Global Opportunities for the Long-term Development of ASGM (GOLD+) in Uganda

Part I: Project Information

Name of Parent Program
Global Opportunities for Long-term Development of artisanal and small-scale gold mining ASGM) Sector Plus - GEF GOLD +

GEF ID
10618

Project Type
FSP

Type of Trust Fund
GET

CBIT/NGI
CBIT **No**
NGI **No**

Project Title
Global Opportunities for the Long-term Development of ASGM (GOLD+) in Uganda

Countries
Uganda

Agency(ies)
UNEP

Other Executing Partner(s)
IMPACT

Executing Partner Type
CSO

GEF Focal Area
Chemicals and Waste

Taxonomy

Focal Areas, Chemicals and Waste, Mercury, Artisanal and Scale Gold Mining, Land Degradation, Sustainable Land Management, Community-Based Natural Resource Management, Influencing models, Demonstrate innovative approache, Deploy innovative financial instruments, Convene multi-stakeholder alliances, Strengthen institutional capacity and decision-making, Transform policy and regulatory environments, Stakeholders, Private Sector, Large corporations, Capital providers, Financial intermediaries and market facilitators, Local Communities, Type of Engagement, Information Dissemination, Participation, Partnership, Consultation, Communications, Strategic Communications, Awareness Raising, Education, Public Campaigns, Behavior change, Beneficiaries, Civil Society, Academia, Community Based Organization, Non-Governmental Organization, Trade Unions and Workers Unions, Gender Equality, Gender Mainstreaming, Sex-disaggregated indicators, Gender-sensitive indicators, Women groups, Gender results areas, Capacity Development, Knowledge Generation and Exchange, Access to benefits and services, Access and control over natural resources, Participation and leadership, Capacity, Knowledge and Research, Knowledge Exchange, Innovation, Knowledge Generation, Workshop, Training, Waste Management, Hazardous Waste Management, Seminar

Rio Markers

Climate Change Mitigation

Climate Change Mitigation 0

Climate Change Adaptation

Climate Change Adaptation 0

Submission Date

12/2/2021

Expected Implementation Start

5/1/2022

Expected Completion Date

4/30/2022

Duration

60In Months

Agency Fee($)

522,500.00

A. FOCAL/NON-FOCAL AREA ELEMENTS

Objectives/Programs	Focal Area Outcomes	Trust Fund	GEF Amount($)	Co-Fin Amount($)
CW-1-1	Reduction of anthropogenic releases/emissions of mercury from Artisanal and Small-Scale Gold mining into the environment	GET	5,500,000.00	13,016,000.00
		Total Project Cost($)	**5,500,000.00**	**13,016,000.00**

B. Project description summary

Project Objective

To reduce the use of mercury in the ASGM sector in Uganda through a holistic, multisectoral, integrated formalization approach, and increase access to traceable gold supply chains and finance for adoption of sustainable mercury free technologies

Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing($)	Confirmed Co-Financing($)
Formalization Optimization	Technical Assistance	Outcome 1: Government and other national stakeholders increased their capacity to formalize the ASGM sector	Output 1.1: Legislative, regulatory and policy frameworks for formalizing the ASGM sector are adopted and implemented by government Output 1.2: The jurisdictional and multi-stakeholder approach is piloted at selected ASGM mine sites at the local level	GET	1,224,367.00	658,750.00

Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing($)	Confirmed Co-Financing($)
Financial Inclusion and Responsible Supply Chains	Investment	Outcome 2: Miners in Uganda accessed financial products to invest in mercury free technologies	Output 2.1 Increased access to finance through responsible supply chain mechanisms are made available to artisanal miners	GET	1,537,467.00	10,813,750.00
			Output 2.2 Increased access to finance through existing or new financial inclusion initiatives are made available to artisanal miners			

Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing($)	Confirmed Co-Financing($)
Enhancing Uptake of Mercury-free Technologies	Technical Assistance	Outcome 3: Artisanal miners in Uganda adopted mercury free processing technologies	Output 3.1: ASGM stakeholders increased their awareness about mercury and the importance of its reduction Output 3.2: Artisanal miners are capacitated with better ASGM practices (including environmental and gender equitable aspects) for both women and men involved in gold mining at targeted sites	GET	1,643,766.00	609,750.00

Project Component	Financing Type	Expected Outcomes	Expected Outputs	Trust Fund	GEF Project Financing($)	Confirmed Co-Financing($)
Knowledge sharing, communication and local capacity building support	Technical Assistance	Outcome 4: Information and knowledge shared led to improvement in the management of ASGM sector in Uganda	Output 4.1: Knowledge products and tools developed through the project are made available nationally to all GEF planetGOLD project stakeholders in Uganda Output 4.2: Knowledge products and tools developed through the project are available globally through the GEF planetGOLD programme	GET	697,496.00	588,750.00
Monitoring and Evaluation	Technical Assistance	Project achieves objective on time through effective monitoring and evaluation	Project monitored and evaluated	GET	135,000.00	75,000.00
				Sub Total ($)	**5,238,096.00**	**12,746,000.00**

Project Management Cost (PMC)		
GET	261,904.00	270,000.00
Sub Total($)	**261,904.00**	**270,000.00**
Total Project Cost($)	**5,500,000.00**	**13,016,000.00**

C. Sources of Co-financing for the Project by name and by type

Sources of Co-financing	Name of Co-financier	Type of Co-financing	Investment Mobilized	Amount($)
Recipient Country Government	National Environment Management Authority (NEMA) and Ministry of Energy and Mineral Development (MEMD)	In-kind	Recurrent expenditures	2,000,000.00
Private Sector	Argot Heraeus	Grant	Investment mobilized	10,000,000.00
Private Sector	SAP	In-kind	Recurrent expenditures	200,000.00
Civil Society Organization	IMPACT	In-kind	Recurrent expenditures	521,000.00
Civil Society Organization	National Association of Professional Environmentalists (NAPE)	In-kind	Recurrent expenditures	60,000.00
Civil Society Organization	Africa Centre for Energy and Mineral Policy (ACEMP)	In-kind	Recurrent expenditures	100,000.00
Civil Society Organization	Resource Rights Africa (RRA)	In-kind	Recurrent expenditures	20,000.00
Civil Society Organization	Pro-Biodiversity Conservations in Uganda (PROBICOU)	In-kind	Recurrent expenditures	65,000.00
Civil Society Organization	African Centre for Media Excellence (ACME)	In-kind	Recurrent expenditures	50,000.00
			Total Co-Financing($)	**13,016,000.00**

Describe how any "Investment Mobilized" was identified

The investment mobilized via Argor Heraeus was identified via ongoing collaboration between the project implementing and excuting agency. The investment mobilized pertains to envisioned supply chain partnerships between Argor Heraeus and two ASGM associations identified as partners to the project.

D. Trust Fund Resources Requested by Agency(ies), Country(ies), Focal Area and the Programming of Funds

Agency	Trust Fund	Country	Focal Area	Programming of Funds	Amount($)	Fee($)
UNEP	GET	Uganda	Chemicals and Waste	Mercury	5,500,000	522,500
				Total Grant Resources($)	**5,500,000.00**	**522,500.00**

E. Non Grant Instrument

NON-GRANT INSTRUMENT at CEO Endorsement

Includes Non grant instruments? **No**

Includes reflow to GEF? **No**

F. Project Preparation Grant (PPG)

PPG Required **true**

PPG Amount ($)

150,000

PPG Agency Fee ($)

13,500

Agency	Trust Fund	Country	Focal Area	Programming of Funds	Amount($)	Fee($)
UNEP	GET	Uganda	Chemicals and Waste	Mercury	150,000	13,500
				Total Project Costs($)	**150,000.00**	**13,500.00**

Core Indicators

Indicator 4 Area of landscapes under improved practices (hectares; excluding protected areas)

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)
0.00	4976.00	0.00	0.00

Indicator 4.1 Area of landscapes under improved management to benefit biodiversity (hectares, qualitative assessment, non-certified)

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)
	4,976.00		

Indicator 4.2 Area of landscapes that meets national or international third party certification that incorporates biodiversity considerations (hectares)

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)

Type/Name of Third Party Certification

Indicator 4.3 Area of landscapes under sustainable land management in production systems

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)

Indicator 4.4 Area of High Conservation Value Forest (HCVF) loss avoided

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)

Documents (Please upload document(s) that justifies the HCVF)

Title	Submitted

Indicator 9 Reduction, disposal/destruction, phase out, elimination and avoidance of chemicals of global concern and their waste in the environment and in processes, materials and products (metric tons of toxic chemicals reduced)

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)
0.00	60.00	0.00	0.00

Indicator 9.1 Solid and liquid Persistent Organic Pollutants (POPs) removed or disposed (POPs type)

POPs type	Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)

Indicator 9.2 Quantity of mercury reduced (metric tons)

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)
	60.00		

Indicator 9.3 Hydrochloroflurocarbons (HCFC) Reduced/Phased out (metric tons)

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)

Indicator 9.4 Number of countries with legislation and policy implemented to control chemicals and waste (Use this sub-indicator in addition to one of the sub-indicators 9.1, 9.2 and 9.3 if applicable)

Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)

Indicator 9.5 Number of low-chemical/non-chemical systems implemented, particularly in food production, manufacturing and cities (Use this sub-indicator in addition to one of the sub-indicators 9.1, 9.2 and 9.3 if applicable)

Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)

Indicator 9.6 Quantity of POPs/Mercury containing materials and products directly avoided

Metric Tons (Expected at PIF)	Metric Tons (Expected at CEO Endorsement)	Metric Tons (Achieved at MTR)	Metric Tons (Achieved at TE)

Indicator 11 Number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment

	Number (Expected at PIF)	Number (Expected at CEO Endorsement)	Number (Achieved at MTR)	Number (Achieved at TE)
Female		2,250		
Male		2,250		
Total	0	4500	0	0

Provide additional explanation on targets, other methodologies used, and other focal area specifics (i.e., Aichi targets in BD) including justification where core indicator targets are not provided

Part II. Project Justification

1a. Project Description

1.A.1 Global Baseline: Global Environment Problem, Root Causes & Barriers

The negative health and environmental impacts of mercury usage across the world have garnered the attention of and mobilized action amongst a variety of actors and stakeholders, including governments, international bodies, the private sector, civil society, and affected communities. With the artisanal and small-scale gold mining (ASGM) sector serving as the largest contributor of global anthropogenic mercury emissions[1]1, emphasis has been placed on identifying scalable and sustainable solutions to reducing and eventually eliminating the use of mercury in the production of artisanal gold. These efforts are complicated by the complex environments in which artisanal mining often takes place and the characteristics of the sector, which is primarily poverty-driven and operating largely in an informal and unregulated manner.

The Global Environmental Facility?s (GEF) planetGOLD programme, which aims to make artisanal and small-scale gold mining safer, cleaner, and more profitable, is a key initiative in driving large-scale, systemic change across the ASGM sector globally.[2]2 The programme recognizes that tackling the elimination of mercury in ASGM supply chains requires a holistic approach that addresses the root causes of mercury usage and the barriers that often impede miners from transitioning to mercury-free technologies. This includes a focus on several key areas: access to financing and responsible gold markets, support for formalization, awareness raising on the harmful effects of mercury, and increasing access to mercury-free technology and strengthening local capacity for sustainability of solutions. This effort comes as follow up to previous GEF efforts on ASGM mercury reduction such as the Global Mercury Project, the ongoing planetGOLD program (GEF GOLD) and several bilateral initiatives. These efforts have contributed to addressing mercury reduction through addressing root causes for more than a decade.

