices and Value Chains	***Business skills development*** Producer Associations (PA) will access services for business skills development through Technical Assistance provided by private sector partners. These will be supported and backstopped by local government staff at District and sub-county levels. The skills will enable them to carry out their post-harvest management, value addition and marketing more efficiently and effectively.	• Establish the specific skills needs required for provision of appropriate programs and detailed inclusive selection criteria put in place will ensure no one is excluded in the process of business skill development. • Training Programs should be designed in line with the specific business skills needs of the VMG communities.
	Acquisition of equipment and machinery: PAs will acquire climate smart post-harvest management equipment, including community-level storage, value addition and agro-processing equipment and machinery for commercialization of their enterprises.	Provide training and maintenance of farming equipment provided by the project.
	Market linkages: Farmers will be connected to potential off-takers who may be processors or traders of agriculture produce.	Ensure that strong and sustainable structures are built to improve on market access.

Commented [FK6]: Please note that most of these VMGs do not practice farming. For this impact to be achieved, the project will purposefully interest them to embrace farming.

	Access roads: MAAIF will make investments in improving access roads through rehabilitation of choke points to reduce transaction costs and contribute to enhancing incomes.	Ensure that the roads are properly constructed and maintained for purposes of continued access and ease of movement within the VMG communities. Conduct FPIC with the communities, leaders about the benefits of improved road access to their communities.
Negative Risks and Impacts		
Component 1 &2	Risk of spread of HIV/AIDs	Continuous sensitization about HIV/AIDS prior to project implementation and after should be carried out by MAIIF to prevent VMGs ~~and vulnerable groups~~ from contracting/spreading HIV/AIDS.
	Risk of GBV/SEA owing to imported technical labour into project host areas to undertake civil works/infrastructure	Referral pathways to provide support for VMGs should be built in from the beginning to address any backlash which does occur, for instance in the occurrence of GBV as a result of women's engagement in entrepreneurial activities. To ensure that SGBV survivors within the VGM communities can confidentially report incidents through their representatives in the GRM structures and have timely and non-discriminatory access to services and support, including medical, psychosocial, legal and material assistance, as well as safe spaces where needed. The GBV redress mechanism should adopt a survivor-centred approach that: • Treats every survivor with respect. • Ensures the safety of survivors and their families. • Respects the choices, wishes, rights and confidentiality of survivors and their families. • The identity of a survivor should never be revealed without his or her prior consent. • Provides services and support without discrimination on any grounds. • Provide and implement a gender-based violence strategy, which will form one of the Contractor's clauses. • Gender sensitization campaigns in the project held; with specific focus on men and the need for spousal support in business

	Risk of rejecting improved seed varieties by the VMG communities owing to cultural beliefs and misinformation.	• Conduct FPIC with the VMG communities, their cultural leaders and representatives in relation to the benefits of adopting improved farming practices.
	Risk of exclusion of VMGs in selection of beneficiaries. Risk of excluding VMGs from CSA capacity building.	• The selection criteria and screening of beneficiaries for capacity building, access to improved seed varieties, farm equipment, needs to be clear, inclusive and acceptable by key stakeholders otherwise this can exclude other categories of potential beneficiaries in the process; like women with disability, poorer women among VMG communities.
	Risk of Contracting and Spreading COVID-19.	Covid-19 management plan and SOPs both on-site and offsite.
	Risk of poor use and maintenance of established infrastructure such as community-level storage, value addition and agro-processing equipment and machinery for commercialization of their enterprises.	• Ensure that VMGs communities in general and their organizations/local leaders are not excluded by any means in activities of selection, design, and implementation processes.
	Risk of child labour in VMGs communities.	• MAAIF in collaboration with the district local governments should ensure that existing child protection mechanisms (policies and laws on children's rights, labour etc.) are adhered to in line with national laws, ESS2 and the Labour management procedure in the ESMF to guide civil works and minimize any risk associated with it including influx of labour.

3.0 Vulnerable identification process and contents of a Vulnerable Group Plan

Based on the proposed project activities, identification of vulnerable individuals/groups will aim at:

  i. Identification, categorization and prioritization of vulnerable groups/individuals;
  ii. Ensure that vulnerable groups/individuals' voices are heard and integrated into the project planning process through meaningful consultations;
  iii. Prepare and put in place special assistance measures for vulnerable and marginalized persons;
  iv. Identify potential vulnerability risks, impacts, drivers and recommend appropriate mitigation measures;
  v. Identify and plan for in advance issues that might influence project design especially in relation to the various vulnerable groups/individuals and assess and prevent potential risks and negative impacts that could affect them disproportionately, as well as become barriers to accessing project benefits.

