Investing in Forests and Protected Areas for Climate-Smart Development (IFPA-CD) Project

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

FOR THE PROPOSED CONSTRUCTION OF A 25 KM ELEPHANT TRENCH ALONG THE BOUNDARY OF KIBALE NATIONAL PARK

Table of Contents

ACRONYMS

CFR:	Central Forest Reserve
CoC:	Code of Conduct
DoMM:	Department of Museums and Monuments
DWRM:	Directorate of Water Resources Management
ESHS:	Environment, Social, Health and Safety
ESIA:	Environmental and Social Impact Assessment
ESIRT:	Environmental and Social Incident Reporting Toolkit
ESMF:	Environmental and Social Management Framework
ESMP:	Environmental and Social Management Plan
ESSs:	Environmental and Social Standards
GBV:	Gender Based Violence
GHG:	Green House Gas
GRM:	Grievance Redress Mechanism
KNP:	Kibale National Park
MTWA:	Ministry of Tourism, Wildlife and Antiquities
MWE:	Ministry of Water and Environment
NP:	National Park
OPM:	Office of the Prime Minister
OSH:	Occupational Safety and Health
PPE:	Personal Protective Equipment
PWDs:	Persons with Disabilities
SEA:	Sexual Exploitation and Abuse
UWA:	Uganda Wildlife Authority
VAC:	Violence Against Children
VGMP:	Vulnerable Groups Management Plan
WR:	Wildlife Reserve

1.0 INTRODUCTION

1.1 Background

Ministry of Water and Environment (MWE), Uganda Wildlife Authority (UWA) and National Forestry Authority (NFA), with support from the World Bank, are implementing the Investing in Forests and Protected Areas for Climate-Smart Development (IFPA-CD) Project. The project is also implemented in close collaboration with the Ministry of Tourism, Wildlife and Antiquities (MTWA) and the office of the Prime Minister (OPM).

The development objective of IFPA-CD is to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes. The project supports Government of Uganda agenda of increasing forest cover through afforestation and reforestation and slowing down the loss and degradation of the nation's forests.

The project is implemented under 4 components, namely:

- *Component 1: Improved management of forest protected areas*. This focusses on improving management of government-managed forest and wildlife protected areas (PAs) to ensure they can continue to generate revenues and provide important environmental services.
- *Component 2: Increased revenues and jobs from forests and wildlife protected areas*. This focusses on increasing revenues and jobs from forest and wildlife protected areas (PAs) through targeted investments in tourism and productive forests.
- *Component 3: Improved landscape management in refugee hosting areas*. This encourages establishment of greater tree cover in refugee-hosting landscapes on host community land outside PAs, supporting sustainable forest management and landscape resilience on private and customary land.
- *Component 4: Project Management and Monitoring*.

The project is being implemented in selected sites in the Albertine Rift and the refugee hosting areas of West Nile region and Lamwo District with focus on targeted PAs including 7 National Parks (NP), 4 Wildlife Reserves (WR), 28 Central Forest Reserves (CFR) and 18 refugee host districts.

1.2 Project Description

This will involve excavation of a trench along the boundary of the park along the northern boundary. The trench will have a width of 1.5 meters and a depth of 2 meters. It will stretch from the North to North-East and North-west. It will cover the following areas:

DISTRICT:	SUBCOUNTY	PARISH	VILLAGE	KMs
Kabarole	Busoro	Isunga/Kasenda	Kyakahinju	2
Kabarole	Busoro	Kaswa	Nyabushenyi	4

Kamwenge	Busiriba	Nyanibiriko		3
Kasese	Kiswamaba	Hima	Kasanga/Ibuga	5
			Bigando	
			Kyabatukura	
			Kayanja	
Kyenjojo	Nyabuharwa	Kinyatare	Rwabaganda/Nyatungo	10
Bunyangabu	Kakinga			2

Analysis of Alternatives

The process looked at crop raiding data for the last five years (2017-2022) comparing areas with trenches vis-a-vis other interventions in place like bee hive fences, elephant deterrent trenches, board walks, red pepper and Mauritius thorns.

From the data, it was realized that there were more crop raiding incidences in areas with other interventions (bee hives, boardwalks, red pepper and Mauritius thorns) and therefore more losses for farmers in areas with other interventions compared to those with trenches.

The other selection criterion was that while the trenches are more costly compared to the other options, in the long run it turns out to be less costly due to the fact that the trench is cheaper to maintain. The trench also acts as a boundary marker and therefore improves community relations. It is also one way of creating job opportunities to communities who have suffered crop raids, hence being chosen amongst other alternative interventions. Elephant deterrent trenches also create barriers to poachers accessing the park thereby reducing poaching and any other illegal activity in the park due to difficulty in accessibility to the poachers.

