



The Republic of Uganda

MINISTRY of WORKS and TRANSPORT (MoWT)

THE LOT 1B OF THE NORTHEASTERN ROAD CORRIDOR ASSET
MANAGEMENT PROJECT II (NERAMP II) (P514937)

STAKEHOLDER ENGAGEMENT PLAN



MARCH 2026

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EXECUTIVE SUMMARY

The Ministry of Works and Transport (MoWT) has prepared this Stakeholder Engagement Plan (SEP) for Lot 1B of the Northeastern Road Corridor Asset Management Project II (NERAMP II). The SEP details strategies for engaging various stakeholders, including affected communities, vulnerable populations, and interested groups. NERAMP II aims to strengthen climate resilience, enhance road safety, lower transportation costs along the Tororo-Mbale-Soroti Road corridor, and foster social enterprise in the refugee-hosting districts of Koboko, Yumbe, and Moyo. This corridor plays a vital role in linking agricultural, processing, and industrial sectors to both domestic and regional markets, and facilitating trade with South Sudan and Eastern DRC. The project components include: (1) Climate-resilient rehabilitation of the Tororo-Mbale-Soroti road (150.8 km) and the Mbale weighbridge; (2) Upgrading 15 town

roads and 15 access roads in refugee-hosting districts to improve climate resilience; (3) Construction of three climate-resilient markets, two roadside stations, and two weighbridges; and (4) Provision for contingent emergency response to support the Government of Uganda's emergency initiatives.

This Stakeholder Engagement plan is designed to ensure effective engagement with local communities and other key stakeholders throughout NERAMP II life cycle. This SEP supports sub-project conceptualization, feasibility studies, planning and impact assessment processes, implementation, and operational and maintenance phases of the project. NERAMP will maintain dialogue with the relevant regulatory agencies as well as with locally affected communities and their representatives including non-government organizations (NGOs), community-based organizations (CBOs) and other interest groups.

The development of this Stakeholder Engagement Plan (SEP) is grounded in the policy and legal framework of the Government of Uganda, as well as the World Bank's Environmental and Social Framework (ESF). In particular, the Environmental Impact Assessment Guidelines highlight the importance of public participation throughout EIA studies. The National Equal Opportunities Policy seeks to promote equitable development opportunities for all Ugandans. Additionally, the National Information Communication Technology Policy (2012) aims to broaden access to public information, supporting this goal through strategies that enhance the accessibility, consistency, and dissemination of government information.

Conversely, the World Bank's Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure underscores the significance of open and transparent interaction between the Borrower and project stakeholders, recognizing this as a cornerstone of best international practice. Effective stakeholder engagement not only enhances the environmental and social sustainability of projects but also boosts project acceptance and contributes meaningfully to robust project design and implementation. Importantly, stakeholder engagement should be an inclusive, ongoing process throughout the entire project lifecycle. When thoughtfully designed and executed, it fosters strong, constructive, and responsive relationships, which are crucial for the successful management of a project's environmental and social risks. Engagement is most effective when initiated early in the project development, forming an integral component of initial decision-making and the ongoing assessment, management, and monitoring of environmental and social risks and impacts. This approach underpins the preparation of this SEP at the current stage of NERAMP formulation and design, with continued engagement planned for subsequent project phases.

Consultations for the NERAMP project were conducted between January and April 2025 as part of the overall project formulation and preparation process. Additional engagements were conducted between January and February 2026 during the development of the SEP, scoping reports and targeted engagements with local leaders and community. The outcomes of these engagements have directly informed us of the content of these documents. It should also be noted that further consultations are planned for later phases of project appraisal and implementation to ensure ongoing stakeholder involvement. The SEP's key objectives are to

facilitate open and inclusive stakeholder participation, manage concerns and grievances effectively, maximize project benefits, and reduce potential adverse impacts.

The Grievance Redress Mechanism (GRM) instituted under Component 1, which includes 50 established grievance committees, will be utilized to promptly identify and address concerns and issues throughout project implementation. For Components 2 and 3, committees will be established in areas where such committees are not yet in place, ensuring comprehensive coverage and effective grievance management across all project components. GRM is designed to facilitate open communication with the affected population, allowing for early detection of potential conflicts and effective resolution of complaints. Through this mechanism, appropriate corrective actions can be determined and implemented as needed. These committees will be responsible for receiving and deliberating on grievances and will work collaboratively with the MoWT and the project contractor to resolve complaints. Additionally, the GRM will serve as a structured channel for managing disputes within the community, fostering transparency and inclusiveness in grievance resolution.

The SEP includes a monitoring and evaluation process to track implementation of the engagement strategy. MOWT will be responsible for SEP implementation and also ensure contractors and other parties involved in the project undertake effective SEP implementation.

GLOSSARY

***Affected Individuals and Communities:** Individuals and Communities, or groups of people, living in areas where the Project is implemented and who may experience direct or indirect environmental, social, economic, or cultural impacts because of the Project. Under the World Bank ESF, these are commonly referred to as Project-Affected Parties.*

Consultation: A process of two-way communication between the Project and its stakeholders through which information is shared, views are expressed, and feedback is received and considered in Project decision-making. Consultation under World Bank Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure is expected to be meaningful, inclusive, and ongoing.

Engagement: An ongoing process by which the Project builds and maintains constructive, transparent, and responsive relationships with stakeholders throughout the Project lifecycle, including planning, construction, and operation

Environmental and Social Impact Assessment (ESIA): A comprehensive assessment comprising environmental and social studies undertaken to identify, evaluate, and manage potential positive and negative impacts of a proposed Project, and to design appropriate mitigation and enhancement measures.

Grievance: A concern, complaint, or claim raised by an individual or group regarding the Project's activities, impacts, or performance.

Grievance Redress Mechanism (GRM): A Grievance Redress Mechanism is an accessible and inclusive system, process or procedure that receives and acts upon complaints and suggestions in a timely fashion and facilitates the resolution of concerns and grievances arising in connection with the project.

Non-Governmental Organizations (NGOs): Independent, non-profit or not-for-profit organizations that operate outside of government structures and may support community development, advocacy, service delivery, capacity building, or environmental and social protection.

PAP: Persons Affected by the Project. Refers to all persons who are affected by the different impacts that the project may bring, including displacement, environmentally induced social impacts, those related to health and safety, among others.

Personal with Disability: any person with any physical, sensory, mental, psychological or other impairment, condition or illness that has, or is perceived by significant sectors of the community to have a substantial or long-term effect on an individual's ability to carry out ordinary day-to-day activities.

Stakeholder(s): Individuals or groups who are directly or indirectly affected by the Project, or who have an interest in, or the ability to influence, Project outcomes. Stakeholders include Project-Affected Persons, government authorities, local communities, civil society organizations, and other interested parties.

Stakeholder engagement. The continuing and iterative process by which a two-way dialogue is facilitated. It considers the different access and communication needs of various groups and individuals, especially the most disadvantaged.

Stakeholder Engagement Plan (SEP): A Project-specific plan that outlines how stakeholders will be identified, engaged, informed, consulted, and involved throughout the Project lifecycle, including mechanisms for disclosure, feedback, and grievance redress.

Vulnerable or disadvantaged populations. Those who may be more adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. They are also more likely to be excluded from or unable to participate fully in the mainstream consultation process. Due to this, it requires specific measures and assistance.

LIST OF ABBREVIATIONS

CAO	Chief Administrative Officer
CGV	Chief Government Valuer
CLO	Community Liaison Officer
CSOs	Civil Society Organizations
DLG	District Local Government
DRC	Democratic Republic of Congo
ESIA	Environment and Social Impact Assessment
ESS	Environment and Social Safeguard(s)
GBV	Gender -Based Voilence
GO	Grievance Officer
GoU	Government of Uganda
GMC	Grievance Management Committee
GRM	Grievances Redress Mechanism
KYM:	Koboko – Yumbe - Moyo
LC	Local Council
MESS	Manager Environment and Social Safeguards
MLHUD	Ministry of Housing Lands and Urban Development
NERANP:	North-Eastern Road Corridor Asset Management Project
NDP	National Development Plan
NEMA	National Environment Management Authority
NFA	National Forestry Authority
OPM	Office of the Prime Minister
PC	Project Coordinator
PM	Project Manager
RAP	Resettlement Action Plan
SEA	Sexual exploitation and Abuse

SDS	Social Development Specialist
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference
UNHCR	United Nations High Commissioner for Refugees
WB	World Bank
MOWT	Ministry of Works and Transport

1. CHAPTER ONE: INTRODUCTION/PROJECT DESCRIPTION

1.1 General Introduction

This document describes the Stakeholder Engagement Plan that will be implemented as part of the NERAMP II Project. This Stakeholder Engagement Plan (SEP) has been prepared in accordance with World Bank Environment and Social Framework and ESS 10 Stakeholder Engagement and Information Disclosure. This SEP will guide all engagements that will be carried out under the project including during preparation of project instruments. The SEP is a “living document” that will be continuously updated by MOWT along all phases of the project including rehabilitation and later maintenance works in the later stages of the project. In this perspective, this version of the SEP provides an overall framework to manage effective and meaningful stakeholder engagements throughout the lifecycle of NERAMP II.

The plan forms part of the mandatory key environmental and social risk management instruments prepared for the Project, alongside the Environmental and Social Impact Assessment (ESIA) and the Resettlement Action Plans to guide stakeholder engagement and information disclosure during project preparation and subsequent implementation in accordance with World Bank ESF and ESS 10.

Following the World Bank Group’s concerns with Uganda’s enactment of the Anti-Homosexuality Act (AHA) 2023, the Government of Uganda issued five Circulars regarding this law to ensure inclusion and non-discrimination of vulnerable or marginalized individuals or groups. Of particular importance is the Circular on Uganda’s Social Safeguard Policies issued on September 21, 2023, by the Ministry of Finance, Planning and Economic Development, to all Accounting Officers, Ministries, Departments and Agencies and Local Governments which states that:

- “All World Bank-financed projects [in Uganda] must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be

implemented in accordance with World Bank policies and applicable Legal Agreements.

- Under these projects, no one will be discriminated against or stigmatized, and the principles of nondiscrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank [financed] projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring [the Enhanced Implementation Support Mechanism] where applicable.
- Each project implementation entity shall develop comprehensive guidelines to address nondiscrimination.”

Considering this, further consultations were undertaken on nondiscrimination for the project environmental and social risk management documents including the Environmental and Social Impact Assessment (ESIA) prepared, to identify the additional risks and describes mitigation measures to address these risks. They include the implementation, monitoring, and reporting arrangements, and roles and responsibilities to assess the efficacy of the additional mitigation measures being implemented in some of the ongoing World Bank-supported projects. They also include the risks identified in the public consultations on these documents involving the Government of Uganda and civil society organizations. Noteworthy is that the World Bank will provide support to the Government of Uganda, particularly its Project Implementation Units, to help them to implement the additional mitigation measures for this project.

January 6, 2024: Additional Consultations on Non-Discrimination

In January 2024, additional consultations were undertaken on the project to specifically discuss the vulnerability of some individuals or groups to discrimination. During the consultations, key issues raised relating to the Project included:

- The possibility for discrimination against vulnerable or marginalized individuals or groups from access to project benefits.
- The need for a strategy to ensure that recruitment for contracts is competitive and based on merit.
- The possibility of hostility towards and stigmatization of individuals or groups based on their vulnerability.

The approach to managing these issues and other issues raised during the consultations are found at Annexes 6, 7 and 8 of this SEP. A summary of these additional consultations is posted on the World Bank website under Uganda Consultations on <http://www.worldbank.org/en/country/uganda/brief/consultations>

1.2 Project Description

The Government of Uganda has proposed the Northeastern Road Corridor Asset Management Project (NERAMP 2) which aims to enhance climate resilience, improve road safety and reduce transport costs along the Tororo-Mbale-Soroti Road corridor, as well as promote social enterprise in the refugee hosting districts of Koboko, Yumbe and Moyo. Given that Uganda is a landlocked country, the Tororo-Mbale-Soroti road corridor is critical to connect agricultural, processing and industrial activities to domestic and regional markets. The corridor provides a crucial transit route for regional trade, particularly with South Sudan and Eastern DRC. However, the corridor is highly vulnerable to climate change impacts like floods, landslides and rising temperatures and consequently experiences deteriorating road conditions and frequent disruptions that contribute to higher transport costs and poor road safety. Therefore, investing in rehabilitating and upgrading the Tororo-Mbale-Soroti road corridor to climate resilient standards strengthens the domestic and regional road networks and supports regional trade.

In addition, improving the resilience of corridor access roads and town roads in the remote Koboko, Yumbe and Moyo districts is critical to safeguarding livelihoods, social and economic activities, thus enhancing the resilience of the communities served. The refugee hosting districts of Koboko, Yumbe and Moyo are experiencing climate change impacts like floods that disrupt access to social services and economic opportunities. The government recognizes that improving connectivity is essential for unlocking economic opportunities in underserved regions and in its revised Nationally Determined Contribution (NDC), Uganda set the key priority of creating climate resilient transport infrastructure to support economic growth. This goal is reinforced by the National Climate Change Act, which underpins related climate policies. As Uganda continues to grapple with high youth unemployment, sustained investment in resilient roads offers a pathway to inclusive growth, structural transformation, and the realization of Vision 2040's employment targets. A comprehensive approach that includes upgrading district and rural roads to climate resilient standards is essential for maximizing the benefits of major roads. Additionally, roadside social infrastructures such as market access points, rest areas, transport stops, and facilities for pedestrians support community well-being and economic activity, including job creation both during and after road rehabilitation and upgrading.

The proposed Project is to be implemented with financial support from the World Bank. The Project is a follow-on operation to the Uganda North-Eastern Road Corridor Asset Management Project (NERAMP) (P125590) which closed on December 31, 2025; and the Roads and Bridges in the Refugee Hosting Districts/Koboko-Yumbe-Moyo Road Corridor Project (P171339) which is scheduled for completion in 2027. The proposed Project will consist of four components.

1.3 Project components

Component 1: Climate resilient upgrading of highway corridor - Road rehabilitation, operations and maintenance (US\$145 million). This component will fund the rehabilitation and upgrading of the Tororo–Mbale–Soroti road (150.8 km), including the installation of a weighbridge at kilometer 46+700. The selection of this road section was based on its strategic importance within the regional transport network and its heightened vulnerability to climate change effects, such as flooding and landslides. Upgrading will ensure a dependable, all-weather corridor connecting South Sudan, sections of the Democratic Republic of Congo, and

northern and eastern Uganda to the port of Mombasa, thereby strengthening the resilience of the transport network.

Key activities include: (a) designing and rehabilitating road sections to meet climate-resilient standards; (b) implementing routine and periodic maintenance throughout the corridor, with particular attention to climate risks and vulnerable hotspots; and (c) managing operations such as traffic control, road safety, climate risk preparedness and response, and axle load monitoring. Additionally, the component covers supervision, contract management, operational costs of the Project Implementation Unit (PIU), and a graduate internship program for recent graduates. This road section was originally part of the parent NERAMP project (P125590) but was later excluded due to funding constraints and the project's imminent closure. Technical, environmental, and social studies completed under the parent project will be updated as necessary.

Component 2: Climate resilient upgrading and rehabilitating of town roads and access roads infrastructure in the refugee hosting districts of Koboko, Yumbe and Moyo (US\$20 million). This component will support the upgrading of 15 km of priority town roads to climate-resilient standards in the districts of Koboko, Yumbe, and Moyo. These roads connect to the Koboko–Yumbe–Moyo corridor, as well as schools, health facilities, and local markets. The component also funds the upgrading of 15 km of access roads that serve refugee settlements along the project corridor. Road selection will be informed by an assessment of both connectivity needs and climate vulnerability, to be conducted during project preparation.

Component 3: Construction of climate resilient roadside stations, weighbridges and markets (US\$10 million). This component will finance the construction of three climate-resilient vending stations, one each in Koboko, Yumbe, and Moyo districts. It will also support the building of two roadside stations along the Koboko–Yumbe–Moyo road and two weighbridges at the terminus points of the same corridor.

Component 4: Contingent Emergency Response (US\$0 million). This component provides a framework for the Government of Uganda (GoU) to respond swiftly in the event of an emergency, following World Bank procedures for disaster prevention, preparedness, and response.

Project Beneficiaries: The project is expected to directly benefit approximately 2.25 million people, with around 40 percent being women and over 45 percent comprising refugees. Key beneficiary groups include: road users, who will experience enhanced service levels due to upgrades and consistent maintenance of the road network; the tourism sector, which will benefit from improved access to major attractions such as Murchison Falls and Kidepo National Parks; and agricultural producers as well as communities situated along the NERAMP and KYM project corridors, who will gain from increased employment opportunities and better connectivity to markets, social amenities, and economic activities.

1.4 Project Location

The Proposed NERAMP II project will operate in two regions of North-Eastern Uganda (Tororo – Mbale – Soroti corridor) for component 1 and West Nile (Koboko – Yumbe - Moyo corridor) for component 2 and 3.

The Tororo – Mbale – Soroti Road Corridor: The proposed component 1 road project traverses the districts of Tororo, Mbale, Bukedea, Kumi, Ngora and Soroti passing through major townships of Tororo, Mbale, Bukedea, Kumi and Soroti up to Kennedy Square near Soroti District Headquarters (**Figure 1**). Other small trading centres traversed include Busiu, Nakaloke, Kachumbala, Atatur, Mukula and Kapir. Within the project area, the districts are split into counties, sub-counties and subsequently into parishes and villages. The project covers 5 sub-counties in Tororo, 13 sub-counties in Mbale, 5 sub-counties in Bukedea and 2 sub-counties in Kumi district, 2 and 3 sub-counties in Ngora and Soroti, respectively. Table 0-1 below shows the list of districts, sub counties, parishes and villages.

Table 1-1: Project Area by District, Sub County and Village Along Tororo – Soroti Road

District	County/Division/ Constituency	Subcounty/Town Council	Parish/Ward	Village/Cell/Zone	
Tororo	Tororo	Molo	Molo	Molo I	
				Agogomit	
				Akisim Molo	
				Akisim Tuba	
				Aruruket	
				Ginnery	
				Karwok	
				Kipirio North	
				Kipirio South	
				Kiporo	
				Maga I	
				Mairo Mbili	
				Orago	
	Tuba Central				
	Tororo Municipality	Eastern Division		Amagoro B	Amagoro B Central 'B'
					Amagoro B North 'B'
Amagoro B North 'C'					

District	County/Division/ Constituency	Subcounty/Town Council	Parish/Ward	Village/Cell/Zone	
			Kasoli	Amagoro B North 'A'	
				Kasoli 'B'	
			Nyangole	Railways 'C'	
				Nyangole 'A' A	
			Nyangole 'A' B		
			Western Division	Agururu A	Agururu A li 'F'
				Agururu B	Agururu B I 'B'
					Agururu B I 'C'
		Agururu B I 'D'			
		Agururu B I 'E'			
		Agururu B li 'A'			
		Agururu B lii			
		Bison Maguria	Bison 'B' J		
			Bison 'C' Juba A		
	Central	Central 'A'			
		Central 'B'			
		Central 'D'			
		Central Southeast			
		Central Southwest			
		Water 'A'			
	Water 'B'				
	West Budama (Kisolo)	Rubongi	Nyakesi	Nyakesi E 'C'	
				Nyakesi E 'D'	
Nyangole			Achilet D 'A'		
			Maguria 'A'		
			Maguria 'A'		
			Maguria 'B'		
			Nyangole 'B'		
Mbale	Bungokho	Bukasakya	Bukasakya		
			Bugema A		
			Bugema Centre		
			Kijja		
		Bukhiende	Bunashimolo	Munkaga	
				Bukhaboyo Lower	
				Lusaafu	
		Bumasikye	Lwaboba	Rongoro	
				Lwaboba Trc	
		Bumbobi	Muada	Wokukiri Lower	
				Kimwanga	
			Bukhumwa	Mafutu	
		Bungokho	Bubirabi	Bukhumeka li	
				Lukii	
Bumangeni	Bumangeni	Nabikhomwa A			
		Nantondome			
Bumangeni	Bushirusa				

District	County/Division/ Constituency	Subcounty/Town Council	Parish/Ward	Village/Cell/Zone	
				Manyonyi Upper	
				Napulu	
				Shananda	
				Special Area	
			Bushikori	Mabanga	
			Nashikhaso		
			Bungokho-Mutoto	Nauyo	Napooli Lower
			Busiu	Bufukhula	Bufukhula Upper
		Natondome			
		Bunambutye		Lambo Lower	
				Lambo Upper	
				Mabanga	
				Mirumba	
		Busiu Townboard		Alpha	
				Hospital	
				Township A	
		Buwalasi		Township B	
				Buwalasi Bilaa	
		Lumbuku		Namunyu	
				Bumulaha Toma	
				Bunanimi Lower	
		Busoba	Bumasikye	Mako	
				Nalondo	
			Bunambutye	Nalondo	
			Bunanimi	Butunde	
				Namwaro A	
			Busoba	Bulolelo	
				Makhai	
				Namwalye	
		Nakaloke	Kasanja	Doko Kasanja I	
		Nakaloke Tc	Afya	Afya	
				Busajjabwankuba A	
				Busajjabwankuba B	
				Kabogoza A	
				Kawanga	
				Nakaloke Iii	
			Fika Salama	Sajjabi	
Wajambuka					
Kireka Mailo Six					
Najja	Kazibwe				
	Nakaloke li Lower				
	Nakaloke li Upper				
	Namigalo				