1.A.1.1 Global Environmental Problem

The Properties of Mercury

Mercury is a naturally occurring element released primarily through human activity and is recognized as one of the more toxic substances in the world for the human population. Mercury is also released from the earth through natural processes, such as volcanic activity, as well as through mining processes. Mercury sulfide ore (?cinabar?) deposits are located throughout much of the world called cinnabar. Elemental mercury, which is liquid at room temperature, is produced through a process of heating cinnabar to extract mercury in a vapor form. These vapors are captured and condensed as liquid, ?quicksilver?, mercury.[3]3

Mercury can be found in three main forms: elemental, inorganic compounds, and organic. Elemental mercury is liquid at room temperature and has traditionally been used in certain products such as thermometers or dental amalgams, as well as in different processes, such as gold mining, and it released into the air when burned. Inorganic mercury is formed when mercury combines with other elements, creating inorganic mercury compounds. These can occur naturally and are primarily used in industrial processes. Organic mercury is formed when mercury attaches itself to carbon. A common form of organic mercury compound ? methylmercury ? is created when small

microorganisms in found in water or soil convert inorganic and elemental mercury into methylmercury.[4][4] This toxic form of mercury biomagnifies and bioaccumulates as it passes from one trophic level of the food chain to another, meaning as it passes from one animal to another ? or to a human - it becomes more and more concentrated along the way, increasing the threat from one level to another[5][5].

While in certain forms and smaller quantities, mercury exposure and consumption are less likely to be harmful to humans and the environment, anthropogenic exposure to mercury via respiration of mercury vapor, skin contact with liquid mercury or consumption of contaminated water or food sources, especially when these are in high frequency and long-term, can cause severe and irreparable harm. In contrast, direct exposure to the organic mercury compound dimethylmercury can be deadly in even the smallest amounts (i.e., several drops) if absorbed into the skin.[6][6]

Uses of Mercury

Mercury was once used in a wide range of products and processes, in a variety of its forms. For a long period, it was once believed to be a key ingredient in a variety of medicines and medical treatments, such as calomel ? a treatment used for teething toddlers and other illnesses in the early 1900s ? or in steam baths that were once deemed beneficial to the health of individuals.[7][7] As an effective tool for keeping moisture at bay, mercury has been used in fungicides to protect agricultural products from mold, as well as in batteries to prevent the build up of gases that can lead to leakages.[8][8] Typical uses for mercury have also included dental restoration products (e.g. fillings), thermometers, incandescent lights, and more.

In recent time, concerns over the toxicity and harmful effects of mercury on human health and the environment have led to the phasing out of mercury usage in several products, though the extent of this phase out differs across industries and countries. Global efforts to phase out the use of mercury have been primarily executed through the Minamata Convention on Mercury, an international convention designed to protect the health of people and the environment from the negative impacts of mercury. The Minamata Convention on Mercury is discussed in greater depth in section 1.1.3.

Of most relevance to global mercury emissions however is the use of mercury in extraction of gold from ore, notably in the ASGM sector. In this regard, mercury is mixed with gold-bearing ore to form a gold-mercury amalgam, and subsequently burned off to leave out gold sponge. Through this process, mercury is released into the air and can find its way into both humans and the local environment, notably water sources and soil.

Prevalence of Mercury Around the World

It is difficult to assess the extent to which mercury contamination occurs worldwide, especially in regions with less government oversight. The United Nations Environmental Programme (UNEP) has conducted several global mercury impact assessments to help fill this void, with the most recent edition released in 2018. This report estimated that approximately 2220 tons of mercury were released into the air from anthropogenic sources in 2015, reflecting a 20% increase from previous estimates in 2010.[9][9] Of this amount, the ASGM sector contributed 838 tons to global air emissions, with Latin America and Sub-Saharan serving as the largest contributors with 340 tons

and 252 tons, respectively.[10][10] Further, the report estimated that the artisanal and small-scale mining contributed approximately 1220 tons of mercury to soil and water sources worldwide.[11][11]

Impact of mercury on human health and the environment

There is no known physiological role for mercury in the human body, and it is one of the most harmful heavy metals to both humans and animals. Mercury can spread throughout the human body and be difficult to excrete ? leading to a range of negative health impacts, depending on type, quantity, and frequency of exposure[12][12]. It is widely accepted within the health community that frequent or direct exposure to significant quantities of both elemental and methyl mercury can cause serious harm to humans and animals. While there is somewhat less certainty regarding the exact point at which more negligible or low-level exposure to mercury becomes more threatening, the global consensus with respect to mercury has been to eliminate it to the extent possible from various uses and products.

During mining and processing activities in the ASGM sector, mercury losses to the environment occur during amalgamation and amalgam burning. Due to primarily unsafe practices in the sector, mercury is released directly into the environment, contaminating air, land and soils. The uncontrolled loss of mercury, especially released from whole ore amalgamation, can travel long distances around the globe, contributing to mercury pollution and contaminating the world?s ecosystems and fisheries. Consumption of mercury-contaminated fish exposes communities to methyl-mercury, an organic form of mercury that bio-accumulates and bio-magnifies along the food chain.

According to the World Health Organization (WHO), elemental mercury exposure can cause several harmful effects if inhaled, consumed or through direct contact, including various neurological and behavioral disorders that include symptoms such as tremors, insomnia, memory loss, neuromuscular effects, headaches and cognitive and motor dysfunction.[13][13] Some studies have shown that young children and women of childbearing age (and especially pregnant women) are at heightened risk of negative impacts from mercury exposure.[14][14] The extent to which mercury can be harmful varies depending on the pathway to exposure and the type of mercury.
Methyl-mercury is a powerful neurotoxin that is exposed through the food chain. Exposure to high levels results in adverse health effects such as loss of vision, tingling of hands and feet, lack of coordination, impairment of speech, hearing and walking and muscle weakness. When unborn children in the womb are exposed their growing brains and nervous system are affected, resulting in impact in their cognitive abilities.[15][15]

There are numerous studies that have shown the effects of mercury usage on individuals working in the ASM sector who are exposed to elemental mercury when processing ore and extracting gold, as well as nearby ASM communities, exposed through contamination of air, soil and water. Downstream communities are impacted by methylmercury contamination through the food chain.[16][16] While the effect is most acute for workers in the sector working directly with mercury and having skin contact or inhaling vapor, mercury vapor can stay in the air and be transported beyond the site of emission.[17][17] Further, mercury can contaminate water sources and fish

populations, which are then consumed by local community members. Given that mercury bio accumulates as it is passed through the food chain, it can have exponential negative health implications for humans and animals. This is especially the case for fetuses, infants, and young children.[18]18 A recent study estimated that 25-33% of those working in the ASGM sector around the world suffered from chronic mercury vapor inhalation, and that this resulted in an approximate global disease burden of 1.22 to 2.39 million disability-adjusted life years. The authors note that the study was impacted by a lack of accessibility of accurate and credible data and suggest that this figure presents an underestimated disease burden due to mercury usage by those working in the ASGM sector.[19]19

The process of extracting gold in ASGM also leads to wider degradation of the environment. Clearing large areas of forest and vegetation to mine the ore can leave surrounding communities lacking arable land for farming and clean water. Mercury usage in the ASGM sector also has environmental consequences. Mercury as a basic chemical element can not be broken down or degraded. Once released into the biosphere mercury readily moves and cycles through the environment. Once in the environment, the extent to which it can move between the atmosphere and further into waterways is influenced by its form. The harmful effects that different forms of mercury can have on living things are greatly influenced by bioaccumulation (build up inside an organism) and biomagnification (build up along the food chain), as described above. Methylmercury is taken up at a faster rate than other forms and bioaccumulates to a greater extent. In fish, methylmercury becomes so tightly bound in the tissues that, if exposure ceases, it takes a very long time for it to be removed.[20]20 In areas where high grades of gold in the ore are concentrated in harder rock, more mercury is needed for its extraction. The scale of mining capacity in each village and the geology of the site, therefore, also have important implications for rural development and environmental protection.

1.A.1.2 The ASGM Global Context

Artisanal and small-scale gold mining (ASGM) is carried out in over 70 countries by 10-15 million women and men,[21]21 many of whom have several dependents that rely on their source of livelihood. Unfortunately, there are also a significant number of children that can be found working in artisanal and small-scale gold mines in a variety of direct and indirect roles. ASGM is defined in the Minamata Convention on Mercury as ?gold mining conducted by individual miners or small enterprises with limited capital investment and production?.[22]22 Globally, it is the main source of income for many rural and low-income communities, particularly in developing countries where alternative economic opportunities are scarce. ASGM is a key part of the artisanal and small-scale mining (ASM) sector, and accounts for approximately 20% of global gold supply,[23]23 making it around a $35 billion (USD) industry per year.[24]24

ASGM is typically carried out in the informal sector, poorly controlled by local authorities, either due to an absence of an effective regulatory framework, lack of enforcement capacity or corruption. Consequently, ASGM is highly susceptible to predatory actors, including those complicit in human rights violations. Artisanal and Small-scale gold miners often have no formally recognized access to resource rights and are thus frequently criminalized by extractive companies and government bureaucrats. This makes them vulnerable to extortion by corrupt officials who

frequently demand payments for using mine sites. Unlicensed, informal gold production presents a missed opportunity for economic growth. Where mining activities are operating outside the law, national governments are not able to collect tax revenue. Coupled with illicitly traded gold, facilitated by the sector?s informality, significant losses in government revenues are associated with ASGM. Such complex issues of mining taxation, land tenure and fraudulent financing put the sector at a disadvantage to larger scale industrial mining. These factors are crucial in determining the contribution the ASGM sector makes to national economic growth.

Forced to secure financing through informal means, miners and their families often become trapped in a cycle of poverty.[25][25] To achieve their livelihood goals, ?push? factors at the micro level force people to engage in ASGM. For example, impoverished subsistence farmers may turn to ASGM as an alternative source of income due to local population growth or negative climatic impacts on agriculture. ?Pull? factors that attract people to ASGM may typically include higher wages and the chance to inject greater cash flows for small business growth. Mercury amalgamation is the quickest and least expensive method of recovering gold for individual miners. It is often the most trusted method for artisanal and small-scale miners, as it gives them a better sense of control over the recovery process. Low productivity and limited incomes make it harder for many ASGM operators to invest in alternative mercury-free technologies. Not only does this perpetuate environmental damage and deteriorating health outcomes, but it keeps miners in debt to their financiers, further limiting their economic options.

The ASGM sector is also responsible for 35% of all global mercury pollution into the environment, which makes it the largest source of emissions worldwide.[26][26] A key reason for this is the fact that ASGM uses rudimentary techniques of extraction, often undertaken by miners with little technical knowledge of its impacts on the environment or their health. With limited capacity to mitigate the hazards, workers operate under dangerous conditions. As noted above, the open burning of mercury-gold amalgam in ASGM and refining facilities provides major risks to health and safety. Female miners are at risk of toxic exposure from mercury with the majority working in the amalgam-processing stage. Even women and children not directly involved in mining activities share this danger due to amalgam burning in residential areas.[27][27]

1.A.1.3 Global Efforts to Reduce and Eliminate the Use of Mercury

In recognition of the harmful effects of mercury on the human population and the global environment, governments came together, supported by the Chemicals Branch of the UNEP Division of Technology, Industry and Economics, to establish the Minamata Convention on Mercury[28][28], a global treaty to protect human health and the environment from the adverse effects of mercury. The Minamata Convention on Mercury came into force in August 2017, and currently has 128 signatories and 125 parties.

Main components of the Minamata Convention include banning new mercury mines and phasing out existing ones, phasing out mercury usage in various processes and products, addressing proper mercury storage and disposal, and regulating the artisanal and small-scale gold mining sector.

Countries that have ratified the Minamata Convention and determined their domestic artisanal and small-scale gold mining sector is more than insignificant, are required to develop a National Action Plan (NAP). NAPs are tailored to the individual country context but must include several key elements as outlined in the Minamata Convention, such as strategies to facilitate formalization and regulation of the ASM sector and to increase the use of mercury-free technologies.