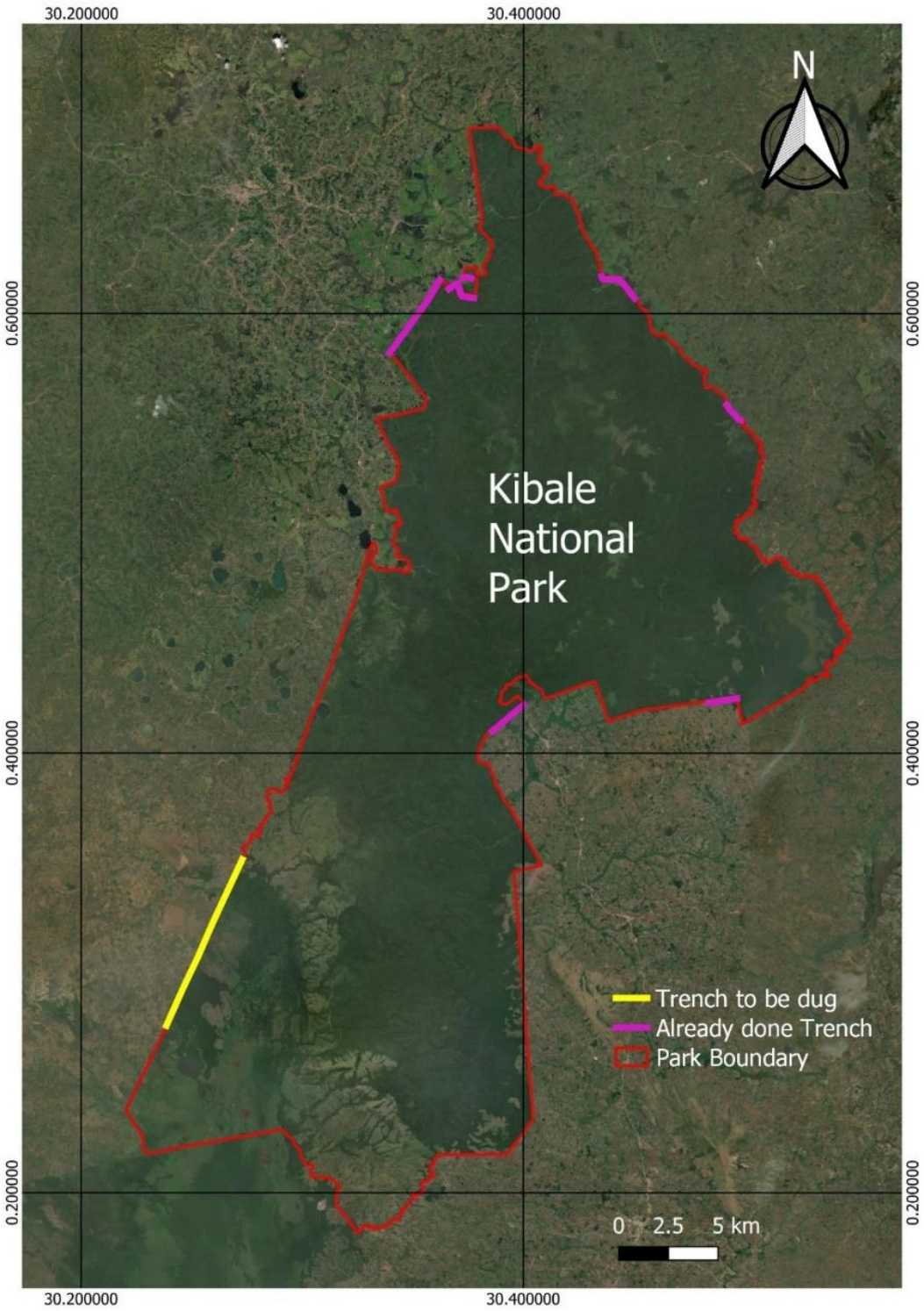
1.3 Objective of the ESMP

This ESMP has been prepared in compliance with the World Bank Environmental and Social Standards (ESSs) as well as applicable national legislation.

This Environmental and Social Management Plan (ESMP) provides adequate measures and controls that shall be used to minimise and mitigate the environmental and social risks and impacts resulting from construction activities of the proposed trench along the northern boundary of Kibale National Park. Uganda Wildlife Authority (UWA) will require the Contractor undertaking the construction of the trench to implement this ESMP, which will be included in the bidding documents and in the works contract.

1.4 Project Location and Map

The sub-project is located in Kibale National Park along Kabarole – Kasese – Bunyangabu districts. There are no watering points for animals across the proposed site and wildlife mostly animals graze inside the park. The surrounding areas are basically gardens and therefore closing off will not affect the forest and all intended project sites are at the park boundary and therefore there will not be much vegetation destruction. The project will not cross any water bodies and there are no wildlife corridors in the project sites.


30.200000
30.400000
N
0.600000
0.400000
0.200000
Kibale
National
Park
Trench to be dug
Already done Trench
Park Boundary
0 2.5 5 km

2.0 POLICY, LEGAL AND REGULATORY FRAMEWORK

This section provides a brief overview of the policy, legal and regulatory framework for environmental and social impacts and risks management in Uganda relevant to the proposed sub-project.

2.1 National Policies

2.1.1 The National Environment Management Policy, 1994

The overall goal of this policy is the promotion of sustainable economic and social development that enhances environmental quality without compromising the ability of future generation to meet their needs.

Relevance to the sub-project: This ESMP has been prepared to ensure sustainable development, as the sub-project is likely to result in environmental impacts and risks.

2.1.2 The Child Labour Policy, 2006

This policy prohibits employment of children.

Relevance to the sub-project: UWA should ensure strictly no employment of children at the sub-project in accordance with this policy.

2.1.3 The National Waters Resources Policy, 1999

The policy caters for safeguarding water sources.

Relevance to the sub-project: No pollutants from the operations at the sub-project should be released to the nearby water sources.

2.1.4 The National Employment Policy, 2010

Employment creation is central to the national socio-economic development process. It is at the core of the transformation of Uganda from a poor agrarian economy to the modern, prosperous and skilled society.

Relevance to the sub-project: UWA shall ensure the provisions of this policy are adhered to as far as the sub-project is concerned.

2.1.5 The National Culture Policy, 2006

Uganda is endowed with a rich and diverse cultural heritage, which includes sixty-five indigenous communities with unique characteristics. The National Culture Policy provides strategies to enhance the integration of culture into development.

Relevance to the sub-project: UWA shall ensure that there is an enabling environment created for social protection and social transformation of the community around the sub-project site.

2.1.6 The Wildlife Policy, 1999

Ownership of wildlife (plant and animal) existing in its wild habitat is vested in Government on behalf of, and for the benefit of, the people of Uganda (Sec. 3(1) - this is consistent with the constitutional position in article 237(2b).

Relevance to the sub-project: UWA should restrict excavation works to areas that will be required for construction of the sub-project so as to minimize on the impacts on wildlife.

2.1.7 The Uganda Gender Policy, 2007

The policy provides a legitimate point of reference for addressing gender inequalities at all levels and by all stakeholders.

Relevance to the sub-project: Based on this policy, UWA and/or the contractor is expected to take gender issues into account during the construction and most particularly, through equitable access to the job opportunities available.

2.2 Legal Framework

2.2.1 The Constitution of Uganda, 1995

The constitution of the republic of Uganda is the cardinal law in Uganda upon which all environmental and social laws and regulations are founded. The constitution provides for, among others:

- The right of every Ugandan to a clean and healthy environment (Article 39);
- The responsibility of Government to enact laws that protect and preserve the environment from degradation and to hold in trust for the people of Uganda such natural assets as lakes, rivers, wetlands, game reserves and national parks (Article 237,2);
- The right of every Ugandan to fair and adequate compensation in instances of land acquisition.

Relevance to the sub-project: UWA should ensure that the sub-project is implemented in a way that aligns with the constitution.

2.2.2 The National Environment Act No.5 of 2019

This act provides for various strategies and tools for environment management, which also includes the Environmental and Social Impact Assessment (ESIA) (Section 113) for projects likely to have significant environmental impacts, and audit (Section 126) for ongoing projects/activities which may significantly affect the environment.

Relevance to the sub-project: The sub-project does not fall under projects that require a project brief or a mandatory ESIA. However, an ESMP has been developed to identify, assess and manage environmental and social risks and impacts as the implementation of the sub-project is likely to have associated negative environmental and social impacts and risks.

2.2.3 The Children's Act, Cap 59

The Act puts into effect the Constitutional provisions on children and emphasizes the protection of the child by upholding the rights, protection, duties and responsibilities as contained in the Convention on Rights of the Child and the Organization for African Unity Charter on the Rights and Welfare of the African Child, with appropriate modification to suit the circumstances in Uganda and other International and regional instruments. For example, Section 8 prohibits employment of children.