Vulnerable/marginalised people and or individuals are in many instances among the most economically marginalized and vulnerable segments of the population. Their economic, social, and legal status frequently limits their capacity to defend their rights to, and interests in, land, territories, and natural and cultural resources, and may restrict their ability to participate in and benefit from development projects. The criteria below will be used to map and categorise marginalised groups under the UCSATP;

  a. *Social factors:* These include; inequality, social exclusion and discrimination by gender and social status, religion, marital status, orphans, age, cultural, psychological and patriarchy conditions
  b. *Economic factors:* These include economic status, livelihood sources and dependency on natural resource as a principle source of livelihood.
  c. *Disability factors:* include physical disability, hearing, visual and mental disability
  d. *Health factors:* chronic illnesses, frailness and immobility
  e. State of citizenship (refugees)
  f. Educational levels
  g. *Environmental factors:* Poor environmental management practices that lead to climate change effects such as prolonged drought, seasonal floods and wild fires
  h. Land tenure-based vulnerability.
  i. *Under served or marginalized communities:* ESS7 recognizes the plight of underserved communities. Under this project, the IK of Kaabong, Tepeth, also referred to as the Soo of Moroto, the Benet of Kween and Batwa found in South Western Uganda are categorized as indigenous people.

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Commented [FK8]: Similar comment as indicated above. Does this mean that these groups are yet to be mapped out?

4.0 Framework for Free, Prior, and Informed Consent (FPIC)

Consultation Stage	Consultation Participants		Consultation Method	Expected Outcome
	Project authority	**Community**		
Location of project activity	MAAIF/Project Implementation Unit and other stakeholders	Vulnerable/Marginalized Groups, CBOs/organizations community leaders/elders, District, Sub-County and Parish Leaders.	Open meetings and discussions, visit proposed project sites	First hand assessment and VG perceived social benefits and risks and prospect of achieving broad support for the project. Explanation of VG rights under law and ESS7
Initial screening of the proposed sub-Projects with FPIC requirements	MAAIF/Project Implementation Unit and other stakeholders	VGs, CBOs, Community leaders/elders, Influential people, key Informants.	Open meetings, focus group discussion and spot interviews	Identification of FPIC circumstances/scenarios/mechanisms
Secondary screening of the proposed projects with FPIC requirements	MAAIF/Project Implementation Unit and other stakeholders	VGs, CBOs, Community leaders/elders, Influential people, key informants	Open meetings, focus group discussion and spot interviews	Identification of major impact issues, feedback from VGs who would be affected by the project
In depth study of risks and benefits of any of the applicable FPIC scenarios taking into consideration inter alia, the conditions that would lead to FPIC being achieved.	MAAIF/Project Implementation Unit and other stakeholders	VGs including likely affected CBOs organization, community leaders, influential people/leaders, key informants	Formal/informal interview, focus group discussion, hotspot discussion on specific impact, alternative and mitigation	More concrete view of impact issues & risks, and feedback on possible alternative, mitigation and development measures or a proposal not to proceed with certain project because FPIC is unlikely to be achieved.
Stakeholder consultations	MAAIF/Project Implementation Unit, NGOs, CBOs,	VGs, organizations, community leaders/elders, adversely affected VGs	Group consultations, hotspot discussion	Preparation of VGPs, and incorporation of SA inputs to avoid or minimize adverse impacts,

Commented [FK9]: Please be specific and indicate the organizations referred to under this column.

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Commented [FK10]: This is not clear. At what stage will these consultations be conducted.

	other knowledgeable persons			promote culturally appropriate benefit sharing and other VG development projects. Achievement and documentation of FPIC through agreed mechanisms or decisions not to proceed with the Project.
Implementation	MAAIF/Project Implementation Unit	Individual VGs, organizations, community leader/elders, other stakeholders	Implementation monitoring committees	Quick resolution of issues, Including through Grievance Mechanism, effective implementation of Vulnerable/Marginalized Group Plans
Monitoring and Evaluation	MAAIF/Project Implementation Unit	VGs organizations/ groups and individuals, NGOs & CBOs	Formal participation in review and monitoring	Identification and resolution of Implementation issues, effectiveness of VGPs

Free, prior and informed consultation (FPIC) as per ESS7, in relation to activities to be undertaken under the UCSATP, refers to a process whereby affected vulnerable and marginalized communities, freely have the choice, based on sufficient information concerning the activities, benefits and potential negative impacts of the Project.

Consent refers to the collective support of affected VGs for the project activities that affect them, reached through a culturally appropriate process. Under provisions of the World Bank ESF FPIC applies in circumstances in which the project will:
   a. Have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
   b. Cause relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities from land and natural resources subject to traditional ownership or under customary use or occupation; or
   c. Have significant impacts on vulnerable people Traditional Local Communities' cultural heritage that is material to their identity and/or cultural, ceremonial, or spiritual aspects.

