FP034: Building Resilient Communities and Ecosystems through Restoration of Wetlands and Associated Catchments in Uganda (UNDP), Uganda

CSO comments on the project given as intervention during the $15^{\rm th}$ GCF Board Meeting, December 2016

- We welcome the demonstrated efforts to ensure strong country ownership by aligning the project with relevant national laws and climate related policies, strategies and programs.
- We note with appreciation the robust stakeholder engagement, gender sensitivity in planning and potentially in implementation and access to benefits arising from the project. The inclusion of the NGOs as part of the project implementation arrangements is also welcomed.
- It is evident that the project, specially through the boundary demarcation and gazettement of wetlands, will affect indigenous peoples and local communities, i.e. the Banyabutumbi and the Batwa. The livelihoods of these communities in the area are predominantly dependent on wetlands and other natural resources. It is crucial that these communities are recognized and specific interventions such as compensation or alternative livelihoods, are designed to address key challenges to them arising from the project.
- It is not clear from the project document how the original high risk factor (attributed to lack of commitment from target communities) changed from a high of 5 to low. (Refer to Para 104)
- In Para 57, it says that "in accordance with the National Environment Management Act Cap 153, the proposed project does not require detailed environmental assessment before implementation." In this case, there are different actors with different Environmental and Social Standards i.e. UNDP, the GCF and the government of Uganda. We would like to seek clarity -- in such a circumstance, which ESS takes pre-eminence, the one with the lower threshold or the higher threshold?