Relevance to the sub-project: UWA should ensure the sub-project during construction adheres to the provisions of this Act.

2.2.4 The Water Act, Cap 152

The Water Act, Cap 152 of 1995 provides for the management of water in Uganda under the mandate of the Directorate of Water Resources Management (DWRM) in the Ministry of Water and Environment. Section 31, subsection (1) of the Water Act deals with prohibition of pollution to water.

Relevance to the sub-project: UWA should ensure that appropriate measures to prevent pollution of underground and surface water sources in the site neighbourhood are implemented.

2.2.5 The Occupational Safety and Health Act, 2006

The Occupational Safety and Health Act of 2006 consolidates, harmonises and updates the law relating to occupational safety and health and repeals the Factories Act of 1964. It makes provisions for the health, safety, welfare and appropriate training of persons employed in work places. The Act provides for safe access to the workplaces and safe work practices which applies to this project as well.

Relevance to the sub-project: The Act is applicable in relation to protection of the construction workers against secondary injuries and hazards during execution of their duties or work. UWA and the Contractor should provide for the protection of workers from adverse weather, provision of a clean and healthy work environment, sanitary conveniences, washing facilities, first Aid and facilities for safe drinking water and meals. In summary, this act should be used as a guideline to ensure health and safety of workers is guaranteed. UWA and Contractor should provide PPE to its entire staff.

2.2.6 The Employment Act, 2006

The Employment Act 2006 is the governing legal statutory instrument for the recruitment, contracting, deployment, remuneration, management and compensation of workers.

Relevance to the sub-project: The Act will govern labour type and conditions under which the people hired by the sub-project work. It prohibits child labour (a condition the contractor must also comply with).

2.2.7 The Workers Compensation Act, Cap 225

The Act emphasizes the provision of personal protective equipment (PPE) to employees to minimize accidents and injuries.

Relevance to the sub-project: All workers at the sub-project should be provided with adequate PPE that is appropriate to the task they are involved in. A workers' compensation policy should be implemented as stipulated.

2.3 Regulatory Framework

2.3.1 The National Environment (Environmental and Social Impact Assessment) Regulations, 2020

The regulations state in Part II, Section 6 (1) A developer of a project in section 112 of the Act and set out in Schedule 4 of the Act shall assess the likely environmental, health and socio-economic impacts of the project.

Relevance to the sub-project: This ESMP has been prepared in consideration of the above requirement.

2.3.2 The National Environment (Waste Management) Regulations, 2020

These regulations provide for sustainable management of wastes and that the waste does not cause harm to human health or the environment.

Relevance to the sub-project: The sub-project should ensure that wastes are managed in a way to avoid environmental pollution and public health impact and that wastes are managed and disposed off in an environmentally friendly manner.

2.4 World Bank Environmental and Social Standards (ESSs)

Environmental and Social Standard	Provision
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	ESS1 provides for carrying out an environmental and social assessment of the project to assess the environmental and social risks and impacts of the project throughout the project life cycle. ESS1 is applicable to the project and the preparation of the ESMP for the construction of the elephant trench is in conformity with ESS1 and also conforms with ESMF and LMP.
ESS2: Labor and Working Conditions	ESS2 promotes the fair treatment, non-discrimination, provision of equal opportunities and safe working conditions for workers engaged on projects. It strongly encourages protection of all project workers, including vulnerable groups such as women, persons with disabilities, children (of working age) and migrant workers, contracted workers and primary supply workers, as appropriate. It provides certain requirements that the project must meet in terms of working conditions, protection of the work force (especially the prevention of all forms of forced and child labour), and provision of a grievance mechanism that addresses concerns on the project promptly and uses a transparent process that provides timely feedback to those concerned. ESS2 is applicable to the project and the project prepared the Labour Management Procedures and Occupational Health and Safety Measures which shall be used to guide the construction of the trench in accordance with ESS2.
ESS3: Resource Efficiency and Pollution Prevention and Management	The ESS3 provides requirements for projects to achieve the sustainable use of resources, including energy, water and raw materials, as well as implement measures that avoid or reduce pollution resulting from project activities. The standard places specific consideration on hazardous wastes or materials and air emissions (climate pollutants) given that the current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of present and future lives. ESS3 is applicable to the project and the sub-project will implement measures to avoid pollution and a waste management plan will be prepared.
ESS4: Community Health and Safety	This standard recognizes that project activities, project equipment and infrastructure increase the exposure of project stakeholder communities to various health, safety and security risks and impacts and thus recommends that projects implement measures that avoid or limit the occurrence of such risks. It provides further requirements or guidelines on managing safety, including the need for projects to undertake safety assessment for each phase of the project, monitor incidents and accidents and preparing regular reports on such monitoring. ESS4 also provides guidance on emergency preparedness and response. ESS4 is applicable to the project and the Occupational Safety and Health Measures prepared under the IFPA-CD project will guide in addressing the issues related to community health and safety in accordance with ESS4.
ESS5: Land Acquisition, Restrictions on Land Use and	This standard seeks to avoid involuntary resettlement. ESS5 promotes consideration of feasible alternative project designs to avoid or minimize land acquisition or restrictions on land use, especially where this would result in physical or economic displacement, while balancing

Involuntary Resettlement	environmental, social, and financial costs and benefits, and paying particular attention to gender impacts and impacts on the poor and vulnerable. ESS5 promotes engagement with affected communities, including host communities, through the process of stakeholder engagement described in ESS10. ESS5 is applicable to the project as implementation of project activities may lead to restrictions on land use. However, for this sub-project ESS5 does not apply.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 promotes the conservation of biodiversity or natural habitats and supports the protection and maintenance of the core ecological functions of natural habitats and the biodiversity they support. It also encourages projects to incorporate into their development, environmental and social strategies that address any major natural habitat issues, including identification of important natural habitat sites, the ecological functions they perform, the degree of threat to the sites, and priorities for conservation. ESS6 is applicable to this project and some of the mitigation measures mentioned in this ESMP are aimed at addressing issues under ESS6.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	This standard seeks to ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of indigenous peoples. ESS7 promotes sustainable development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate and inclusive. ESS7 is applicable under the project. However, ESS7 is not applicable to this sub-project.
ESS8: Cultural Heritage	This standard sets out general provisions on cultural heritage preservation and recommends protecting cultural heritage from the adverse impacts of project activities. ESS8 is applicable to the project and as the sub-project will involve excavations, any chance finds will be handled with the chance find procedure prescribed.
ESS9: Financial Intermediaries	ESS9 sets out how Financial Intermediaries (FIs) must assess and manage environmental and social risks and impacts associated with the sub-projects it finances. ESS9 requires an FI to promote good environmental and social management practices in the subprojects the FI finances and promote good environmental and sound human resources management within the FI. ESS9 is not applicable to the project as there are no financial intermediaries involved in the implementation of the project.
ESS10: Stakeholder Engagement and Information Disclosure	ESS10 seeks to encourage open and transparent engagement with project-affected parties throughout the project life cycle. The standard establishes a systematic approach to stakeholder engagement and helps to identify stakeholders and build and maintain a constructive relationship with them, as well as disclose information on the environmental and social risks and impacts to stakeholders in a timely, understandable, accessible and appropriate manner and format. It recommends that stakeholder engagements are commenced as early as possible in the project development process and continued throughout the lifecycle of the Project. This allows for stakeholders' views to be considered in the project design and environmental and social performance. ESS10 also provides for establishment and implementation of a grievance mechanism to receive and facilitate resolution of concerns and grievances. ESS10 is applicable and various stakeholders were consulted as part of the overall project and the project has