The consultations and participation of VMGs will be ensured to adequately deal with needs, priorities, and preferences. VMGs will be provided with relevant Project information in languages and manner suitable to them. Separate focus group discussions will be carried out to assess the subproject impacts and benefits to these groups. The outcome of social assessment and VMPP will be presented in community meetings.

The following documents will be made available;
   a. A final Vulnerable and Marginalized Groups Plan
   b. The revised Vulnerable and Marginalized People's Plan, following detailed project design or change in scope.

> **Commented [FK11]:** A framework was prepared. Why would the plan be prepared prior to obtaining the detailed project design?

4.1 Requirements for Free Prior and Informed Consent
Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities may be particularly vulnerable to the loss of, alienation from or exploitation of their land and access to natural and cultural resources. In recognition of this vulnerability, in addition to the General Requirements of ESS7, ESS1 and ESS10, MAAIF is expected to obtain the Free, Prior and Informed Consent (FPIC) of the affected vulnerable and marginalized people. The FPIC principles are as follows:
   a. *Free* – people are able to freely make decisions without coercion, intimidation or manipulation
   b. *Prior* – sufficient time is allocated for people to be involved in the decision-making process before key project decisions are made and impacts occur
   c. *Informed* – people are fully informed about the project and its potential impacts and benefits, and the various perspectives regarding the project (both positive and negative)
   d. *Consent* - refers to the collective support of affected Sub-Saharan African Historically Underserved Traditional Local Communities for the project activities that affect them, reached through a culturally appropriate process.

4.2 FPIC Process for Vulnerable and Marginalized Groups
The following key steps will be followed during the FPIC process.
A. *Screening of the Need for FPIC:* The implementing agency, MAAIF, with support and guidance from the E&S Specialist in the Project Coordination Unit will identify the need for FPIC based on the project activities. In case the need for FPIC is confirmed:
B. *Sensitization of the VMP and Community*: The Project will inform VMPs about the

project purpose and proposed outcomes, potential beneficiaries and geographical scope of the project. The community will also be informed about the principles of FPIC, their right to participate and what will be needed to achieve FPIC.

C. *Additional Meetings:* Additional meetings will be held to discuss the concerns and any other issues that the VMP have including any barriers to the achieving consent. The VGs will be further informed of any benefits or potential impacts associated with the project, other beneficiaries and approaches to grievance resolution. The VMP representatives will discuss and agree with the project team on how they will demonstrate consent in line with their traditional decision-making processes while demonstrating that ethnic minorities, men, women, the disabled and youth have all participated in the decision-making process.

D. *Free Prior and Informed Consent*: When ready, the VMGs will demonstrate consent (or lack of it) through processes that are appropriate to that group. The agreements will be documented in the appropriate manner. The Project will document:
    i. the mutually accepted processes
    ii. the outcome of such processes.

4.3 FPIC Consultation Tools
The UCSAT project will utilize an evidence-based approach and tools to ensure FPIC is observed throughout the lifecycle of the project. The proposed FPIC tools will include stakeholders' attendance lists, photographic evidence and minutes and/or back-to-office reports.

4.4 Conditions under which FPIC is Required
In particular, FPIC would be applied when sub-projects:
    a. have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
    b. cause relocation of VGs from land and natural resources subject to traditional ownership or under customary use or occupation; or
    c. have significant impacts on the cultural heritage of VGs that is material to their identity and/or cultural, ceremonial, or spiritual aspects of their lives.

While it is considered unlikely that the VMPP will impact on the cultural heritage of the VGs, the possibility remains that there may be impact on sites of cultural importance and spiritual property. Such impacts will be identified through the development of the social assessment of the vulnerable groups, which will include engagement and the need for FPIC on such elements will be determined in consultation with the VGs.

4.5 Preliminary Stakeholder Consultations
Consultations were undertaken with various stakeholders for the preparation of this VMGF. Details of the consultations (who was consulted, where, when and issues that emerged) can be found in section Annex 61. The consultations were mainly to establish the impacts, both positive and adverse, of the UCSATP subprojects on VMGs which have been presented in the previous section. Additionally, the consultations were to get the views of the stakeholders; and to check with the VMGs, on their own views as well as seek broad stakeholder/institutional support for the proposed UCSAT. Below is the summary of the views from the VMGs representatives and coordinators:

Commented [FK12]: Prior to this section, please detail the development process of this plan.

Commented [FK13]: There are no annexes to this plan. Also note that the consultations were expected to be conducted during preparation of this plan. Remember minimal consultations were conducted during preparation of the framework. It was agreed then that extensive engagements would be conducted during preparation of the plan.