To implement the Minamata Convention on Mercury, many governments require capacity building and resources to carry out relevant activities. As such, funding mechanisms have been established, including through the Global Environmental Facility (GEF), which is the primary source of financial contributions for the implementation of the Minamata Convention. The GEF supports governments and implementing partners to carry out assessments of mercury usage and risks within their national contexts, to conduct needs assessments for reducing and eliminating mercury usage, to create their NAPs and to undertake activities in a number of strategic areas to help reduce and eliminate the use of mercury in ASM gold supply chains, such as support for formalization, adaptation of mercury-free technologies, access to financing and awareness raising. In this regard, GEF has created a specific programme ? PlanetGOLD ? that brings together several governments, private sector, and civil society organizations to support ASGM communities in these key areas. Additionally, many donor governments, multilateral institutions, industry actors and civil society organizations have prioritized the reduction and/or elimination of mercury from ASGM supply chains in a variety of formalization, governance and environmental focused projects and initiatives.

1.A.1.4 Root Causes and Barriers to be Addressed

There is a myriad of intertwined health, environmental and socio-economic challenges related to high mercury usage and emissions in the ASGM in Uganda. Informality is a defining feature of the sector and is a key obstacle to capital investment in more responsible mining infrastructure. Despite ongoing efforts to encourage alternative extractive techniques, mercury use is still the primary method of recovering gold. The main barriers to the adoption of mercury-free practices include:

i. Informality and the lack of an effective legislative and regulatory framework (challenges of formalization)

The perpetual informality of the ASGM sector is one of the main root causes of its dependence on mercury in extracting gold from the ore. Informal ASGM activities do not have the requisite licences and permits required by law to operate. This provides a substantial barrier for mining communities in acquiring enforceable property rights or accessing finance that can support improvements to their operations. The drivers of informality are primarily rooted in the lack of an effective governance framework for the ASGM sector that serves to both regulate and incentivize miners to formalize. This includes the presence of fiscal-administrative obstacles, such as high costs for licenses, burdensome processes and distance between government services and ASGM sites, all of which can encourage informal activity. Despite exploring various forms of land access by ASGM, which include working in sites managed by license holders, landlords, pit owners or machine owners, the sector remains highly informal. Its informality and migratory nature weaken its organisations ? namely ASGM associations ? which are in most cases inactive. The Mining and Mineral Bill 2019 proposes provisions for ASMs to acquire mining rights, however this will only improve formalisation if licence costs are made affordable.

Legislation prioritising large-scale mining has also put ASGM practitioners at a big disadvantage, who struggle to comply with the rules. An example of this is a requirement for mineral rights applicants to conduct an Environmental and Social Impact Assessment (ESIA) in order to secure their license ? a requirement that is significantly more attainable for medium and large-scale operators, given that those working in the ASGM sector can often not afford these assessments. These types of requirements, if not adapted to the realities of the ASGM sector, risk giving monopolised access to mineral bearing land for large-scale mining companies, thus marginalising the ASGM sector to an even greater extent. The issue of land ownership can therefore be a significant source of conflict. Informality also allows ASGM communities to operate in remote areas in the absence of appropriate social and environmental impact oversight.

Beyond an effective regulatory and legislative framework for formalizing the ASGM sector, a lack of resources and capacity has hindered the ability of government ministries and departments to

reinforce regulations, laws, and policies or to provide effective support services to the ASGM sector so that it is able to move towards formalization and improve their practices (including mercury reduction).[29][29] A lack of decentralization and coordination has also played a role in minimizing the effectiveness of existing formalization efforts.

ii. Poor knowledge of environmental and health related best practices for ASGM

Miners and government officials often have limited knowledge and understanding of the potentially negative health and environmental impacts that are associated with mercury usage. Additionally, those who may understand these negative impacts often have limited awareness of and access to technologies that reduce or eliminate the use of mercury, or that can at least improve environmental and worker safety risks when it is used. While education is an important component in addressing this barrier, it is also important to consider this in the broader context of those working in the ASGM sector or governing it. A lack of effective local solutions and capacities to organize and collectively address these problems[30][30], especially via scalable knowledge sharing and communication efforts, can often weaken the impact of efforts to educate and improve understanding. Miner?s peer training of improved panning and direct smelting as an alternative to mercury has been initiated in Busia District, however this has not been integrated into strategies to scale up this knowledge more widely within the District and across the country. The technical methods used are labour intensive, discouraging wider adoption by miners. A lack of active engagement by academic institutions and equipment manufacturers in developing locally grown solutions on mercury-free gold processing keeps knowledge and capacity in the country low.

iii. Limited access to finance

The financing of the ASGM sector comes with high risks. Concerns over risks such as money laundering, child labour, mercury usage and corruption provide the threat of reputational damage for lenders.[31][31] Investors are often discouraged by the fact that ASGM is largely financed through informal channels,[32][32], as well as the unpredictability of the sector regarding prospective production, the migratory nature of the sector, and the lack of collateral on behalf of most of those working in the sector. The majority of ASGM areas in Uganda do not benefit from the presence of formal lending systems[33][33], instead relying on informal lending provided by family, friends, gold traders or informal savings groups.[34][34] When lenders are willing to engage in the ASGM sector, they often demand high interest rates or strict repayment schedules to balance the risk of their investment. This means loans are often very inaccessible for many small-scale businesses. Further, even when banking institutions or credit initiatives are willing to lend to ASGM actors, many are unable to access these options as they are unbanked altogether.[35][35]

As a result, there is no incentive for miners to adopt responsible mining practices, such as mercury-free technology, as their primary sources of financing and gold sales are not providing the demand for mercury-free gold. Furthermore, it reduces their ability to invest in mercury-free technology or practices, as this cost directly impacts their margins and is not shared amongst supply chain actors further downstream.

iv. Local Realities and Capacities for Adopting Mercury-free Technologies

While mercury-free technology and processing has been introduced in some areas in Uganda, notably in Busia and Namayingo this equipment is sometimes underutilized or abandoned altogether. The technologies introduced include panning and direct smelting, use of centrifuge and sluice upgrade and use of shaker tables. This is mostly due to localized realities that disincentivize their use, such as the price and availability of electricity to operate the machines or lower grade ore.[36][36] Most of the machines introduced have higher throughput capacity than a single miner needs, and thus fail to be relevant for the majority of miners. Rather, these machines could be more effective in a group set up or when there is a clear strategy to reprocess or dispose of the tailings to the miner?s benefits. It is important to consider that many miners are working at an individual or small team level, producing very small quantities that are at times less conducive to processing via mercury-free technologies and processes compared to larger quantities. Furthermore, it is important to have an in-depth understanding of their decision-making and barriers to using mercury-free technology, such as increasing time for processing compared to mercury processing.[37][37] Further analysis of why mercury-free technologies have not upscaled in Busia and Namayingo would provide some insights into some of the barriers and challenges.

Additional barriers identified (outside of the general barriers listed in the PFD) for Uganda country specific context are listed below:

v. Poverty

In Uganda, and in many ASGM active countries, participation in the sector has become a primary means of survival for many miners and their families, with some miners dependent on the sector to address food insecurity.[38][38] Most alternative work is low paid and hard to come by. Despite its intensive labour demands, ASGM has lucrative income generating potential, especially in certain areas where other income generating activities are more difficult (e.g. some individuals in Karamoja prefer mining to agriculture because of erratic rain patterns).[39][39] ASGM provides an opportunity for these groups to supplement their seasonal earnings. Poverty-driven ASGM represents a crucial obstacle to reducing mercury use especially as barriers to entry in the sector are low, while barriers to access mercury-free technologies can be high.

vi. Gender inequality

Representing approximately 45% of those engaged in Uganda?s ASGM sector, recognition is needed of the important role and different experiences of women in ASGM.[40][40] Powerful cultural and patriarchal norms, where it is considered taboo for women to participate in the sector, where women are consigned to domestic and childcare responsibilities, and where women do not have equal access to and control over gold resources, have marginalised their role in ASGM. The traditional view that mining is a man?s task limits women?s direct involvement at mine sites.[41][41] Instead, they are mostly engaged in non-digging activities such as sluicing, washing, sieving, and processing, including using mercury-gold amalgamation.[42][42] Consequently, women are exposed to serious health risks, as they can often be the ones to perform ore purification with mercury[43][43]. Being largely excluded from activity that includes gold discovery also means that women do not have the same opportunities as men in benefitting from sales. Discrimination against

them at the policy level too, denies them access to mining licences, finance, and resourceful land. These factors present unique economic challenges, denying women access to control over their own earnings, which forces them to perform the most toxic jobs. As there are few alternative economic opportunities for women, processing the amalgam is often an important source of livelihood. Despite these challenges and barriers, it is important to note that the ASM sector also provides many economic and social benefits for women participants, as documented through research in East Africa (including Uganda). Women are often able to use the income generated from the sector to meet their household needs and to invest in other types of income generating activities, which can also support them in advancing their social status[44]44.

Given the challenges and barriers that women face in the ASGM, and the gendered roles they play that are linked to mercury usage ? its important to consider the extent to which gender inequality in the sector serves as a root cause for women?s exposure to mercury contamination. While from the perspective of sheer numbers, men are the most impacted by mercury contamination in the ASGM sector, this is explained by their larger representation in the sector, and not necessarily driven by gender inequality. This is contrasted with the experiences of women, by which they find themselves, in some circumstances, dependent on the use of mercury to guarantee their income related to the sector given their more limited access to other income generating activities.

1.A.2. National Baseline and Associated Baseline Projects

Uganda?s ASGM sector current state is illustrated through the problem tree below. Further details are provided through this section on the past and ongoing activities in an attempt to improve the sector.

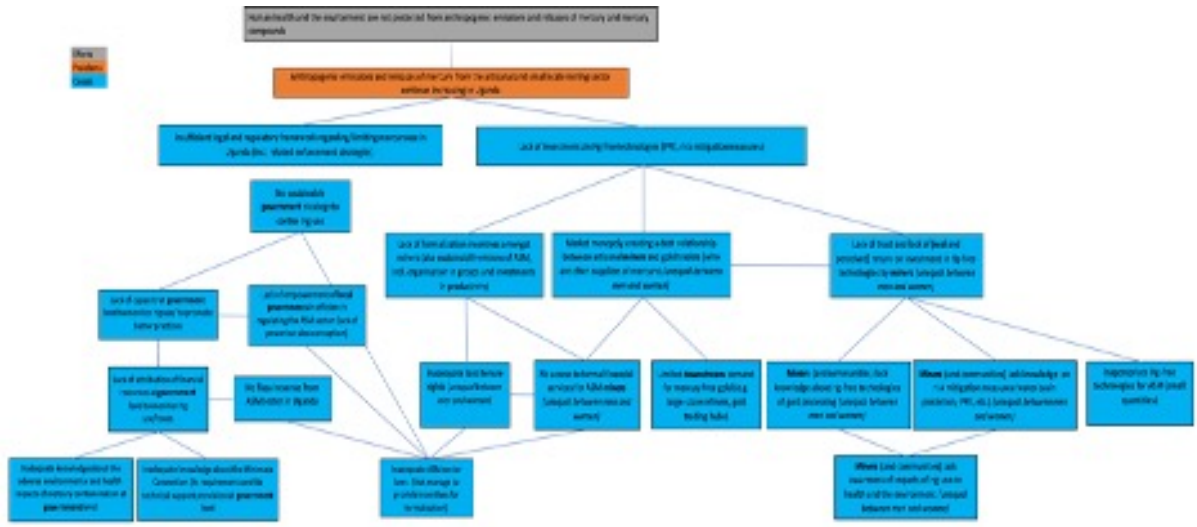

FIGURE 1. PROBLEM TREE FOR UGANDA?S ASGM SECTOR

1.A.2.1 Uganda country context and baseline

Uganda is located in East Africa and lies across the equator, about 800 kilometers in land from the Indian Ocean. It lies between 10 29? South and 40 12? North latitude, 290 34 East and 3500? East longitude. The country is landlocked, bordered by Kenya in the East; South Sudan in the North; Democratic Republic of Congo in the West; Tanzania in the South; and Rwanda in South West. It has a total area of 241,554.96 square kilometers, of which land area covers 196,906.34 square kilometers.