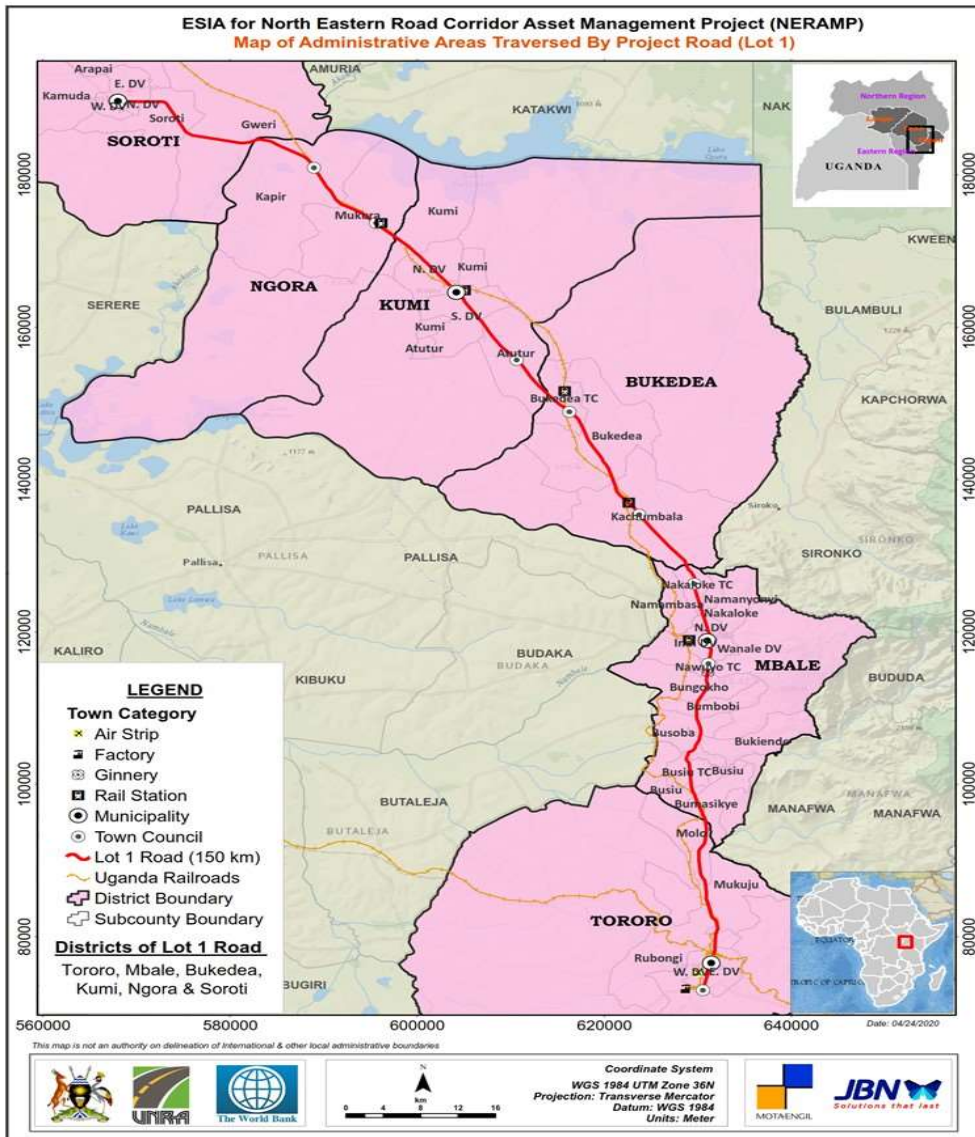
District	County/Division/ Constituency	Subcounty/Town Council	Parish/Ward	Village/Cell/Zone	
			Nakaloke	Nabitende	
				Nakaloke I	
			Rock	Nakaloke Central A	
				Nakaloke Central B	
				Nandala A	
				Nandala B	
			Namanyonyi	Nkoma	Kinyoli A
					Kinyoli B
					Nabunyiri
			Mbale Municipality	Industrial Division	Malukhu
	Majanga				
	Sironko				
	South Central	Bishop Wasoke			
		Cathedral			
		Kale			
		Lwakhakha			
		Naboa			
		Park			
		St. Andrews			
	Northern	Iuiu		Northern	
				Staff	
		Nabuyonga		Buwalasi	
				Magezi	
				Kikyafu	
				Mirembe	
				Kisenyi	
		Namakwekwe		Gudo	
				Kachumbala	
Kiteso					
Nabijo					
Nkoma		Bujoloto			
	Nambozo				
North Central	Clock Tower				
	Duka				
	Hospital				
	North Road				
Wanale	Boma	Elgon Forest Reserve			
		Union			
Bukedea	Bukedea	Bukedea	Kakere	Atiriri	
			Kamon	Okolimer	
				Kamon	
				Okolimer	
Suula	Suula				

District	County/Division/ Constituency	Subcounty/Town Council	Parish/Ward	Village/Cell/Zone		
		Bukedea Town Council		Okobwa		
			Bukedea	Okoona		
				Bukedea		
				Too A		
			Emokori	Emokori B		
				Emokori A		
			Kachabule	Rock View		
				Apoopo		
				Kabolo		
			Kide	Kide South		
				Kide North		
				Kide Central		
			Tamula	Abilakin		
				Tamula		
				Orapada		
		Kachumbala	Amus	Amus		
				Sapir		
				Amus		
			Kachaboi	Kachaboi		
				Mukura		
			Kachumbala	Obur		
				Kachumbala		
				Obur		
			Kachuru	Kachuru		
			Kawo	Kakira		
			Kongoidi	Komuriakere		
				Kongoidi		
		Kongunga				
		Kwabalin	Nyako			
		Kumi	Kumi	Atatur	Akalabai	Akalabai
						Apuda
					Ariet	Ariet
						Atatur
Orapada						
Kapokin	Kalungar					
	Kapokin					
Kumi	Asinge			Asinge		
	Olupe			Olupe		
Northern Division	Bazaar Ward			Bazaar		
	Emejai			Rarak		
	Kabata			Kabata		
Southern Division	Abubur			Abosan		
				Abubur		
	Boma Ward			Boma North		

District	County/Division/ Constituency	Subcounty/Town Council	Parish/Ward	Village/Cell/Zone		
			Kelim	Kelim		
			Olungia	Aoloko		
			Tank Ward	Tank		
Ngora	Ngora	Kapir	Kapir	Atira		
				Kapir		
			Koloin	Koloin		
				Ocodio		
		Mukura	Adul	Rapad		
				Adul		
			Agogomit	Agogomit		
			Akeit	Akeit		
				Obur		
			Okunguro	Okunguro		
Soroti	Soroti	Gweri	Awoja	Awoja		
				Odukurun		
				Awoja		
				Obur		
				Acaboi		
				Otidonga		
				Ongeseba		
				Otidonga		
		Ongeseba				
		Soroti	Soroti	Soroti	Acetgwen	Orwadai
					Amen	Amen
						Amen
						Obuku
						Amen
	Opuyo				Owalei	
					Omalera B	
					Omalera A	
					Omuron	
		Opiro				
	Alaki					
	Soroti Municipality	Northern Division	Kichinjaji	West Cell		
				East Cell		
			Madera Ward	Aminit Cell		
			Pioneer Ward	Ejalu Cell		
				Pioneer Cell		
				Engwau Cell		
				Madudu Cell		
Moroto Road Cell						
Hospital Cell						
Eastern Division			Agip Ward	Agip Cell		
					Kigandani Cell	

District	County/Division/ Constituency	Subcounty/Town Council	Parish/Ward	Village/Cell/Zone
			Central Ward	Agip Cell
				Cell E
				Cell C
				Cell F
				Cell B
				Cell D
				Cell A
				Cell G

Figure 1: Administrative areas traversed by the Tororo- Mbale - Soroti



The west Nile region (Components 2 and 3): The West Nile region traverses through 03 districts; starting from Koboko, through Yumbe to Moyo District. In Koboko District, the project covers 2 sub-counties and 2 divisions in Koboko Municipality affecting a total of 8 parishes and 19 villages/cells. In Moyo District, the project covers 2 sub-counties and 1 town council affecting a total of 8 parishes and 19 villages/cells. In Yumbe District, the project area covers 6 sub-counties and 1 town council, 21 parishes/wards and 61 villages/cells. A summary of the project area is indicated in **Error! Reference source not found..**

The primary livelihood activity in the rural areas along the alignment is crop farming, predominantly at subsistence level, with only limited engagement in livestock rearing. In contrast, around urban areas and rural growth centres, the main economic activities include small-scale commercial, provision of social services, transport, and light industrial enterprises. Land tenure is largely customary, with freehold and leasehold arrangements becoming more common in urban areas.

Table 1-2 below indicates the specific locations for proposed project components along the Koboko- Yumbe – Moyo road corridor

Table 1-2 : Component 2 -3 Project Area of Influence by District, Sub- County and Villages

Project component	Subcomponent	District	Specific Locations	
Component 2: Town Roads and Access Roads	3 Town Roads (15kms)	Koboko	Koboko Municipality council	
		Yumbe	Kuru Town Council Lodonga Town Council	
		Moyo	Moyo Town Council, Lefori Town Council and Moyo district headquarters	
	Refugees Access Roads (15kms)	Koboko	Koboko	
		Yumbe	Yumbe	
Moyo		Moyo		
Component 3: Roadside Stations, Weighbridges, and Markets	Roadside Market construction (3 markets)	Koboko	Nyai Village, Metino Parish, Abuku Subcounty	
		Yumbe	Central Village, Kerila Parish, Apo Sub-county	
		Moyo	Gwere East Village, Gwere Parish, Lefori Subcounty	
	Road side stations (two)	Koboko	Woropanga Village, Onyukunga Pariash , Abuki Subcounty	
		Yumbe	Bagdad Village, Kochi Parish, Kochi Sub-County	
Two weighbridges	Koboko	Woropanga Village, Onyukunga Parish, Abuku Subcounty, at Km 16+350 to 16+400 along the KYM Road		
	Moyo			

1.5 Objectives and Scope of SEP

1.5.1 Objective of the SEP

This Stakeholder Engagement Plan (SEP) outlines the identification of stakeholders and details how the Ministry of Works and Transport (MoWT) and the contractor will actively engage with them throughout every phase of the project. The SEP defines a structured, purposeful, and culturally appropriate approach to stakeholder consultation and disclosure of information, in accordance with the World Bank Environmental and Social Standard 10 (ESS10). The SEP recognizes the diversity of stakeholders and their varying interests, influence, and expectations, and sets out an approach for engaging stakeholders at different stages and levels of interaction with the Project.

The overall aim of the SEP is to foster an atmosphere of trust, transparency, and mutual understanding that actively involves Project-Affected Persons (PAPs) and other stakeholders in Project planning and implementation, thereby supporting informed decision-making and improved environmental and social performance.

The specific objectives

- i) Establish a systematic approach to stakeholder engagement that enables the MoWT and the Contractor to identify stakeholders, including Project-Affected Persons, and to build and maintain constructive relationships with them throughout the Project lifecycle.
- ii) Assess the level of stakeholder interest, concerns, and support for the Project, and ensure that stakeholder views are considered in project design, implementation, and environmental and social risk management.
- iii) Promote effective, inclusive, and continuous engagement with Project-Affected Persons and other relevant stakeholders on issues that may affect them during all phases of the Project.
- iv) Ensure that timely, relevant, and understandable information on Project activities, environmental and social risks, and mitigation measures is disclosed to stakeholders in an accessible and appropriate format.
- v) Provide accessible, inclusive, and culturally appropriate mechanisms through which Project-Affected Persons and other stakeholders can raise concerns, provide feedback, and lodge grievances, and ensure that such issues are addressed in a timely and transparent manner.

1.6 The Scope of this SEP

The focus of this SEP includes:

1. Identification and analysis of Project stakeholders, including vulnerable or marginalized individuals and groups.
2. Planning and implementation of stakeholder engagement modalities, including communication, consultation, and disclosure mechanisms that enable stakeholders to influence project decisions.

3. A program dedicated to ongoing engagement and communication activities, as well as regular reporting and feedback to both internal and external stakeholders. This includes mechanisms for reviewing and documenting how stakeholder perspectives are incorporated into project design, implementation, and the management of environmental and social risks.
4. Definition of institutional roles and responsibilities for effective SEP implementation.
5. Establishment of monitoring, reporting, and feedback measures to assess the effectiveness of stakeholder engagement activities; and
6. Elaboration of the role, structure, and procedures of the Project Grievance Mechanism (GM), including provisions for handling sensitive grievances such as Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH).

1.7 Principles of Stakeholder Engagement

Effective stakeholder engagement is an essential part of good business practices and is central to the successful management of risks, impacts and benefits. The objective is to earn the stakeholders' trust and establish a two-way dialog through detailed design, rehabilitation and operation. The project will adhere to established principles during stakeholder consultations and engagement processes, in alignment with World Bank Environmental and Social Framework (ESF), Environmental and Social Standard 10 (ESS10), and recognize international best practices.

- **Transparency and lifecycle approach:** stakeholder engagement will ensure that information is shared in a transparent manner, as a basis for a relationship of trust. Stakeholder engagement and public consultations will be conducted throughout the entire Project lifecycle in an open, transparent, and inclusive manner, free from manipulation, interference, coercion, or intimidation.
- **Timely:** Stakeholders will be engaged throughout the different phases and from an early stage of the project preparation. PAPs will always receive information in a timely manner, with enough time to process decisions and to get prepared. Experience shows that early consultations with all stakeholders reduce the risk that people's expectations, speculations and concerns remain unmanaged. In turn, it provides an avenue for an open and constructive dialog. Therefore, MOWT will continue to (re)engage with all stakeholders immediately from the effectiveness date of NERAMP II building on earlier engagements and commitments to the stakeholders, engage all parties on their expectations and address them in a dialog with all parties involved. The nature and frequency of these consultations will vary from stakeholder to stakeholder depending on the risks to and expected magnitude of impacts, the sensitivity to these impacts, and the level of public interest.
- **Inclusiveness and sensitivity:** Stakeholder identification and engagement processes will be inclusive and accessible. Attention will be given to vulnerable or marginalized groups, including women, youth, elderly persons, persons with disabilities, and other socially or economically disadvantaged groups, to ensure their meaningful participation.
- **Informed participation and feedback:** Relevant Project information will be disclosed in a timely and appropriate manner to enable stakeholders to understand Project risks and opportunities. Stakeholders will be provided with opportunities to express their views, and their feedback will be documented, analyzed, and addressed.

- **Flexibility:** Engagement methods will be adapted to context-specific conditions and constraints. Where traditional face-to-face engagement is not feasible, alternative methods such as telephone, radio, online platforms, or written communication will be used in accordance with national requirements (including Ministry of Health standard operating procedures) and relevant World Bank guidance on stakeholder engagement.
- **Meaningful and ethical engagement:** Engagement will be conducted in a manner that is respectful, culturally appropriate, and ethical, ensuring that all stakeholders can participate meaningfully and without fear of retaliation or exclusion.
- **Accessible and responsive grievance management:** Clear, transparent, and accessible mechanisms will be in place for receiving and resolving stakeholder complaints and grievances. This includes the application of a survivor-centred approach for handling GBV, SEA, and SH-related complaints, as well as confidential and safe pathways for reporting cases related to exclusion or discrimination of vulnerable or marginalized individuals or groups.
- **Systematic and well documented process :** MOWT will ensure a well - structured, comprehensive and effective management of its engagement with all identified stakeholders and to assure that all stakeholders, their stake, and their specific needs are documented and available to those involved in the engagement process throughout the lifetime of the project, MOWT established and maintains a comprehensive stakeholder database (containing the names and contract details of people and organizations).

1.8 Overview of environment and social impacts linking to SEP

The Environmental and Social Impact Assessment (ESIA) reports for Component 1, along with the scoping reports for Components 2 and 3, have identified a range of potential environmental and social (E&S) impacts throughout the planning, construction, and operational phases. These impacts differ in nature, scale, and significance, affecting various stakeholder groups including Project-Affected Persons (PAPs), local communities, vulnerable and marginalized groups, workers, and institutional stakeholders to varying degrees. . Significant social and environmental impacts are anticipated during the construction phase. Impacts during the operational phase are expected to be minimal. By directly linking the identified E&S impacts to the objectives and activities of stakeholder engagement, the SEP ensures that engagement remains meaningful, responsive, and consistent with the Project’s risk profile, in line with the requirements of the World Bank Environmental and Social Standard 10 (ESS10).

Table 1-3 Overview Impacts – Engagement Linkage

Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party	Timing
Land use impacts (restricted access to land and livelihoods)	Ensure PAPs understand Right-of-Way (RoW) restrictions, their compensation and livelihoods' restoration options, and temporary access limitations	Disclosure of strip maps; household consultations; livelihood restoration planning sessions	Project Implementation Unit (PIU) Social Team, Resettlement Action Plan (RAP) Team, Local Council I (LC1) leaders	RAP preparation; monthly during pre-construction
Land acquisition and involuntary resettlement (economic displacement)	Ensure transparent valuation, and compensation, consistent with the replacement cost standard, and livelihood restoration for physically and economically displaced PAPs	Compensation notices; valuation disclosure meetings; relocation planning and resettlement consultations	RAP Team, PIU, Licensed Valuers	Prior to compensation payment and during relocation and livelihoods' restoration activities
Employment and local economic impacts	Promote fair and nondiscriminatory access to local employment and manage resource-related conflicts Respect for Ugandan labor law regarding wages, hours to be worked per week, holidays, social security/insurance, etc.	Disclosure of recruitment procedures; labour awareness meetings; dissemination of the workers' grievance mechanism	Contractor, PIU, District Labour Office	Pre-construction; quarterly

Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party	Timing
Traffic disruptions	Inform communities of planned disruptions and relocation of public infrastructure where relevant	Advance public notices; road signage; coordination meetings with district engineers	Contractor Health, Safety and Environment (HSE) Team, District Engineers	At least 14 days before disruption
Cultural and archaeological heritage (risk of disturbance or destruction of physical cultural resources)	Prevent damage to known or chance-found cultural heritage and ensure awareness of Chance Finds Procedures	Disclosure of Chance Finds Procedure; consultations with cultural and religious leaders; coordination with Museums and Monuments Department as relevant	PIU Environmental and Social Team, Contractor, Department of Museums and Monuments	Before construction; as needed
Gender relations (risk of Sexual Exploitation and Abuse and Sexual Harassment, and marginalization of women)	Prevent Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) and promote safe participation of women in project activities	Women-only meetings; SEA/SH awareness sessions; worker Code of Conduct training; Operational procedure for addressing SEA/SH-related claims using a survivor-centered approach, information on confidential reporting and	PIU Gender-Based Violence (GBV) Specialist, Contractor Safeguards Team	Before mobilisation; quarterly

Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party	Timing
		referral pathways		
Community social cohesion (conflict and exclusion of vulnerable PAPs)	Reduce social conflict and ensure inclusion of vulnerable and or marginalized groups	Conflict mediation meetings; school safety awareness; targeted household visits for vulnerable and or marginalized PAPs	PIU Social Team, LC1 leaders	Monthly; and as needed
Community health and safety risks (disease spread, traffic accidents, worker interactions)	Minimise community health and safety risks associated with construction activities	Community safety campaigns; SEA/SH hotline awareness; traffic safety meetings	Contractor HSE Team, District Health Offices	Pre-construction; quarterly
Landscape and visual impacts (vegetation clearing and visual change)	Ensure that vegetation clearance complies with ESMP guidelines for replacement and aims to minimize environmental and visual impact	Design disclosure meetings; consultations with tourism and local business stakeholders	PIU Environmental Team	Before clearing; during construction
Workers' occupational health and safety (OHS)	Ensure safe working conditions and workers' awareness of grievance channels	An operational and regularly monitored OHS plan, which includes oversight of materials supply; workers' induction	Contractor Occupational Health and Safety (OHS) Team, PIU Safety Officer	Monthly

Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party	Timing
		sessions; toolbox talks; disclosure of Workers' Grievance Mechanism		

Table 1.4: Impact–Engagement Linkage - Operation and Maintenance phase

B. Operation and Maintenance (O&M) Phase Impacts				
Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party	
Land use impacts during maintenance (temporary access restrictions)	Inform landowners and land users of temporary access limitations during maintenance activities Conduct maintenance activities generating the less damage possible to landowners	Maintenance notices; Short Message Service (SMS) alerts; radio announcements	MoWT Operations and Maintenance (O&M) Team MoWT Social Team	
Infrastructure disruptions (telecommunications or utility interruptions)	Provide timely notification of service disruptions	Coordination of meetings with service providers; public notices	MoWT O&M Team	
Gender relations (temporary economic impacts on women due to crop loss or restricted access)	Support women affected by temporary crop loss or restricted access to agricultural land during maintenance	Targeted livelihood advisory visits; women’s forums on compensation and livelihood restoration measures	MoWT Social Team	

B. Operation and Maintenance (O&M) Phase Impacts			
Impact (as assessed in the Environmental and Social Impact Assessment)	Engagement Objective	Specific Engagement Activities	Responsible Party
Community social cohesion (legacy land and compensation disputes)	Maintain community relations and address outstanding or legacy grievances	Annual community meetings; dispute resolution clinics	MoWT Social Team
Community health and safety (electrocution and electromagnetic field awareness)	Promote public safety and awareness around operational transmission infrastructure	Safety awareness campaigns; school-based education programmes	MoWT O&M Safety Team
Landscape and visual impacts (ongoing vegetation management)	Maintain communication regarding vegetation control and scenic areas	Vegetation management consultations with affected communities	MoWT Environmental Team
Worker health and safety (O&M activities)	Ensure continued compliance with occupational health and safety requirements	Toolbox talks; refresher training; worker grievance awareness	MoWT O&M OHS Team
Traffic and road safety (maintenance vehicles)	Reduce risks associated with maintenance traffic	Disclosure of maintenance schedules; coordination with traffic police	MoWT O&M Team

The SEP will take into consideration these impacts, and any other that may surge, to manage the engagement of the stakeholders.

2. CHAPTER TWO: STAKEHOLDER IDENTIFICATION AND ANALYSIS

The first identification of stakeholders has been done. As previously mentioned, this will be developed and updated throughout the lifespan of the project, including during the preparation and implementation of the Resettlement Action Plan (RAP) and at the commencement of the construction. This plan clarifies the procedure for stakeholder identification at both the national and project area levels throughout preparation and implementation. It is designed to ensure adherence to national regulations and World Bank standards for effective stakeholder engagement. NERAMP 2 will involve a broad spectrum of

stakeholders, encompassing individuals and groups who may be directly or indirectly impacted by the Project, as well as institutions and organizations interested in its delivery. Although not all affected parties will be direct beneficiaries, it is vital that information is shared and consultations are carried out inclusively and transparently, enabling all stakeholders to understand the Project's scope, implementation methods, and criteria for accessing Project-related benefits. Emphasis is placed on disadvantaged or vulnerable groups, such as women, youth, the elderly, persons with disabilities, refugees, widows, and female-headed households, who may face obstacles to participation or be disproportionately affected by the Project's impacts. The SEP strives to ensure meaningful involvement of these groups and prevent exclusion, discrimination, or harm during project processes. Stakeholder mapping will be an ongoing activity throughout the project. The process involves identifying all individuals and groups with an interest in the project, as well as assessing their level of interest, influence, and the ways in which they may impact or be impacted by the project. In accordance with World Bank Environmental and Social Standard 10 (ESS10), paragraph 5, stakeholders are defined as:

- i) Project affected parties.
- ii) Interested parties; the stakeholders include those who, despite not being directly affected, hold an interest in the project.
- iii) Women and disadvantaged/vulnerable individuals or groups

2.1 Stakeholder Analysis

The Project utilizes the ESS10 stakeholder classification as its foundational framework for identifying stakeholder engagement needs and developing suitable engagement strategies. In alignment with ESS10, all stakeholders are categorized into three main groups: Project-Affected Parties, Other Interested Parties, and Disadvantaged/Vulnerable Groups.

For internal planning and operational efficiency, the Project further sub-classifies stakeholders into primary, secondary, or tertiary groups, based on the nature and frequency of their interaction with the Project not on their relative power or influence:

- Primary stakeholders: Individuals or groups requiring regular, direct engagement because of their close proximity to Project activities or their potential exposure to Project impacts (e.g., Project-Affected Persons and vulnerable populations).
- Secondary stakeholders: Institutions and organizations that provide facilitation, regulatory oversight, or coordination roles in Project implementation and stakeholder engagement (such as district authorities and sector agencies).
- Tertiary stakeholders: Wider interested parties who may only require indirect or occasional engagement, such as members of the media or national-level institutions.

This internal sub-classification is intended solely to enhance the practical planning of engagement activities including determining the appropriate frequency, methods, and assignment of responsibilities during the implementation of the Stakeholder Engagement Plan (SEP), Environmental and Social Impact Assessment (ESIA), Environmental and Social

Management Plans (ESMPs), and Resettlement Action Plans (RAP). Importantly, this approach does not replace the ESS10 categories, nor does it suggest any hierarchy of power or influence; it is designed to ensure the Project remains in full compliance with the World Bank Environmental and Social Framework.