Table 4-12: Summary of stakeholder views related to VMGs

Stakeholder	Date	Issues/concerns	Responses
Coordinator CSOs working with Batwa (Ms. Penninah Zaninka)	20th April 2022	a. Land size and fertility are major constraints towards agricultural yields and contributors to food insecurity amongst the Batwa communities.	This is noted. The project will ensure that it engages Batwa communities on land use practices and smarter ways of agricultural projection to mitigate the risk and challenge of food insecurity.
		b. Due to land scarcity, Batwa households do practice over-cultivation, that depreciates their land fertility thereby depriving of them of good yields and food insecurity.	Through consultation with the communities, the project will suggest strategies and improved farming practices to alleviate the challenges of infertility and poor crop yields.
		e. Droughts are perceived to be particularly difficult as they impact both food and water security.	The UCSAT project will have Climate applications which include seasonal weather forecasts, monitoring and early warning products for drought, floods and pests and disease surveillance.
		f. Awareness of potential coping strategies is key and the Batwa should be given tailor made programs addressing; crop rotation, inter-cropping, crop diversification, tree planting, cash crops growing such as tea and coffee, animal husbandry, support towards bee-keeping, provision of agricultural inputs to support improved yields, post-harvest technologies and long-term planning can be potential strategies to address improved crop production in the communities of the Batwa;	Noted. Tailor made information related to cropping with challenges will be passed on to the Batwa.
		a. It is vital that, the Project has a tailor-made approach which is responsive to the needs and set up of the Batwa. Some sections of the Batwa communities do not have national identity cards and if have the identity cards is	The project will have inclusive and realistic requirements to enable the Batwa access project financing. Verification will factor in recommendations from LCs and cultural leaders for those without NID.

		a compliance requirement to access project financing or otherwise, such groups will miss out;	
		it would also be worthwhile to draw on best practices and lessons from similar cases where similar types of interventions have worked amongst marginalized and vulnerable communities such as Batwa rather than to simply fit these groups into a program, that may not work well.	Noted.
		d. Deliberate drive to grow alternate cash crops such as coffee, tea and agro-forestry is critical for the sustainability of these communities and the project needs to factor such into their plan for Batwa.	Noted.
		UCSATP in its PMU should amongst its staffing should include a VMG Specialist who amongst others, is to ensure information regarding the project is accordingly packaged and delivered to and from VMGs for their effective and meaningful involvement in UCSATP;	The project will have a Social and Environmental specialist who will work with VMG Liaison personnel at grassroots level.
		UCSATP and MAAIF should focus on maximizing production more efforts are needed to end discrimination and domination against Indigenous communities and promote inclusive structures and processes through legal and policy reforms.	Noted
District Commercial Officer Kaabong (Thomas Lemu)	19th April 2022	One the problem the Ik have is access to accurate weather information and such information ought to be readily available in	The UCSAT project will have Climate applications which include seasonal weather forecasts, monitoring and early warning

		their local dialects so that they are able to synchronize their cropping calendars. The UCSATP should avail programs of early warning to the communities so as to address cropping timings;	products for drought, floods and pests and disease surveillance. The project will also ensure that this information is accessible and understandable by the VMGs
		The project should be careful in its design, operations and management of its revolving funds. For instance, when Government came with its Emyoga funds for small-scale interventions, the beneficiary community took it as a political hand-out and an appreciation after the elections.	The VMGs will be consulted during project preparation and design to ensure that it lays emphasis on the needs and expectations of the VMG communities and also sensitize them about the requirements and expectations of the project.
		There is need for adequate mobilization and sensitization about the project	MAAIF as the project proponent will use its existing local government structures. PMUs, CSOs operating in VMGs to mobilise and sensitize the communities about the project.
		UCSATP should provide Ik with simple mechanized agricultural equipment because lately cattle rustling has swept virtually all cows amongst the Ik people and they begin to feel safe without cattle for fear of rustlers;	Noted.
		f. Interest groups and vulnerable categories ought to have their resources and involvement be ring-fenced others often they are left out during implementation. What is key, let there be clear provisions for interventions meant for vulnerable groups in view of their uniqueness. In NUSAF 2 and 3 there was a special program and approach meant for Karamoja which should be the case under UCSATP otherwise these groups tend	The project will be inclusive for all groups including the VMGs. The preparation of the VMGF will further inform the project implementation process in respect of the social dynamics of the VMGs.

		to miss out from programs where they are included in the overall project interventions	
		On the issue of GRM, when faced with complaints within the community -The IK always use their traditional GRM structures headed by elders known as **'Mgikaskou'**. Issues resolved by the clan leaders include Marital issues Conflict over land. However, for issues that are criminal nature the formal grievance redress structures are used	Noted, the project will integrate the local community-based structures to build a robust and functional GRM structure that will serve the community and the IK

5.0 Implementation of the VMGP

The implementation of the VMGP will involve a range of stakeholders, each with specific mandate and responsibility. Irrespective of their mandates and level of engagement, the following organizations will participate in prevention/avoidance, minimizing or mitigation of the social impact on the VMGs.