Uganda is a country rich in natural resources, including cobalt, gold, copper, iron ore, tungsten, steel, tin and other industrial products such as cement, diamonds, salt, and vermiculite. While mining has been taking place in Uganda for over a century, the country is believed to have significant reserves of untapped mineral potential. Large-scale mining remains nascent in Uganda, with only a handful of mines having been brought into production. In the year 2019, the mining sector contributed approximately 0.3% of GDP, though according to the Uganda Chamber of Mines and Petroleum, it, once contributed up to 30% in the 1960s.

Uganda hosts both alluvial and primary gold deposits. While some small and medium sized gold production operations exist, with increasing mechanization, the majority of those working in the ASGM sector rely on manual methods of gold extraction, including digging, crushing, panning, sluicing, washing, and manual processing of ore. Use of mercury to extract gold is very common. ASGM producing districts in Uganda include Buhweju, Amudat, Moroto, Busia, Namayingo, Kassanda, and Kisoro.[45][45]

Both women and men are active in the ASGM sector, though their representation varies from one region to another. For example, in Districts like Kisoro, women do not make up a high percentage of those working in ASGM production and trading, while in Karamoja region there are mine sites which are comprised of over 90% women miners. On average, women?s representation in the sector is estimated to be approximately 45%, and women are deemed to be at a high risk of mercury exposure because they are often engaged in the processing and washing stages, where exposure is high. The gender dimensions of the ASGM sector are further elaborated in Appendix 6.

While Ugandan law recognizes all people in Uganda as indigenous peoples, there are some who view the Benet, the Batwa, the Ik, the Karamojong, and the Basongora as deserving particular status as indigenous peoples. For the most part, there is not a significant number of individuals from indigenous groups that participate in the ASGM sector, however some have begun to enter the sector in Kisoro District (Batwa) and in the Karamoja sub-region (Karamojong).

Nationally, ASGM gold production is approximately 7081 kg per year, with the sector accounting for over 90% of total gold production in Uganda.[46][46] However, because ASGM operations have remained informal, miners cannot provide basic accounts of production that demonstrate the viability of their operations.[47][47] Therefore, much of the gold production in Uganda is unreported and statistics on gold reserves and production by the US geological service are only estimates. Despite the informal nature of the ASGM sector and the lack of significant reporting or monitoring that has taken place, it is widely known that many informal ASGM miners are using mercury in order to extract gold in their operations, a substance hazardous to the health of miners, communities and the surrounding environment.

Uganda was an original signatory of the Minamata Convention on Mercury when its text was first adopted in October 2013. Following a 2018 Minamata Impact Assessment, implemented by UNEP and funded by the GEF, the Government of Uganda deposited its instrument of ratification on Friday March 1, 2019, thereby becoming the 104thParty to the Minamata Convention.

Uganda?s Minamata Impact Assessment (MIA) report quantified total mercury output from primary mining at approximately 18, 652 kg/year, which accounts for approximately 60% of total outputs in the country. Furthermore, when conducting field assessments for the National Action Plan (NAP) in 2019, also implemented by UNEP and funded by the GEF, NEMA estimated total ASGM mercury emissions and releases at over 15,000 kgs per year, broken down across the regions as follows: Central: 7,822 kg/year, Eastern: 1,796 kg/year, Ankole (Western Region): 1,183 kg/year, Kigezi (Western Region): 91 kg/year and Karamoja (Northern Region): 1,452

kg/year. As such, the ASGM sector is responsible for the largest human exposure to mercury contamination in Uganda. ?The predominant pathway for the mercury releases and losses is air (atmosphere, 64.2%) followed by water (marine and freshwater bodies, including via wastewater systems ? 12%), land, general waste, and sectors specific waste disposal?.

Artisanal and small-scale gold mining (ASGM) is critical for Uganda?s prospects for economic development. In the financial year 2015/16, for example, gold earned 204 million USD in foreign revenue. The commodity holds great livelihood significance as an important source of income and employment to miners and their dependents. An estimated 400,000 ? 600,000 women and men work in the wider artisanal small-scale mining (ASM) sector, according to the Directorate of Geological Survey and Mines (DGSM, a department under the Ministry of Energy and Mineral Development (MEMD)), supporting an additional estimated 2 million people indirectly. The National Environmental Management Authority (NEMA) estimates that 31,622 of those working directly in the ASM sector are mining gold.[48][48] Gold production is therefore vitally important for local economies, especially around the Karamoja region, where the combined annual income of miners is 17 million USD.[49][49] It is important to note that a geographic divide exists where women are engaged in the ASGM sector. In the Southwest of Uganda women make up around 10-25% of miners, while in the North ? which is arguably more impoverished ? around half of ASGM miners are women, and the figure is as high as 90% in certain areas.

i. Legal and Regulatory Framework

Though technically providing a path for artisanal miners to secure legal status, the current regulatory and legislative framework in Uganda does not explicitly recognize the artisanal and small-scale sector, nor does it adequately address or consider the unique needs, challenges and limitations that the ASGM sector faces in comparison to large-scale operators. Over the past years, this has been acknowledged by government and non-government stakeholders alike, and a number of important steps have already been taken or are currently underway to address these gaps. This includes the creation of an inter-ministerial task force that held consultations and drafted revisions to the National Mining and Minerals Policy of Uganda (NMMPU), which was adopted and gazetted in 2018. The policy is set to strengthen the institutional framework and address governance and operational challenges with respect to formalizing the ASM sector (in addition to the large-scale mining sector), and includes cross-cutting issues such as environmental protection, health and safety, conflict mitigation and land access, gender and equity. The Mining Act of 2003 remains the most pertinent piece of legislation for the ASGM sector, however the government has been in the process of revising the law (based in part by the revisions to the NMMPU) and released a draft Mining and Minerals Bill in 2019. The Bill is yet to be adopted into law, though the government has stated that it will do so shortly. The bill is currently being discussed in Parliament and it is expected to repeal the Mining Act of 2003 before the end of 2021.

While the law is still in draft form, it has been viewed as addressing several specific issues of importance to the ASGM sector and makes clear the commitment to formalizing the sector. Some prominent features of the draft law include:

? Recognition of the ASM sector, including differentiation between artisanal and small-scale miners
? Facilitation of the creation of ASM associations and access to mineral rights
? Progressive professionalization and formalization of the sector
? Improvement of women?s conditions through gender empowerment programs
? Creation of ASM zones[50][50]

Contrary to the positive provisions on the ASM sector, the Draft Mining Bill (2019) has been described as uncompetitive compared to the 2003 Mining Act by large scale mining actors. Some of the concerns include:

? High free carried interest with substantial increase to the investor?s effective tax rate
? The proposed establishment of a National Mining Company (NMC) and implementation of Production Sharing Agreements in the sector
? Vesting of powers to issue, revoke and hear appeals on licenses in a political appointee (i.e. the Minister), rather than a tenured technocrat

In addition to the Mining Act of 2003, there are several other pieces of legislation, regulation or policies that are relevant to the ASGM sector, including:

? The Mining (Licensing) Regulations of 2019
? National Environment Act Cap 153
? Land Act Cap 227
? Public Health Act Cap 281
? Occupational Safety and Health Act, 2006
? External Trade Act Cap 88
? The National Water Resources Regulations, 1998
? The National Environment (Environmental and Social Assessment) Regulations, 2020
? The National Environment (Audit) Regulations, 2020
? The National Environment (Oil spill Prevention, Preparedness and Response) Regulations, 2020.
? The National Environment (Waste Management) Regulations, 2020
? The National Environment (Standards for Discharge of Effluent into Water or Land) Regulations, 2020
? National Environment (Management of Ozone Depleting Substances and Products) Regulations, 2020
? The National Environment (Strategic Environmental Assessment) Regulations, 2020
? The Employment Act, 2006
? The Anti-Money Laundering Act, 2013
? The National Gender Policy, 2007[51][51]
? The National Child Labour Policy, 2006
? The National Action Plan on the Elimination of the Worst Forms of Child Labour, 2012
? The Local Government Act, 1997, and The Local Government (Amendment) Act, 2015
? International Conference on the Great Lakes Region Act, 2017

The Mining Regulations, 2019 touch on licensing, environmental management, mineral export and integrate ICGLR certification provisions. A number of additional environmental regulations adopted in 2020 have brought Uganda?s regulatory regime in line with international standards and best practice, and will have implications for the gold mining sector. One gap that is yet to be addressed through Uganda?s legislative and regulatory framework is in the area of occupational, health and safety, which currently do not align with emerging international best practice. Furthermore, there are a number of additional gender-specific policies in Uganda that are relevant to varying degrees, which have been further described in the Appendix 6 (Gender Analysis and Preliminary Action Plan).

ii. The Mercury Trade in Uganda

Official data from the Uganda Bureau of Statistics (UBOS) and UN COMTRADE on import statistics shows that Ugandan imports of mercury average 0.3t per year.[52][52] Formal imports to Uganda come mainly from Kenya, Malaysia and India, where they are mainly registered for industrial use by chemical companies based in the country. However, once it has entered the country legally, mercury often gets informally redirected to the ASGM sector. Wholesalers order mercury from the large-scale importers and act as intermediaries supplying gold brokers, dealers, processors and ASGM miners. According to various sources, the price of mercury has ranged between 135 USD per kilogram to 300 USD, depending on the region, source and time of the information being collected.[53][53]These prices are documented in Table 1 below. Prices vary according to remoteness of the ASGM site, seasonality, fear of political turmoil and market-related factors (e.g. supply, demand, quantity purchased, etc.). Small retailers, such as jewelry shops, supply gold brokers and dealers too, and often sell mercury to ASGM miners directly in amounts as little as 1g. It should also be noted that pricing information provided by informants is not always accurate, and it is difficult to confirm pricing until an actual sale is witnessed and confirmed.

Table 1: Average mercury prices in Uganda based on various sources

Source	Year	Average reported prices of mercury
Uganda Mercury Impact Assessment[54][54]	2018	180 ? 300/kg USD
Uganda National Action Plan[55][55]	2019	135-189/kg USD
IUCN NL Study: Opening the Black Box: Local Insights into the Formal and Informal Global Mercury Trade Revealed[56][56]	2020	250 to 270/kg USD
PPG Mine Site Visits	2021	143/kg USD (Moroto District) 153/kg USD (Kassanda District) 190-280/kg USD (Namayingo and Busia Districts) 140/kg USD (Amudat District)

Mercury to gold ratio applied (Hg: Au) is 2 to 3g Hg: 1g Au, and is therefore considered to be a relatively cheap alternative, especially given easy recovery efforts. For a period of time following

the MIA study carried out in Uganda, the price of mercury had reportedly risen and became more expensive for the miners. Despite this, mercury use was still pushed because most of the processing facilities employ a business model by which the plant operator provides most of the processing services for free in exchange for the miner leaving the tailings. Mercury was provided by the processing plant operator. Based on the field visits conducted for the PPG Phase however, and as noted above, the price of mercury seems to have come down slightly.

Regional mercury trade is multi-directional across borders, rather than strictly from trade hub to mining sites. Kenya and South Africa serve as the main supply hubs for Uganda (primary flow). In some cases mercury is transported the other way (secondary flow). These directional changes depend on demand, supply and price. Primary flows of mercury cross the Ugandan border at Busia, Malaba, Mutukala and Karamoja. From these areas, it is distributed to ASGM sites across the country. Mercury trade is higher along Uganda?s border to DRC and Kenya compared to its border with Tanzania, due to many informal entry routes in those areas. These are monitored by the informants of mercury traders, which make illegal crossings hard to control. Nevertheless, given the gold fields of Tanzania are located around Lake Victoria, Tanzanian traders bring some of their mercury into Uganda through the border post of Mutukula. Some of this mercury smuggled into Uganda simply passes through the country on its way to DRC.