2.1.1. Affected parties

Affected parties include local communities and other parties that may be subject to direct impacts from the Project. These are individuals and communities that may experience direct or indirect environmental, social, or economic impacts from the Project, whether positive or negative. In broad terms, affected parties consist of residents from the communities / villages identified in the project description, where the project's components will be implemented. This includes not only the primary sites but also areas along the roads and other associated facilities supporting infrastructure related to the project. For component 1 -these will relate to roadside communities and those living around ancillary facilities such as quarries, borrow pits, campsites, dumping sites etc. For components 2 and 3, the primary stakeholders include communities situated along town and access roads, individuals residing near vending stations, rest stations, and weighbridges, as well as all vendors currently operating at these vending stations. Table 2-1a, b and c below present the analysis of key Project Affected Parties.

2.1.2 Affected parties

Table 2-1: Stakeholder Analysis – Project -Affected Parties under the project

Stakeholder Group	Engagement Category	Relevance / Rationale
Local communities / residents (landowners, homeowners, leaseholders, tenants whose assets are likely to be affected)	PAPs	Residents living within or adjacent to the Right-of-Way (RoW) affected by construction nuisances, traffic, safety risks, and temporary access restrictions, potential displacement, noise pollution, and changes in land use. benefit from improved road infrastructure, increased access to markets, and enhanced economic opportunities.
Women and men who are Heads of Households (PAPs)	PAPs	Often land and asset holders are involved in compensation decisions and livelihood restoration, and key participants in household-level decision-making.
Youth in Affected Communities	PAPs	Affected through land and livelihood impacts and community safety issues; also interested in employment opportunities and skills development.
Truck drivers and transport operators/ Bodabodas	PAPs	Direct beneficiaries of the improved road infrastructure, which will reduce travel times, increase efficiency, and lower transportation costs but face high safety risks

Stakeholder Group	Engagement Category	Relevance / Rationale
Traders/business owners (retail shops, workshops, kiosks)	PAPS	Affected by construction nuisances, traffic, safety risks, and temporary access restrictions. Benefit from increased economic activity, improved access to markets, and increased customer traffic. Improved access to markets, increased customer traffic, enhanced economic opportunities. Besides will be directly impacted by the infrastructure markets, weighbridge and roadside station construction, including potential displacement, noise pollution, dust pollution, changes in land use
Farmers/ agricultural producers (landowners, tenants, leaseholders)	PAPS	They are primary stakeholders because they will benefit from improved access to markets, increased efficiency in transporting goods, and potential increases in production and sales.
Roadside market vendors and stall vendors)	PAPS	Affected by construction nuisances, traffic, safety risks, and temporary access restrictions but all key beneficiaries Direct beneficiaries of the improved roadside markets, which will improve their business operations, increase customer traffic, and enhance economic opportunities but at risk of any risks -potential displacement, noise pollution, changes in land use, labour influx, HIV/AIDS, GBV/SEA, competition from influx of business
Utility service providers (NWSC, Mobile phone, Electricity companies along the road)	PAPS	Services disruptions by the project, affecting service delivery to their clientele. Be involved
Public institutions (roadside schools)	PAPS	Affected by construction nuisances, traffic, safety risks, and temporary access restrictions
Religious /cultural institutions with assets / ritual places	PAPS	Affected by construction nuisances, traffic, safety risks, and temporary access restrictions
Industries (Visible small-medium – large)	PAPS	Affected by construction nuisances, traffic, safety risks, and temporary access restrictions
Refugees' on communities within the project area with limited opportunities	PAPS	Affected by the project, benefit from improved access to services, economic opportunities, and social infrastructure. But also, nuisance of road construction, including potential displacement, noise pollution, dust

Stakeholder Group	Engagement Category	Relevance / Rationale
		pollution, changes in land use, social risks of labour influx, GBV/SEA, HIV/AIDS
Refugee-hosting communities within the project area with limited opportunities	PAPs	Affected by the project, benefit from improved access to services, economic opportunities, and social infrastructure. But also nuisance of road construction, including potential displacement, noise pollution, dust pollution, changes in land use, social risks of labour influx, GBV/SEA, HIV/AIDS
Truck drivers and transport operators	PAPs	Will benefit from improved roadside facilities, including weighbridges and parking areas, which will improve their efficiency and reduce costs.

2.1.3. Other interested parties

In addition to those parties directly impacted by the project, a range of other stakeholders are involved. These include government agencies, local authorities, community leaders, development committees, civil society organizations, and development partners. While these stakeholders may not be directly affected, they hold a vested interest in the project owing to their institutional responsibilities, proximity to the project area, involvement within relevant sectors, or their mandated roles. Table 2-2 below identifies the principal other interested parties as defined by the World Bank's Environmental and Social Framework (ESF) and Environmental and Social Standard 10 (ESS10).

Table 2-2: Stakeholder Analysis – Other Interested Parties (combined 3 components)

Stakeholder Group	Engagement Category	Relevance / Rationale
Ministry of Works and Transport	Institutional Stakeholders	Implementing agency responsible for overseeing the project and ensuring its successful completion, managing follow up operations and maintenance the road network
Office of the Prime Minister	Institutional Stakeholders	Collaborating with the Ministry of Works and Transport on the project and strong mandate on refugee's issues.
Uganda Revenue Authority (URA)	Institutional Stakeholders	Interest / involved in regulating and collecting revenue from the roadside markets and weighbridges.
Ministry of Trade, Industry, and Cooperatives	Institutional Stakeholders	Interest and involved in promoting trade and commerce in the project area, especially at near cross-border points. Interest in improved market and trade infrastructure and services.

Stakeholder Group	Engagement Category	Relevance / Rationale
Police	Institutional Stakeholders	Involved in maintaining law and order during the project's implementation, road safety operations, interest in improved and safe infrastructure and services.
Other central government Ministries - MoFPED, MoLHUD MoGLSD, MoWT, MWE, MoH, MoLG	Institutional Stakeholders	Legally mandated to handle policy aspects Make decisions that may affect implementation of environment and social safeguards issues
Government Agencies /Authorities, NEMA, NFA, UWA, UAC, EOC	Institutional Stakeholders	Legally mandated to handle policy aspects Make decisions that may affect implementation of environment and social safeguards issues
Surveyors Registration Board	Sector Institution	Regulates professional conduct of surveyors and valuers involved in Project-related land acquisition activities.
District Local Governments (RDCs, CAOs, LC5s, Mayors)	Institutional Stakeholders	Responsible for local governance, coordination, mobilisation, security oversight, and participation in grievance management.
District Technical Teams (DTTs)	Institutional Stakeholders	Provide technical support on land administration, physical planning, agriculture, health, and social development matters.
District Land Boards and Area Land Committees	Institutional Stakeholders	Responsible for land valuation oversight, land dispute resolution, and customary land verification.
Sub-county Technical Staff (SAS, CDOs, Health Assistants)	Institutional Stakeholders	Support community mobilisation, social services, public health, and grievance handling at local level.
Grievance Management Committees, LCIII and LC1 Leaders	Community structures / Representatives	Act as key links between communities and the Project for mobilisation, verification of PAPs, and grievance redress.
Cultural and Religious Leaders	Community Influencers	Influence community norms, support dispute resolution, and facilitate engagement on cultural heritage and social cohesion issues.
Civil Society Organisations (CSOs) and Non-Governmental Organisations (NGOs)	Civil Society Stakeholders	Represent community, environmental, and vulnerable group interests. CSOs/NGOs may support stakeholder mobilisation, independent monitoring, biodiversity and natural habitat conservation, environmental awareness, Gender-Based Violence (GBV) prevention and referral pathways, livelihood restoration, and social accountability during Project preparation and implementation

Stakeholder Group	Engagement Category	Relevance / Rationale
Media (Radio, Television, Print and social media)	Communication Channels	Dissemination of Project information, public notices, and stakeholder feedback.
UNHCR	Institutional Stakeholders	Collaborating with the government on refugee-related issues. Look out for associated impacts to refugees and associated impacts – social risks such as GBV/SEA, child rights, benefits to refugees and host communities.
International NGOs	Institutional Stakeholders	Protection of rights vulnerable and marginalized groups and associated impacts – social risks such as GBV/SEA, child rights, benefits to refugees and host communities. + other related mandates associated with transport + social risks
Local Businesses and Contractors	Private Sector Stakeholders	Potential service providers and employers; interface with communities on employment, traffic, and service delivery issues.
Contractors and construction companies	Private Sector	Information on participation in business opportunities
Suppliers and vendors of goods and services	Private Sector	Information to participating in business opportunities

2.1.4. Disadvantaged / vulnerable and marginalized individuals or groups

Certain individuals and groups may be disproportionately affected by the Project or may face barriers to participation in consultation, compensation, livelihood restoration, and grievance redress processes. In the context of this Project, vulnerability may arise due to gender, age, disability, household composition, social exclusion, or exposure to specific environmental and social risks, including those associated with land acquisition, livelihood disruption, labour influx, and community health and safety.

The Environmental and Social Impact Assessments (ESIA) under component 1 and scoping reports for facilities under component 2 and 3 identified that resettlement-related impacts, community safety risks, and gender-based risks may affect some groups more severely than others. The Project will therefore apply targeted and inclusive engagement measures, and where necessary, additional assistance, to ensure that disadvantaged or vulnerable individuals and groups are able to participate meaningfully in Project processes and access Project benefits on an equitable basis.

Table 2-3: Disadvantaged, Vulnerable and Marginalized Individuals and Groups

Disadvantaged / Vulnerable Group	Applicable to Component 1,2 & 3	Relevance / Rationale to SEP
Women and Girls	All components	<p>Women may encounter challenges in participating in decisions about land, compensation, and livelihoods, and are at greater risk of livelihood disruptions. There are also increased risks of Gender-Based Violence (GBV), including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), especially with labor influx. Targeted engagement is needed to ensure women can safely participate and access project benefits.</p> <p>Girls may have less access to education and face higher risks of sexual exploitation and abuse due to social norms and labor influx. The Project will provide age-appropriate engagement, protective measures, and work with child protection services to prevent harm and exclusion.</p>
Widows	All components	May be directly affected by land acquisition and livelihood impacts and face heightened risks of exclusion or intra-household disputes over compensation and assistance
Youth with limited access to opportunities / unemployed	All components	Youth may be affected by livelihood impacts and may face limited employment opportunities. Engagement will focus on access to information on Project-related employment, skills development, and community safety, while discouraging involvement in risky or harmful activities.
Female-Headed Households / Widows	All components	Female-headed households, including widows, may face economic vulnerability, limited access to resources, and risks of exclusion from compensation due to intra-household or extended family dynamics. These households may require targeted support, including assistance with documentation and access to grievance redress mechanisms.
Child-Headed Households	All components	Child-headed households may face significant barriers in accessing compensation, livelihood support, and legal documentation, particularly in areas affected by HIV/AIDS-related mortality. Special engagement and coordination with social welfare institutions will be required to protect their rights and interests.
Children	All components	Children may be exposed to risks such as child labour, sexual abuse, and road safety hazards during construction. Engagement will include community awareness, school-based safety programmes, and coordination with relevant child protection authorities.
Persons with Disabilities (PWDs)	All components	Persons with disabilities may face physical, communication, and social barriers to participation in consultations, compensation processes, and grievance mechanisms.

Disadvantaged / Vulnerable Group	Applicable to Component 1,2 & 3	Relevance / Rationale to SEP
		Women and elderly persons with disabilities may face compounded vulnerability. Engagement methods will be adapted to ensure accessibility and inclusion.
Elderly Persons	All components	Elderly persons, particularly those heading households, may experience challenges in attending meetings, understanding procedures, or accessing compensation. Targeted assistance and adapted communication approaches may be required.
People living with HIV/AIDS or other serious health issues.	All components	PLWAIDS, may experience challenges in attending meetings, especially if bedridden or facing stigma. Targeted assistance and adapted communication approaches may be required.
Indigenous Small-scale traders and vendors at roadside markets	Mainly component 1&3	Economic displacement or loss of livelihoods due to project activities. May be excluded from to new emerging opportunities / benefits from new market and infrastructure facilities, unless special attention and support provided and involved in SEP
Refugees in settlement areas project areas in KYM districts	Components 2 & 3	May be excluded from access to information to new emerging opportunities / benefits from new market and infrastructure facilities, unless special attention and support provided and involved in SEP. More at risk of GBV/SEA and other associated social risks
Refugee-hosting communities within the project area with limited opportunities	Components 2 & 3	May be excluded from to new emerging opportunities / benefits from new market and infrastructure facilities, unless special attention and support provided and involved in SEP
Most poor and vulnerable	All components	households in the project area: They may be impacted by the project and may require special attention and support
Vulnerable or marginalized individuals or groups	All components	Vulnerable or marginalized individuals or groups may suffer discrimination against or exclusion in providing or receiving benefits from the Project. These may require focused engagement as needed and appropriate including tailored meetings and workshops supported through enhanced implementation support and monitoring undertaken throughout project implementation.

3. CHAPTER THREE: STAKEHOLDER ENGAGEMENT PROGRAM

3.1. Summary of stakeholder engagements undertaken during preparation of NERAMP II

This chapter details the Stakeholder Engagement Programme, outlining past and future stakeholder engagement activities across the Project lifecycle. In accordance with the World Bank Environmental and Social Standard 10 (ESS10), the programme ensures early, continuous, inclusive, and meaningful engagement with Project-Affected Parties, Other Interested Parties, and Disadvantaged or Vulnerable Groups. Building on previous consultations, the Stakeholder Engagement Programme informs the ESIA, Resettlement Policy Framework (RPF), and the SEP, integrating concerns such as land acquisition, livelihood impacts, community health and safety, employment opportunities, gender-based risks, grievance management, and information disclosure into its strategies and mitigation measures. The chapter summarizes engagement activities and key issues raised to date, sets out planned activities for upcoming phases including RAP preparation and implementation, construction, and operation and explains the process for documenting, responding to, and incorporating stakeholder feedback into project decision-making to maintain transparency, accountability, and adaptive management.

From the initial development of NERAMP I in 2020 through to the preparation of NERAMP II in 2026, a series of stakeholder meetings were held throughout the proposed project area. These consultations supported key preparatory activities, including pre-design and pre-construction phases, development of the ESIA, RAPs, the GBV/SEA Action Plan, and the SEP. The documented engagements were pivotal in identifying stakeholder concerns, informing impact assessments and mitigation strategies, and shaping the approaches outlined in the SEP.

The consultations covered all project locations, including component 1 (Tororo–Mbale–Soroti section) as well as components 2 and 3 (Koboko–Yumbe–Moyo districts). These engagements involved district and sub-county leaders, technical officers, community representatives, and residents from potentially affected communities. Specifically, for component 1—which builds on the ongoing road rehabilitation, operation, and maintenance efforts started under NERAMP I and currently contracted to Mota-Engil through February 2027—stakeholder engagement activities were conducted continuously from 2020 through 2025. These sessions helped inform the pre-design, pre-construction, ESIA, abbreviated resettlement action plans, GBV/SEA action plan, and the SEP. The most recent consultations occurred in February 2026, involving stakeholders from local communities to district level, with the aim of sharing project design information and addressing participant concerns. The MoWT has relied on information gathered from these engagements to prepare the SEP, ensuring stakeholder concerns and mitigation measures shape the engagement programme for component 1.

Priority issues from these consultations included sharing technical design information, addressing project impacts, ensuring local content, access to employment opportunities, project benefits, fair compensation and resettlement processes, and avoiding land-use restrictions. Additional concerns involved risks of gender-based violence and sexual abuse, HIV/AIDS prevention, grievance management, and access to information. A summary of these issues is presented under table 3-1 below.

For components 2 and 3, over 256 stakeholders were consulted between July 2025 and January 2026 in 13 meetings, supplemented by a desk review of concerns raised in earlier consultations from 2022. Key issues highlighted for these components included inadequate market infrastructure, ambiguous land ownership, environmental and social impacts such as soil and air pollution, cultural site destruction, safety risks, labour influx, GBV/SEA, and HIV/AIDS. Stakeholders stressed the importance of continuous engagement, prioritization of local employment, and robust measures to prevent GBV/SEA. The integration of urban physical development plans, protection of women and children's rights, and gender-responsive recruitment were identified as crucial. These discussions also emphasized the need for inclusive planning and implementation, particularly for vulnerable groups such as refugees, women, unemployed youth, and children, to avoid exclusion. A summary of these issues is provided in tables 7,8 and 9 below. All identified issues have been incorporated into the SEP's engagement strategies, disclosure approaches, grievance mechanisms, and inclusion measures to be addressed throughout the project.

3.1.1 Summary of stakeholder engagements undertaken under the project

Tables 3-1 and 3-2 below present a summary of some of the consultations previously undertaken in the project area. These engagements, held at community, sub-county, and district levels, played a key role in shaping the preparation of the SEP. Further consultations are planned prior to the project's effectiveness.

Table 3-1: Summary of stakeholder engagements conducted under component 1 (Tororo-Mbale-Soroti)

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
1. Nursery Operators	24 Feb 2026	Mbale Weighbridge	4	Identification of PAPs concerns, livelihoods, and communication preferences
2. UWEC Project Engineer	24 Feb 2026	Telephone	01	Validation of impacts, relocation of PAPs affected by UWEC construction activities including access construction within existing MOWT road reserve
3. Nursery Operators and leaders	21Feb 2026	Mbale Weigh bridge (Km 46)	26	Updates on project status and forthcoming activities including RAP preparation.
4. NFA/ MOWE field staff	21 Feb 2026	NFA/MOWE Mbale Field Office	3	Working arrangements agreed with UWEC in establishing the UWEC Mbale centre, relocation of PAPs and livelihoods restoration support activities

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
5. District Community Development Officer (DCDO), Probation officer, Labour officer, Gender officer and staff of MOWT, PMMC and the Contractor.	12 Feb 2026	Bukedea District	13	Validation of impacts, disclosure preferences, RAP (Nalugayi quarry) and SEP inputs.
6. Leaders in Kongunga town council i.e. The town clerk, CDO, town agents, LC1s from the 3 cells, MOWT, PMMC and the Contractor.	12 Feb 2026	Kongunga Town council	23	SEP validation and input into proposed Nalugai quarry (data collection on artisan minors).
7. Chief Administrative Officer, DCDO, The MOWT Filed staff, the Consultants team	11 Feb 2026	Bukedea District	7	District coordination, land administration, grievance handling, validation of SEP and input in proposed project impacts, updating of ESIA
8. High field Nursery and primary school, Opuyo Nursery and primary school, Awoja bridge primary school.	17 - 20 of Feb 2026	Soroti District: High Field, Opuyo and Awoja bridge primary schools	305	Input into SEP and expected impacts on road safety concerns and safety sensitizations in schools
9. Landowners for stockpiles (Soroti and Ngora)	8 Jan 2026	Km 141 and 119 in Soroti and Ngora District	7	Engaged the landowners for the renewal of lease contract for the stockpiles at km 119 and 141, and restoration of the sites
Total			382	

Table 3-2: SUMMARY OF engagements conducted under component 2 and 3

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
1. JICA, districts and town council technical officials for Koboko, Moyo and Yumbe districts - town mayors, town clerks, physical	19 Jan 2026	Yumbe base camp	35	Engaged stakeholders in defining selection criteria for town roads and access roads to the Bidibidi refugee settlement, Conducted focused group discussions to assess potential impacts during the scoping phase. The

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
planners, CDOs, environmental officers, secretaries for works, superintendents of works, district/town council engineers				engagement approach and preferred communication channels were incorporated into the Stakeholder Engagement Plan (SEP).
2. Koboko district leaders, Koboko town council, Nyai sub-county and Abuku sub-county leaders	16 Feb 2026	Koboko town council	42	Engagement on scoping and ESIA studies for the town roads, including a rapid appraisal of NERAMP 2 preparatory progress, SEP preparation, and planning for future activities.
3. Yumbe district leaders, Yumbe town council political and technical leaders, Apo sub-county and Kotchi sub-county	16 Feb 2026	Yumbe town council	27	Engagement on NERAMP2 project preparations – project sites selection, scoping and ESIA studies for the town roads and rapid appraisal of NERAMP 2 including SEP preparation
4. Koboko district leaders, Moyo town council, Lefori sub-county	16 Feb 2026	Moyo town council	39	Engagement on NERAMP2 project preparations – project sites selection, scoping and ESIA studies for the town roads and rapid appraisal of NERAMP 2 including SEP preparation
5. Yumbe District Technical Team	30 Jan 2026	Yumbe district	10	Engagement with district officials over proposed town roads, preparation of Scoping reports and SEP preparation
6. Moyo District and town council technical authorities	30 Jan 2026	Moyo district	04	Engagement with Moyo District and Town Council Technical Team over proposed town roads, selection criteria, environment and preparation of scoping reports and SEP preparation
7. Koboko District and town council technical authorities	22 Jan 2026	Koboko district	06	Consultations over proposed town roads, roadside station and roadside market as well as preparation of scoping reports and SEP preparation

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
8. Yumbe (local and sub county leaders, Parish Chief – Kotchi Sub-county, Land Owner, GMC members, LC1 – Bagdad Village, LC3-Kotchi Sub-county, Community members of Bagdad Village, Kotchi Parish, Kotchi Sub-county.	10 Dec 2025	Yumbe	30	Site identification and valuation of land for vending station
9. Yumbe District Local Leaders: SA-CAO Kotchi Sub- County, LC1 Bagdad Village, Landowner	17–18 Nov 2025	Yumbe	03	Consultation and verification of the proposed Roadside station and Surveying of the Land.
10. Yumbe District Technical Committee, Apo Sub-county Leaders i.e. LC3,	17 Nov 2025	Apo Sub County	08	Engagement on proposed roadside market.
11. Yumbe District technical Team and Apo Sub-county	14–16 Jul 2025	Apo Sub County	24	Engagement with leadership on scoping environment and social issues of the proposed road side market.
12. Office of the Prime Minister (OPM), United Nations High Commission for Refugees (UNHCR) and Ministry of Lands, Housing and Urban Development (MoLHUD)	2022	Koboko Yumbe Moyoa	8	Consultations on proposed project
13. Koboko District leadership, sub-county and community leadership including women and youth leaders	2022	Koboko Yumbe Moyoa	20	Initial disclosure of planned projects and SEP preparation, the inception and scoping reports for the RAP and ESIA respectively
Total # stakeholders			256	

Table 3-3: Key Issues Raised During Stakeholder Engagements and how they were addressed

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design
Project benefits	Economic opportunities - Increase in economic potential and connectivity to service centres	MOWT / DLGs will disseminate economic benefits during SEP implementation channels.
Local employment opportunities	Will the locals be employed on the project. What other benefits are available to locals	The MOWT will encourage contractor to prioritise local employment for locals in accordance with LMP.
Improved Market infrastructure	Potential for increased vending and economic activity in markets Improved connectivity and accessibility Attracting investors and opening up development in suburbs	Keep stakeholder engaged as part of local content. Embedded in SEP
Selection criteria for market sites	What is the selection criteria for market sites	MOWT will develop and implement criteria for selecting markets in consultation with key stakeholders mainly DLGs and town councils. Will engage stakeholders as per SEP.
Technical designs	Designs for markets and roadside stations not disseminated, Limited input of local people into designs	MOWT will disseminate proposed road designs to districts, town councils and local leaders for their input. Ongoing engagements included in SEP program such as meetings, one-on-one interactions, shared written briefs and other communication methods
Technical designs	Include waste management facilities and sanitation facilities for the disabled	Same as above
Composition of ESIA team	The external ESIA team should be comprised of key experts for a comprehensive assessment of all anticipated impacts and well-coordinated with project and district / town council technical teams	MOWT will ensure all experts coordinate with MOWT PIUs and designated project teams. MOWT to ensure ESIA teams engage project and district / town council technical teams including sharing ToRs and joint working during field data collection. Ongoing engagements with project and other government experts integrated into SEP
Roadside market inclusive designs	<p>Need to integrate the following concerns in the designs:</p> <ul style="list-style-type: none"> - toilets and sanitation facilities for vendors. - nearby water sources may be affected. - No clear access road to market - Cooling rooms in the design. - parking space for loading and offloading. - lighting system in design. - changing rooms in the design. - Waste management facility. 	Markets and rest stations will incorporate these services in the design. MOWT PIU to continuously engage stakeholders as per SEP