established a Grievance Redress Mechanism (GRM). Additionally, the ESMP of the construction of the elephant trench will be publically disclosed in conformity with ESS10.

3.0 METHODOLOGY

This section highlights the methods that were used in the development of this ESMP.

3.1 Environmental & Social Screening

This is the stage at which it was determined that an ESMP would be adequate to mitigate the likely environmental and social impacts and risks. The sub-project was subjected to the project screening checklist and it was determined that the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. The likely impacts are mostly predictable and expected to be low in magnitude, temporary and/or reversible, site-specific, without likelihood of impacts beyond the actual footprint of the project.

3.2 Document Review

Documents readily available relating to the sub-project and the project as a whole were reviewed. The following project related documents were reviewed during the development of the ESMP:

i. The project Environmental and Social Management Framework (ESMF)
ii. Labour Management Procedures (LMP)1
iii. Occupational Health and Safety Measures

3.3 Site visit

The area of the proposed sub-project was examined during a site visit. During the site visit, the observation and assessment of the physical characteristics of the proposed sub-project site, the immediate surrounding areas and other environmental and social attributes likely to affect or be affected by the implementation of the sub-project was undertaken.

The site visit assisted in identifying and assessing the likely impacts as a result of the sub-project implementation. The site visit also assisted in establishing benchmarks that will be used in monitoring compliance of the sub-project to mitigation measures.

There is only one migratory corridor connecting Kibale National Park to Queen Elizabeth National Park in the south where wildlife ranges freely. There are no plans to put a trench in this corridor since it is a continuous ecosystem between Kibale National Park and Queen Elizabeth National Park. The trench will not block the corridor.

The surrounding areas are basically gardens and therefore closing off will not affect the forest but rather protect community property and enhance community-park relations.

3.4 Stakeholder Consultations

Consultations were carried out with key staff of Uganda Wildlife Authority (UWA) and local community members to obtain their comments on the proposed sub-project with respect to the potential environmental and socio-economic issues and impacts. These consultations were mainly aimed at

identifying environmental, social and health impacts and also inform the process of developing appropriate mitigation and management options.

4.0 IMPACT IDENTIFICATION AND MITIGATION

4.1 Expected Positive Benefits/Impacts

IMPACT	DESCRIPTION OF IMPACT	ENHANCEMENT MEASURES	PHASE
Provision of employment	Local community members will be employed by the sub-project for example as labourers to dig the trench thus the subproject will act as a source of income for local community members.	The contractor should hire local workers whenever possible. External labor should be hired only if specific skills are not available locally. Workforce recruitment should be undertaken with involvement of local leaders who can identify local community members.	Construction
Mitigation of human wildlife conflict	The stone wall will ensure that animals do not raid crops and attack community members hence there will be peaceful co-existence between the park and community members and this will also result into good relations between UWA and the surrounding communities.	Stakeholder consultations should be undertaken before construction commences.	Operational
Improved food security and livelihood	The trench construction will eliminate crop raiding thus improving food security in communities surrounding the park.	The design of the trench should be effective	Operational
Increased literacy levels	The trench construction will eliminate the need for children to stay at home and guard crops against animals. This means that the children will be able to go to school hence increased literacy levels.	The design of the trench should be effective	Operational
Reduced compensation claims	The elephants and other wild animals will no longer be able to raid crops in the neighbouring communities hence there will be reduced or no compensation claims made by community members against UWA.	The design of the trench should be effective	Operational

4.2 Key Adverse Impacts and Risks

1. Soil erosion may happen as a result of the excavation and exposure of soil to elements of weather. Suggested mitigation measures include:

    i. Vegetation restoration along the alignment of the trench should be undertaken to avoid soil erosion.
    ii. Unnecessary vegetation clearance along the alignment of trench should be avoided.
    iii. Carrying out the excavation of trenches during the dry season to prevent soil erosion as a result of storm water/surface runoff.

2. There will be increased soil and debris as a result of excavation of the trench. Suggested mitigation measures include:

    i. Use mounds of soil and debris as strategic reinforcement to the trenches.
    ii. If the soil and debris remain after the reinforcement of the trenches, it will be disposed off in an authorized landfill site.

3. Project workers may carry out indiscriminate waste disposal along the alignment of the trench. Additionally, inadequate provision of sanitary facilities for use by construction workers can lead to ad hoc defecation in secluded areas around the park, thus creating of unsanitary conditions and sources of fly infestation. Suggested mitigation measures include:

    i. Provision of adequate waste bins.
    ii. Remove all waste generated on a daily basis and dispose to an authorized landfill site.
    iii. The contractor will provide mobile toilets for the construction workers on site.

4. Project workers may be attacked by animals causing injuries or even death. Suggested mitigation measures include:

    i. Ensure Ranger presence all the time.
    ii. UWA should develop emergency response measures and ensure that Rangers receive training in first aid, emergency response protocols, and specific procedures for handling different types of incidents.

5. As with any construction project, there is potential for impacts on health and safety likely to occur as a result of accidents and unplanned events that may occur during the construction process. Suggested mitigation measures include:

    i. The Contractor shall implement the provisions of the project OSH measures that have been developed for the project.

    Among others:

    ii. All construction workers should be provided with adequate PPE like helmets, gumboots, overalls etc. and it should be mandatory for workers to wear protective clothing while on duty.
    iii. The PPE shall be inspected regularly and maintained or replaced as necessary.
    iv. There shall be a safety awareness/induction training for workers before commencement of construction works.
    v. Continuous safety training should be carried out in form of toolbox safety talks.
    vi. A fully equipped first aid kit should be available on site.
    vii. Orient the contractor on the Project Environment and Social Incident Reporting Toolkit (ESIRT) procedures especially in case of major/serious incidents that may occur at the project site.