Table 5-1: Roles and responsibilities in the implementation of the VMGF

Implementing Partners	VMGP Roles and Responsibilities
Ministry of Agriculture Animal Industry and Fisheries (MAAIF)	MAAIF will be the lead implementing agency with primary operational guidance and implementation functions. MAAIF will take the overall responsibility of implementing UCSAT project through the established Project Implementing Unit (PIU); including ensuring the effective execution of the VMGPF.
	A Project PIU comprised of senior level officials from the respective technical departments of MAAIF to take on responsibility for day-to-day management of the project. Among other staff, the PIU will be constituted by Environmental Specialist, Social Specialist, Financial Management Specialist and Procurement Management Specialist. MAAIF will undertake overall technical coordination and implementation of the project, coordinating the National level MDAs and the participating District Local Governments.
	Coordination of all social issues including on VMGs under the project will lie with the PIU. The Environment and Social Safeguard Specialist (ESSS) and the Social Development Specialist in the Ministry/PIU will oversee the preparation and implementation of the VMGP.
District Local Government	Given that the project will rely heavily on decentralized delivery mechanisms, the local governments (Districts) will have a key role in planning and oversight. To this end, each District will have a District Implementation Support Team (DIST), composed of relevant technical staff at the District (District Natural Resources Officer, District Environment Officer, District Community Development Officer, District Forest Officer, Wetlands Management Officer, District Labour Officer, District Gender Officer, District Probation officer and Community Based Officers), led by the District Production or Agriculture Officer. The DIST will meet regularly to discuss implementation activities, as well as activities generated by the communities. Specific to VGMs, DLGs will: • Collaboration with the PIUs (the Environmental and Social safeguards) to undertake District and sub-county level monitoring of the implementation of the VMGP. • Undertake social screening to confirm presence as well as the participation of VMGs communities in their area of jurisdiction.

	• Mobilize the relevant communities/create awareness about the project. • Monitor mitigation measures intended to involve participation of the VMG communities in UCSATP Project. Monitor the implementation of the VMGP on ground.
The World Bank	The World Bank is a vital source of financial and technical assistance. The Bank will provide technical and financial support to ensure that the project is inclusive in implementation and does not promote any form of discrimination, human rights abuse or injustice among the Vulnerable and marginalized groups.
VMGs: Beneficiary Vulnerable and marginalized women's entrepreneur groups will be part of the actual implementers of the proposed project	Among their roles will be: • Attend and make contributions during stakeholder meetings; • Participate in project implementation on the ground; • Participate in the monitoring of VMGP implementation; and Safeguard and maintain project infrastructure as applicable.
Local/Community Based Organisations, NGOs	If deemed necessary, active local organisations such as, Bwindi Mgahinga Conservation Trust (BMCT), Mount Elgon Benet Indigenous Ogiek Group (MEBIO) and United Organisation for Batwa Development in Uganda (UOBDU) operating in the affected VMGs' communities may be called upon to support the DCDO and project personnel in not only mobilising VMGs to actively participate and benefit from the project but also in sharing their experiences and knowledge of working with VMGs. A number of NGOs have been instrumental in helping the VMGs stand up for their rights and continuous consultations with such NGOs is critical. Their roles include: a. Providing capacity building services to ensure participation of the IP groups. b. Sensitizing VMG communities on social and gender related issues Sensitizing about livelihoods, savings, and their rights as IPs.

Monitoring and Reporting Mechanism

Baseline data collection on the socio-economic status and cultural practices of VMGs will be carried out during, as necessary and the development of ESMPs. These will form the basis for establishing baseline data to monitor the project impacts on VMGs. The subsequent VMGPs where required, will also specify systems of data collection and monitoring of the anticipated changes and will include Terms of Reference (ToR) for the monitoring agency/consultant. The respective PIUs will submit monitoring reports to the World Bank for review.

> **Commented [FK15]:** Any reasons why this information wasn't collected during preparation of this plan?
>
> **Commented [FK16]:** Monitoring indicators are expected to be part of this plan.

Monitoring will be the mechanism through which the implementers of the project will get the feedback about project progress, delays and problems. Monitoring enables timely responses while providing lessons on implementation strategies. It is expected that every identified vulnerable group will have its plan that will be used for verification of these, among others:

> **Commented [FK17]:** Does this imply that each group will have a vulnerable and marginalized groups plan?