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design
	- Markets should have baby care centres	
Land acquisition		
Unclear land ownership and management for roadside station	Effective consultation and engagement required	MOWT will engage more with district, local leaders and other stakeholders on the issue. Ongoing engagements incorporated in SEP planning and implementation
Land tenure issues	Land tenure is customary and not managed by local governments, but clan leaders	Consultation will be conducted with clan leaders and LG officials Valuation surveys to separate landowners from land users Compensation will ensure that both landowners and land users are paid for what they own.
Land acquisition for markets	Land acquisition for markets by the districts or town councils, should ensure a clear, transparent process is followed and titles secured to avoid future elections by landowners	MOWT in consultation with DLGs agreed that DLGs/ Town Council land acquisition will be their responsibility and should ensure encumbrance free possessions before commencement of project works
Voluntary land donations / consents	Land acquisition process for roadside stations and markets is not yet complete	MOWT will ensure land acquisition, compensation and re-location and resettlement of PAPS (if any), conform to with ESS5, including verifiable consents for land donation.
Land documentation	Screening of proposed land for markets and other infrastructure should be well-documented	All land donations -consent agreement should be clear on the nature / perpetuity of land transfers for roadside markets and other infrastructure
Voluntary Land Donations	Land consent agreements should be clear, permanent land acquisition not temporary voluntary land donations to avoid eviction of markets and roadside stations in future	MOWT will ensure all voluntary land donation/ consent agreements are very clear to the land donors / owners and are not by coercion through direct engagement / verification with the owners before proceeding with any project. Engagements for land acquisition embedded in SEP
Land compensation	DLGs don't have updated compensation rates	The project will consult further the DLGs about updated compensation rates. Where these are not present, neighboring districts updated rates eg Arua may be utilized to adopt compensation rates
Fair and timely compensation	Unfair compensation issue	Compensation will be aligned with ESS5 The project will ensure timely compensation at full replacement cost.
Information access on valuation in SEP	There will be need for clear information on valuation process and compensation rates	PAPS, communities, community and district leaders to be informed about the property valuation process · Provided for in SEP
Roadside market at Kerira	Land for market is being acquired by Yumbe district, and the titling process kick started	MOWT monitor, engage DLGs / Town councils to ensure compliance with ESS 5 and ESS 10

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design
Business disruption	Construction works are likely to disrupt town vending and traffic	MOWT will ensure construction works limit negative impacts on businesses and traffic flow, with well implemented ESMPs in place with active stakeholder engagements as per SEP
Priority allocation of market stalls / spaces to existing Vendors	Existing market vendors may not be prioritised after-market construction	MOWT closely working with DLGs and Town councils to ensure existing market vendors are properly registered pre-project implementation and given first priority in new stalls/ space allocation upon project completion
Guidelines for occupancy for new markets	Modalities of occupancy for new markets not disseminated	MOWT will closely link with DLGs and town councils to ensure guidelines / modalities will be developed and made integral to SEP program – meetings and other communication channels
Sensitive receptors	Sensitive receptors such as health centres, schools, rivers, waters sources	Scoping consultant to undertake focused and intensified stakeholder engagements on selected roads across the 3 towns and access roads. Sensitive receptors will be comprehensively scoped and assessed with meaningfulness of all relevant stakeholders. MOWT will ensure all assessed risks and mitigation measures are integrated SEP activities and implemented
Composition of ESIA team	The external ESIA team should be comprised of key experts for a comprehensive assessment of all anticipated impacts and well-coordinated with project and district / town council technical teams	MOWT will ensure all experts coordinate with MOWT PIUs and designated project teams. MOWT to ensure ESIA teams engage project and district / town council technical teams including sharing ToRs and joint working during field data collection. Ongoing engagements with project and other government experts integrated into SEP
Air pollution	Anticipated dust and noise pollution during construction of markets and roadside stations	Integrate components of ESMP in SEP. Integrate identified risks and mitigation measures in SEP.
Flooding / drainage blockages	Market and roadside stations construction may lead to flooding / wiyart stagnation due to blocked drainage channels leading to malaria	Integrate identified risks and mitigation measures into contractors ESMPs and SEP and implementation of SEP program - meetings and other communication channels
Social Ills associated with GBV/SEA, HIV/AIDS, Social Ills of refugee and labour influx, increased prostitution	High risk of social ill, including prostitution, drug abuse and gender-based violence in the proposed works due to high refugees, business influx and labour influx	MOWT will ensure there are measures to manage labour and population influx included in the ESMP, GBV/SEA action plan, HIV/AIDS plan and SEP

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design
Vulnerable Groups	Market design to integrate the needs of vulnerable groups such as Install rails for PWDs for markets	SEP integrates issues of vulnerable groups and will implement ongoing SEP activities – targeted meetings, one-one meetings for vulnerable and marginalized groups
Management of roadside stations and markets	The marketing management committee is in place. Project should ensure there is proper management plan before and after markets construction for orderly allocation of markets stalls	Integrate management structures in SEP and continuously engage the districts, town councils and market committees.
Access to market sites	The selected site for Kelira market is not accessible, i.e. the proposed market has no access road, parking space for loading and offloading	MOWT will address issue of access as part of project design and scope through planned engagement channels as per SEP
GBV /SEA risks	GBV/SEA key concern in the refugee setting	A GBV/SEA/SH action plan will be developed and implemented throughout the project. This will contribute to the management of GBV issues. Workers will be required to sign a CoC A nominated service provider will be engaged to conduct both community and workers sensitizations.
Project GRM	Elaborate on the multi-tier project GRM	<ul style="list-style-type: none"> • MOWT will operate a four -tier GRM – community level, sub county -level, district level and MOWT-PIU level with a liberty for judicial redress.
Stakeholder engagement and communication	<p>Need for effective consultation and engagement</p> <p>Involved municipal, sub-county, cultural, and clan leaders in consultations</p>	<p>Ongoing stakeholder engagement activities have been embedded in SEP. Town authorities, clan leaders, and vulnerable and marginalized groups to be consulted throughout the implementation of the project.</p> <p>Continuous consultations · Continuous community sensitization</p> <p>· Community members, road users, and local leaders to be involved in consultations</p>
Women and child rights	Protection of women and children's rights	These to be done through sensitization and IEC materials. Vulnerable groups integral to SEP
Labour influx	Impact of construction workers on family and social relations	The project will prepare and implement an LMP including a workers' GRM, sensitization for workers and the community.
Safety and security related	Risk of child labour, accidents, and SGBV near schools	No children below the age of 18 will be employed on the project, road safety sensitization will be conducted throughout the project. A nominated service provider will be engaged to conduct GBV sensitization throughout implementation of the project. All communities will be engaged in child labour.

Note: Comprehensive records of all issues raised, comments received, and corresponding responses are provided in Annex 1.

3.2. Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement.

The Stakeholder Engagement Plan below outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Table 3-4: SUMMARY SEP PROGRAM - NERAMP II

Project stage	Target stakeholders	Topic of consultation / message	Method for Information Disclosure	Responsibilities	Frequency/Timeline
Prior to construction					
Design	Community members plus vulnerable and marginalized groups and individuals	Risks and impacts identified and mitigation measures to be implemented, Next steps in project preparation, how labor will be managed, how they can participate, channels for community engagement, how grievances will be managed, GBV/SEA/SH management plan and safety management measures.	<ul style="list-style-type: none"> Public/ community meetings Joint project – community site inspections Radio shows Project brochures Corporate websites Phone calls 	<i>MOwT including the contractor and consultants Environment and social team</i>	<i>Prior to final design approval and construction works</i>
Design	Districts / City Local government level:	Project design disclosure consultation, and feedback on necessary adjustments to address expressed needs	<ul style="list-style-type: none"> Meeting at city and local levels 	<i>MOwT Contractor – Engineering Safeguards, ROW Teams</i>	<i>Prior to final design approval and construction works</i>
Design	Government institutions District and Subcounty leaders	To disclose Project design, preparation of E&S assessments, Present impacts identified and plans to be implemented to manage them, activities to be implemented and consulting if any adjustments are required for given sites, define the coordination team	<ul style="list-style-type: none"> Meetings at national level Meetings at District levels Meetings at Sub-county levels. 	<i>MOwT and social consultants</i>	<i>Prior to final design approval and construction works</i>

Project stage	Target stakeholders	Topic of consultation / message	Method for Information Disclosure	Responsibilities	Frequency/Timeline
Preparation and update of instruments	Government institutions, NGOs and CSO, Local governments, Land boards NEMA, local communities as listed above including refugees	identified impacts and mitigation measures to be implemented, ESIA findings and certificate and RAP	<ul style="list-style-type: none"> Meetings Public consultations Disclosure on final reports by MoWT, NEMA, WB Circulation of the reports with district 	MOWT/PIU / Contractor – Safeguards, Engineering Teams	Prior to finalization of the instruments, designs and commencement of construction
RAP Preparation / Update					
Introduction of the commencement of Valuation and resettlement.	Ministry Lands Housing and Urban Development: Office of the chief Government Valuer, local leaders, community members plus vulnerable and marginalized groups and individuals	<p>Communicate the project start date and provide details regarding upcoming work activities.</p> <p>Organize and coordinate public consultations with community members to ensure their active participation and address any concerns.</p> <p>Survey and valuation activities.</p> <p>Compensation principles, entitlement matrix and disclosure of compensation</p> <p>Present the Grievance Redress Mechanism (GRM) to stakeholders and oversee its effective implementation and ongoing operation.</p>	<ul style="list-style-type: none"> One-on-one meetings Community meetings Community radio announcements 	MOWT/PIU / Contractor – Safeguards, ROW Teams	Prior to resettlement or entry into the community

Project stage	Target stakeholders	Topic of consultation / message	Method for Information Disclosure	Responsibilities	Frequency/Timeline
Implementation of RAP	local leaders and PAPs	<p>Communicate the schedule and methods for conducting the census of PAPs, including timelines and procedures, to ensure transparency and participation.</p> <p>Explain how asset and land valuation will be performed</p> <p>Describe how gender considerations are being incorporated into the RAP.</p> <p>Entitlement packages</p> <p>Participation of PAPs in valuation</p> <p>GRM purpose and channels</p> <p>Presentation of strip maps and gather feedback, compensation options</p> <p>Resettlement arrangements, livelihood restoration activities, relocation assistance and timelines</p>	<ul style="list-style-type: none"> • Community meetings; • targeted household visits • Engagement through local leaders • Disclosure of draft RAP • Radio announcements • Brochures 	<p><i>MOWT/PIU</i> /</p> <p><i>Contractor</i> –</p> <p><i>Safeguards,</i></p> <p><i>Engineering Teams</i></p>	<p>During RAP preparation and implementation; household level</p>
PRE- CONSTRUCTION					

<p>Pre-construction</p>	<p>Community members, vulnerable and marginalized individuals and groups, local leaders, District / City Leaders, NGOs/CBOs, religious and opinion leaders</p>	<p>Final road designs, Construction schedule, community health and safety measures, GBV/SEA/SH prevention and GRM</p> <p>Information on commencement of the construction, explaining how it will be carried out.</p> <p>Information on impacts that can be expected, reinforcing information provided about the ESIA, measures that will be taken, reinforcing information on the different plans that will be implemented (labour management plan: job opportunities and Code of Conduct; GBV plan, health and safety regulations, SEP, among others).</p> <p>Information on accesses to be built, including accesses outside of the wayleave.</p> <p>Information on temporary relocation of vendors from the vending stations.</p> <p>Inform about the accesses that will be restricted for people</p> <p>Information on clearance of trees and vegetation.</p> <p>Information on GBV and violence against children: risks and measures to be taken.</p> <p>Information on Job opportunities and GRM</p>	<ul style="list-style-type: none"> • District / city workshop / meetings • Community meetings; • Radio talk shows 	<p><i>MOWT/PIU / Contractor – Safeguards, Engineering Teams</i></p>	<p>Before contractor mobilization;</p>
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Project stage	Target stakeholders	Topic of consultation / message	Method for Information Disclosure	Responsibilities	Frequency/Timeline
CONSTRUCTION / Rehabilitation, Mobilization for Works					
+Construction phase	Leaders – Districts / Cities, Leaders of the GMCs, LC 1/ villages and LCIII	<p>Project Launch, scope of works, associated ESHS</p> <p>Progress on RAP implementation</p> <p>Status on grievances. grievances received, responses given.</p> <p>Potential impacts and measures.</p> <p>Relocation of vendors Accesses closure.</p> <p>Information on dust and noise.</p> <p>Health and safety awareness programs.</p> <p>GBV and VAC, HIV/AIDs sensitizations</p> <p>Results of awareness campaigns among workers and the community about the gender violence risks, including spread of HIV/AIDS and unwanted pregnancies.</p>	<ul style="list-style-type: none"> • Community meetings; • Radio announcements • Notice boards 	<i>MOWT/PIU / Contractor Safeguards, GBV/SEA Engineering Teams</i>	Continuously throughout the construction – daily, weekly, monthly as needed

Project stage	Target stakeholders	Topic of consultation / message	Method for Information Disclosure	Responsibilities	Frequency/Timeline
Construction phase	GMC Leaders / LC Local Leaders (special targeting as facilitators of GRM)	Training / refresher on GRM, Project issues, problem solving, site Regular updates on GRM actions, information / skills / knowledge empowerment trainings	<ul style="list-style-type: none"> • Phone calls • One-one GMC meetings • Joint GMC meetings • Periodic GMC trainings • Site inspections 	MOWT/PIU / Contractor – Safeguards Teams	Weekly, Monthly and quarterly as needed
Construction phase	Contractors and workers.	Workers engagement on Code of Conduct, relationship with communities and GRM awareness	<ul style="list-style-type: none"> • Training during the induction • Trainings / sensitisation meetings throughout the construction phase including weekly toolbox talk meeting. 	MOWT/PIU / Contractor – Safeguards Teams	Induction at the beginning of the construction in each new community or new staff recruitments, . Monthly refreshers to workers
	Other Interested Parties – CSOs, National Agencies, Media	Inform on: about the construction activities, benefits and consultation channels including GRM	<ul style="list-style-type: none"> • Periodic communication campaigns through a publication, MOWT website, email circulation, • Special visits to the project with the media and key institutions as pre-arranged 	MOWT PIU Management and communications team.	Quarterly or any other as need arises

Project stage	Target stakeholders	Topic of consultation / message	Method for Information Disclosure	Responsibilities	Frequency/Timeline
OPERATION PHASE					
Operation	District /City Authorities	Maintenance schedule information	<ul style="list-style-type: none"> • Notices / project briefs • Letter • Meetings • Emails 	<i>MOWT/PIU / Contractor- Engineering and – Safeguards Teams</i>	<p>Prior to maintenance activities; monthly, quarterly as needed below</p> <p>At the end of the construction/start of operation / maintenance for the introduction of the new phase.</p> <p>Quarterly to inform about the project, the maintenance activities and deal with social, health and safety issues.</p> <p>According to grievances throughout the operation.</p>
Operation	<p>Communities / PAPS along the road corridor including targeted Vulnerable plus Marginalized individuals and groups</p> <p>Leaders of the GMCs, LC 1/ villages and LCIII</p>	Maintenance schedules, safety information, land-use restrictions within the RoW, Grievances handling procedures, GBV/SEA, HIV/AIDS	<ul style="list-style-type: none"> • Radio announcements; community meetings. • Notice boards • Letters of information. • Meetings with leaders. • Workshops directed to the population. 	<i>MOWT/PIU / Contractor – Safeguards, Engineering Teams</i>	

Project stage	Target stakeholders	Topic of consultation / message	Method for Information Disclosure	Responsibilities	Frequency/Timeline
	Contractors and workers.	Inform and educate on: Code of Conduct, relationship with communities. GRM for communities. How to channel consultations and grievances. Gather their feedback. Role of the safeguards teams. Social conflicts prevention.	<ul style="list-style-type: none"> • Training during the induction. • Training / sensitisation meetings throughout the construction phase including weekly toolbox talk meeting. 	<i>MOWT/PIU / Contractor – Safeguards Teams</i>	Induction at the beginning of the construction in each new community or new staff recruitment, Monthly refreshers to workers
	Civil society organizations and media	Inform and coordinate joint work on: Objectives and justifications of the Project. Importance of the Project for the development of the region. Socioeconomic benefits. Development of E&S Plans and Programmes, presenting results in terms of performance indicators. Information on channels for consultations and complaints. Contact channel for consultations and complaints.	<ul style="list-style-type: none"> • 	Communication team	

3.3. Proposed strategy to incorporate the views of vulnerable groups

The project recognizes that women and vulnerable and marginalized groups, including children, people with disabilities, elderly persons, and refugees, often face significant barriers in accessing information and participating in decision-making processes. To address this, the project has identified and analyzed the needs of these groups and will implement targeted measures to ensure their active engagement and participation.

The project will assess the situation of women and identify vulnerable individuals and groups through comprehensive assessments, including the RAPs, ESIA, Gender-Based Violence/Sexual Exploitation and Abuse (GBV/SEA) risk analysis, and dedicated vulnerability analyses. A specialized team with expertise in social communication and psychosocial support will build trust with vulnerable groups by maintaining ongoing, personalized interactions. Additionally, the project will collaborate with established structures such as Local Council 1 and 3, local governance bodies, and non-governmental organizations (NGOs) to effectively inform, consult, and engage with vulnerable communities.

Key engagement strategies include one-on-one interviews, focus group discussions, home visits, and use of trusted community intermediaries will be utilized. The project will also provide information in clear and accessible formats, using local languages and translation services, and ensure representation of vulnerable groups in the Grievance Mechanism (GM). Differentiated spaces for participation will be created, including specific meetings for women and children, to ensure that vulnerable groups can participate without intimidation.

The project will prioritize the participation of women and vulnerable groups in decision-making processes, including consultations related to land acquisition, compensation, resettlement, and livelihood restoration. Women's groups and representatives will be engaged on an ongoing basis to promote gender equality and inclusive decision-making. The GM has been designed to be accessible, safe, and responsive to vulnerable and marginalized groups, with multiple intake channels for submitting grievances confidentially and without fear of retaliation.

By implementing these strategies, the project aims to ensure that vulnerable and marginalized groups are not only informed but are active participants in shaping project decisions and outcomes, consistent with World Bank Environmental and Social Standard 10 (ESS10). The project will adapt engagement methods to address specific communication, accessibility, and participation needs, including language preferences, literacy levels, mobility constraints, and gender-sensitive considerations.

The project's engagement with vulnerable populations is a crucial aspect of its implementation, and it will be carried out throughout the different cycles of the project.

Pre-Construction Phase:

The focus will be on resettlement and incorporating vulnerable populations into the decision-making process. This will involve identifying families and individuals in situations of vulnerability, determining the best ways to engage with them, and coordinating with those who exercise power over them to ensure their participation. The project will employ a range of targeted strategies to engage vulnerable populations, such as conducting one-on-one interviews, organizing focus group discussions, and facilitating workshops. These efforts will ensure that vulnerable individuals and groups not only have access to relevant and clear information but are also made fully aware of the Grievance Mechanism (GM) and how to utilize it. The project team will verify that these populations can participate actively and safely in project-related processes, adapting engagement methods to address their specific needs, including language, literacy, and mobility considerations, while maintaining regular communication and providing accessible channels for feedback and concerns throughout all project phases.

Construction Phase:

MoWT social team and RAP consultant will identify any negative impacts that may disproportionately affect vulnerable and marginalized groups and will map these impacts to the groups affected. Once this mapping is complete and the general engagement strategy is in place, the team will ensure these populations receive pertinent information and have accessible channels to express concerns. Ongoing monitoring will assess how these groups are being impacted, with particular attention to keeping vulnerable populations informed about the GRM and maintaining regular contact during construction. Should any issue arise that harms any vulnerable or marginalized group, it will be addressed promptly. Additionally, MoWT will proactively inform vulnerable groups about available opportunities such as jobs or the provision of services, ensuring they know, in a timely manner, what benefits they can access and the steps required to do so.

Operation Phase:

Throughout the operational phase, the responsible team will actively identify information that is especially important for vulnerable and marginalized groups and individuals, ensuring that these groups have access to it. The team will also provide clear explanations about the GRM, making sure that vulnerable populations understand how it functions. Regular visits will be scheduled at least twice a year to check whether these groups have concerns or issues that need to be addressed. In addition, when organizing health and safety trainings, the team will assess which groups are most at risk and design targeted sessions to address their specific needs.

3.4 Review of Stakeholder Concerns, comments and Feedback

Stakeholders will constantly be consulted and engaged at all stages of project preparation and implementation activities including pre-construction phase, ESIA and RAP preparation, detailed project design such a joint inspection with technical teams, and implementation phase engagement activities.

The Project will systematically collect, review, analyze, and use stakeholder comments, concerns, and suggestions to inform Project design, implementation, and adaptive management throughout the Project lifecycle. Inputs will be gathered through multiple engagement channels, including community meetings, Focus Group Discussions (FGDs), consultations with local authorities, and records from the Grievance Mechanism (GM).

All stakeholder inputs will be consolidated and maintained in a Stakeholder Feedback and Comments Register, managed by the Project Implementation Unit (PIU) Social Safeguards Team. The register will record the source of the feedback, the issues raised, the Project's response, actions agreed or taken, responsible parties, and the status of follow-up. This process will enable the Project to track emerging concerns, identify trends, and adjust engagement and mitigation measures as necessary.

Stakeholder feedback will be actively used to:

- Refine Project design and implementation arrangements.
- Inform the development and updating of environmental and social mitigation measures, including RAP and ESMP measures.
- Improve communication approaches and engagement methods.
- Identify additional support needs for vulnerable or marginalized groups; and
- Strengthen grievance management and resolution processes.

Recognizing that stakeholder engagement is a two-way process, the Project will ensure that feedback is provided back to stakeholders in a timely and appropriate manner. Where possible, clarifications and responses will be provided during engagement meetings. Where issues require further review, stakeholders will be informed of outcomes and next steps through follow-up meetings, communication via local leadership structures, written responses, telephone calls, or other preferred communication channels.

To support transparency and close the feedback loop, the Project will prepare periodic "What We Heard – What We Did" summaries that explain how stakeholder inputs have influenced Project decisions or actions. These summaries will be shared with stakeholders through community meetings, district and sub-county notice boards, and other disclosure channels described in this SEP.

During Project preparation and implementation, particular attention will be given to providing feedback on issues raised by stakeholders during earlier engagement phases, including ESIA, RPF,

and RAP consultations, to demonstrate how concerns have been considered and addressed over time. Through these measures, the Project will ensure that stakeholder inputs are not only documented but are meaningfully integrated into Project decision-making and communicated back to stakeholders, in line with the requirements of the World Bank Environmental and Social Standard 10 (ESS10).

4. CHAPTER FOUR: RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT

4.1. Implementation Arrangements and Resources

The overall responsibility for SEP implementation lies with the Project Implementation Unit (PIU) Project Coordinator (PC) supported by the Contract Managers (CMs). Other key members of the PIU include Manager Environment and Social Safeguards, CLOs/ Sociologists (4), Environment Officers (4), Surveyors (2), Valuer (2). As per ESCP, the PIU will have a number of Technical Assistance Specialists namely: Social Development Specialists (2), GBV Specialists (2) and Environment Specialists (2).