The origins of mercury transit are unclear. Its transport is very secretive given the risks to the trader and the supply chain is built on trust between different actors. Miners often deny using mercury, and when they do acknowledge use, they will not divulge the source of where it's procured from. Agents in mining areas are often young men, well connected in the local ASGM sector, who use motorbikes and bicycles to transport the mercury. This is repackaged from 34.5 kg flasks, which enter the ports of Mombasa and Nairobi, into smaller 1 kg bottles. In ASGM, miners settle their mercury debts by selling gold to the same dealer. There is thus a strong relationship between mercury and gold supply chains.

iii. Access to finance

The informality of the ASGM sector often limits the ability of various supply chain actors, including miners, traders, and exporters, to access legitimate forms of financing. According to the National Baseline Overview of the ASGM National Action Plan in Uganda, there are no formal financing systems in ASGM sites, and the miners often do not have access to affordable financing options to sustain their operations.[57][57] There are many factors that contribute to this reality. For one, the lack of a formal business entity upon which legitimate financiers can enter a lending relationship presents a significant barrier. Additionally, burdensome, costly and lengthy processes for registering a formal enterprise in Uganda, as well as high corruption and bribery risks associated with these processes, often serves as a disincentive to those interested in formalizing and serves as a barrier for access finance.[58][58]

Without access to formal and legitimate sources of financing, ASGM actors are often reliant on informal lending actors and networks, some of which engage in predatory lending behaviours. These often leave miners at risk of receiving unfavourable terms and heavily indebted to informal dealers.[59][59] Informal dealers advance cash or mercury to miners, who then must sell their gold back to the dealer in order to repay their debt.[60][60] These debt relationships can often create a dependency on mercury usage. Other sources of informal lending often occur amongst friends and family ? whether through an organized vehicle such as a village savings and loans association (VSLA) or one-on-one. For example, in Mubende, a survey administered by IMPACT for its

project Digging for Equality indicated that 51% of women and 35% of men reported receiving a loan from a friend.[61][61]

There are several microcredit or savings associations programmes in Uganda facilitated by the government, private sector and development organizations ? however these tend to focus on other sectors, such as agriculture, fisheries, forestry, or small retail/service-related businesses. The ASGM sector can at times be stigmatized as being too high risk because of its propensity for being informal and erratic with respect to production and returns.

iv. Mercury free technologies

Mercury amalgamation is the most widely used method to extract gold from ore in Uganda, though a range of mercury-free technologies do exist. These include gravity concentration, sluice boxes, shaking tables, centrifuges, direct smelting, and more complex techniques, such as chlorine processing, cyanide leaching, flotation methods, agglomeration, and electrolytic processes. In recent years, progress has been made in identifying mercury alternatives such as elutriation, and leaching with lixiviants (such as thiosulphate). However, the high costs of alternatives to mercury use combined with limited technical knowledge continue to serve as significant obstacles to the transition to mercury-free gold processing by artisanal miners in Uganda. Some of these methods are yet to be tested at field level to ascertain efficacy and ease of application in ASGM. Additionally, the majority of ASGM miners are processing very small quantities of gold (< 1 gr), which are generally less conducive for the mercury-free technologies that have been developed. As such, the incentive for using these is not strong from an economic perspective, as miners worry that these will lead to greater losses and less efficiency than mercury. In typical ASGM operations, mercury-free technologies that can be applicable to lower volume production methods, such as improved panning and direct smelting, apply to high grade ores. However, these are not always representative of the type of deposits that the majority of miners work in. As such, innovative approaches to integrate existing mercury-free methods to the ASGM processing should be explored. The major challenge for adaptation of mercury free technologies lies in their applicability to different ASGM operations and conditions, including smaller production quantities and lower ore grades, as well as their general ease of use, accessibility and associated costs.

The use of direct smelting (with borax as a flux) in lieu of mercury was recently introduced by the Uganda National Association of Community and Occupational Health (UNACOH) and Ban Toxics from the Philippines, with the support of the Danish government, in a number of gold producing districts, notably Mubende, Buhweju, Bugiri, Namayingo, Busia, Moroto and Nakapiripirit.[62][62] Further efforts to promote and train on the use of direct smelting in ASGM have been supported by the GEF, and executed by the National Association of Professional Environmentalists (NAPE) through a train-the trainer approach in Kasanda District.[63][63] Observations from some of the pilot projects in Namayingo and Busia show direct smelting has not scaled up and in some cases the pilots have been abandoned all together, with miners continuing with amalgamation. Some of the concerns raised include the time it takes for improved panning and direct smelting, losses if the gold is very fine, and low-grade ores being processed better with mercury.

Use of borax in gold smelting is common with gold buyers and traders in Uganda. It is important to mention that use of borax is not a mercury free alternative, but rather improved panning and subsequent direct smelting. Despite promotion of direct smelting, some miners have expressed that borax is not as widely accessible in Uganda, requires a higher capital investment for specific equipment (i.e. a special heating vessel and liquid petroleum gas), and is less convenient given that it must be used in a more controlled environment to be effective and can take more time.

Furthermore, Borax is less effective on very small amounts of gold (<0.8 grams), which are more common among individual ASGM miners in Uganda.[64][64] The small size of the gold button risks being lost into the sludge created by the borax flux. As such, it has been difficult to convince miners to use borax, especially when mercury is so easily and widely available.[65][65]

In addition to direct smelting with borax flux, other instances of non-mercury methods in Uganda include hand picking of alluvial gold as experienced in Kaabong District and panning and swirling in riverbeds in Katenga mining site in Buhweju District.[66][66] Miners in Kisoro use panning and handpicking, but have expressed knowledge that they are losing the finer gold. Uganda?s National Action Plan also notes the use of vortexes, spiral concentrators, centrifuges, shaking tables, magnets and higher quality sluices as potential mercury-free technologies - though these also tend to have their own challenges for miners, such as less efficiency or the need for constant clean water supply, which many ASGM actors do not have access to.[67][67] Regardless the type of mercury-free technologies being promoted in Uganda, ensuring an appropriate fit with the context and level of ASM organization, training miners in safer practices during mining operations and cost-efficient alternative gold recovery methods are vital to change unsustainable patterns of gold production in Uganda. Miners expressed willingness to shift to mercury-free technologies if they could be: 1) made available to them; 2) easy and fast to use; 3) recovers gold better than mercury, and 4) they have access to finance to procure them. With regards to mercury transition, health and environmental considerations have minimum influence on the miners, rather it is the economic considerations that are most influential.

v. Pricing and Costs

It can be difficult to obtaining pricing information on the sale of artisanal gold, due to the informal and sensitive nature of the sector. Field data collected through the National Overview found that the average price of pure 24k gold in Uganda was approximately 28.13 USD/gr (UGX 105,476). This was consistent with the results found in the MIA, which found the price of gold per gram varied from USD 27.3 (UGX. 90,000) to USD 33.5 (UGX 110, 500) in 2016. Some regions, notably Karamoja, secure slightly higher prices because of the purity of gold being mined in the area. During the mine sites visit carried out as part of the PPG, some actors reported higher prices, including 160,000 UGX in Kassanda District.

Given that traders have access to more information on international market prices, they tend to have an advantage when it comes to negotiating the price paid for gold. Furthermore, they often use their own scales and are able to capitalize on the lack of buying and negotiating power of individual miners, who often find themselves indebted to traders. In some areas, gold is sold to owners of the location license, who set the price and provide little room for negotiation ? such as in Kisoro.

Understanding the cost structures of the ASGM sector is critical to understanding how proposed interventions in support of formalization, access to finance and mercury reduction are likely to be perceived or taken up. The poverty-driven nature of the ASGM sector means that often times, miners express not having the resources to invest in things like improved environmental processes or formalization (e.g. the cost of a license application).

Generally, ASGM associations and miners have the following costs to consider under the current legal and regulatory framework:

1) Fees for an Exploration License (EL), which is a requirement for a Location License (LL):
1. 500,000 UGX= registration fees
2. 1,000,000 UGX = preparation/application fees
3. 50,000 UGX = per km2 or part of a km2 as mineral rent annually
4. 300,000 UGX = for gazetting grant of EL

2) Fees for a Location License (LL), renewable every two years.
1. 500,000 UGX for registration fees
2. 800,000 UGX for preparation/application fees
3. 1,000,000 UGX for mineral rent annually
4. 300,000 UGX for gazetting grant of LL

The proposed Mining Act also includes provisions which could have cost implications for miners and associations, including:

- ? Costs for rehabilitation and reclamation of mined out areas;
- ? Costs associated with submitting to the Minister monthly returns of his or her operations;
- ? Costs associated with accurate record keeping of production from artisanal mining permit areas;
- ? Costs associated with abiding by the measures for health, safety and environmental protection prescribed by regulations; and
- ? Costs of trading gold in Uganda

For gold traders in Uganda, a Mineral Dealer?s License (MDL) costs 5,000,000 UGX (approximately 1400 USD), which is the cost of a license for dealing in precious metals. The license is payable annually, and when granted, expires on the 31st of December of the same year it is issued. In addition to payment of the fee, the following requirements are noted by the DGSM:

Individual:
a) Valid Identification e.g. Passport, Voter?s Card, Driving Permit
b) Bank Statement
c) Executed Form XIV 2.

Company:
a) Certified copy of certificate of incorporation/registration
b) Certified copy of articles and memorandum of association
c) Bank Statement
d) Executed Form XIV.

a. Costs of exporting gold in Uganda

According to the DGSM?s website, an individual or entity with an MDL or a mineral right has the right to export gold out of Uganda. There is a 5% royalty applied to the gross value of the gold being exported.[68][68] As of July 1st 2021, Gold exporters will be required to pay 200 USD (or Shs740,000) for each exported kilogramme of the precious metal, according to the Mining (Amendment) Bill 2021.[69][69]

b. Costs of Importing Gold in Uganda

Uganda is frequently used as a transit country for gold originating from neighboring countries, especially the DRC. To legally import gold into Uganda, the importer of the consignment must have a valid MDL, an export permit from the originating country, a certificate confirming legal

export from the destination country, a formal application for an import permit, and must pay a flat import fee of 1,000,000 UGX and a 1% of the gross value of the consignment.[70][70]

For additional detailed information on the ASGM sector in Uganda, please refer to Appendix 10.

1.A.2.2 ASGM Programs/Projects in Uganda

There are a number of past projects/programmes targeting the ASGM sector and mercury reduction in particular that have taken place in Uganda. These include the following:

Sustainable Management of Mineral Resources Project (SMMRP) (2003-2011)

The objective of this project, implemented by the World Bank, was to assist the Government of Uganda (GOU) to implement a strategy to accelerate sustainable development, and reduce poverty by strengthening governance, transparency, and capacity in the management of mineral resources, with particular emphasis on community development in mining areas, and improve small-scale, and artisanal mining, in addition to promoting a socially, and environmentally sound development of the minerals sector, based on private investments. 50 artisanal and small-scale mining associations were formed to support production and marketing, licenses rose from 100 to 952 from 2003 to 2011, 1000 miners were trained on mining related topics, and income rose from US$3 per day to US$5-$7 per day from 2006 to 2011. Furthermore, 18 small grants to begin mainstreaming artisanal and small scale mining into national local economic development. Finally, a new online geological database was launched to help increase exploration investments from US$5 million to US$65 million over the course of the project.

NAPE ? Mercury-free training (2017- 2018)

To help miners in the districts of Mubende, Buhweju / Ibanda, Bushenyi, Bugir, Namayingo, Busia, Moroto, Nakapiripirit and Amdat transition to mercury-free technologies, that protect their economic and social welfare wellbeing, NAPE is training miners in alternative gold recovery methods. To lead advocacy for mercury-free ASGM nationally in Uganda, the ?Mercury-Free Gold Mining-New Horizons? project was implemented in partnership with the National Association of Community and Occupational Health (UNACOH), alongside the Department of Occupational Safety and Health (DOSH) in the Ministry of Gender, Labour and Social Development (MGLSD). The project, which ran from January 2017 to June 2018, was financed by the Danish government through a grant from CISU, an independent association of Danish civil society organisations. Di?logos, a Danish environmental NGO, was responsible for organising these funds. The project was largely successful in forming alliances between local and regional stakeholders, enrolling ASGMs in international networks and building capacity on mercury-free gold mining. For example, two demonstration sites were constructed for training artisanal miners in borax technology and communities were helped to form grassroots associations on sound chemical management.