- Are all vulnerable groups in the project area identified?
- Are all groups equally participating in project decision-making?
- Are vulnerable groups treated with equal respect as decision makers, implementers, and participants?
- Are there measures that deliberately ensure inclusion of vulnerable and marginalized individuals and groups?
- Are those involved in project implementation continually encouraged to maintain vulnerable group inclusion in a non-judgemental environment?
- The project will support vulnerable and marginalized groups and other affected communities so that they are able to monitor the status of adverse social impacts and the effectiveness of mitigation measures outlined. The project will have to ensure that VMGs and communities are aware of the potential adverse impacts to monitor;
- The level of inclusiveness of VMGs in project activities
- The implementation of agreed activities; and
- The effectiveness of the conflict resolution and grievance settlement mechanisms.

5.1 Reporting Mechanisms

The M&E mechanisms adopted for the project will ensure that in addition to process and outcome indicators, appropriate impact indicators are defined related specifically to impacts on vulnerable groups and their livelihoods. These will include: how many vulnerable people participated actively and benefitted from project activities and documentation of their opinions on project impacts and if any of their specific concerns were addressed during implementation. In measuring the extent and quality of participation, it will be important to understand and capture how gender differences will affect the participation of girls and women in scheme activities. Gender analysis will therefore be an integral part of monitoring and evaluation of scheme activities.

The monitoring and evaluation mechanisms for the project will ensure that in addition to process and outcome indicators appropriate impact indicators are defined related to specifically to impacts on vulnerable groups and their livelihoods. It is recommended that an impact evaluation be undertaken about 6 months before project completion to assess the changes in the overall living standards compared to the time before project implementation.

5.2 Indicators for the implementation of the Plan and Framework

Monitoring indicators for VMGs will include gender and vulnerability specific indicators, and monitoring reports will present data disaggregated by gender, vulnerability and location. To effectively monitor project impacts on VMGs, the baseline data for the project will include data on representative VMGs' households. The socioeconomic baseline indicators will be used for measuring participation, outcomes and impacts on vulnerable and marginalized

communities. Key indicators for both benefits and VMGs' participation are indicated in table 7 below.

Table 5-2~~1~~: Indicators for monitoring the implementation of the VMGP

Proposed Activities	Indicators	Source of data
Undertake consultations with VMGs as part of SEP implementation	Number of consultations with VMGs at various stages of project implementation Number of participants attending the consultations.	Consultative meeting reports
Conduct extensive culturally appropriate awareness on shared benefits among the IK, Tepeth, Benet and Batwa to address gender discrimination that may be triggered by implementation of the project.	Number of sensitization and awareness meetings/sessions using various media and platforms Number of participants	Activity reports
Undertake project disclosure meetings (where applicable) on compensation of lost natural resources or cultural assets and other livelihoods support activities for the VMGs by the project.	Number of disclosure meetings undertaken among the VMGs Number of participants	Quarterly and activity reports
Undertake community mobilization, sensitization and awareness creation of VMGs on risks of GBV/SEA/VAC associated with labour influx and project works.	Number of radio talk shows, community dialogues and meetings	Quarterly Progress reports
Identify and train champions in the VMG communities to support local level interventions on safety and management of accidents associated with implementation of the project.	Number of VMGs' established and trained in VMGs' communities	Training reports Field/Activity reports
Formation and training of Grievance redress committees in the VMG communities on reporting cases and supporting a GBV/SEA referral mechanism within the local governance structures.	Number of VMGs on both the local project committee and Grievance Redress Committee to manage and support GBV/SEA referrals	GRM Reports

Negative impact, if any shall also be monitored to determine how project implementation has triggered negative impact and to what extent the negative impact has been reduced.
Some of the UCSAT Project outcome indicators will include:

   a. Number of VMGs' households and individuals physically or economically displaced by the project;
   b. Number of VMGs' in the project reach that have not benefited from the project;
   c. Number of VMGs' that have been exposed to GBV and VAC in relation to the project;
   d. Number of VMGs' registered grievances.

5.3 Participatory Impact Monitoring (PIM)

The PIM will be based on the data gathered through the screening process and social assessments, the organizations of the VMGs, the relevant governmental structures (lands, forests, development and social) at district and sub-county levels, etc. The selection of the

facilitators will be in close collaboration with the community leaders. It will be advisable to choose people who are able to elaborate on the basis of the PIM reports, which reflect the situation on the ground in a transparent and plausible way.

6.0 Disclosure arrangements for VMGP
6.1 Stakeholder Engagement and Communication Plan

The UCSAT Project has developed a Stakeholder Engagement Plan (SEP) which provides for a systematic approach to stakeholder engagement that will help implementing agencies identify stakeholders and build and maintain a constructive relationship with them, in particular the project affected persons. The VMGs form a critical part of the project stakeholders.