6. The trench may interfere with movement of wildlife by blocking wildlife migratory routes/corridors, passage to bleeding areas etc. Suggested mitigation measures include:

i. Ensuring that the trenches do not cross and avoid ecologically sensitive areas such as well-known migratory routes/corridors.
ii. Engaging neighbouring communities, partners and relevant agencies in monitoring possible changes in wildlife movement due to the presence of the trench.

4.3 Environment and Social Management Plan (ESMP)

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
PRE-CONSTRUCTION PHASE					
Misunderstandings and conflicts	Misunderstandings and conflicts are likely to develop between UWA, local community members and other stakeholders especially if adequate consultations are not carried out about the proposed sub-project.	Adequate consultations should be undertaken.	UWA	10,000,000	Before commencement of works
CONSTRUCTION PHASE					
Vegetation clearance	Vegetation clearance will be undertaken along the alignment of the trench during excavation works.	The trench should be constructed along already cleared areas (for example: existing firebreaks and security patrol access road). Vegetation clearance should only take place on the necessary areas. Densely vegetated areas should be avoided. A field survey and inventory will be undertaken for any tree cut and protected and endangered species will not be impacted on.	Contractor Supervising Consultant UWA	No additional cost	During construction Before start of construction
Trampling on vegetation	Construction workers may wander to areas next to the trench alignment and trample on vegetation.	Close supervision and enforcement by UWA rangers. Orientation of workers prior to commencement of construction.	Contractor Supervising Consultant UWA	2,000,000	During Construction
Soil erosion	Soil erosion may happen as a result of the excavation and exposure of soil to elements of weather.	Vegetation restoration along the alignment of the trench should be undertaken to avoid soil erosion.	UWA Contractor	No additional cost	Throughout project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
		Unnecessary vegetation clearance along the alignment of trench should be avoided. Carrying out the excavation of trenches during the dry season to prevent soil erosion as a result of storm water/surface runoff.	Supervising Consultant		
Aesthetic impacts	The landscape may be altered as a result of placing the soil from excavation along the trench alignment.	Ensuring that the soil is well lined along the trench configuration to prevent unsightly heaps of soil.	Contractor	No additional cost	During construction
Increased soil and debris	There will be increased soil and debris as a result of excavation of the trench.	Use mounds of soil and debris as strategic reinforcement to the trenches. If the soil and debris remain after the reinforcement of the trenches, it will be disposed off in an authorized landfill site.	Contractor	No additional cost	During construction
Noise	Noise may be generated as a result of construction activities and this may affect the nearby communities.	Limiting construction works to day time only. Ensuring use of hand-held tools and equipment.	Contractor UWA	No additional cost	During construction
Disruption of game movement	The movement of wild animals may be disrupted and some may be trapped in the trench.	Ensuring the trenches do not interfere with the natural wildlife dispersal patterns. In cases where animals are trapped outside the park and are unable to cross back to the park as a result of the trench, the animals will be caught and gently guided back to the park. Planning construction time in response to movement of wildlife within the areas to avoid or minimize disturbance and conflict.	Contractor Supervising Consultant UWA	No additional cost	During construction

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
Solid and liquid waste generation	Project workers may carry out indiscriminate waste disposal along the alignment of the trench. Additionally, inadequate provision of sanitary facilities for use by construction workers can lead to ad hoc defecation in secluded areas around the park, thus creating of unsanitary conditions and sources of fly infestation.	Provision of adequate waste bins. Remove all waste generated on a daily basis and dispose to an authorized landfill site. The contractor will provide mobile toilets for the construction workers on site.	Contractor Supervising Consultant	30,000,000	During Construction and throughout implementation.
Poaching	Poaching may take place due to the fact that project workers may have easy access to animals as they will be working on the edge of the park.	Sensitization and supervision of workers by UWA rangers. Ensure that an ESHS code of conduct (CoC) is in place for Contractor and site workers, who should be sensitized on the contents of the CoC and agree to abide by the requirements there in.	UWA Contractor Supervising Consultant	2,000,000	Throughout project implementation
Labour influx risks and impacts	Like any other project, the construction of the trench may attract different people both from within and outside the local community for employment opportunities. Although this is expected to be minimal as local community members will be considered for employment, labour influx comes with its own negative impacts such as crime, conflicts with the local people etc	Every project worker will be required to sign and abide by a workers Code of Conduct (CoC) and will be adhered to by the Contractor. There will be zero tolerance to SEA by the Contractor.	Contractor Supervising Consultant UWA	No additional cost	Throughout project implementation
Attacks from animals	Project workers may be attacked by animals causing injuries or even death.	Ensure Ranger presence all the time. UWA will develop emergency response measures and ensure that Rangers receive training in first aid, emergency response	Contractor UWA	No additional cost	Throughout project implementation

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
		protocols, and specific procedures for handling different types of incidents.			
Non-payment of workers or unreasonable delays in payment	The Contractor may fail and/or delay to pay the workers thus causing agitation among the workers.	Provide and establish a Project GRM and advise workers on where to report grievances. Develop and implement a Grievance Redress Mechanism for project workers before engaging them and maintained throughout project implementation. All workers must sign contracts that indicate payment conditions and enforce to ensure contractors adhere to this. Verification should first be undertaken to confirm that workers have been paid by the Contractor before payment is made to the contractor.	Contractor Supervising Consultant	3,000,000	During Construction
Occupational, health and safety risks and impacts/ Accidents and injuries of workers	As with any construction project, there is potential for impacts on health and safety likely to occur as a result of accidents and unplanned events that may occur during the construction process.	The Contractor shall implement the provisions of the project OSH measures that have been developed for the project. Among others: All construction workers will be provided with adequate PPE like helmets, gumboots, overalls etc. and it will be mandatory for workers to wear protective clothing while on duty. The PPE shall be inspected regularly and maintained or replaced as necessary.	UWA Contractor Supervising Consultant	20,000,000[1]	Throughout project implementation

[1] Some items for example PPE will be included as preliminaries in the bid document

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
		There shall be a safety awareness/induction training for workers before commencement of construction works. Continuous safety training will be carried out in form of toolbox safety talks. A fully equipped first aid kit will be available on site. Orient the contractor on the Project Environment and Social Incident Reporting Toolkit (ESIRT) procedures especially in case of major/serious incidents that may occur at the project site.			
OPERATION AND MAINTENANCE PHASE					
Modification of the local hydrology	The local drainage of the area maybe altered and this can result in floods and cause erosion.	Developing a risk assessment to mitigate flood and erosion risks by evaluating potential hazards and vulnerabilities specific to the trench. Constructing drains to channel water away from the trenches to the natural course ways. Integrating spillway drains into the design. Avoiding construction of the trenches along waterways and wetlands.	Contractor Supervising Consultant UWA	Included in project design	Throughout project implementation
Possible interference with wildlife movement	The trench may interfere with movement of wildlife by blocking wildlife migratory routes/corridors, passage to bleeding areas etc.	Ensuring that the trenches do not cross and avoid ecologically sensitive areas such as well-known migratory routes/corridors.	UWA	20,000,000	Operational phase