FairPhone ? Child Labour and Responsible Supply Chains(2017-2019)

In 2017, an international coalition of Fairphone, Philips, Solidaridad, Fairtrade, UNICEF and Hivos/Stop Child Labour, was formed to support a more responsible approach to gold sourcing in Busia, Uganda. Named the Uganda Gold Partnership, this five year alliance between various electronics manufacturers and local and global NGOs has pioneered a multi-stakeholder

project to tackle child labour in artisanal and small-scale gold mines.[71][71] It has also helped to establish a sustainable, traceable gold supply chain. Local implementation partners include: three ASM associations in Busia (Tiira Small-scale Miners? Association, Tiira Landlord Miners? Association, and Busia United), local government and authorities in the implementing areas, EWAD, Nascent, Fairtrade Africa, Solidaridad East and Central Africa, and The Impact Facility. The programme has achieved a range of positive results for the mining sector and community in Busia so far. Notable achievements include: the signing of memorandums of understanding (MoUs) with three mining cooperatives committed to upholding environmental best practices, installation of a mercury-free gold processing centre and the formation of village saving groups. These savings groups help families to manage their incomes so that their children will not become involved in gold mining labour.

Environmental Women in Action for Development (EWAD)- (2017-2019)

Between 2017 and 2019, Environmental Women in Action for Development (EWAD) conducted a project to eliminate the use of mercury in the ASGM communities of the Busia District, through a grant of $30,000. New gold mining equipment increased the rate of gold extraction from a range of 50-60% to 80-95% and eliminated water contamination from mercury pollution.

Advocates for Natural Resources & Development (ANARDE) (2019-2020)

ANARDE, a nonprofit group with expertise in human rights advocacy, environmental governance, and corporate and government accountability in the extractive sector, began an awareness raising program in December 2019 to evaluate the level of knowledge on mercury, potential routes of exposure, health risks for children versus adults, mercury related health effects, reproductive risks and effects on the environment in Karamoja. This project was undertaken in partnership with Avocats Sans Fronti?res (Lawyers Without Borders), as well as with community-based volunteers that engaged in sensitization and training on mercury usage and potential harmful effects. The objective of the project was to help artisanal gold miners reduce and or eliminate the use of mercury in gold mining, and reduce harmful risks to their health and the environment.

Investment in Miners? Potential through Access to Capital and Transparent Markets (IMPACT) Facility ? Mercury-free loans plant (2017-2020)

Since 2017, the IMPACT Facility has supported mining organisations across Uganda, Tanzania and Kenya in responsibly sourcing gold. Business and governance training has been provided for environmental stewardship and awareness campaigns to reduce child labour in ASGM. As a means to facilitate mercury-free gold recovery, in 2019, a first round of investments in enhanced processing equipment was made. In Tiira, part of the Busia District in Eastern Uganda, a pilot ?pay-per use? gold processing plant was installed by IMPACT Facility along with local service provider Borassus. Use of a gravity circuit followed by smelting fully eliminates mercury use in the processing of the gold ore. The ?pay-per use? scheme required an upfront investment of 10% but no single organisation had to assume the burden of the $55,000 outlay needed to install it. This model offers miners the chance to test out the system without making a long-term financial commitment themselves, reducing barriers to entry in adopting mercury-free technology. The plant in Tiira is operated and maintained by locally recruited and trained IMPACT Facility staff.

Mercury Free Gold Mining Project ? New Horizons (2019)

Uganda National Association of Community and Occupational Health (UNACOH) and Uganda National Association of Professional Environmentalists (NAPE) together with the

Ministry of Labour, Gender and Social Development (MGLSD) have made attempts to address this problem. This was through the Mercury Free Gold Mining Project ? New Horizons. This project aimed at promoting healthy and safe and environmentally friendly practices among artisanal small-scale gold miners through the adoption of Mercury-free methods. This was through training of selected miners and key stakeholders in the use of this method and advocacy for Mercury-free ASGM nationally in Uganda, regionally in Africa and internationally. This project was implemented over one year in the following districts; Namayingo, Mubende, Buhweju, Busia and Nakapipiriti.

In addition to these past projects/programmes, a number of programs are currently underway in Uganda, including:

GEF Small Grants Programme (2019-2022)

In July 2018, the Global Environment Facility (GEF) launched an innovation programme to address mercury contamination in artisanal small-scale gold mining (ASGM), and to manage its associated environmental and health impacts. The $2 million programme has been implemented in 7 different countries, including Uganda, by UNDP along with the Global Opportunities for Long-term Development in Artisanal and Small-Scale Mining Programme (GEF GOLD), Zero Mercury Working Group and other partners. A number of projects are currently under execution in Uganda. These include:

? Mercury-free centre in Busia (November 2019 ? October 2021) ? Funded by a grant of $45,000 to Busia United Community Based Organisation (BU-CBO). The project seeks to establish a centre of excellence for best practice and mercury-free technology in gold processing in Busia District.

? Promoting Mercury Free Gold (November 2019-October 2021) ? Funded by a grant of $20,000 to the National Association of Professional Environmentalists (NAPE). The project seeks to stop mercury pollution from ASGM and improve the organisation of civil society in mining communities in Buhweju District.

? Advancing zero mercury gold (April 2020-March 2022) ? Funded by a grant of $20,000 to Vision Care Foundation (VCF). The project seeks to promote the use of mercury-free mining techniques in the pastoralist artisanal mining communities in Amudat District.

? Mercury use control in Namayingo (April 2020-March 2022) - Funded by a grant of $20,000 to Supporting Development Initiatives and Actions (SUDIA). The project seeks to eliminate the use of mercury in ASGM communities in Namayingo district, by training miners on safer mercury handling techniques and by purchasing mercury-free gold processing equipment.

? Reducing mercury use in gold (April 2020-March 2022) - Funded by a grant of $50,000 to Uganda National Association of Community and Occupational Health (UNACOH). The project seeks to strengthen capacities of stakeholders in the ASGM sector in Uganda to reduce utilisation of mercury by miners in Amudat District.

German Federal Institute for Geosciences and Natural Resources (BGR) (2020-2023)

In February 2020, Uganda signed an agreement with the International Conference on the Great Lakes Region (ICGLR) and the German Federal Institute for Geosciences and Natural Resources (BGR) to adopt the certification mechanism and audit of Tin, Tungsten, Tantalum (3TGs) and Gold. This will allow ASGM operators to sell gold on the international market for a fair price. The Regional Certification Mechanism (RCM) is a scheme that audits mining companies and exporters to ensure that minerals are sourced conflict-free through responsible supply chains. It was developed in 2010 as part of the

Regional Initiative against the Illegal Exploitation of Natural Resources (RINR) within member states of the International Conference on the Great Lakes Region (ICGLR). Uganda has developed a national plan for its implementation. IMPACT is assisting BGR in setting up the Uganda-ICGLR Mineral Tracking and Certification Unit which will be based at the Directorate of Geological Survey and Mines, Entebbe.

EPRM-ACEMP (2019-October 2021)

The European Partnership for Responsible Minerals (EPRM) and Africa Centre for Energy and Mineral Policy (ACEMP) are partners in an ongoing project in Uganda (Western, Central and Eastern regions), DRC and Rwanda which aims to prepare 3TGs and gold mine site operators, traders and exporters to use responsible mineral supply chains which, are free of conflict financing and human rights violations. Running from June 2019 to October 2021 the project will also promote the formalisation of ASMs, enhance mining revenue collection and tackle restrictive practices that limit full participation of women in mining.[72][72] EPRM and ACEMP?s implementing partners include: Optima Mines and Minerals Ltd, the National Planning Authority, and the Directorate of Geological Survey. Alongside these organisations, EPRM and ACEMP hope to facilitate good governance of the mining sector in Uganda and establish a working partnership between the government and key actors throughout the mineral supply chain.

Biometric Registration of Artisanal and Small Scale Miners Project (BRASM) (2020-March 2022)

The BRASM project is part of the Government of Uganda?s efforts to formalize the ASGM sector and is being implemented by ACEMP. The project involves biometric registration of all miners, laborers, dealers and agents, and will issue them with renewable certificates and or permits. These are intended to align with the systems of the National Identification and Registration Authority (NIRA). The project will engage ICT experts to develop an application to register miners, which will link to a national database managed by the DGSM, and will include information on the individuals, such as name, age, sex, location and membership in associations.[73][73] The project is intended to cover the entire country, according to Uganda?s National Action Plan.[74][74]

IMPACT ? Digging for Equality (November 2020-August 2022)

IMPACT is implementing a series of interconnected activities over a three year period, designed to support women working in the ASM sector to tackle the barriers that they face with respect to achieving full gender equality in the ASM sector, including: 1) Ensuring laws, policies, regulations and practices affecting the ASM sector serve to improve women?s security and reduce gender inequality; 2) Increasing the economic benefits that women derive from ASM; and 3) Building the capacity of women to become environmental stewards in ASM. The project is taking place across three countries, including Uganda, Zimbabwe and the DRC. The Ugandan component of the project will be implemented at the national level as well as in Mubende.[75][75]

Coordination with Past and Ongoing Initiatives

The above initiatives have created a strong foundation for the implementation of the planetGOLD project as they have begun to raise the profile of the importance of addressing mercury usage in the ASGM sector and associated harms amongst key stakeholders. They have also generated some learnings on the challenges for increasing the uptake of mercury-free technologies, including those related to formalization, access to finance and identifying fit-for-purpose mercury-free

technologies. The baseline projects have so far targeted one or two Districts primarily, and thus the planetGOLD project will provide the opportunity to expand outreach into a larger number of Districts. Furthermore, it will take the opportunity to learn from some of the lessons related to technical interventions in the sector and the implementation of mercury-free technologies to identify solutions that are adapted to the realities of ASGM production in Uganda ? notably the production of gold in very small quantities by individual or small groups of miners.

Regional and International Commitments

The International Conference on the Great Lakes Region, of which Uganda is a member, adopted a Regional Certification Mechanism (RCM) in 2012 for gold, tin, tantalum, and tungsten. Uganda has domesticated the RCM into national legislation, but, has so far struggled to implement it and bring it to scale across the country. Many stakeholders are still unfamiliar with the requirements related to the RCM, and procedures and processes to implement it are lacking.[76][76] With respect to the gold sector in particular, a lack of demand for legal documentation asserting the origin of gold in many destination cities for Ugandan exports, such as Dubai, has contributed to slow progress in this sector. Experts have also documented that efforts by the Ugandan Revenue Authority to strengthen oversight and request information on the origin of gold in 2015 primarily resulted in an increased in illegal exports, pushing the trade further underground and resulting in a loss of revenues.[77][77] The ICGLR has also developed two key guidance documents for the ASM gold sector in the Great Lakes region. These are the ASM Formalisation Guide for the ICGLR member states and the ICGLR Strategy for Artisanal and Small-Scale Gold. The ICGLR had begun hosting meetings between member states on these topics prior to the Covid-19 pandemic, though these activities slowed down following the onset of the pandemic.