The Manager Environment and Social Safeguards (MESS) will lead in contract management and supervision of the safeguards team in implementation of the SEP but also other safeguards activities – environment, social, health, safety, RAP and GRM at both MOWT, supervising consultant, contractor and sub-contractors. The MESS will be supported by a number of Safeguards team. For SEP and other social safeguards activities, 2 Specialists Social Development Specialist (Tas), will support stakeholder engagement plan implementation in addition to other safeguards components. The entities responsible for carrying out stakeholder engagement activities routinely will be MOWT Social Safeguards Teams (including CLOs and Sociologists) based on project sites. These too will be technically supported by the Social Development Specialist on a day-to-day basis while working in the field. There will also be a Safeguards Team at the Contractor’s level working closely with MOWT safeguards teams.

The safeguards teams at various levels will regularly monitor the SEP and all other safeguards activities, tracking, documenting and assisting in the resolution of complaints. Besides the PIU and field level safeguards team, there is expertise team at MOWT who will come in periodically to support SEP communications, especially community relations, media work and other communication activities.

However, the Contractors always being at the forefront of implementation of the project activities, will have more frequent and intense contact with the target stakeholders closest to the work fronts, and with adequate required safeguarding staffing in place, they will be the first line team able to provide an initial response to any complaints or requests for information or feedback from the project in relation to SEP and any other project related issues. Many times, issues raised to the MESS and MOWT PIU Safeguards will immediately be forwarded to the

Contractors for first response. Thus, a need to ensure the contractors have competent safeguards staff to manage the processes.

Table 4-1: Roles and Responsibilities for SEP Implementation

Role	No. of positions	Minimum Qualifications / Experience	Key Responsibilities	Reporting Line
Social Development Specialist	02	<ul style="list-style-type: none"> Advanced Degree in Social Sciences, Anthropology, Development Studies, or related field Extensive 10+ experience in social development safeguards management in road infrastructure Demonstrated experience implementing World Bank ESS10 ESS5, ESS4, ESS2, ESS1 including RAPs, SEP, GRM and safeguards aspects 	<ul style="list-style-type: none"> Overall technical advisory and support implementation of social safeguards at MOWT, RE/PMMC and contractor levels including SEP implementation Ensure compliance with ESS10 and alignment with RAP, ESMPs, and GRM Supervise field engagement teams Review and approve consultation records and reports 	PIU Manager E&SS Manager
GBV/SEA/SH Specialist (02	<ul style="list-style-type: none"> Advanced Degree in Gender Studies, Psychology, Social Work, or related field Experience in GBV risk management and survivor-centred approaches 	<ul style="list-style-type: none"> Implement GBV/SEA/SH prevention and response measures Establish and manage referral pathways Train workers, GM committees, and community focal points Support safe and confidential handling of GBV-related grievances 	Project Manager
Community Liaison Officers Comp 2-3	02	<ul style="list-style-type: none"> Degree in Gender Studies, Psychology, Social Work, or related field Experience in community development, SEP, GRM, safeguards management 	<ul style="list-style-type: none"> Day-to-day community engagement and mobilisation Support consultations, disclosure, and household visits Facilitate engagement with vulnerable and marginalized groups 	Social Safeguards Specialist

Role	No. of positions	Minimum Qualifications / Experience	Key Responsibilities	Reporting Line
		<ul style="list-style-type: none"> Fluency in local languages Experience working in 	<ul style="list-style-type: none"> Maintain attendance lists, minutes, and follow-up actions 	
Sociologists Comp 1	02	<ul style="list-style-type: none"> Degree in Gender Studies, Psychology, Social Work, or related field Experience in community development, SEP, GRM, safeguards management Fluency in local languages Experience working in 	<ul style="list-style-type: none"> Day-to-day community engagement and mobilisation Support consultations, disclosure, and household visits Facilitate engagement with vulnerable and marginalized groups Maintain attendance lists, minutes, and follow-up actions 	Social Safeguards Specialist
Contractor Safeguards Team	Various	<ul style="list-style-type: none"> Social / Community Liaison Officer Occupational Health & Safety Officer GBV/SEA/SH Focal Person 	<ul style="list-style-type: none"> Conduct pre-construction and site-specific sensitisation Implement Worker Code of Conduct Report on social incidents and grievances to PIU Participating in joint community engagement activities 	Contractor Project Manager; functional reporting to PIU Safeguards
GBV/SEA Service Provider (2No)	2	<ul style="list-style-type: none"> Community Development Officers (CDOs) Senior Assistant Secretaries (Sub- County) LC1 and LC3 leaders District Technical Teams 	<ul style="list-style-type: none"> Support community mobilization and information disclosure Assist with PAP identification and verification Participate in grievance management committees Support inclusion of vulnerable and marginalized groups 	PIU (coordination role)
GMCs	<ul style="list-style-type: none"> 50 	<ul style="list-style-type: none"> Nominated and voted by the area community members 	<ul style="list-style-type: none"> Receive, verify and record grievances 	Sociologist / CLOs

4.2 Documentation of Stakeholder Engagement Activities

All stakeholder engagement activities under the Project will be systematically documented using a standardized and auditable documentation system, consistent with the requirements of World Bank Environmental and Social Standard 10 (ESS10). Documentation will enable transparency, tracking of commitments, monitoring of follow-up actions, and verification of meaningful stakeholder engagement.

The following records will be maintained throughout the Project lifecycle:

- I. Stakeholder engagement meeting minutes template capturing the date, location, type of engagement, stakeholders present by gender disaggregation, and key outcomes.
- II. **Stakeholder Engagement inventory template (Logbook) – a database summarizing all engagements undertaken overtime** (digital and hard-copy), capturing the date, location, type and cumulative number of engagements, key issues of engagement, stakeholders met by gender disaggregation present, and key outcomes.
- III. **Attendance Registers**, disaggregated by sex and, where relevant, by vulnerable group category.
- IV. **Meeting Minutes for every engagement**, documenting issues raised, responses provided, agreed actions, responsible persons, and timelines.
- V. **Harmonized Grievance Redress Mechanism (GRM) Database**, with unique reference numbers for each grievance and status tracking jointly maintained by MOWT PIU, contractor and supervising consultant, mainly the safeguards teams of both parties.
- VI. **Monthly and quarterly stakeholder engagement reports**, summarizing activities undertaken, key concerns raised, responses provided, and lessons learned.
- VII. **Photographic Evidence**, where appropriate and culturally acceptable, to support verification of engagement activities.

All documentation will be securely stored by the PIU Social Safeguards Team in both electronic and physical formats. Records will be made available to the World Bank and other financing partners upon request and will support project supervision, monitoring, and independent audits.

4.3 Communication and Reporting Between PIU / MOWT and Contractors

During detailed design and implementation of the projects, the MOWT Social Safeguards team and the Consultant's Social Expert will interact on a regular and formal basis to ensure SEP and

related communications and community relations are properly implemented by Project Contractors for both components.

The Contractors as first line operators will prepare monthly reports to inform the MOWT Management and Safeguards Team representatives about activities under their responsibility and the overall progress.

In addition to the reports, regular meetings will be held with the participation of the Safeguards, Engineering and PIU MOWT teams, Supervising Consultants and the Contractors and subcontractors, in which SEP implementation progress will be reviewed, discussed, corrective actions and next action plans agreed. Such meetings will mainly include: monthly site meetings, ESHS monthly meetings, adhoc meetings like donor implementation support missions, MOWT own organised compliance monitoring meetings. Reporting on stakeholder engagements will be guided by standard reporting indicators adopted under this SEP;

4.4 Budget (Indicative) for preparing and implementing SEP

The cost of implementing SEP has been estimated at US\$ **2.561** Million over a five -years period

Table 4-2: One-Year (Initial) Indicative Budget for Implementation of the Stakeholder Engagement Plan

No.	Cost Category	Activities Covered	Responsible Party	Unit Cost (USD)	Quantity / Frequency	Total (USD) – 1 Year	Total (UGX)
1	Consultation Meetings	Community meetings; LC1/LC3 meetings; district and sub-county consultations	PIU Social Safeguards Team; District Local Governments		172 meetings	40,000	144,000,000
2	Disclosure and Communication	Printing of ESIA/RAP summaries; posters; radio announcements; SMS alerts; notice boards	PIU Social Safeguards Team	Lump sum	–	15,000	54,000,000
3	Targeted Engagement for Vulnerable Groups	Home visits (elderly, PWDs); women-only meetings; sign-language	PIU Social Team; Community Development Officers		30 sessions / year	10,000	36,000,000

No.	Cost Category	Activities Covered	Responsible Party	Unit Cost (USD)	Quantity / Frequency	Total (USD) – 1 Year	Total (UGX)
		interpretation; tailored materials					
4	Grievance Redress Mechanism (GRM)	Establishment and operation of GM committees; grievance clinics; hotline; documentation and tracking	PIU Social Safeguards Team; District GRM Committees	Annual	1 year	25,400	91,440,000
5	GBV/SEA/SH Prevention and Awareness	Service Provider for Community sensitization; IEC materials; engagement with women and girls; referrals	PIU Social Team; GBV Service Providers	Lump sum	1 Year	130,000	468,000,000
6	Training and Capacity Building	Training of PIU, contractors, and district teams on SEP, ESS10, GRM, GBV/SEA/SH	PIU; External Trainers		4 sessions per year	24,000	86,400,000
7	Monitoring and Reporting	Quarterly field monitoring and reporting	PIU Social Safeguards Team; Third Parties	Annual	1 year	6,000	21,600,000
8	Logistics and Transport	Vehicle running ; fuel; per diem for engagement visits and monitoring	PIU	Annual	1 year	40,000	144,000,000
9	Key Social Safeguards Specialists & Staff Costs	2 Social Specialists, 2 GBV Specialists 2 CLOs, 2 Sociologists Comp 1,2 and 3	PIU	Annual	1 Year	211,800	762, 480,000

No.	Cost Category	Activities Covered	Responsible Party	Unit Cost (USD)	Quantity / Frequency	Total (USD) – 1 Year	Total (UGX)
9	Contingency (10%)	Inflation and unforeseen engagement needs	PIU	–	1 Year	10,000	36,000,000
	Total Estimated SEP Budget - 1 Year				1 Year	512,200	1,843, 920,000

5. CHAPTER FIVE: GRIEVANCE REDRESS MECHANISM

MOWT has an existing harmonized Community -Based Grievance Management system that is applied across its projects implemented with close engagement and involvement of Local Council (LC), Sub-county, and District administrative structures. This system has been used to manage community-level grievances related to land and construction related impacts in ongoing road projects. For this Project, the existing system will be retained as the foundation of the GM to ensure familiarity, accessibility, and alignment with local governance structures but further enhanced in accordance with World Bank Environmental and Social Framework (ESF). The GRM is a core element of the Project’s stakeholder engagement framework and provides a structured, transparent, and culturally appropriate process through which stakeholders may raise concerns, seek clarification, and have project-related issues addressed throughout the Project lifecycle. A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, feedback, and concerns of project-affected parties related to the environmental and social performance and contractors’ works of a project to be submitted and responded to in a timely manner. In addition, the World Bank-hired Enhanced Implementation Support and Monitoring (EISM) firm will provide advice and recommendations to enhance existing project-level grievance redress mechanisms to safely, ethically, and confidentially receive cases related to exclusion or discrimination of vulnerable or marginalized individuals or groups following enactment of the AHA 2023. In response to these recommendations, The PIU will be responsible for strengthening the capacity of the existing project GRM as required to increase its awareness and ability to refer exclusion or discrimination cases under the Project to the EISM firm. The firm has established a nationwide GRM hotline – 0800 333125, hosted and operated by a local NGO, to receive grievances related to discrimination and exclusion under the Project.

5.1. Description of Grievance Redress Mechanism (GRM)

In alignment with the World Bank Environmental and Social Framework (ESF), NERAMP II will retain and strengthen the existing grievance redress mechanism to ensure it remains accessible, inclusive, and effective for addressing concerns and complaints related to project activities. Specifically, Environmental and Social Standard 10 (ESS10) obligates Borrowers to provide Project-Affected Parties with appropriate channels to raise issues and grievances, and to guarantee that these are addressed promptly and transparently throughout the project lifecycle.

The Grievance Mechanism (GM) for NERAMP II is designed to receive, assess, and resolve concerns related to the Project's environmental, social, health and safety under the following key broad grievances categories

- a) Community Grievance Redress Mechanism: This includes, but is not limited to, grievances related to land acquisition and resettlement, compensation and livelihood restoration, contractor activities, labour influx, community health and safety, traffic impacts, and environmental disturbances.
- b) GBV/SEA/SH Cases / Grievances Redress: The GM also incorporates specific procedures for handling Gender-Based Violence (GBV), Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH) cases, applying a survivor-centred, confidential, and ethical approach.
- c) Workers Grievance Redress Mechanism: In addition, a separate workers' grievance mechanism, consistent with ESS2 (Labour and Working Conditions), will be established for direct, contracted, and sub-contracted workers. Workers will be informed of this mechanism at the time of recruitment and assured that they may raise concerns without fear of retaliation. The workers' GM, including procedures for workplace-related GBV/SEA/SH cases, will be detailed in the Contractor's Environmental and Social Management Plan (ESMP).

5.2 NERAMP II Project-Specific Enhancements to the GRM

To achieve complete adherence to ESS10 and effectively manage the anticipated complexity and sensitivity of project-related issues, the current MOWT grievance mechanism will be further enhanced with project-specific improvements.

a) Existing Grievance Uptake Channels

The project will maintain and enhance existing channels, that provide the stakeholders multiple, accessible grievance intake options, including:

- MOWT PIU dedicated GRM telephone numbers and WhatsApp line managed by the social safeguards team.
- Telephone of the person responsible for construction (Resident Engineer's office) .
- Local telephone numbers of the Contractors for consultations and complaints.
- Members of the Grievance Management Committees (GMCs) and their telephone contacts.
- A grievances logging book stationed at community GMC level (secretary's office / home)

- A grievances logging book stationed at PIU for logging office walk-in grievances at MOWT and contractor’s offices
- Direct intake through Grievance Officers (Community Liaison Officers / Sociologists) and local and district leaders.
- Establishment of public information centres preferably at GMC and sub county levels.

These channels will ensure accessibility for different stakeholder groups, including vulnerable and marginalized individuals.

b) Key Grievance Redress Mechanism Tiers

To improve clarity, accountability, and escalation, the Project will continue to operate a GRM at two main tiers:

- **Community Level GRM through maintaining or establishing Grievance Management Committees** – to handle grievances escalated from the PAPs, project beneficiaries and roadside communities and other road users; and
- **MOWT PIU Level GRM** – using multiple grievances intake channels highlighted above, it will serve as the final administrative resolution level prior to judicial or other administrative remedies outside of MOWT Project GRM.
- .

This tiered structure strengthens oversight and ensures timely resolution.

c) GBV/SEA/SH-Specific Survivor-Centred Pathway (New)

A dedicated and confidential grievance pathway will be established for **GBV/SEA/SH cases**, representing a significant enhancement to the existing system. Key features include:

- Separate intake channels managed exclusively by trained GBV focal points.
- Immediate referral to accredited GBV service providers.
- Strict confidentiality and informed consent requirements.
- No disclosure of survivor information to non-GBV personnel.
- No requirement for survivors to pursue formal complaints or legal action to access support.

This pathway aligns with good international practice and World Bank guidance on GBV risk management.

d) Standardized Grievance Handling Timelines (New)

To improve predictability and accountability, the following standardized timelines will apply:

- **Acknowledgement of receipt:** within 5 working days.
- **Initial assessment:** within 10 working days.
- **Resolution:** within 30 working days;
- **Escalation:** after 30 days if unresolved. (where not possible to resolve within timeframe, prior engagement will have been undertaken with complainant(s) and GMCs for their understanding and patience over a long duration to resolve the issue).

Sensitive GBV/SEA/SH cases will follow survivor-centred timelines defined by service providers.

e) Transparency and Feedback Measures (New)

To strengthen trust and accountability, the Project will implement:

- Quarterly GM performance reports;
- Public disclosure of non-sensitive grievance statistics;

5.3 Principles, Goals, and Objectives of the Grievance Mechanism

The Project Grievance Mechanism (GM) is guided by the principles of accessibility, transparency, fairness, and responsiveness, in line with the World Bank ESS10 (Stakeholder Engagement and Information Disclosure). The GM is intended to provide a trusted, effective, and inclusive platform for addressing concerns related to the Project's environmental and social performance.

5.3.1 Objectives of the GRM

In line with the MoWT ESS policy, MOWT Harmonised Grievance Redress Mechanism, 2019, and ESS10, the specific objectives of the GRM are:

- To provide to MoWT stakeholders at various levels with a clear mechanism of channelling grievances.
- To operationalize the policy statement on Grievance Management in the MoWT Environment and Social Safeguards policy by setting up and making known to all stakeholders a clear, accessible, and efficient system for receiving and resolving grievances for all stakeholders
- To record, categorize and prioritize the grievances.
- To set up and make known to all stakeholders a clear, accessible, transparent and efficient system for receiving and resolving grievances.
- To provide an environment that fosters free and honest exchange of information, views, and ideas regarding resolving received grievances, including provisions for confidentiality.
- To provide and define clear roles and responsibilities of the various parties involved in handling and resolving grievances.
- To promptly resolve the grievances in consultation with relevant stakeholders and have such grievances closed out within a specified period.
- To escalate unresolved grievances to other relevant offices or authorities in line with MOWT GRM procedure.

5.3.2 Guiding Principles

The following principles apply to the Project Grievance Mechanism:

- Accessibility and Cultural Appropriateness:** GM shall be readily accessible to all Project-Affected Persons (PAPs) and other stakeholders, free of charge, and implemented in a culturally appropriate manner, considering language, literacy levels, gender, disability, and local norms.

- II. **Timeliness and Effectiveness:** Grievances shall be acknowledged, assessed, and resolved promptly and efficiently in accordance with defined timelines, ensuring that concerns are addressed before they escalate.
- III. **Transparency and Accountability:** The grievance process shall be clearly communicated to stakeholders through community engagement and disclosure activities. Records of grievances received, actions taken, and outcomes shall be systematically documented and reported, with due regard for confidentiality.
- IV. **Fairness and Objectivity:** Grievances shall be handled impartially, objectively, and without bias, ensuring equal treatment of all complainants.
- V. **Legitimacy and Independence:** The GM shall operate through clearly defined and credible institutional arrangements, with sufficient independence to ensure that decisions are free from undue influence or interference.
- VI. **Simplicity and Ease of Use:** Procedures for lodging grievances shall be simple, clearly explained, and easy to follow. Multiple intake channels shall be available, and grievance offices or focal points shall be physically and socially accessible.
- VII. **Participation and Inclusion:** The GM shall actively encourage participation, particularly by vulnerable and marginalized individuals or groups, and shall take into account their specific needs and vulnerabilities when resolving grievances.
- VIII. **Confidentiality and Anonymity:** The GM shall allow for grievances to be submitted anonymously. Confidentiality of complainants shall be respected at all stages of the process.
- IX. **Non-Retaliation:** Complainants shall not be subject to retaliation, sanctions, or adverse consequences for raising grievances in good faith.
- X. **Survivor-Centred Approach (SCA) for GBV/SEA/SH Cases:** The GM shall uphold a survivor-centred approach for handling Gender-Based Violence (GBV), Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH) cases. Survivors shall be supported to access the **Minimum Package of Services (MPS)** in a safe, ethical, confidential, and respectful manner, in accordance with survivor preferences and informed consent.
- XI. **Complementarity with Judicial and Administrative Remedies:** The GM shall not prevent or limit access to judicial or administrative remedies. Stakeholders shall retain the right to pursue other legal avenues at any stage of the grievance process.
- XII. **Partnership and Referral:** The GM shall operate in coordination with relevant institutions and service providers, including district authorities, legal institutions, labour offices, and accredited GBV service providers, to ensure appropriate handling of different categories of grievances, particularly complex or sensitive cases.

5.3.3 Inclusion of Vulnerable and Marginalized Groups

The Project Grievance Mechanism will include specific provisions to enable vulnerable or marginalized individuals or groups to safely, ethically, and confidentially report grievances related to exclusion, discrimination, or unequal access to Project benefits. Tailored communication and

intake approaches will be applied, consistent with the engagement needs identified in the SEP. Where required, referral pathways and additional support measures will be developed with the assistance of World Bank provided Enhanced Implementation and Monitoring Support, to ensure that grievances from vulnerable and marginalized groups are addressed effectively and in line with the principles of non-discrimination and inclusion.

5.3.4 Grievance Management Implementation Structure

To ensure that project-related grievances are addressed in a timely, accessible, and transparent manner, the Project will establish Grievance Management Committees (GMCs) with clearly defined mandates, membership, and procedures. The GMCs form a core component of the Project's Grievance Redress Mechanism and provide structured platforms for resolving grievances at appropriate administrative levels. The GRM process will apply to the planning as well as the implementation phase.

5.3.5 Establishment and Scope of Grievance Management Committees

Community – Based Grievance Management Committees (GMCs) (on average within a radius of 3Kms) will be maintained or established where none exist as part of overall Project implementation arrangements and will operate throughout the Project lifecycle, including RAP preparation and implementation, construction, and operation and maintenance. The GMCs are not limited to resettlement-related grievances but will address the full range of project-related concerns, including environmental, social, labour, compensation, livelihood restoration, contractor-related impacts, and community health and safety issues. It should be noted that under component 1, there are 50 committees that are in place. Additional committees will be established under component 2 and 3. All committee members will be trained by MOWT in grievance handling procedures, documentation, confidentiality, and survivor-centered approaches for sensitive cases. Grievance Management Committees will be established at two formal project levels; Community-Based and District/City; linked to the MOWT Project Implementation Unit (PIU).

5.4.2 First Level: Community Grievance Management Committees

The community-based grievance redress mechanism mainly involves working through Grievance Management Committees (GMCs) at community to parish level (a single community level GMC may comprise two – four villages in a parish, stretching to an average of 3Kms per GMC). The GMCs usually have a minimum of 6 members inclusive of representatives PAPs, project beneficiaries inclusive of women representative; 02 represent opinion leaders, member of CBO or Observer; and LCI chairpersons as ex-officials) as per the MOWT Harmonized GRM Guidelines,2019. The six members of GMCs, including the Chairperson, Secretary, Publicity and members are directly elected by all the village residents, on basis of the knowledge of the representatives and their commitment to voluntary community work, high moral rating and championing residents' interests with fairness.

In implementing the community level GRM tier, the sub counties and districts will be closely engaged and involved as key stakeholders and local governance structures responsible for implementing and overseeing government programmes within their localities. This will include involving relevant structures in capacity building / refresher training of community level GMC trainings, providing regular information about the grievances being received through periodic project briefs and planned stakeholder engagement. The sub county and district level structures may also be involved by MOWT/PIU in joint problem solving and engagement of PAPs and project beneficiaries where their persuasive mediating (not coercive) not role may be required to solve issues amicably.

5.4.3 MOWT / PIU Grievance Review Level Two

Where grievances remain unresolved after District/City GMC review, or where the nature of grievance requires Project-level intervention, complainants will be referred to MOWT through the Project Implementation Unit (PIU). This level provides a final administrative review within the Project's Grievance Mechanism and ensures consistency in decision-making across districts prior to aggrieved persons seeking the courts of law.