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
		Engaging neighbouring communities, partners and relevant agencies in monitoring possible changes in wildlife movement due to the presence of the trench.			
Possible injuries and accidents to wildlife and livestock	Wildlife and livestock may fall into the trench and may get injured and possibly die.	Establishing the trench alignment along the inner section of the park boundary. Continuing with maintenance by cutting overgrown grass and ensuring the trench is seen by wild animals. Placing soil mounds on the side to reduce wildlife coming into close contact with the trench. Strategic placement of warning signs and disclaimer signs along the fence alignment.	UWA Contractor	10,000,000	Operational phase
Possible back filling of the trench	The trench may be backfilled with soil, vegetation and debris as a result of human activity or by wildlife.	Assigning personnel to periodically monitor the trenches and recommend adjustments/improvements. Ensuring that the trench is periodically maintained and proper housekeeping is observed during operational phase. Ensuring adequate resources are available for monitoring and maintenance. Engaging the local community and other stakeholders in detecting breaches / deficiencies for timely corrective measures.	UWA	20,000,000	Operational phase

POTENTIAL IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE	RESPONSIBILITY	COST ESTIMATE	IMPLEMENTATION TIMEFRAME
Occupational health and safety risks during maintenance activities	Possible adverse occupational health and safety risks and impacts may be prevalent to workers doing routine maintenance activities.	Providing and enforcing strict use of Personal Protective Equipment (PPE). Hiring trained personnel for activities requiring skilled labour. Providing First Aid kits.	UWA	8,000,000	Operational phase
Risk of soil erosion during decommissioning of the trench	There is risk of soil erosion during decommissioning as the soil is being backfilled into the trench.	Decommissioning of the trench should take place during the dry period to minimize the risk of soil being washed away by rain. Proper backfilling should be undertaken	UWA Contractor	20,000,000	Decommissioning
Occupational health and safety risks during decommissioning	Workers may suffer from occupational, health and safety risks and impacts during backfilling of the soil into the trench.	Workers should be provided with adequate PPE like gumboots, gloves, masks, etc. There should be a safety awareness/induction training for workers before start of backfilling. A fully equipped first aid kit should be available on site.	Contractor UWA	20,000,000	Decommissioning

5.0 Environmental and Social Monitoring Plan

POTENTIAL IMPACT	PROPOSED MITIGATION MEASURE	LOCATION	PARAMETERS TO BE MONITORED	MEASUREMENTS	FREQUENCY OF MEASUREMENT	RESPONSIBILITY	COST ESTIMATE[23]
PRE-CONSTRUCTION PHASE							
Misunderstandings and conflicts	Adequate consultations should be undertaken.	Project area	Records of consultative meetings	Review of records	Before commencement of works and throughout project implementation.	UWA	15,000,000
CONSTRUCTION PHASE							
Vegetation clearance	The trench should be constructed along already cleared areas (for example: existing firebreaks and security patrol access road).	Project area	Design of the trench	Visual observation	Quarterly	UWA	6,000,000
	Vegetation clearance should only take place on the necessary areas.	Project area	Extent of vegetation cleared/vegetation density	Visual observation	Monthly	UWA	
	Densely vegetated areas should be avoided.	Project area	Extent of vegetation cleared	Visual observation	Monthly	UWA	
	A field survey and inventory should be undertaken for any tree cut and protected and endangered species should not be impacted on.	Construction site	Records of a field survey and inventory	Review of documentation Visual observation	Before start of works	UWA	4,000,000

[2] Part of regular monitoring activities

[3] Costs of monitoring overlap as during one field monitoring, several parameters of different mitigation measures can be monitored

POTENTIAL IMPACT	PROPOSED MITIGATION MEASURE	LOCATION	PARAMETERS TO BE MONITORED	MEASUREMENTS	FREQUENCY OF MEASUREMENT	RESPONSIBILITY	COST ESTIMATE[23]
Trampling of vegetation	Orientation of workers prior to commencement of construction.	Project area	Records of orientation meetings	Review of records	Quarterly	UWA	6,000,000
Soil erosion	Vegetation restoration along the alignment of the trench should be undertaken to avoid soil erosion.	Project area	Restored vegetation	Visual observation	Quarterly	UWA	6,000,000
	Carrying out the excavation of trenches during the dry season to prevent soil erosion as a result of storm water/surface runoff.	Project area	Work schedules	Review of schedules	Quarterly	UWA	
Aesthetic impacts	Ensuring that the soil is well lined along the trench configuration to prevent unsightly heaps of soil.	Project area	Soil alignment	Visual observation	Quarterly	UWA	6,000,000
Increased soil and debris	Use mounds of soil and debris as strategic reinforcement to the trenches.	Project area	Soil reuse and integration into the design	Visual observation	Quarterly	UWA	6,000,000
Noise	Limiting construction works to day time only.	Project area	Activity schedules	Review of schedules	Quarterly	UWA	6,000,000
Disruption of game movement	Employing humane approaches in translocation/movement of wildlife caught outside the park and unable cross back due to the trench.	Project area	Wildlife translocation approaches	Review of approaches	Quarterly	UWA	6,000,000
	Planning construction time in response to movement of wildlife within the areas to avoid or minimize disturbance and conflict.	Project area	Activity schedules	Review of schedules	Quarterly	UWA	
Solid and liquid waste generation	Provision of adequate waste bins.	Project working areas	Number of waste bins on site Littering of waste on site	Visual observation	Monthly	UWA/PCU	4,000,000

POTENTIAL IMPACT	PROPOSED MITIGATION MEASURE	LOCATION	PARAMETERS TO BE MONITORED	MEASUREMENTS	FREQUENCY OF MEASUREMENT	RESPONSIBILITY	COST ESTIMATE[23]
	Remove all waste generated from the park on a daily basis and disposal to a gazetted dumping site.	Project working areas	Removal Logs Contract with a registered waste handler	Review of logs Review of contract	Weekly	UWA /PCU	
	The contractor will provide mobile toilets for the construction workers on site.	Project working area	Presence of mobile toilets	Visual observation	Monthly	UWA	
Poaching	Sensitization and supervision of workers by UWA rangers.	Project working areas	Number of incidents related to poaching	Review of incident logs	Monthly	UWA	6,000,000
	Ensure that an ESHS code of conduct (CoC) is in place for Contractor and site workers, who should be sensitized on the contents of the CoC and agree to abide by the requirements there in.	Project working areas	Signed ESHS codes	Review of codes	Quarterly	UWA/PCU	
Labour influx risks and impacts	Every project worker will be required to sign and abide by a workers Code of Conduct (CoC) and will be adhered to by the Contractor.	Project working areas	Signed codes of conduct	Review of codes of conduct	Quarterly	UWA/PCU	6,000,000
Attacks from animals	UWA Rangers will be used for escorting and guarding Project workers.	Project working areas	Presence of UWA Rangers on site	Visual observation	Monthly	PCU	4,000,000
	UWA will develop emergency response measures and ensure that Rangers receive training in first aid, emergency response protocols, and specific procedures for handling different types of incidents.	Project working areas	Presence of emergency procedures	Review of emergency procedures Visual observation	Quarterly	UWA	4,000,000