The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG) is a key reference standard for responsible mineral sourcing and is increasingly becoming a global normative framework. While the practice of conducting supply chain due diligence is becoming increasingly known and accepted amongst downstream market actors, these efforts are met with significant challenges in the upstream sector of the supply chain, where the concept of due diligence is often not well understood and sharing information or transparency is not the norm. Fear of possible shut down when faced with inspections, audits or requests for information, high due diligence costs and reluctance to be under greater scrutiny from various actors continues to make uptake of due diligence implementation a challenge particularly as gold export markets do not universally demand documentation of origin.[78][78]

1.A.3. Alternative Scenario

ASGM is present in a number of Districts across each of Uganda?s four regions see Figure 2 for a map of Uganda?s four regions). The particular dynamics in each region or District varies, such as whether mercury is currently being use, how much mercury is being used or the extent of progress being made with respect to formalization. As such, the project will carry out a set of holistic activities that will target the root causes of mercury usage in Uganda which can benefit each region based on its current needs and context. Given the interconnectedness of gold and mercury supply chains in Uganda and the broader region, it is important to approach the challenges in Uganda?s ASGM sector as a whole, in order to prevent displacing the problem of mercury usage from one location to another, rather than eliminating it altogether. Table 2 provides a high-level summary of the particular dynamics of each region, estimated mercury usage in these areas, the Districts where

the project activities will take place, indicative mine sites, and the specific activities/outputs that will be targeted in these sites. These mine sites were selected via multistakeholder discussions led by NEMA and members of the national coordination mechanism for the Minamata Convention on Mercury during the PPG Phase, using the planetGOLD Site Selection Checklist as guidance. The Project Steering Committee will review the selected mine sites ahead of project activities commencing, in order to confirm their suitability for each respective activity.

FIGURE 2: UGANDA?S ASGM REGIONS[79]79

The project activities emphasize the need to support the development of capacity and leadership within Uganda-based institutions and stakeholders. As such, a number of activities are targeting these institutions and stakeholders in an initial train-the-trainer (ToT) model, which will then allow these institutions and stakeholders to better support and service the ASGM sector to formalize, access finance, improve its practice and reduce mercury usage. This will increase the sustainability of the interventions, as they will be embedded in the relevant institutions and stakeholders that are needed by ASGM actors. However, it is important to note that many miners and associations have echoed the need to have support and training closer to the mine sites themselves and to target

miners and associations themselves, as there is frequently a bottleneck of sensitization and trainings being offered at the level of national and District-level authorities that is not trickling down. As such, the project is emphasizing not only the ToT model, but has ensured that activities to support these trainers to conduct sensitization and trainings, as identified, can also be carried out.

Table 2: Summary Table of Context, Activities and Outputs per Region, District and Mine Site in Uganda

Region	Context	Districts/Sub-region	Mine Sites (TBC)	Activities / Outputs
Eastern Mercury Use = HIGH (5,023 kg/y)	Degree of formalization is relatively high with most mining associations/cooperative operating within location licenses. Associations work in partnership with private investors who fund mining activities. Extensive efforts to introduce mercury-free equipment, but limited uptake/continuity. Knowledge of mercury impacts/mercury-free technology is high. Interventions more focused on Busia, and recently Namayingo. Cyanide leaching of tailings by 3rd parties is wide spread. Local government support is strong and ASGM economic contribution in the district is visible.	Busia District	Siyanyonja # of miners: 138	Formalization (1.1) (inc. JA/LA approach (1.2)), mercury awareness (3.1), knowledge sharing (4.1)
			Tiira # of miners: 153	Formalization (1.1) (inc. JA/LA approach (1.2)), access to finance/responsible ASGM (2.1), mercury awareness (3.1), mercury-free technologies (3.2), knowledge sharing (4.1)
		Namayingo District	Buhere # of miners: 85	Formalization (1.1) (inc. JA/LA approach (1.2)), mercury awareness (3.1), knowledge sharing (4.1)
Northern Mercury Use (Karamoja sub-region) = MEDIUM (1,259kg/y)	ASGM organizations are largely informal and led by traditional or family leaders. Work is done at community level, with women making up significant portion of ASGM miners. Limited awareness of the harms presented by mercury usage; Limited knowledge and training on mercury reduction and mercury free	Moroto District (Karamoja sub-region)	Nakabaat # of miners: 200	Formalization (1.1), mercury awareness (3.1), knowledge sharing (4.1)
		Amudat District (Karamoja sub-region)	Kapiyosa # of miners: 229	Formalization (1.1), mercury awareness (3.1), knowledge sharing (4.1)

	technologies; limited organization of ASGM miners; women miners exposed to mercury; Some alluvial mining areas do not use mercury. Some recent efforts by civil society to raise awareness on mercury free methods, such as direct smelting.		Cheptakol # of miners: 59	Formalization (1.1), mercury awareness (3.1), knowledge sharing (4.1)
Central Mercury Use = HIGH (7,822kg/y)	The region has a formalized mine site at Kagaba Hills under the management of MUMA. There is uncertainty over the tenure of the permit area. Mining associations in this region are highly organized and formal. Limited awareness of the harms presented by mercury usage; Limited knowledge and training on mercury reduction and mercury free technologies. High density of official and informal processing plants spreading into Mubende district most using dry mills, sluicing and amalgamation of sluice concentrates. This region is known to transfer mining labour and mercury use across Uganda. The district government supports a multi-stakeholder engagement process to advance responsible ASGM.	Kassanda District	Kagaba Hill # of miners: 800	Formalization (1.1), access to finance/responsible ASGM (2.1, 2.2), mercury awareness (3.1), mercury-free technologies (3.2), knowledge sharing (4.1)
			Kayonza # of miners: 300	Formalization (1.1), mercury awareness (3.1), knowledge sharing (4.1)
Western Mercury Use (Ankole sub-region) = MEDIUM (1,129kg/y)	The association is not very formalized, one Cooperative was created but proved ineffective and miners are working on registering a Buhweju ASM association. Land access has been difficult, much of the area is covered by Exploration Licenses. Mining activities do occur in protected areas. Limited awareness of the	Buhweju District (Ankole sub-region)	Katenga # of miners: 350	Formalization (1.1), mercury awareness (3.1), knowledge sharing (4.1)
		Kisoro District (Kigezi sub-region)	Nyabiremura # of miners: 180	Formalization (1.1), mercury awareness (3.1), knowledge sharing (4.1)

	harms of mercury usage; Limited knowledge and training on mercury reduction and mercury free technologies; Training offered to district official and ASGM leaders only, however this needs to cascade down to miners. Some alluvial mining sites are not using mercury. Engaged, supportive and informed local government officers who want to advance the formalization of the sector. Economic contribution visible at district level.		Rushaga # of miners: 70	Formalization (1.1), mercury awareness (3.1), knowledge sharing (4.1)

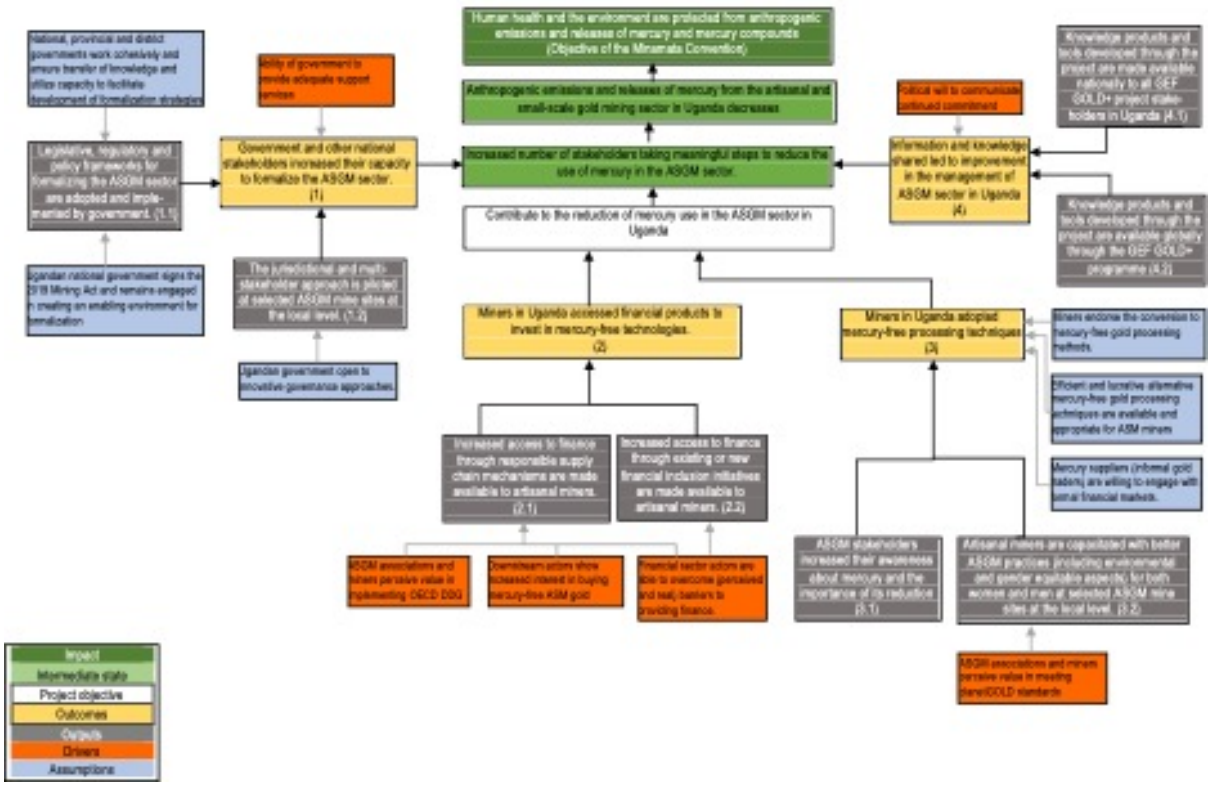

FIGURE 3. THEORY OF CHANGE

i. Expected impact and intermediate impact

There are recognised and concrete evidence showing environmental and health risks associated with mercury. Therefore, the impact of the proposed project is aimed to protect human health and the environment from emissions and releases of mercury and mercury compounds generated

through its use in ASGM operations. Uganda will comply with their obligations under Article 7 of the Minamata Convention to reduce mercury use in their national context and position as an example and contribute towards a set of globally accessible tools (on formalization, legislation, access to finance and markets, information on mercury free technologies and knowledge management and dissemination) for utilization by all Parties of the Convention. The expected **intermediate impact** of the project is that anthropogenic emissions and releases of mercury from the ASGM sector in Uganda decreases and increased number of stakeholders are taking meaningful steps to reduce the use of mercury in the ASGM sector. The direct beneficiaries of the project are miners and their communities, and artisanal gold supply chain stakeholders. With the political support leading to formalize the ASGM sector and increased awareness of the risks on using mercury to produce gold, the innovative approaches presented in this project will improve the social, economic and environmental aspects of the sector.

ii. Project Description

The project will be implemented through the below outlined components, outputs and activities.

Component 1: Formalisation Optimization

As identified in Uganda?s National Action Plan (NAP), an ongoing challenge to the formalization of the ASGM sector in Uganda has long been the lack of legal recognition of the sector and an effective legal, regulatory and policy framework to guide and support affected stakeholders to formalize. The Government of Uganda has taken some important steps to address this gap, namely the drafting of the Mining and Minerals Bill (2020) that includes the ASM sector, as well as a new Minerals and Policy (2018) which also seeks to strengthen the institutional framework for the ASM sector. Uganda?s National Action Plan also notes ?Reviewing relevant laws/regulations to incorporate provisions of ASGM/ASM formalisation strategies? as a particular activity for achieving its objective of formalizing the ASGM sector. While the proposed new Mining and Minerals Bill (2020) was first drafted in 2019, the Covid-19 pandemic combined with a national election has led to significant delays. Once the new Mining Bill is adopted, implementing regulations will help support its implementation, and there is a need to ensure that the use of mercury in the ASGM sector is adequately considered in Ugandan law given that there is no specific law regulating the use of mercury in Uganda. There is a need to ensure that responsible government stakeholders are well-equipped to communicate and sensitize ASGM stakeholders on the new ASGM framework in Uganda, so that they are aware and able to navigate the new requirements and access relevant services. There is also a need to ensure that the efforts to encourage and support the formalization of the ASGM sector recognize that there are a multitude of actors that are directly and indirectly affected by the ASGM sector ? positively and negatively ? and that a multistakeholder approach that recognizes the value, opportunities for and competing interests of various stakeholders can be more effective in introducing sustainable and scalable formalization efforts in the ASGM sector.