The Environmental, and Social Safeguards Specialists at MAAIF will provide technical support and ensure compliance with the VMGP by coordinating and working with the implementing agencies. The Communications Officer at MAAIF will liaise with the corresponding Communications Teams at the Project Implementing Agencies (PIAs) to ensure that all information on matters affecting VMGs are adequately addressed.

The Specialists team will provide the linkage between MAAIF, the VMGs and the Districts and sub-county administration on identification and management of VMGP related issues during the implementation of the sub-projects. The team will also be responsible for gathering information and feedback from the VMG communities and GRMs and channel them to the relevant governmental structures. The Specialists team will implement collaboration arrangements with Ministries, Departments and Agencies relevant for implementation of VMGPF.

7.0 Grievance Redress Mechanism for the VMGPs

Apart from the general project grievance procedures as already indicated in the ESMF, and SEF a grievance mechanism specific for VMGs will be put in place. According to WB ESF, ESS 7 emphasises that grievance mechanism should be culturally appropriate and accessible to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.

> **Commented [FK20]:** Does this mean that there will be two mechanism? One for the community and the other specific for the VMGs?

The project has prepared a Grievance Redress Mechanism (GRM) through which, the project affected and interested persons, local communities and the public are able to raise issues on the UCSAT project. The GRM shall guarantee privacy and confidentiality on the part of the aggrieved party.

To be effective, the mechanism shall utilize culturally appropriate existing local VMG administrative and community structures. All grievances will be addressed to and collected by the appropriate community VMG leader, and established GMCs. The GRM under ESS7 will be linked and follow the appeal processes of the community GRM with the participation of the VMG community leader.

MAAIF will conduct awareness raising for the affected communities about the presence of the GRM and inform their right to file any concerns, complaints and issues they have related to the project.

7.1 Grievance Redress Mechanism Composition

To be effective, the mechanism shall utilize existing local leadership, administrative and community structures. All grievances concerning non-fulfilment of contracts, levels of compensation, exclusion from sub project benefits, or take of assets without compensation, complaints about the CSA activities from farmer groups among others shall be addressed to the Local Council I Chairperson or cultural leader and VMG coordinator. Before project commencement, MAAIF will work with the district officials (Community Development officer and Environmental officer) to reach to the communities in the presence of the LCI chairperson and VMG coordinator and representative of cultural leader to establish or compose grievance committees that will represent those communities in case of any grievances.

The Social Safeguards Team at the MAIIF and PIUs shall work with community leaders including leaders of the VMGs in the project area to set up Grievance Redress Committees to be the first point where grievances shall be lodged and addressed. The LC1 Grievance Committee shall comprise at least 6 members including LC1 Chairperson; LC1 Secretary for Women and Children Affairs, VMGs' Chairperson and representation from each of youth, women, elderly and People with Disability (PWD) group from VMG community and elected community representative in the event that the community is mixed. Grievance committees shall be composed, at the district, sub-county, village levels.

Members seeking redress and wishing to record grievances will do so by notifying their Local Leader (LC 1 Chairperson) who will chair a Local Grievance Committee at LC 1 level set up with guidance of the Social Development Specialist. The Local Leader will inform and consult with the district administration to determine validity of claims. If valid, the Local Leader will convene a meeting of the LC1 Grievance Committee to resolve the grievance and notify the complainant of the outcome. If the complainant's claim is rejected, the matter shall be brought before the sub-county or district local government for settlement.

Any objections or grievances related to exclusion/marginalization shall be made in writing, in the language that the VMGs understand and are familiar with, to the Local Leader.

The grievance committee members who will be trained by the Social Safeguards team at the MAAIF using standard training materials shall maintain records of grievances and complaints, including minutes of discussions, recommendations and resolutions made. The procedure for handling grievances shall be as follows:

a. The affected person should file his/her grievance orally or in writing, to the Local Leader or member of the GMC who will record it in a grievance record book. The grievance note should be signed and dated by the aggrieved person. Where the affected person is unable to write, s/he should obtain assistance to write the note and emboss the letter with his/her thumbprint.

b. The Local Leader should respond within 7 days during which any meetings and discussions to be held with the aggrieved person should be conducted. If the grievance relates to valuation of assets, a valuer may need to revalue the assets. In this case, the aggrieved person must be notified by the Local Leader that his/her complaint is being considered.

c. If the aggrieved person does not receive a response or is not satisfied with the outcome within the agreed time s/he can lodge his grievance to the District Local Administration.

d. The Local Administration will then attempt to resolve the problem (through dialogue and negotiation) within 7 days of the complaint being lodged.