POTENTIAL IMPACT	PROPOSED MITIGATION MEASURE	LOCATION	PARAMETERS TO BE MONITORED	MEASUREMENTS	FREQUENCY OF MEASUREMENT	RESPONSIBILITY	COST ESTIMATE[23]
Non-payment of workers	Provide and establish a Project GRM and advise workers on where to report grievances. Develop and implement a Grievance Redress Mechanism for project workers before engaging them and maintained throughout project implementation.	Project working areas	Presence of a functional GRM on site Records of grievances Payment records	Review of grievance logs and payment records	Monthly	UWA	6,000,000
Occupational health and safety risks and impacts	All construction workers will be provided with adequate PPE like gumboots, gloves, overalls etc. and it will be mandatory for workers to wear protective clothing while on duty. The PPE shall be inspected regularly and maintained or replaced as necessary.	Project working areas	Presence and use of PPE Health and safety incidents	Visual observation Review of incident and accident logs	Continuous	UWA Contractor	20,000,000
	There shall be a safety awareness/induction training for workers before commencement of construction works.	Project working areas	Records of trainings	Review of training records	Quarterly	UWA/PCU	
	Continuous safety training will be carried out in form of toolbox safety talks.	Project working areas	Records of toolbox meetings	Review of records	Weekly	UWA	
	Fully equipped first aid kits will be provided on site.	Project working areas	Presence and number of first aid kits	Visual observation	Continuous	UWA	
	Orient the contractor on the Project Environment and Social Incident Reporting Toolkit (ESIRT) procedures especially in case of major/serious	Project working areas	Records/documentation of the orientation	Review of documentation	Quarterly	UWA/PCU	

POTENTIAL IMPACT	PROPOSED MITIGATION MEASURE	LOCATION	PARAMETERS TO BE MONITORED	MEASUREMENTS	FREQUENCY OF MEASUREMENT	RESPONSIBILITY	COST ESTIMATE[23]
	incidents that may occur at the project site.			Review of logs of incidents/accidents			
OPERATION & MAINTENANCE PHASE							
Modification of the local hydrology	Constructing drains to channel water away from the trenches to the natural course ways.	Project area	Trench alignment	Visual observation	Monthly	UWA	6,000,000
	Integrating spillway drains into the design.	Project area	Presence of spill drains	Visual observation	Monthly	UWA	
Possible interference with wildlife movement	Engaging neighbouring communities, partners and relevant agencies in monitoring possible changes in wildlife movement due to the presence of the trench.	Project area	Monitoring reports	Review of reports	Yearly	UWA	20,000,000
Possible injuries and accidents to wildlife and livestock	Establishing the trench alignment along the inner section of the park boundary.	Project area	Trench design	Visual observation	Before commencement of works	UWA	30,000,000
	Continuing with maintenance by cutting overgrown grass and ensuring the trench is seen by wild animals.	Project area	Number of accidents	Review of reports	Monthly	UWA	
	Strategic placement of warning signs and disclaimer signs along the fence alignment.	Project area	Warning signs and notices	Visual observation	Every six months	UWA	
Possible back filling of the trench	Assigning personnel to periodically monitor the trenches and recommend adjustments/improvements.	Project area	Personnel records	Review of records	Quarterly	UWA	25,000,000

POTENTIAL IMPACT	PROPOSED MITIGATION MEASURE	LOCATION	PARAMETERS TO BE MONITORED	MEASUREMENTS	FREQUENCY OF MEASUREMENT	RESPONSIBILITY	COST ESTIMATE[23]
	Ensuring that the trench is periodically maintained and proper housekeeping is observed during operational phase.	Project Area	Maintenance records	Review of records	Quarterly	UWA	
	Ensuring adequate resources are available for monitoring and maintenance.	Project area	Budget	Review of the budget	Yearly	UWA	
	Engaging the local community and other stakeholders in detecting breaches / deficiencies for timely corrective measures.	Project area	Engagement reports	Review of reports	Quarterly	UWA Local Community	
Occupational health and safety risks during maintenance activities	Providing and enforcing strict use of Personal Protective Equipment (PPE).	Project area	Presence of PPE	Visual observation	Continuous	UWA	12,000,000
	Hiring trained personnel for activities requiring skilled labour.	Project area	Training records	Review of records	Monthly	UWA	
	Providing First Aid kits.	Project area	Presence of first aid kits	Visual observation	Continuous	UWA	
Risk of soil erosion during decommissioning of the trench	Decommissioning of the trench should take place during the dry period to minimize the risk of soil being washed away by rain.	Trench alignment area	Work schedule	Review of work schedule	Monthly	UWA	4,000,000
Occupational, health and safety during decommissioning	Workers should be provided with adequate PPE like helmets, gumboots, gloves, masks, overalls etc.	Trench area	Presence and use of PPE	Visual observation	Monthly	UWA	4,000,000
	There should be a safety awareness/induction training for workers before demolition works.	Trench area	Records of trainings	Review of records	Monthly	UWA	4,000,000

POTENTIAL IMPACT	PROPOSED MITIGATION MEASURE	LOCATION	PARAMETERS TO BE MONITORED	MEASUREMENTS	FREQUENCY OF MEASUREMENT	RESPONSIBILITY	COST ESTIMATE[23]
	A fully equipped first aid kit should be available on site.	Trench area	Presence and number of first aid kits	Visual observation	Monthly	UWA	4,000,000

ANNEX 1: CODES OF CONDUCT

CONTRACTOR CODE OF CONDUCT

IMPLEMENTING ESHS AND OHS STANDARDS, PREVENTING GENDER BASED VIOLENCE AND VIOLENCE AGAINST CHILDREN

The Contractor is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the Environmental, Social, Health and Safety (ESHS) standards, and ensuring appropriate Occupational Health and Safety (OHS) standards are met. The Contractor is also committed to creating and maintaining an environment where children under the age of 18 will be protected, and where Sexual Exploitation and Abuse (SEA) and sexual harassment have no place. Improper actions towards children, SEA and sexual harassment are acts of Gender Based Violence (GBV) and Violence Against Children and as such will not be tolerated by any employee, supplier, associate, or representative of the Contractor.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the Contractor commits to the following core principles and minimum standards of behaviour that will apply to all Contractor employees, associates, and representatives, including Managers and suppliers, without exception:

General

1. The Contractor – and therefore all employees, associates, representatives, Managers and suppliers – commits to complying with all relevant national laws, rules and regulations.
2. The Contractor commits to fully implementing the Environmental and Social Management Plan ESMP as approved by the Project.
3. The Contractor commits to treating women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV and VAC are in violation of this commitment.
4. The Contractor shall ensure that interactions with local community members are done with respect and non-discrimination.
5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behaviour are prohibited among all Contractor employees, associates, and its representatives, including sub-Managers and suppliers.
6. The Contractor will follow all reasonable work instructions (including regarding environmental and social norms).
7. The Contractor will protect and ensure proper use of property (for example, to prohibit theft, carelessness or waste).