5.4.4 Second Level: Sub- County and District Local Government escalation and mediation

Few of the grievances received at community GMC level may be resolved at this level such as in situations where expressed grievances is not project related or if the issue being raised had already been addressed by the project. Where grievances remain unresolved after GMC level review, or where the nature of grievance requires project-level intervention, complainants will be referred to MOWT through the Project Implementation Unit (PIU). This level provides a final administrative review within the Project's Grievance Mechanism and ensures consistency and fairness in decision-making across project area prior to minimize aggrieved persons' dissatisfaction and seeking judicial mediation in the courts of law. The MOWT PIU tier operates in harmonized approach between MOWT PIU, the contractor, resident engineer and other service providers using a centralized grievances data base for effective coordination of actions in resolving the grievances. Further coordination is maintained with the diverse project teams (engineering, safeguards and project leadership) to ensure effective, coordinated action planning for grievances closure and escalation.

Moreover, the MOWT as per this SEP has targeted the districts and sub counties as key stakeholders for continuous engagement activities.

5.4.5 Access to Judicial and Administrative Remedies Option

Beyond the two tiers of the GRM above elaborated, the aggrieved person(s) may resort to judicial remedies within the courts of law or other government administrative channels of their choice at any stage of project GRM process as their right. This option, though recognized by the project,

does not constitute another project GRM tier but an external legal option available to complainants. This clarification is provided to ensure transparency and to recognize that some grievances such as those involving pre-existing land disputes, inheritance matters, or legal title issues may fall outside the administrative scope of the project.

5.5 Roles and Responsibilities of the Grievance Management Committees (GMCs)

The Grievance Management Committees (GMCs) are responsible for receiving, reviewing, and resolving grievances related to the Project in a timely, fair, transparent, and culturally appropriate manner, consistent with ESS10 and ESS2 requirements.

Key Roles and Responsibilities

The GMCs shall:

- Receive and register grievances from Project-Affected Persons (PAPs), workers, and other stakeholders through approved intake channels.
- Verify facts presented during grievance hearings using local knowledge, records, and site inspections when required.
- Ensure that grievances are acknowledged **within five (5) working days** of receipt.
- Review and assess grievances **within fourteen (14) working days**, including categorization and assignment of responsibility.
- Provide an accessible, free, and dignified forum for grievance resolution at the **lowest appropriate level**.
- Propose and communicate resolutions **within thirty (30) working days** of grievance registration.
- Ensure grievance handling is discreet, impartial, and sensitive to gender, disability, and vulnerability considerations.
- Facilitate participation of complainants in discussions affecting decisions that may adversely affect them.
- Maintain complete and accurate records of grievances, decisions, and actions taken.
- Prepare and submit minutes, decisions, and follow-up actions to the PIU for monitoring and reporting; and
- Escalate unresolved grievances to the next level of the Project GRM in accordance with established timelines and procedures.

Where grievance remains unresolved after escalation within Project GRM, complainants retain the right to pursue administrative or judicial remedies at their discretion, without prejudice.

Figure 2

Figure 2: Process Flow for proposed Community GRM for the project

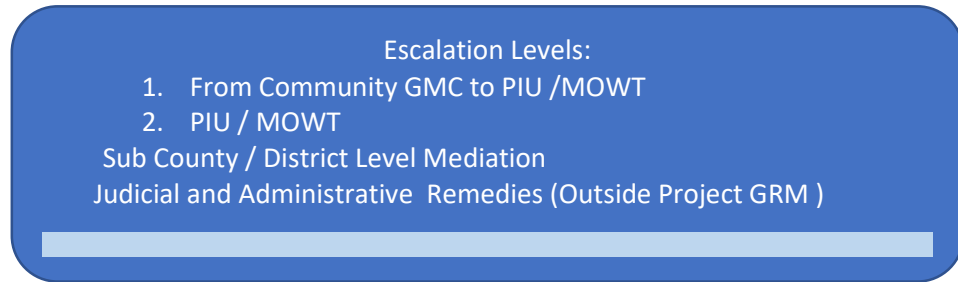


Figure 2 illustrates the two key tiers of the project GRM. It emphasizes that if a complainant issue is not resolved at tier 1 or complainant not satisfied with the resolution outcome at at this stage, the GMC will escalate the issue to the MOWT PIU GRM level for redress. The MOWT PIU GRM will involve MOWT (both at PIU and HQs) , contractor, consultant and service providers working harmoniously to address logged grievances. This is regarded as the final tier for project administrative grievances redress by the MOWT PIU. Beyond this, the complainant may opt for judicial remedy. Judicial system includes Courts of Law while administrative review channels (outside of project GRM(include other formal channels such as office of the CGV(valuation/compensation) , Office of the President / Resident District Commissioner (RDC) and any government structures outside MOWT. A summary of the proposed indicative grievance management structure and flow procedure is illustrated in the **Error! Reference source not found.** above .

Figures 3 and 4 below further illustrate the Project Grievance Redress Mechanism (GRM), applicable to all phases of the Project lifecycle and types of project-related grievances.

Figure 3: The Comprehensive GRM

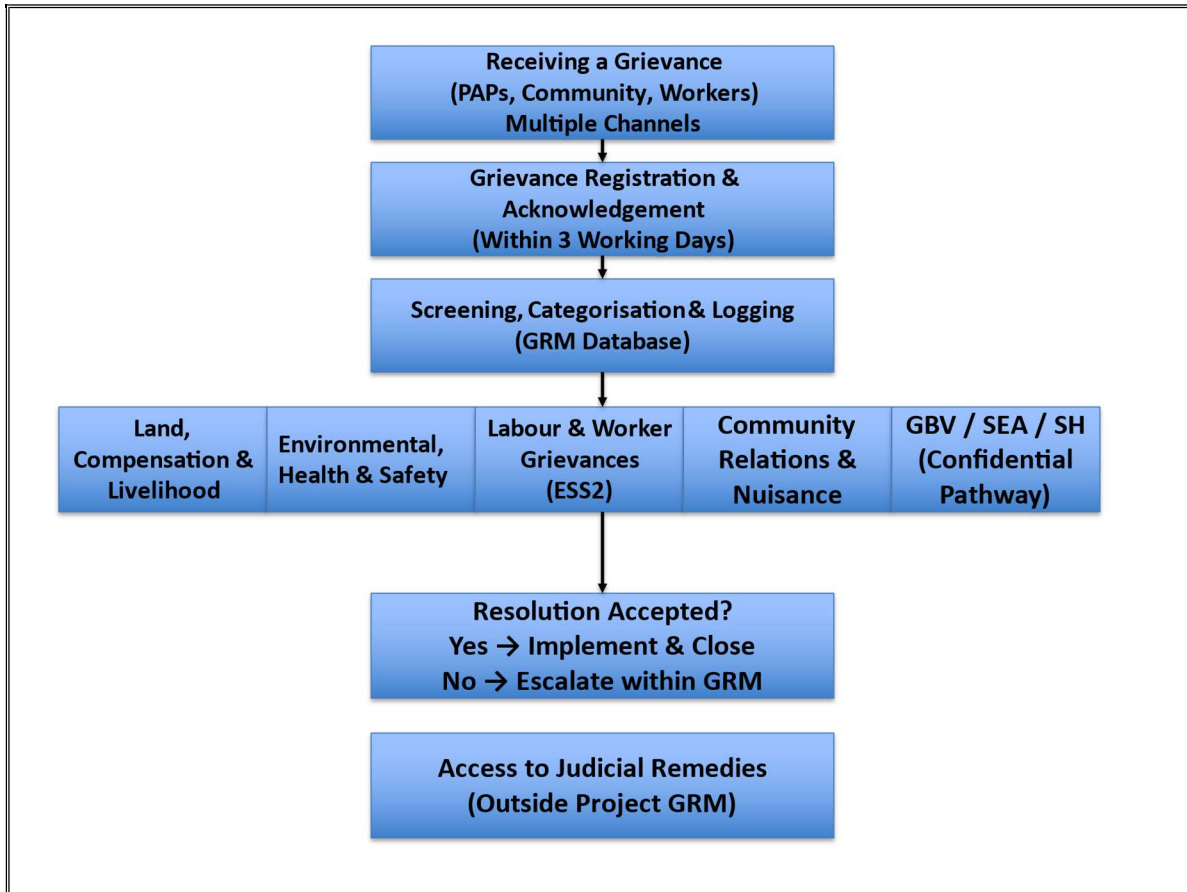
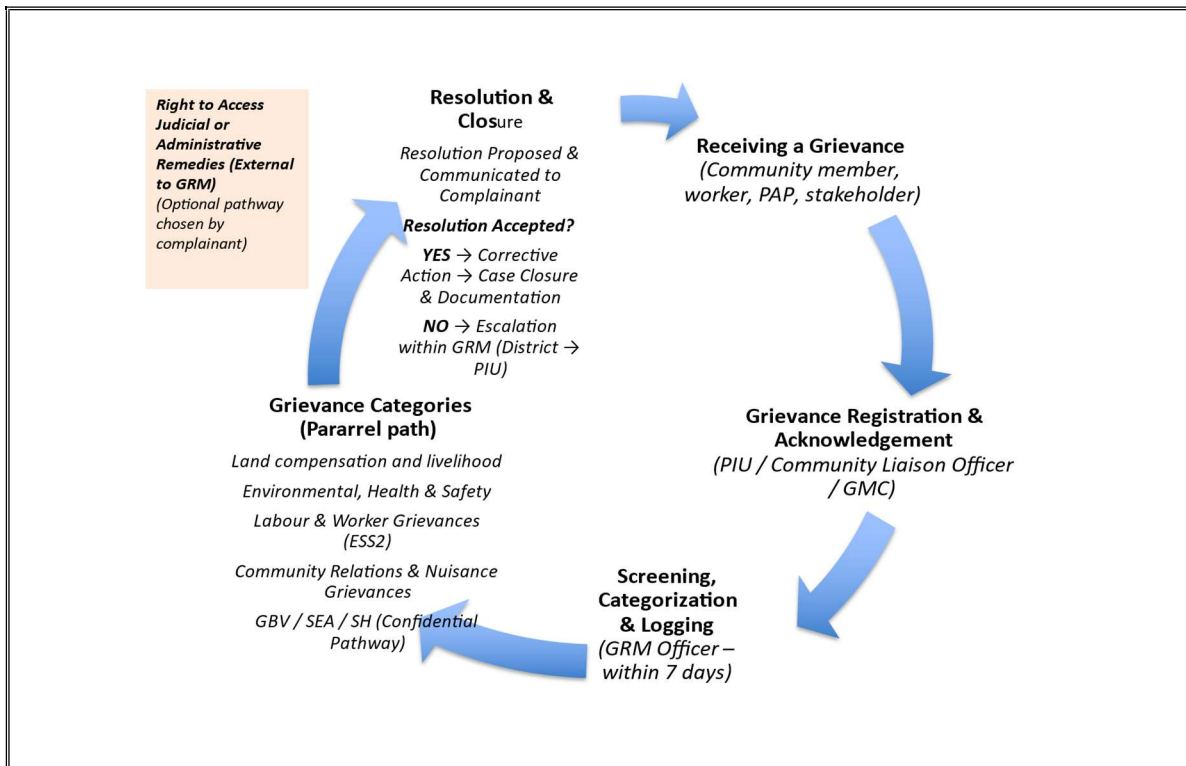


Figure 4: **The GRM Flow Chart**



GRM begins with multiple intake channels, registration, screening, and categorization, followed by resolution pathways. Land, compensation, and livelihood-related grievances are handled through Community, Sub- County and District GMCs, with escalation to PIU where required. Environmental, health, and safety grievances are managed by the Contractor's E&S team under PIU oversight. Labour grievances are addressed through a dedicated Worker GRM while GBV/SEA/SH complaints follow a separate, confidential survivor-centred pathway. Once a resolution is proposed, it is communicated to the complainant for acceptance. Accepted resolutions are implemented and formally closed, while unresolved cases may be escalated within the Project GRM structure. At all times, complainants retain the right to access judicial or other administrative remedies, which operate outside the Project GRM and are pursued at the complainant’s discretion. However, stakeholders are advised to make use of the project GRM for resolution of grievances. This system ensures transparency, accessibility, accountability, and alignment with World Bank ESS10, ESS2, and ESS5 requirements.

5.6 Publicizing the Grievance Mechanism

The GRM will be publicized through:

- Community sensitization meetings and public barazas.
- Village, sub-county, and district notice boards.
- LC1 and LC3 offices in affected communities.

- Urban centres, public meeting places, and places of worship;
- Local radio announcements in local languages;
- Project information materials (posters, leaflets, summaries); and
- Inclusion of GM information in compensation agreements, consent forms, and worker induction materials.

Publicization of the GM will be integrated into all stakeholder engagement, consultation, and disclosure activities across the Project lifecycle, including Project preparation, RAP development and implementation, construction, operation and maintenance. The GM will be communicated in formats and languages that are accessible to women, youth, persons with disabilities, elderly persons, and other vulnerable or marginalized individuals or groups.

5.7 Types of Grievances That May Be Raised

The Project Grievance Mechanism is designed to address a broad range of project-related grievances, including but not limited to the following categories:

The GRM addresses:

a) Land, Compensation, and Livelihood-Related Grievances

- Ownership disputes
- Boundary disputes
- Valuation of land and other properties
- Assets established after cut-off date
- Absentee landowners who could not be contacted despite documented efforts;
- Confusion between lawful occupants and informal occupants;
- Family disputes arising from deaths, divorces, or inheritance issues affecting compensation.

b) Environmental, Health, and Safety Grievances

- Pollution, dust, noise, vibration, or waste management concerns;
- Traffic disruptions, road safety risks, or property damage caused by construction activities.
- Community health and safety risks related to construction or operational activities.
- Damage to crops, structures, or other assets caused by Project works.

c) Labour and Worker-Related Grievances (ESS2)

- Recruitment practices, wages, working hours, or employment conditions.
- Workplace health and safety concerns.
- Allegations of worker misconduct or harassment.

d) Community Relations and Governance Issues

- Insufficient information disclosure or lack of consultation on Project activities.
- Non-compliance with Project commitments, policies, standards, or safeguard instruments.
- Access restrictions or disruptions affect community livelihoods or services.
- Social conflict or tensions related to Project activities.

e) GBV / SEA / SH and Discrimination-Related Grievances

- Allegations of Sexual Exploitation and Abuse or Sexual Harassment.
- Exclusion of, or discrimination against, vulnerable or marginalized individuals or groups in accessing Project benefits, opportunities, or services.

f) Queries, Suggestions, and Positive Feedback

- Requests for clarification or information.
- Suggestions for improving Project implementation.
- Positive feedback related to Project activities or engagement processes.

g) Exclusion of and discrimination against vulnerable or marginalised individuals or groups from providing or receiving opportunities and benefits from the Project

5.8 Grievance Management Procedures (Intake to Close-Out)

All project-related grievances, queries, and feedback are submitted through multiple channels and registered in the Project Grievance redress mechanism. Each case is acknowledged within 5 working days, assessed, categorised, and assigned to the appropriate handling pathway. Resolutions are communicated to the complainant, and cases are formally closed after implementation. Unresolved cases may be escalated within Project GRM, without limiting the complainant's right to pursue judicial or administrative remedies.

- Land, Compensation, and Livelihood-Related Grievances:** These include disputes related to land acquisition, valuation, compensation, eligibility, resettlement assistance, and livelihood restoration. Complaints are reviewed by the Community GMC, with escalation to Sub-County GMC, District GMC and PIU GMC if unresolved. Resolution outcomes will be communicated, and corrective actions will be implemented prior to closing out.
- Environmental, Health, and Safety Grievances:** Environmental, health, and safety grievances concern related to dust, noise, vibration, traffic disruptions, property damage, and environmental pollution. The Contractor's EHS Team will handle these grievances under PIU oversight. Corrective actions will be agreed, implemented, and verified, with escalation to PIU if issues persist.
- Labour and Worker-Related Grievances (ESS2):** Labour grievances, including issues related to recruitment, working conditions, wages, occupational health and safety, or worker conduct, are managed through a separate Worker Grievance Mechanism operated by the Contractor, in line with ESS2. Workers may submit grievances confidentially and without fear

of retaliation. The Contractor will address grievances within defined timelines, with oversight and monitoring by the PIU. Unresolved cases may be escalated to MOWT management or relevant labour authorities.

- d) **Community Relations and Governance Issues:** Community relations grievances include access restrictions, worker behaviour, social tensions, and information gaps. These grievances will be managed through Community and Sub-county GMCs and the PIU Social Safeguards Team, involving mediation and dialogue with local leaders. Resolutions will be proposed, communicated, and implemented, with escalation to higher levels of the Project GRM where necessary.
- e) **GBV / SEA / SH and Discrimination-Related Grievances:** GBV/SEA/SH and discrimination-related grievances will follow a separate, confidential survivor-centred pathway, handled exclusively by trained GBV Focal Points. Survivors will be referred to accredited service providers, and case details will be recorded in a restricted-access system.
- f) **Queries, Suggestions, and Positive Feedback:** Queries, suggestions, and positive feedback will be registered in the GRM system and responded to promptly. These inputs are documented and used to improve project design, communication, and implementation.

5.8. 1 Case Closure and Feedback

All grievance resolutions are formally documented and communicated to the complainant. Accepted resolutions are implemented and recorded as closed in the GRM database. Aggregated grievance information and lessons learned are shared with stakeholders through community meetings and “What We Heard – What We Did” summaries, ensuring transparency and continuous improvement.

All Grievance resolutions will be formally documented and communicated to the complainant. Accepted resolutions are implemented and recorded as closed. Aggregated grievance information and lessons learned will be shared with stakeholders through community meetings and through briefing reports to key stakeholders.

5.9 Grievance Database Management and Tracking

All grievances received under the Project; whether submitted in person, verbally, in writing, electronically, or through designated representatives, will be systematically recorded, tracked, and managed using a centralized Grievance Management Database maintained by the Project Implementation Unit (PIU).

5.9.1 Grievance Registration and Tracking

- i. All grievances received will be registered using the grievance logbooks and logged onto the MOWT Grievance and General Enquiry Management System using standard procedure. The complainant should receive an acknowledgment of receipt of the grievance within a reasonable timeframe of 12 hours, preferably in writing. To enhance consistency and compatibility of data management related to grievances, record forms and logo books already in use by the project

proponent for similar road projects will be adapted. These have been already shared with the consultant.

- ii. Screening for Eligibility of and Categorizing Grievances: Grievances received will be screened and categorized¹ to establish the nature, type and eligibility of the complaint using the following criteria: within limit/scope of the ESIA and RAP studies, grievance is clear and relevant information is given.
- iii. Once the complaint is screened for eligibility, then a decision will be taken to either drop it or proceed with assessments and investigation, and the complainant will be duly informed. Complaints that are categorized as (0) or (1) and are straightforward can often be resolved on first contact and closed out.
- iv. After screening and ascertaining need for further investigation, the grievance will be assigned to relevant cluster on the study (ESIA and RAP); and or to relevant department at MOWT through the Grievances Manager for further assessments or management

Each grievance will be assigned a unique reference number at the time of registration to enable effective tracking and follow-up. An acknowledgement of receipt will be issued to the complainant within five (5) working days, using the complainant's preferred communication method, unless the grievance is submitted anonymously.

The Grievance Database will, at a minimum, record the following information: Unique grievance reference number, Date and method of submission, Location (village/sub-county/district), Stakeholder category (PAP, community member, worker, etc.), Grievance type (e.g. land/compensation, environmental, labour, GBV/SEA/SH, community relations), brief description of the issue raised, Responsible unit or committee, agreed timeline for assessment and resolution, actions taken and decisions made, status (open, under review, resolved, closed, escalated) and date of resolution or closure. GBV/SEA/SH-related cases will be logged without personal identifiers, using a restricted-access module handled only by trained GBV focal points, in line with survivor-centred principles and confidentiality requirements.

5.9.2 Monitoring, Reporting, and Disclosure

The CLOs / Sociologists will make weekly grievance management reports to the SDSs and team leaders. The SDSs on behalf of the team leaders will make and submit weekly and monthly grievance management reports to the assignment coordinator for sharing with the client. The weekly and monthly reports will highlight information regarding the status, management, coordination and implementation of the GRM.

The Grievance Database will be used to:

¹Category 0: Complaints that are not related to a MOWT project, project workers or any MOWT activity; (b) Category 1: Queries, comments, and suggestions; (c) Category 2: Complaints and concerns, which are not criminal in nature or do not require the involvement of police, (d) Category 3: Complaints and concerns that involve allegations that require investigation or intervention by the police or other law enforcement authorities.

- Monitor compliance with agreed GRM timelines (acknowledgement, assessment, resolution).
- Track trends, recurring issues, and systemic risks.
- Support management decision-making and corrective actions; and
- Generate periodic reports for internal and external review.

Key indicators relevant for the weekly and monthly GRM reporting will be:

In addition, the following indicators will be reported against.

- No of grievances received / month or week
- No. of outstanding grievances currently within each tier of the GRM
- No. of outstanding grievances and reasons for non-resolution
- No. resolved and closed out grievances
- No. of closed out grievances on stipulated time allowed
- No. of closed out grievances outside the stipulated time allowed
- No. of escalated grievances and reasons

In line with the above relevant indicators, monitoring is to be done on the effectiveness of the grievance mechanism. As part of the monthly review/report, analyzing the trends and time taken for grievance resolution will help to evaluate the efficacy of the comment response and, grievance mechanism.

5.9.3 Reporting to Stakeholders and the World Bank

- Quarterly GRM summary reports will be submitted to the World Bank as part of Project monitoring, including aggregated data on:
 - Number and types of grievances received.
 - Average time to resolution.
 - Percentage of grievances resolved/closed.
 - Number of grievances escalated; and
 - Key corrective actions taken.
- As part of the broader stakeholder engagement process, MOWT will also report back to communities and other stakeholders through:
 - Community meetings.
 - District and sub-county notice boards; and

- Quarterly “What We Heard – What We Did” summaries.

These reports will present non-sensitive, aggregated information only, ensuring transparency while protecting complainant confidentiality.

5.9.4 Record Retention and Data Security

All grievance records will be securely stored (digitally and, where applicable, in hard copy) for the duration of the Project and in accordance with MOWT data protection procedures. Access to the database will be restricted to authorized personnel to ensure data integrity, confidentiality, and ethical grievance handling.

5.10 Incident Reporting

Project-related incidents, including serious environmental, social, health and safety incidents, are managed through the Project’s Incident Reporting and Response System in line with the World Bank ESIRT. Where such incidents also give rise to complaints from affected persons, these will be logged and tracked through the GRM in a coordinated manner.

5.10.1 Scope and Definition

Incident reporting applies to all environmental, social, health and safety (E&S / H&S), labour, security, and GBV/SEA/SH incidents that occur during Project preparation, construction, and operation. Incident reporting is distinct from grievance handling, as it addresses events or accidents that occur during Project activities, whether or not, a complaint is formally lodged by an affected person.

Severe incidents are defined as incidents that result in, or have the potential to result in, significant adverse impacts on workers, communities, or the environment. These include, but are not limited to: fatalities, serious injuries, major traffic accidents, significant environmental pollution events, forced or child labour, and GBV/SEA/SH incidents.

5.10.2 Incident Notification and Reporting Timelines

- Immediate notification: Severe incidents shall be reported by the Contractor to MOWT/PIU as soon as they become known, and no later than 48 hours after occurrence.
- World Bank notification: MOWT will notify the World Bank of severe incidents in line with the Environmental and Social Incident Response Toolkit (ESIRT) requirements, using anonymised information where applicable.
- Non-severe incidents will be recorded, assessed, and managed through routine incident reporting and corrective action procedures.