UCSAT GRMs shall be Sub-project-based grievance redress procedure and will not in any way replace existing legal processes. It is common that most of the vulnerable and marginalized

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Commented [FK21]: If the LC1 will be in position to receive these grievances, then why have two mechanisms. You may consider having one mechanism and having a VMGs representative on committees in communities that will have these groups.

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communities have traditional means and mechanisms of managing a community conflict or misunderstanding. As is normal practice under customary law, attempts will be made to ensure that the traditional and/or religious leaders have the first opportunity to resolve all disputes in communities after a thorough investigation of the facts. The traditional/communal dispute resolution structures existing for each of the VMGs will be used as the first step in resolving grievances. They will be handling issues regarding rightful property ownership where there is a dispute especially where there is no legal documentation of those properties in question.

MAAIF will develop and implement GRM guideline that details the procedure, timing, indicative committee members, etc. Resources will be allocated for the GRM. The complaints recorded, resolved and referred will be reported quarterly and annually together with the environmental and social implementation performance report. All attempts shall be made to settle grievances amicably before resorting to courts of law. Every effort will be made towards ensuring that the grievance redress procedures are made simple, least bureaucratic and administered as fast and far as possible.

The complainants shall have recourse to the courts of law in the country any time they feel aggrieved. However, given the fact that legal process can be daunting, expensive and at most confusing especially for the poor and vulnerable, the project GRM shall endeavour at all times to be the first point of call for grievances. If the grievance procedure fails to provide a result, complainants are free to seek legal redress in the Uganda Courts of Law.

7.2 Grievance Log Documentation and Recording

Documentation of complaints and grievances is important, including those that are communicated informally and orally. These should be logged, assessed, assigned to individuals for management, tracked and closed out or "signed off" when resolved, ideally with the complainant(s) being consulted, where appropriate, and informed of the resolution. Records provide a way of understanding patterns and trends in complaints, disputes and grievances over time. Transparency should be maintained – for example, through regular reports on issues raised and rates of resolution – provision should also be made for confidentiality of information or anonymity of the complainant(s) whenever necessary.

A grievance log (See Sample under annex II) will be established by the UCSATP PIUs, Social Safeguards teams and copies of the records kept with all the relevant authorities at the respective district, sub-county and village levels and will be used in monitoring of complaints and grievances.

Commented [FK22]: No log has been attached.

7.3 Monitoring Complaints

Data on community interactions from low-level concerns and complaints to ongoing disputes and higher-order grievances shall be collected quarterly so that patterns can be identified, and project management alerted to high-risk issues. Effective monitoring may also help to prevent the escalation of lower-level disputes into more serious conflicts.

7.4 Capacity Building for the Grievances Management Committees

A team (Social Safeguard Specialist and PIU) shall be constituted at MAAIF to train the grievance committees on how to handle project related complaints. In the execution of their responsibilities, the respective committees will seek support and advice from any other relevant

11.0 Budget requirements for implementation of the VMGP

Costs required to plan and implement the VMGPF will be incorporated in the project

implementation budget. The project implementation budget will include detailed annual costs allocated for the required activities of preparation and implementation of VMGPs as needed. For implementation of VMGF and preparation of the VG Plans, PIU through its social specialist will conduct screening, social assessments, awareness raising, to the VGs on the various subproject activities.

All mitigation activities and benefits included in the Social Assessment and the VMGP will be budgeted under the project. Detailed budget breakdown will be provided during the development of the Vulnerable and Marginalized Groups Plan (VMGP) Specific activities for the implementation of this framework are provided below.

Table 0-1: Proposed VMGF Budget

Component/Activity	Timing	Responsibility	Amount (USD)
Implementation of FPIC including mobilization, translation of reports, and special focus meetings for IK, Tepth, Batwa and Benet	Before and during project implementation	MAIIF-PIU	300,000
Recruitment of field project safeguard officers for IK, Tepth, Batwa and Benet	During project implementation	MAIIF-PIU	300,000
Development and implementation of the Vulnerable and Marginalised Groups Plan (VMGP) for IK, Tepth, Batwa and Benet	Before and during project implementation	MAIIF-PIU	500,000
Awareness and sensitisation of VMG communities (HIV/AIDS, SGBV, Child protection) for IK, Tepth, Batwa and Benet	During project implementation	MAIIF-PIU	500,000
Stakeholder consultations including district leadership meetings on management of social impacts of the project for IK, Tepth, Batwa and Benet	Monitoring to be done every quarter throughout project implementation	MAIIF-PIU LGs and other relevant departments	400,000
Composition and training of a Grievance Redress Committees (training materials, transportation, venues, allowances, etc) for IK, Tepth, Batwa and Bene	During project implementation, composition of committees at respect districts of the IK, Tepeth, Benet and Batwa.	MAIIF-PIU, GRCs	150,000
		Total (USD)	**2,150,000**