Health and Safety

8. The Contractor will ensure that the project's OHS Measures are effectively implemented by Contractor's staff, as well as Managers and suppliers.

9. The Contractor will ensure that all persons on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents, and reporting conditions or practices that pose a safety hazard or threaten the environment.

10. The Contractor will:

    i. Prohibit the use of alcohol during work activities.

    ii. Prohibit the use of narcotics or other substances which can impair faculties at all times.

11. The Contractor will ensure that adequate sanitation facilities are available on site.

12. The Contractor will not hire children under the age of 18 for construction work, or allow them on the work site, due to the hazardous nature of construction sites.

Gender Based Violence and Violence Against Children

13. Acts of GBV and VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment and, if appropriate, referral to the Police for further action.

14. All forms of GBV and VAC, are unacceptable, regardless of whether they take place on the work site, the work site surroundings, or within the local community.

15. Sexual harassment of work personnel and staff (e.g., making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature) are acts of GBV and are prohibited.

16. Sexual favours (e.g., making promises of favourable treatment such as promotions, threats of unfavourable treatment such as losing a job, payments in kind or in cash dependent on sexual acts) and any form of humiliating, degrading or exploitative behaviour are prohibited.

17. The use of prostitution in any form at any time is strictly prohibited.

18. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.

19. Unless there is full consent by all parties involved in the sexual act, sexual interactions between the Contractor's employees (at any level) and members of the communities surrounding the work place are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.

20. In addition to Contractor sanctions, legal prosecution of those who commit acts of GBV and VAC will be pursued if appropriate.

21. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and VAC by a fellow worker.

22. Managers are required to report and act to address suspected or actual acts of GBV as they have a responsibility to uphold Contractor commitments and hold their direct reports responsible.

Implementation

To ensure that the above principles are implemented effectively, the Contractor commits to:

23. Ensuring that all employees sign the 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in GBV and VAC, child endangerment or abuse, or sexual harassment.

24. Displaying the Contractor and Individual Codes of Conduct prominently and in clear view, in offices, and in in public areas of the work space.

25. Ensuring that all employees attend an induction training course prior to commencing work on site to ensure they are familiar with the Contractor's commitments to ESHS and OHS standards, and the project's GBV and VAC Codes of Conduct.

26. Ensuring that all employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the GBV and VAC Codes of Conduct.

I do hereby acknowledge that I have read the foregoing Contractor Code of Conduct, and on behalf of the Contractor agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and ESHS standards, and to prevent and respond to GBV and VAC.

I understand that any action inconsistent with this Contractor Code of Conduct or failure to act mandated by this Contractor Code of Conduct may result in disciplinary action.

Contractor Name: _____

Signature: _____

Name: _____

Title: _____

Date: _____

INDIVIDUAL CODE OF CONDUCT

IMPLEMENTING ESHS AND OHS STANDARDS, PREVENTING GENDER BASED VIOLENCE AND VIOLENCE AGAINST CHILDREN

I, _____, acknowledge that adhering to Environmental, Social, Health and Safety (ESHS) standards, following the project's Occupational Health and Safety (OHS) requirements, and preventing Gender Based Violence (GBV) and Violence Against Children (VAC) is important.

The Contractor considers that failure to follow ESHS and OHS standards, or to partake in activities constituting GBV and VAC—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV may be pursued if appropriate.

I agree that while working on the project I will:

- Attend and actively partake in training courses related to ESHS, OHS, GBV and VAC as requested by my employer.
- Will wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.
- Take all practical steps to implement the Environmental and Social Management Plan (ESMP).
- Implement the OHS Measures.
- Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not sexually exploit or abuse project beneficiaries and members of the surrounding communities.
- Not engage in sexual harassment of work personnel and staff —for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature is prohibited, e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.
- Not engage in sexual favours —for instance, making promises of favourable treatment (e.g., promotion), threats of unfavourable treatment (e.g., loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
- Not use prostitution in any form at any time.

- Not participate in sexual contact or activity with children under the age of 18—including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.
- Unless there is the full consent by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.
- Consider reporting through the GRM or to my manager any suspected or actual GBV/VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

- Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
- Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also "Use of children's images for work related purposes" below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labour below the minimum age of 18.
- Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank's ESSs on child labour and minimum age.
- Take appropriate caution when photographing or filming children.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.

6. Termination of employment.
7. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety measures. That I will avoid actions or behaviours that could be construed as GBV/VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Name: _____

Title: _____

Date: _____

ANNEX 2: CHANCE FIND PROCEDURE

Chance find procedures will be used as follows:

a) Stop the project activities in the area of the chance find;
b) Delineate the discovered site or area;
c) Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be deployed until the responsible local authorities and the DoMM take over;
d) Notify the project supervisor who in turn will notify the responsible local authorities and the National Museum immediately (within 24 hours or less);
e) The local authorities and the National Museum will take charge of protecting and preserving the site in case the finds are of interest to the Department
    i. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the National Museum (within 72 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values;
    ii. Decisions on how to handle the finding shall be taken by the responsible authorities and the National Museum. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage;
    iii. The local authority/ National Museum decision concerning the management of the finding shall be communicated in writing by the National Museum; and
    iv. Findings will be recorded in World Bank Implementation Supervision Reports (ISRs), and Implementation Completion Reports (ICRs) will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.
    v. Project works could resume after permission is given from the responsible local authorities and the National Museum concerning safeguard of the heritage;
f) The above procedure when applicable must be referred to as standard provisions during the project activities and therefore site supervisors shall monitor the procedure for any chance find encountered during project activities
g) If the finds are not of interest to the Department of Museums and Monuments, they should be reburied on a site set aside for such purpose and project works continue

In case of Chance finds, the Implementing partners for the project will ensure that the chance finds procedure is adequately utilised and monitored.