5.10.3 Incident Recording and Tracking

All incidents will be captured in the Project's central incident register / Environmental and Social Incident Reporting Tool (ESIRT) database, maintained by the PIU. Records will include Date and location of the incident, type and category of incident, description of the event, immediate response actions taken, responsible party, corrective and preventive measures and status and closure date. Where an incident also generates a complaint or concern from stakeholders, the issue will be cross-referenced in the GRM database, ensuring coordinated follow-up without duplication.

5.9.4 Feedback and Communication

MOWT will provide timely feedback to affected persons regarding reported incidents, using appropriate channels such as direct communication, local leadership structures, or community meetings. For sensitive incidents, including GBV/SEA/SH, feedback will be provided bilaterally and confidentially, in accordance with survivor preferences.

Aggregated, non-sensitive incident information will be shared with stakeholders through periodic engagement activities including meetings and project briefs.

5.11 GBV / SEA / SH—Specific Incident Handling

Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) pose significant risks in infrastructure projects and require specialised, sensitive handling. In recognition of the potential harm to survivors and the need for strict confidentiality, the Project has established a dedicated survivor-centred incident handling framework that operates separately from standard grievance and incident management procedures, while remaining fully aligned with the World Bank Environmental and Social Framework and good international practice.

5.11.1 Confidential Reporting and Data Management

GBV/SEA/SH incidents will be handled through a separate, confidential survivor-centred pathway. Incident data recorded will be strictly limited to: The nature of the allegation (as described by the survivor), whether the alleged perpetrator is associated with the Project, survivor's age and sex (with informed consent) and referral actions taken. No personally identifiable information will be recorded or shared. If the survivor does not wish to pursue a formal complaint, referral to available services will still be offered, and the case will be recorded as closed with the survivor's preference documented.

5.11.2 Referrals

Referrals are the process through which survivors are connected to appropriate services, including health, psychosocial, protection, legal/justice, and economic reintegration

support. The grievance or incident recipient will immediately provide contact information for available services in the area and, where necessary, support transport or access costs.

Survivors will be informed of their right to control how information is shared and may place limitations on what is disclosed. Informed consent must be documented prior to any referral or reporting.

5.11.3 Case Management and Follow-Up

Where the survivor consents, the case will be referred to the MOWT GBV Specialist, who will: Ensure the survivor has accessed appropriate services, monitor safety and well-being and coordinate follow-up actions. If the alleged perpetrator is a Project worker, the case will be referred to the relevant employer for action under the Code of Conduct and applicable labour laws. Disciplinary action is the responsibility of the employer, while MOWT provides oversight. The survivor will be informed of actions taken, subject to consent. The GRM does not investigate or judge GBV/SEA/SH allegations. Where the survivor opts to pursue legal action, MOWT will facilitate access to support services, while formal investigations remain the responsibility of the justice system.

5.11.4 Case Closure and Confidentiality

A GBV/SEA/SH case is considered closed when: The survivor has been referred to services (with consent); appropriate actions have been initiated against the perpetrator where applicable; or the survivor indicates they do not wish to pursue the case further. All reporting will strictly protect survivors' confidentiality. No information that could lead to identification of survivors or retaliation risks will be disclosed at any stage.

5.11.5 Provision of feedback by Project Teams

The Project Safeguards Teams within the MOWT PIU team, working harmoniously with the Contractors' Safeguards' teams constantly tracks logged grievances against resolution action taken on monthly basis based on the MOWT PIU generated summary grievances resolution. With this information, each of the aggrieved parties are provided timely feedback on progress of resolution of their grievances mainly through the GMCs, phone calls with safeguards teams. They are updated on the decisions made on their grievances. If no decision is made, the complainant is updated on next steps. If the aggrieved person is not satisfied with resolution decision, they have an option (as their right) to appeal to the next stage including Ugandan Courts of Law. Regular and / or periodic stakeholder's engagements are scheduled with GMCs, communities, local leaders and districts to among others issues engage them on progress of grievances resolution both on progress, delayed resolution and challenges thereof. This also constitutes a complaints' tracking and feedback mechanism in relation to grievance redress.

5.13 Training / Capacity building

The PIU Social Development Specialists will work with and support the training of MOWT and the contractor on the GRM and all related management procedures. The training will also provide the established GMCs to understand the GRM for the project as well as their roles.

Furthermore, the communities / PAPs will also be sensitized about the GRM as well as about the dispute resolution process. This information should include the following: who can raise complaints (affected communities), where, when, and how community members can file complaints, who is responsible for receiving and responding to complaints, external parties that can take complaints from communities, what sort of response complainants can expect including timing of response, what other rights and protection are guaranteed and how the disputes will be resolved in an impartial and timely manner. Above all, PAPs will be trained on grievance log forms and made aware of the need to retain a copy of log sheet for future reference with the GMC and MOWT or contractor.

5.14 Payment of reparations following complaint resolution

This is subject to the action agreed upon for resolution between MOWT, contractor and the complainant. Most grievances may be settled in -kind not direct payment.

5.14 WB's Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

Further to the enhanced project-level GRM and the dedicated hotline, the World Bank has developed a specific window under its existing Grievance Redress Service (GRS) to manage complaints related to any World Bank supported project globally. A protocol has been developed to process all complaints related to exclusion or discrimination against vulnerable or marginalized individuals or groups following the enactment of the AHA 2023, in the Uganda portfolio.

6. CHAPTER SIX: SEP MONITORING AND EVALUATION

6.1 Introduction

MoWT will maintain a database detailing all public consultations, disclosure information and grievances collected throughout the project which will be available on request.

Monitoring of the stakeholder engagement activities is important for several reasons such as:

- 1) Ascertaining whether planned stakeholder engagements and other related activities are progressing as planned
- 2) Whether intended outputs are being realized
- 3) For the effectiveness and efficiency of SEP to be evaluated, challenges to be identified and rectified in time.

MOWT will ensure that a periodic review of the implementation of the SEP is carried out, focusing on the effective implementation of the Plan, taking into account the requirements ESS 10 and project plan.

Monitoring assesses whether SEP objectives include the following verifications:

- Public consultations: review of comments from stakeholders and the feedback provided to them.
- Focus groups discussions.
- Rapid satisfaction and impact surveys.
- Consultations with grassroots organizations.
- Community scorecards on the Project.
- Operational GRM with a grievance log.
- Monitoring Reports.

6.2 Level of Monitoring and Evaluation

Two levels of monitoring are anticipated:

- 1) Process monitoring of stakeholders' engagement activities: short-term monitoring of stakeholder engagement activities to ascertain whether SEP is being followed and expected outcomes are being realized; necessary resources have been deployed and are being used efficiently; routine reporting is being undertaken and report are being used to make improvements in the SEP and its implementation; and whether necessary support supervision for the stakeholder engagement team is being realized.

- 2) At the completion of all planned engagement activities after the RAP. ESIA, design and construction implementation phases, a review of activities, outputs and outcomes to evaluate the efficiency and effectiveness of the SEP.

6.2.1 Monitoring and Evaluation Responsibility

Monitoring stakeholder engagement activities will be undertaken by MOWT and appointed representative on a monthly basis and ongoing basis, working with established staff structures, especially ESHS teams. The Contractor will have responsibility of reporting on SEP implementation as well through contractually agreed reporting obligations.

6.3 Monitoring and Evaluation Indicators

By identifying key performance indicators that reflect the objectives of the SEP and the specific engagement activities, it is possible to both monitor and evaluate the process undertaken. The suggested indicators for M and E include

Table 6-1: Performance Indicators

SEP Measure	Indicator (s)
Project Stakeholder Mapping and Analysis	<ul style="list-style-type: none"> Review and expansion of the project's stakeholder mapping
Public Consultation with Stakeholders	<ul style="list-style-type: none"> Number of persons contacted in relation to the number identified in the stakeholder mapping Number of stakeholder engagement activities conducted Number of participants (disaggregated by sex, age, and vulnerable group); Evidence of responding to consultation issues
Continued Disclosure of the Project	<ul style="list-style-type: none"> Evidence of publications on the MOWT website and in the press against the planned frequency
GRM from External Stakeholders	<ul style="list-style-type: none"> Evidence of disclosure of the GRM and available channels Evidence of training on GRM Number and types of grievances received, resolved, and pending. Timeliness of grievance resolution
GBV/SEA	<ul style="list-style-type: none"> Evidence of implementation and disclosure of a specific channel for complaints of sexual and gender-based violence Evidence of training on GBV/SEA GRM Number and types of grievances received, resolved, and pending.

	<ul style="list-style-type: none"> • Timeliness of grievance resolution • Number of GBV/SEA/SH reports, referrals, and follow-ups
Workers Grievances	<ul style="list-style-type: none"> • Evidence of established workers GRM • Number of grievances received, resolved, and pending. • Timeliness of grievance resolution

6.4 Reporting on Stakeholder Engagement

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

Reporting during stakeholder engagements for planning phase in respect to this assignment is anticipated at two levels:

1) Internal reporting within the stakeholder team.

The project will undertake regular reporting on the following.

- i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, Indigenous Peoples Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.
- iii) Quantitative reporting based on the indicators included in the SEP. An illustrative set of indicators for monitoring and reporting is included in Annex 3.

MOWT has developed standard reporting templates for SEP report. All stakeholder engagements of MOWT and other actors are minuted and the results of the minutes are stored in MOWT's stakeholder engagement database that will also be used by the OPRC, PMMC Social Risk NGOs. The purpose of the database is to ensure that communication with stakeholders is accurately

logged such that views expressed are taken into consideration by the project and that any commitments made are delivered upon.

The results of stakeholder engagement activities including how stakeholder comments have been taken account of will be reported in the ESIA, RAP and the monitoring and progress reports established by all parties involved largely for internal coordination but will result in an annual report on stakeholder engagement under NERAMP with December 31 as cut of date.

iv) External Consultants' reporting

Where consultants or service providers are leading on activities such ESIA, RAP, GBV/SEA, HIV/AIDS as externally contractors - these will conform to contractually agreed deliverables and performance indicators as well as harmonized NERAMP II reporting

6.5 Reporting back to stakeholder groups

The SEP will be revised and updated as necessary during project implementation. Monthly stakeholder engagements inventories or summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the project managers.

Specific mechanisms to report back to the stakeholders will include the following: quarterly stakeholder meetings with district leaders, quarterly meetings with GMCs to refresh them about their roles and matters arising from previous engagements This reporting back to the stakeholders will be held quarterly. Other mechanisms will be sharing quarterly project progress briefs including on key with district top leadership

ANNEXES

ANNEX 1: KEY ISSUES RAISED DURING STAKEHOLDER ENGAGEMENTS AND HOW THEY WERE ADDRESSED

SUMMARY OF STAKEHOLDER ENGAGEMENTS CONDUCTED COMPONENT 1 (TORORO-MBALE-SOROTI)

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
9 Nursery Operators	24 Feb 2026	Mbale Weighbridge	4	Identification of PAPs concerns, livelihoods, and communication preferences
10 UWEC Project Engineer	24 Feb 2026	Telephone	01	Validation of impacts, relocation of PAPs affected by UWEC construction activities including access construction within existing MOWT road reserve
11 Nursery Operators and leaders	21 st Feb 2026	Mbale Weigh bridge (Km 46)	26	Updates on project status and forthcoming activities including RAP preparation.
12 NFA/ MOWE field staff	21 Feb 2026	NFA/MOWE Mbale Field Office	3	Working arrangements agreed with UWEC in establishing the UWEC Mbale centre, relocation of PAPs and livelihoods restoration support activities
13 District Community Development Officer (DCDO), Probation officer, Labour officer, Gender officer and staff of MOWT, PMMC and the Contractor.	12/02/2026	Bukedea District	13	Validation of impacts, disclosure preferences, RAP (Nalugayi quarry) and SEP inputs.
14 Leaders in Kongunga town council i.e. The town clerk, CDO, town agents, LC1s from the 3 cells, MOWT, PMMC and the Contractor.	12/02/2026	Kongunga Town council	23	SEP validation and input into proposed Nalugayi quarry (data collection on artisan minors).
15 Chief Administrative Officer, DCDO, The MOWT Filed staff, the Consultants team	11/02/2026	Bukedea District	7	District coordination, land administration, grievance handling, validation of SEP and input in proposed project impacts, updating of ESIA
16 High field Nursery and primary school, Opuyo Nursery and primary school, Awoja bridge primary school.	17 th - 20 th of Feb 2026	Soroti District: High Field, Opuyo and Awoja bridge	305	Input into SEP and expected impacts on road safety concerns and safety sensitizations in schools

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
		primary schools		
17 Landowners for stockpiles (Soroti and Ngora)	08/01/2026	Km 141 and 119 in Soroti and Ngora District	7	Engaged the landowners for the renewal of lease contract for the stockpiles at km 119 and 141, and restoration of the sites
Total			382	
Previous engagements on same proposed project				
18 Mbale District Local Government – CAO, Environment, community development, labour and district planner	13 th May 2024	Mbale district	5	Stakeholder engagements on Lot1B designs, project updates-, scope of works, GBV/VAC, HIV/AIDS, safeguards, project impact and resettlement, key concerns
19 Mbale city leadership - City Clerk, MP, Land Surveyor, City Mayor	13 th May 2024	Mbale City	4	Engagement on project updates
20 Tororo Municipality and District officials: Town Clerk, Mayor Tororo: CAO, Environment, community development, labour and district planner	14 th May 2024	Tororo District	2	Engagement on project updates
21 Bukedea district officials: CAO, Environment, community development, labour and district planner	15 May 2024	Bukedea distr	5	Engagement on project updates, issues and concerns
22 Soroti City and Ngora District: CAO, Environment, community development, labour and district planner	15 & 16 May 2024	Ngora District	8	Engagement on project updates / issues as above
23 GMCs/ Local communities and Community Awoja, Mukura Community Engagement, Olupe Community Engagement, Kapokin trading center, GMC 38 Engagement, Amus Trading Centre GMC 29,	7 th - 21 st May 2024	Tororo – Mbale – Soroti road	344	FGDs / Stakeholder engagements on the designs, project updates-, works, GBV/VAC.

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
Kongunga- GMC 31, Kachumbala Sub County & GMC 32, AChaboi GMC 33, Aloet Trading Centre/Market, GMC 34, Ocuuma Otiluk, GMC 35 and GMC 50 & 51				
Abbreviated RAP Tororo – Mbale – Soroti Consultation				
1. Tororo- Mbale -Soroti (Mbale District leaders, Tororo District Leaders, Mbale City Leaders, Bukedea District Leaders and Kumi District Leadership	November 24	Mbale – Tororo- Soroti	86	ARAP Preparation
2. Market vendors, PAPs in the road reserve: Tororo-Mbale -Soroti road	November 24	Mbale district	78	Updating of vendors on physical and economic displacement. Provision of relocation assistance- Livelihoods restoration Vulnerability assessment
3. Bungkhoh Furniture stores: Tororo- Mbale -Soroti road	November 24	Mbale	12 males	Same as above
4. Nauyo Market Venders: Tororo- Mbale -Soroti road	November 24	Mbale	27F & 16M	Same as above
5. Bugema Market Vendors: Tororo- Mbale -Soroti road	November 24	Mbale	8F, 12M	Same as above
6. Kikindu Market venders - Tororo- Mbale -Soroti road	November 24	Mbale	8F, 10M	Same as above
7. Nkoma Market venders- Tororo- Mbale -Soroti road	November 24	Mbale	6F 17M	Same as above
8. General market Leadership	November 24	Mbale	20	Same as above
Stakeholder Consultations / engagement on ancillary sites acquisition				
9. Soroti District DCDO, District Engineer, Deputy CAO	8 th Dec 2022	Soroti DLG	3	Public Consultations Process for Acquisition of Quarries and Auxiliary Sites, ESIA impacts, mitigation measures, physical and economic displacement impacts and engagement strategies – SEP planning
10. Mbale DCDO, Physical Planner	9 th Dec 2022	Mbale DLG	5	Same as above

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
11. Senior Environment Officer, Deputy CAO				
12. Sub County Chief, Sub County Speaker	14 th Dec 2022	Kwari Sub County, Bukedea	3	Same as above
13. Sub county Speaker, Sub County Chief,	14 th Dec 2022	Bumasikye Sub County, Mbale District	2	Same as above
14. Senior Accounts Assistant (SAA), Sub County Accounts Secretary	14 th Dec 2022	Tororo Town council	2	Same as above
15. Town Clerk, Town Agent and CDO	14 th Dec 2022	Magodesi Town Council Tororo	3	Same as above
ESIA Stakeholder Consultations March 2020				
16. Tororo – Mbale – Soroti district leadership	09th /03/2020	Soroti District		Consultations on road environment and social impacts – inform SEP planning and implementation
17. Ngora District leadership	10th/03/2020	Ngora District	6	Consultations on road environment and social impacts – inform SEP planning and implementation
18. Mbale District leadership	Mbale District -	11th/11/2020	8	Consultations on road environment and social impacts – inform SEP planning and implementation
19. Bukedea District leadership	Bukedea District -	12th /03/2020	7	Consultations on road environment and social impacts – inform SEP planning and implementation
20. Kumi District leadership	12th /03/2020	Kumi District	10	Consultations on road environment and social impacts – inform SEP planning and implementation
21. Tororo District: communities of Osukuru, Molo, Mukunju, Eastern and Western Division.	13/03/2020	Tororo	18	Consultations on road environment and social impacts – inform SEP planning and implementation

Stakeholder / Entity/ People Met	Date(s)	Venue / Level	No of Ppts	Purpose and Relevance to SEP/ Key Issue
22. Ngora District: Kapiri and Mukura Sub-counties	14/03/2020	Ngora	10	Consultations on road environment and social impacts – inform SEP planning and implementation
23. Mbale District: communities of Bumbobi Bungokho Busiu Busoba.	19/03/2020	Mbale	12	Consultations on road environment and social impacts – inform SEP planning and implementation
24. Kumi District: Kumi, Northern and Southern Division	19/03/2020	Kumi	12	Consultations on road environment and social impacts – inform SEP planning and implementation
Managing Labour Influx and Social Risk Assessment associated with GBV/SEA and RAP/ ROW Tororo-Mbale – Soroti – MAY 2018				
25. Tororo, Mbale and Soroti district leadership	May -2018	Tororo Mbale Soroti	60	NERAMP – SEP engagement planning
Engagement on Tororo- Mbale – Soroti -Key stakeholder concerns				
26. Roadside communities / residents Communities, LC 1 and LC 3 leaders	October 2018	Tororo- Mbale- Soroti	500	GMC Formation in Consultation with stakeholders – detailed SEP planning
GBV/SEA Risks Consultation				
27. MOGLSD and 25 CSOs (Tororo-Mbale-Soroti)	July 2018	Soroti	25	Consultation on GBV/VAC Risks and management measures – SEP planning – GBV/SEA action plan
Total participants			872	

TABLE 0-3: COMPONENT 1 KEY ISSUES RAISED DURING STAKEHOLDER ENGAGEMENTS AND HOW THEY ARE ADDRESSED

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
Component 1: LOT 1: Road Rehabilitation, Operations and Maintenance		
Access to jobs to local people	Priority for local employment	Local labour preference included transparent recruitment and disclosure measures related to employment
Local content / project benefits to the community	Priority for local suppliers for local materials, food supplies and subcontracts for local companies	Many opportunities will be available such as local food, rental, materials, medical services, local contracts for

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
		work, drainage, road maintenance. Addressed in ESMP / SEP. Also with a good road, communities should be encouraged to engage in socio-economic activities, business start, increased trade to take advantage of
Sharing road designs with districts, local leaders and communities	Stakeholders need to be aware of the proposed designs and incorporate their concerns such as covered drainage for cities and towns before it is late	MOWT will disseminate the designs pre-construction phase for review and input of relevant stakeholders
Pedestrian Walks	Will project provide walkways to separate pedestrians from vehicles and reduce accidents	MOWT will explore providing walkways only in urban centers not entire
Problematic road sections	MOWT may not know all problematic road sections such black spots, flooding sections, poor drainage spots, rural access points and thus generating a lot of grievances during works	MOWT will undertake joint inspections with local leaders, GMCs and district works department to identify those problematic road sections
Road Safety Concerns	Road projects increase accidents and this may not be exception, provide humps early enough to minimize accidents	Road safety measures are integral to the project designs and measures to prevent accidents are also included in the construction activities. Further road safety education is integral to the project
Dust	Dust nuisance during road work disrupts local businesses and health risks	Dust suppression will be addressed in the ESMP and suppressed constantly during road works as contractual obligation
Disruptions of public utilities	We have experienced disruption of power, water and phone lines by road works	Re-location of public utilities is managed prior to construction works, for the short disruptions affected communities and businesses will be informed in advance with regrets of inconveniences
GBV and sexual violence exploitation	With increased labour influx incidences of GBV and sexual abuse may increase from workers towards children, young girls and married persons	MOWT and contractor will integrate management of GBV / SEA into the project / contracts to ensure workers sign CoC and regularly sensitized on GBV/SEA. Communities will also be engaged as per SEP

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
GRM	Some grievances registered may remain unresolved by contractors / projects	MOWT has established a robust GRM including setting up GMCs at community level to log community grievances at community level and ensure they are received by MOWT and are resolved in a timely manner. MOWT will keep complainants informed of progress
GMCs facilitation	GMCs should be adequately facilitated to link well with MOWT and contractor and facilitate the GRM	MOWT will not only focus on material facilitation but will also provide training and other capacity building as incentives to enable GMCs function well
Awareness & mobilisation	Risk of conflict if communities not sensitized	Continuous engagement plan defined in SEP; multiple communication channels
Transparent communication	Need for accurate, consistent information	Disclosure strategy and feedback loops defined in SEP
Right of Way Acquisition	Physical and economic displacement	MOWT is in process of assessing the extent of land acquisition requirements for the project. Where land -take is required. A resettlement action plan will be done with involvement of interested parties and other parties, and those impacted will be adequately compensated and resettled if physically affected.
Compensation Issues	Concerns of fair compensation, over valuation, graves, replacement costs	World Bank ESS5 on Land Acquisition, Restriction on Land Use and Involuntary Resettlement -aligned compensation principles; disclosure during RAP development and implementation
Grievance management over land issues	Disputes over valuation and family conflicts	Multi-tier Grievance Mechanism outlined in SEP
HIV/AIDS & health risks	Labour influx increases health risks	Contractor ESMP to include HIV/AIDS prevention; district partnerships
Timing of resettlement	Fear of displacement before payment	SEP reiterates “compensation before displacement”
Local benefits / power access	Concern over bypassing communities	Addressed through RAP-linked community development initiatives
Valuation process	Who values and delays	Independent valuers and CGV approval disclosed
Early notification of project start-up	Notify stakeholders in advance of project of project start and those	MOWT will convene project start-up meetings and provide details of the

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
	specifically affected so that they plan to manage early	project and associated impacts and those affected
Key stakeholders' participation	Project should actively involve districts, lower-level government structures and communities	MOWT has developed a SEP in which districts, LC 111, LC1, GMCs, communities, vulnerable and marginalized groups will be adequately involved
Mbale Weighbridge		
Non-payment of compensation / over delayed compensation	PAPs were valued and were prepared	MOWT regrets inconveniences caused as project was restructured and funds became unavailable to do the project (weighbridge)
Out-dated RAP/LRP by CGV	The RAP / LRP was approved by CGV in December 2024 (over a year ago) and was not implemented and now outdated	MOWT will update the RAP/LRP to ensure it captures the current developments and updated values
Additional capitalization of nurseries	Some nursery operators have invested more in the businesses (nurseries) and this has raised the valued amount	As above RAP update will re-value the businesses. Stakeholders will be continuously engaged through appropriate channels highlighted in the SEP under preparation.
Change of planting varieties by nursery operators	Some PAPs stopped planting species that take time to mature in fear of being relocated, which MOWT delayed. They need compensation for this loss	MOWT conducted previous engagements about non-relocation before payment and encouraged every to continue their operations. MOWT will thus revalue and compensate for existing / ongoing activities.
Relocation sites	The PAPs had by 2025 relocation places but some taken already due to delayed / non- payments.	In the event NERAMP II is approved, PAPs will be engaged and informed of the re-valuation process/ update schedule of the RAP/LRP and including when to identify new relocation sites
New Nursery Operators at the Weighbridge,	What will MOWT do for new nursery operators at the Weighbridge, not valued in the original RAP	MOWT/PIU will as part of RAP update, will value all nurseries and trees of all new PAPs and re-value the earlier existing ones, with active engagement through meetings and other channels of communication as part of SEP
PAPs compensation for NFA land donated to UWEC	Access works to be undertaken by UWEC will affect approx. 16 PAPS some of the PAPs nurseries	MOWT will not be responsible for physical and economic displacements caused by other developers not

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
		associated with the proposed project. PAPs and local leaders should directly engage UWEC /developer. MOWT already engaging with UWEC over the same
Relocation time	Inquiry was made about how much time they would be given to vacate the marked areas.	A period of four to six months shall be given to PAPs to relocate with a disturbance allowance of 30%. Some PAPs mentioned once paid they need not more than 2 months to relocate. Engagements through meetings and other channels included in the SEP.
Grievances	PAPs at nurseries proposed nursery operators' specific other stakeholders wanted to know where they would channel their complaints about the project. It is strongly proposed a nursery operators specific grievance committee be formed	MOWT has an established GRM from Community to District and MOWT/PIU level, the weighbridge area will be incorporated, MOWT open to setting up a weighbridge GMC. Ongoing engagement activities – meetings, one-on-one phone calls, radio announcements, special vulnerable groups activities embedded in SEP
Damage outside the marked site / project area	Activities of the project may damage property outside the demarcated 4.78ha? What provisions are damaged?	Any damage outside the marked site shall be considered for assessment on a case-by-case basis.
Flooding around weighbridge and overflowing bridge 1 Km ahead	PAPs expressed worries over occasional flooding around the weighbridge and ever flooding bridge (1 Km ahead on Mabel-Tororo Road) and requested if it also be renovated.	MOWT will make appropriate designs to address drainage around the weighbridge while the other bridge will be addressed in the rehabilitation of Tororo-Mbale road section. Stakeholders will be engaged in the process through SEP activities – meetings, GMCs, grievances redress, other communication channels
Accruing project benefits to the community	<ul style="list-style-type: none"> Will prioritise employment of the local people, especially the youths. Will project support schools and community projects like water, roadside sanitary facilities for the nursery operators 	A comprehensive needs assessment will be undertaken together with the community to identify an activity that could be funded to benefit the entire community. This will be during the implementation phase. The developer will be asked to make consideration for

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
		employment of local people who express the will and ability to work.
Taxes remittances to DLGs to Mbale City	<ul style="list-style-type: none"> MOWT should ensure Contractors remits workers taxes (local service tax) at Weighbridge to Mbale City 	MOWT ensures total contractor's compliance with statutory obligations such as tax and nssf remittances. MOWT will encourage DLGs/City to engage the contractor on all project issues including tax remittances and modalities
PAPs Identification documents	<ul style="list-style-type: none"> What document can be used by a PAP someone who does not have the National Identification.? 	All the PAPs are encouraged to have their National Identification cards, if lost they can get replacement or NIN from NIRA.
Assistance for National IDs processing	Can MOWT help us to get National IDs faster?	MOWT encourages will try and explore with NIRA at district level to speed up the process for PAPs to get IDs leveraging on government-to-government cooperation.
Joint Registration of PAPs	If I jointly registered my name and my wife, how will the payments be made?	MOWT commends cooperation of spouses and families in jointly receiving payments. Both spouses will be advised to open joint account and will be paid jointly. If you agree your spouse will pick the money, you will be guided to consent in writing as to who is paid the money and instruct MOWT accordingly. Through ongoing various engagements such as sensitisation of valuation process, financial literacy awareness, information verification and disclosure engagement meetings, and other communication channels, PAPs will be further engaged and guided on the RAP process including livelihoods assistance
Vulnerable PAPs	We some people that fell sick and are bedridden we suggest such persons been traced and supported with compensation from home	A list of vulnerable members shall be compiled / updated, and their status will be monitored throughout the project period. They will be provided with special assistance during the process
Nalugai Quarry		

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
Compensation for neighboring Households and Project -affected persons within 500M radius	Compensation and relocation of all neighbouring households within 500m radius	MOWT to ensure an acceptable RAP is prepared to address all direct affected parties and fully implemented with prior and continuous engagements as per SEP
	Low rates of compensation cannot facilitate relocation	MOWT to ensure compensation / RAP rates represent FRV and in accordance with ESS5 before approval for implementation. Continued PAPS engagement as per SEP activities
Health and safety issues	Blasting concerns including blasting noise) dust on crops, flying stones, dust& noise beyond 500m,	MOWT to ensure there are appropriate blasting measures such as dedicated blasting days announced prior in advance, wet crashing to avoid dust. Keep the PAPs and stakeholders meaningfully engaged as per SEP.
	Dust from quarrying needs to be suppressed	MOWT to ensure contractors / subcontractors will adequately address dust suppression within the ESMP and stakeholder engagements with local communities and PAPs.
	Some cracks may develop in buildings because of blasting	MOWT to ensure RAP approval addresses issue of cracked houses and other injurious affections including undertaking baseline of neighboring structures
GBV/SEA risks and other social ills	GBV/SEA risks exist	MOWT will ensure the contractor / sub-contractor will adapt Project GBV/SEA/H action plan focusing on prevention and response as part of RAP preparation and implementation. GBV/SEA will be integral to SEP activities through agreed program including meetings and other communication channels
Access protocols	Open access to the quarry is safety risk for persons at the quarry	Contractor to institute and implement access protocols within the approved RAP. Continuously engage stakeholders as per SEP program.

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
GRM	Lack of clear GRM for the quarry	MOWT a GRM includes aligning with MOWT GRM tiers in instituted and implemented by the contractor (assistance from MOWT PIU) and in accordance with this SEP, and ESS 10.
Safety of families inside quarry	Safety concerns for workers' families residing within the quarry.	The approved RAP should adequately address all safety concerns including but not limited to all workers residing outside the existing quarry area. Engagement activities embedded in SEP
Fencing	Unfenced premises	Approved ESIA and RAP should provide for fencing off the quarry to restrict unauthorized access from the general public
Local artisans	Local artisan miners from the vicinity may be rendered redundant	MOWT ensure RAP approval provides relocation assistance of subsistence and Livelihoods restoration support for local artisan miners with the 500M radius
Local employment and benefits	Limited jobs for the locals	MOWT to ensure contractors / subcontractor meaningfully engages local communities about locally available opportunities at the quarry and ensure promotion of employment for the locals. Ensure contractors / subcontractor have an approved labour management plan. Local opportunities embedded in SEP and will be implemented through elaborated engagement channels – meetings, GRM, phone calls etc

Component 2 Key Issues Raised During Stakeholder Engagements and How They Are Addressed

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
Project benefits: Access and connectivity	Increased accessibility and reduced loss of time	Dissemination of project description and associated benefits embedded in the SEP and will be implemented through appropriate engagement channel
	Selected roads will improve accessibility to key service centres, i.e., health centres, schools and other public facilities.	This is to be enhanced in SEP implementation through appropriate communication channels
	Selected roads will benefit the refugees, especially self-settled refugees in Moyo town.	
Access to jobs to local people	Priority for local employment	Local labour preference included; transparent recruitment and disclosure measures related to employment
Road technical design	<ul style="list-style-type: none"> Need to share road for town road including the 17 Km access road to Bidibidi refugee camp and settlement 	Preliminary designs for the access road (17km) to be shared to guide scoping and ESIA studies.
	Road design to take care of the drainage channels and walkways	MOWT to consider in designs and disseminate feedback as per SEP. Outline designs for clustered markets, refugee roads and town roads in SEP. Messages on the basis of prioritizing town roads were developed and disseminated.
	Does design does not cater for dark spots in town	As above
	Install solar-powered street lighting on proposed roads.	As above
	Design should connect to the border post	As above
	Integrate community security safeguards, including streetlights	As above
Road corridor	How roads have been selected not clear to wider to wider communities, local leaders and other stakeholders	All the selected town roads have been surveyed, opened and gazetted with a width of 20 meters jointly with DLGs of KYM and relevant town councils . MOWT and DLGs/Town councils to integrate selection criteria and documentation in SEP. MOWT to follow up through SEP activities

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
	Will occupants of gazetted corridors be relocated before road works	MOWT will ensure compliance to ESS 5 and ESS10 and SEP. Occupants of gazetted corridors be issued letters of consent
Selection criteria for roads	Prior selection, there is need for criteria for clustering priority roads	MOWT/PIU has developed and is implementing selection criteria for markets in consultation with key stakeholders. Already used selecting 5 town roads selected were approved by the respective town councils. The selection criteria included: connectivity to public services; Economic viability and none land acquisition for refugees and host communities. To be further disseminated in the SEP
	Clarity needed on the selection of roads for small towns and trading centres	MOWT with DLGs / Town Councils will undertake further stakeholder engagements on selection criteria as per SEP
Underprioritized road selection in Moyo Town and Lefori town council	32 roads are prioritized by the stakeholders, but only 5 km will be funded in Moyo,	The scope of work does not cover all priority roads due to budget limitations; selection issues embedded in SEP and will further be addressed through ongoing engagements. Outline of designs for clustered roads in SEP.
Land acquisition and resettlement		
Understanding Land tenure issues	<ul style="list-style-type: none"> Land tenure is customary and not managed local governments, but clan leaders 	<p>Consultation will be conducted with clan leaders and LG officials</p> <p>Valuation surveys to separate landowners from land users</p> <ul style="list-style-type: none"> Compensation will ensure that both landowners and land users are paid for what they own.
Land acquisition	<p>There may be some incumbancers in some sections of selected town roads and thus need for land acquisition and relocation of structures, residences and businesses.</p> <p>Will there be individual consents for land acquisition from residents</p> <p>Will there be forced evictions</p> <p>Need for guidelines for land donations including individual consents</p>	<p>DLGs and town council authorities will undertake fresh surveys of selected roads to ensure there are no any land encumbrances. Where they exist, engage with concerned parties to resolve them in an acceptable manner.</p> <p>MOWT will ensure land acquisition, compensation and re-location and resettlement of PAPS (if any), conform to ESS5, including verifiable consents for land donation. No forced evictions will be accepted. Continuous stakeholder engagement activities will be maintained during land acquisitions process as per this SEP including maintaining a GRM throughout the project cycle.</p>

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
	Voluntary land donation consent agreements unclear on some aspects such titling, land transfers to donees / land recipients	<ul style="list-style-type: none"> •
Land compensation where applicable	<ul style="list-style-type: none"> • compensation / land acquisition issues - DLGs don't have updated compensation rates 	<ul style="list-style-type: none"> • The project will consult further the DLGs about updated compensation rates. Where these are not present, neighboring districts updated rates eg Arua may be utilized to adopt compensation rates
	Unfair compensation issue	<p>compensation will be aligned with ESS5</p> <ul style="list-style-type: none"> • The project will ensure timely compensation at full replacement cost.
Information access on valuation in SEP	<ul style="list-style-type: none"> • There will be need for clear information on valuation process and compensation rates 	<ul style="list-style-type: none"> • PAPs, communities, community and district leaders to be informed about the property valuation process · Provided for in SEP
Livelihoods restoration	Consider impacts on livelihood activities	<ul style="list-style-type: none"> • Livelihood restoration to be part of RAP and stakeholders will be engaged as per SEP program
Sensitive receptors	<p>Sensitive receptors such as health centres, schools, rivers, waters sources</p> <ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Scoping consultant to undertake focused and intensified stakeholder engagements on selected roads across the 3 towns and access roads. Sensitive receptors will be comprehensively scoped and assessed with meaningfulness of all relevant stakeholders. MOWT will ensure all assessed risks and mitigation measures are integrated SEP activities and implemented
Composition of ESIA team	<ul style="list-style-type: none"> • The external ESIA team should be comprised of key experts for a comprehensive assessment of all anticipated impacts and well-coordinated with project and district / town council technical teams 	<ul style="list-style-type: none"> • MOWT will ensure all experts coordinate with MOWT PIUs and designated project teams. MOWT to ensure ESIA teams engage project and district / town council technical teams including sharing ToRs and joint working during field data collection. Ongoing engagements with project and other government experts integrated into SEP
Access road to Bidibidi settlement (17km)	<ul style="list-style-type: none"> • Coordinate with JICA, which is working on 2km of access road starting at Delo in Yumbe town council, leaving 15km to be funded under component 2 of NERAMP 	<ul style="list-style-type: none"> • MOWT to closely engage and coordinate with JICA as well as ensuring other key DLGs, OPM and other stakeholders' engagement. SEP to include continuous engagement activity

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
		including dissemination of the road design for the access road as per SEP
Environmental impacts	Potential negative environmental impacts (dust and air pollution)	MOWT will ensure managing negative impacts part of the ESMP, SEP and ongoing engagements through various communication channels pollution control plans
Cultural heritage	There may be sacred trees along alignment	<ul style="list-style-type: none"> • Chance find procedure to be prepared and implemented under the project
Vulnerable groups	Vulnerable groups may be left out of project <ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • The SEP which guides the consultations includes strategy for identifying and engaging vulnerable groups
GBV /SEA risks	GBV/SEA key concern in the refugee setting	A GBV/SEA/SH action plan will be developed and implemented throughout the project. This will contribute to the management of GBV issues. Workers will be required to sign a CoC A nominated service provider will be engaged to conduct both community and workers sensitizations.
Project GRM	Elaborate on the multi-tier project GRM	MOWT will operate a four -tier GRM – community level, sub county -level, district level and MOWT-PIU level with a liberty for judicial redress.
Stakeholder engagement and communication	Need for effective consultation and engagement Involve municipal, sub-county, cultural, and clan leaders in consultations	Ongoing stakeholder engagement activities have been embedded in SEP. Town authorities, clan leaders, and vulnerable groups to be consulted throughout the implementation of the project Continuous consultations · Continuous community sensitization · Community members, road users, and local leaders to be involved in consultations
Women and child rights	<ul style="list-style-type: none"> • Protection of women and children's rights 	<ul style="list-style-type: none"> • These to be done through sensitization and IEC materials. Vulnerable groups integral to SEP
Labour influx	<ul style="list-style-type: none"> • Impact of construction workers on family and social relations 	<ul style="list-style-type: none"> • The project will prepare and implement an LMP including a workers' GRM, sensitization for workers and the community.
Safety and security related	Risk of child labour, accidents, and SGBV near schools	No children below the age of 18 will be employed on the project, road safety sensitization will be conducted throughout the project. A nominated service provider will be engaged to conduct GBV sensitization

Issue Raised	Summary of Stakeholder Concerns	Response - How Issue Addressed in the SEP / Project Design/
		throughout implementation of the project. All communities will be engaged in child labour,

ANNEX 2: GBV / SEA / SH CASE REGISTRATION FORM - TEMPLATE

(CONFIDENTIAL – RESTRICTED ACCESS ONLY)

Important note:

- 1) This form shall **only be completed by trained GBV focal points**.
- 2) Information recorded must be **limited to what is strictly necessary**, guided by the **Survivor-Centred Approach (SCA)**.
- 3) No identifying information shall be shared without the **explicit, informed consent** of the survivor.

A. Administrative Information

Item	Information
1	Grievance / Case ID
2	Survivor Code (unique identifier – no names)
3	Date case registered
4	Date incident occurred (if known)
5	Case reported by survivor directly <input type="checkbox"/> Yes <input type="checkbox"/> No
6	Case reported by third party (without survivor present) <input type="checkbox"/> Yes <input type="checkbox"/> No
7	Initial point of contact (GBV focal point / hotline / CLO / other)
8	Immediate safety risk identified <input type="checkbox"/> Yes <input type="checkbox"/> No
9	Immediate referral required <input type="checkbox"/> Yes <input type="checkbox"/> No

B. Survivor Information

(Record only with informed consent; do not collect unnecessary personal details)

Item	Information
10	Sex <input type="checkbox"/> Female <input type="checkbox"/> Male <input type="checkbox"/> Other
11	Age (or age range)
12	Location / Area (district/sub-county only)

13	Person with disability <input type="checkbox"/> Yes <input type="checkbox"/> No
14	Child survivor (<18 years) <input type="checkbox"/> Yes <input type="checkbox"/> No
15	Is the survivor a project-affected person or community member? <input type="checkbox"/> Yes <input type="checkbox"/> No
16	Informed consent obtained to record this case? <input type="checkbox"/> Yes <input type="checkbox"/> No
17	Consent to share anonymised information for reporting? <input type="checkbox"/> Yes <input type="checkbox"/> No

C. Child Survivor Sub-Section (Complete only if applicable)

Item	Information
18	Does the child live alone? <input type="checkbox"/> Yes <input type="checkbox"/> No
19	Primary caregiver relationship (parent/guardian/relative/other)
20	Immediate child protection referral made <input type="checkbox"/> Yes <input type="checkbox"/> No

D. Incident Description (Survivor's Own Words)

(Do not probe; record only what the survivor chooses to share)

Item	Information
21	Brief description of incident
22	Incident location (general, non-specific)
23	Was any money, goods, services, or benefits exchanged? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
24	Type of incident <input type="checkbox"/> SEA <input type="checkbox"/> SH <input type="checkbox"/> Other GBV

E. Alleged Perpetrator Information

(Only if voluntarily provided by survivor)

Item	Information
25	Number of alleged perpetrators
26	Relationship to survivor (worker/community/unknown)
27	Is the alleged perpetrator associated with the Project? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
28	Employer (if project-related) (Contractor / Sub-contractor / Other)

F. Referral and Immediate Support Actions

Item	Information
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29	Survivor referred to services <input type="checkbox"/> Yes <input type="checkbox"/> No
30	Type of services requested (tick all that apply): <input type="checkbox"/> Health <input type="checkbox"/> Psychosocial <input type="checkbox"/> Legal <input type="checkbox"/> Police <input type="checkbox"/> Shelter <input type="checkbox"/> Livelihood support
31	Referral organisation / service provider
32	Safety measures taken (transport, safe space, accompaniment)
33	Survivor's immediate emotional state (general observation only)

G. Case Management & Closure

Item	Information
34	Case handler (GBV focal point code)
35	Follow-up actions agreed (with survivor consent)
36	Case status <input type="checkbox"/> Open <input type="checkbox"/> Referred <input type="checkbox"/> Closed
37	Date of closure (if applicable)
38	Reason for closure (services provided / survivor opted not to proceed / referral completed)

H. Confidentiality Statement

- 1) All information contained in this form is **strictly confidential** and shall be stored securely with **restricted access**.
- 2) No information shall be disclosed without the survivor's informed consent, except where required by law and agreed by the survivor.
- 3) Names of survivors, alleged perpetrators, or witnesses **must never be included** in reports shared with the Project, the World Bank, or other parties.

Annex 3: MOWT Grievance Logging Sheet Template

Ref NO: (to be assigned by Grievance Officer/ MOWT PIU)		
1	Name (The Complainant/s should feel free to remain anonymous)	Name/s of complainants Gender Male Female (Box) Age of complainantYears. I wish my identity not to be disclosed Yes (Box)... No...(Box). My identity should not be disclosed without my consent...Yes (Box)...No (Box)
2	Contact Information Specify how you would like to be contacted and provide details	Contact me by: Telephone.....email..... Post (P.O Box)..... Physical address (Specify).....
3	Language (Specify all possible languages in which you can be contacted)	
4	Description of grievance	What.....
		Where.....
		When.....
		How
		By whom.....
		What was the impact/outcome.....
5		Frequency of incident

6.	What would you like to happen in order to resolve the grievance
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Name and Signature of GMC Secretary _____ Signature _____ Date: _____

Name and Signature/Thumb print of complainant _____ Signature _____ Date: _____

Grievance resolution status

Issue Type	Issue Description	Action Taken	Issue Status

Resolution signatures

Name of ComplainantSignature.....Date.....

Second Party (UNRA/Contractor etc)Signature.....Date.....

GMC Chairperson NameSignature.....Date.....

GMC Secretary NameSignatureDate

Annex 4: Anti-Homosexuality Act (AHA) 2023

Following the World Bank Group's concerns with Uganda's enactment of the Anti-Homosexuality Act (AHA) 2023, the Government of Uganda issued five Circulars (see Annexes 6 and 7) regarding this law to ensure inclusion and non-discrimination of vulnerable or marginalized individuals or groups. Of particular importance is the Circular on Uganda's Social Safeguard Policies issued on September 21, 2023, by the Ministry of Finance, Planning and Economic Development, to all Accounting Officers, Ministries, Departments and Agencies and Local Governments which states that:

- "All World Bank-financed projects [in Uganda] must be implemented in a manner consistent with the principles of non-discrimination as provided under Article 21 of the Constitution of the Republic of Uganda. These projects should also be implemented in accordance with World Bank policies and applicable Legal Agreements.
- Under these projects, no one will be discriminated against or stigmatized, and the principles of nondiscrimination and inclusion will be adhered to. Support should be provided to all project beneficiaries.
- All implementing entities of World Bank [financed] projects will implement specific mitigation measures to address non-discrimination.
- These mitigation measures will require enhancing project grievance redress mechanisms as well as strengthening existing project monitoring by implementing entities including third-party monitoring [the Enhanced Implementation Support Mechanism] where applicable.
- Each project implementation entity shall develop comprehensive guidelines to address nondiscrimination."

Considering this, further consultations were undertaken on nondiscrimination for the project environmental and social risk management documents including the Environmental and Social Impact Assessment (ESIA) prepared, to identify the additional risks and describes mitigation measures to address these risks. They include the implementation, monitoring, and reporting arrangements, and roles and responsibilities to assess the efficacy of the additional mitigation measures being implemented in some of the ongoing World Bank-supported projects. They also include the risks identified in the public consultations on these documents involving the Government of Uganda and civil society organizations. Noteworthy is that the World Bank will provide support to the Government of Uganda, particularly its Project Implementation Units, to help them to implement the additional mitigation measures for this project. Guidelines for implementing these mitigation measures to address AHA related risks are provided under Annex 8.

January 6, 2024: Additional Consultations on Non-Discrimination

In January 2024, additional consultations were undertaken on the project to specifically discuss the vulnerability of some individuals or groups to discrimination. During the consultations, key issues raised relating to the Project included:

- The possibility for discrimination against vulnerable or marginalized individuals or groups from access to project benefits.
- The need for a strategy to ensure that recruitment for contracts is competitive and based on merit.
- The possibility of hostility towards and stigmatization of individuals or groups based on their vulnerability.

The approach to managing these issues and other issues raised during the consultations are found at Annexes 6, 7 and 8 of this SEP. A summary of these additional consultations is posted on the World Bank website under Uganda Consultations on <http://www.worldbank.org/en/country/uganda/brief/consultations>.