This component aims to capitalize on existing momentum and further the ongoing establishment of an ASGM formalization framework in Uganda via various laws, policies and regulations applicable to the ASGM sector (whether finalized or under consideration), and support the capacity building of all stakeholders to implement it, including those offering support services to the sector (i.e. various levels of government), as well as those whom are directly targeted by the formalization framework (i.e. miners, associations, and traders). This will be done by supporting relevant government ministries and departments to finalize the ASGM formalization framework ? notably by supporting the adoption of the existing draft Mining and Minerals Bill (2020) and creating regulations to implement the Mining Bill, including a regulation pertaining to mercury usage in the sector. The project will support the development of different sensitization materials, tools and guidelines that government officers at the national, district and local level can be trained to use to carry out sensitization and trainings on formalization with miners, associations and traders. The project will then support the various government service providers to the ASGM sector to provide

training to government officers and staff to understand the new legal and regulatory environment, and to carry out their respective roles of sensitizing and supporting ASGM actors to formalize and increasingly abide by these new rules.

To further mobilize different stakeholders to advance formalization through holistic and integrated approaches, jurisdictional/landscape approaches and other multi-stakeholder governance frameworks will be introduced to Ugandan ASGM stakeholders and piloted in Busia and Namayingo Districts which are located in the Eastern Region of Uganda ? an area hosting approximately 6,700 miners.[80]80 Upon introduction of the JA/LA approach, stakeholders will be supported with methodologies to build a multi-stakeholder coalition and develop an action for implementing the JA/LA approach. The JA/LA approach is envisaged to address formalization (including access to finance), upscaling of mercury free technologies, protection of pollution of Lake Victoria and fish against mercury contamination, amongst other priority areas established by the stakeholders. This output will receive support and training from the Global Component of the planetGOLD on JA/LA approaches, while the whole component will tap into any resources and knowledge products provided through the Global Component?s resources on formalization approaches of the ASGM sector.

Expected Outputs:

OUTPUT 1.1: Legislative, regulatory and policy frameworks for formalizing the ASGM sector are adopted and implemented by government

The activities carried out under Output 1.1 will help to ensure that the ASGM formalization framework in Uganda is finalized, that mercury usage is adequately targeted in this framework and other relevant regulations (e.g. incorporates restrictions on open burning of amalgam in residential areas, settlements, etc.), and that responsible government parties are properly equipped with training and tools to conduct outreach with and provide support to ASGM stakeholders to understand and abide by the new legal, regulatory and policy environment.

Specific activities

Activity 1.1.1 Provide technical support and guidance to government officials and parliamentarians on the formalization of the ASGM sector

As the draft Mining and Minerals Bill (2020) undergoes the legislative process and review, the project will provide technical support and guidance to government officials and parliamentarians where opportunities arise for promoting and supporting the formalization of the sector and eliminating the use of mercury within it. The project will host one formal information session for interested government and parliamentary officials, and will also facilitate additional technical briefings on an as-needed basis (i.e. where particular requests are made, or where the PSC identify additional needs or opportunities).

Activity 1.1.2 Collation of assessments of legal and regulatory framework related to ASM

Various assessments of the current legal and regulatory framework for the ASGM sector in Uganda, including those of the proposed Mining and Minerals Bill (2020) and/or other recently adopted policies and regulations, will be collated to inform the creation of the implementing regulations and guidance documents for the Bill (once it is adopted by parliament) and other laws related to the ASGM sector (e.g. the National Environment Act 2019). Additional stakeholder input will be collected where needed, especially with respect to the views of women and other disenfranchised groups.

Activity 1.1.3 Support the development of regulations and guidelines for the ASGM sector (including implementing regulations for the new Mining and Minerals Bill (2020) (once adopted) and a regulation, district-level ordinances or district-level By-laws specific to the use of mercury in the ASGM sector)

The project will support the DGSM and NEMA to develop regulations and guidance on ASGM formalization that accompany the draft Mining and Minerals Bill (2020) and the Minerals and Mining Policy (2018). Specifically, support will be provided to NEMA and DGSM to create and co-chair an ASGM Regulations Working Group (?the Working Group?) which will inform the development of accompanying regulations and guidelines to the draft Mining and Minerals Bill (2020) and other pertinent pieces of legislation, such as the National Environment Act 2019. This will include a regulation specifically targeting the management and control of mercury use in Uganda?s ASGM sector, a gap that was identified in Uganda?s National Action Plan. DGSM will take the lead on drafting regulations for the draft Mining and Minerals Bill (2020), while NEMA will lead on drafting mercury regulation and any guidelines pertaining to the National Environment Act 2019. The Working Group will provide input and support a cohesive, harmonized approach across different government ministries, departments and other existing regulatory frameworks. It will also carry out a gender impact assessment of proposed regulations, in order to mitigate risks of unintended negative impacts on women and men, and ensuring that promotion of gender equality is considered. The assessment will be conducted using IMPACT?s Toolkit: Gender Impact Assessments for Projects and Policies Related to Artisanal and Small-Scale Mining, which was released in 2020 and provides a set of resources and guidance to policymakers and project implementers on meaningfully considering the gender implications of particular policies or projects. The toolkit was created based on field-work and IMPACT?s experiences in DRC, Uganda and Rwanda, and had direct input from Ugandan government representatives, who participated in several workshops during the development of the toolkit. The toolkit is currently being used with Ugandan stakeholders in the context of IMPACT?s Digging for Equality project. The toolkit will be introduced during the working meetings of the Working Group, with the support of the project?s gender expert, and will help policymakers to reflect on the gendered implications for a proposed policy, with an emphasis on considering impacts on gender inequality and disproportionate positive or negative impacts on women and men.

In addition to NEMA and DGSM, the Working Group will be comprised of representatives from relevant ministries, including:

- The Ministry of Water and Environment (MWE)
- Ministry of Finance, Planning and Economic Development (MFPED)
- Uganda Revenue Authority
- Ministry of Health
- Ministry of Gender, Labor, and Social Development
- Ministry of Local Government

The Working Group will engage with non-government stakeholders, including private sector, civil society, financial institutions, academia, or others, in order to inform the development of regulations, consider stakeholder perspectives and also ensure lessons learned and challenges of operationalizing formalization such as cost, centralized application processes, and other barriers are taken into consideration. This will be done on an as-needed basis, such as informal meetings or invitations to participate in working group meetings, but will not include formal membership in the Working Group.

Opportunities for regional harmonization will also be explored through Uganda?s membership in the ICGLR ? which has a gold and formalization component ? as well as with other planetGOLD and planetGOLD country partners, namely Kenya and the Republic of Congo. This will also allow for reflection on the impacts of various legal and regulatory frameworks at the regional level, given the interconnectedness of both gold and mercury supply chains across East Africa. Effort to

formalize and tackle mercury usage in Uganda?s ASGM sector is expected to have a contribution at the regional level, as Uganda is a transit route to ASGM in DRC and South Sudan.

Once the regulations and guidelines are drafted, the project will support DGSM and NEMA to host a consultation workshop prior to finalize the regulations and guidelines. This will be held in Kampala, and will bring together approximately 30 stakeholder representatives from various perspectives, including miners, associations, traders, landowners, private sector, and civil society.

Activity 1.1.4 Engage with responsible government and private sector parties (e.g. DGSM, etc.) to implement the new ASGM legal, regulatory and policy framework

This activity will involve mapping and identifying all the relevant actors and institutions to advance ASGM formalization from the national to the local level, as prescribed by legislation, regulations and policies that relate to the ASGM sector. An implementation strategy will be developed by DGSM and NEMA with the support of learning specialist, and will include the development of communication and sensitization tools and training materials that government officials will be trained to use to engage and offer capacity building support to various ASGM actors (miners, association, cooperatives, traders, land-owners). The communication and sensitization tools and training materials will be gender-responsive, meaning they will consider different communications channels and messaging to ensure that both women and men are served.

The implementation strategy will be based on a train-the-trainer approach, embedded in existing government structures, roles and responsibilities. In the first phase, this will involve training in Kampala of approximately 20 national and regional level government officials within the DGSM and NEMA that hold responsibility for promulgating and enforcing the legal, regulatory and policy framework for the ASGM sector. This training will focus on ensuring that these government officials first have clarity with respect to their mandate and understand the new legal, regulatory and policy framework themselves, and secondly that they are trained on how to carry out gender-inclusive sensitization of the framework in ASGM communities. The 20 national and regional level government officials will partake in 3 training sessions (2 days each), and will include an overview of the formalization framework in Uganda (i.e Minerals Policy (2018), draft Minerals and Mining Bill (2020) (if adopted), pertinent regulations, ICGLR Regional Certification Mechanism (RSM), Environmental Impact Assessment guidelines for ASM, etc.), the particular roles and responsibilities of government ministries, as well as how to deliver gender-responsive sensitization sessions and the importance of gender equality, emphasizing gender-sensitive communication and strategies. In this regard, the project will engage with gender focal points within the DGSM and NEMA to ensure that they can benefit from the trainings as well as develop their own capacity to carry out their functions within their respective ministries ? as often times these focal points do not necessarily have the appropriate skills and experience.

In the second phase, national and regional government officials will be supported by the project to work with and build the capacity of local government officials (approximately 5 per District) by jointly carrying out sensitization in the 7 Districts targeted by the project. During the PPG mine site visits, some local government officials noted that sensitization on formalization is often done at a high-level with authorities, but not at the actual mine site level amongst miners and associations more broadly ? which can make their job challenging. The project will provide resources to host sensitization sessions in the targeted Districts and mine sites, such as travel support, location rentals (where needed) and/or refreshments. The project will also provide expert support in ensuring sensitization sessions are carried out in a gender-sensitive manner, mainly via the help of the project?s gender officer as well as resources to increase women?s participation. The project will host up to 8 sensitization sessions in each District (approximately 20-30 people each). Success for formalization will require the different stakeholders playing their part, and thus the sensitization sessions will be provided to a wide group of stakeholders ? not only miners. Such stakeholders may include landowners, traditional leaders, traders, representatives of financial institutions, and so on.

Complimentary to the support provided to government officials to implement the new ASGM legal, regulatory and policy framework, IMPACT will also provide technical and capacity building support to the Uganda Association of Artisanal and Small-Scale Miners to professionalize the association and support them to grow, engage and better support their membership to formalize under Uganda?s new framework. This may include technical support such as guidance on organizational development, membership structure, governance or finances, support for engaging with policymakers.

Activity 1.1.5 Monitor implementation of new mercury/ASGM regulations, draft Mining and Minerals Bill (2020) and Minerals Policy (2018) by government departments

Through the working group, stakeholders will monitor progress in adopting and implementing the regulations by responsible parties. Workshops will be held at national, District and local level to develop a monitoring plan and review progress with implementation of regulatory frameworks, progress with formalization and challenges faced. Recommendations will be drawn and relevant stakeholders supported in development of solutions through the Working group (composition of the Working Group is described under Activity 1.1.3). The monitoring will continue throughout the life of the project.

OUTPUT 1.2: The jurisdictional and multi-stakeholder approach is piloted at selected ASGM mine sites at the local level

Within this output, innovative approaches to implementing Uganda?s evolving ASGM formalization framework ? which is comprised of a number of laws, policies and regulations that govern the sector ? will be piloted through multi-stakeholder approaches at the local level, namely the Jurisdictional or Landscape Approaches. Multi-stakeholder approaches provide for engagement of different stakeholders with interest within a landscape to define their priorities and define how ASGM could operate in respect of other land users. The output of these activities will include raised awareness of jurisdictional approaches to the district(s) with the support of both the project and the Global Component, the creation of a multistakeholder group (MSG), a gap and SWOT analysis of existing formalization programmes and services, an action plan to guide the work of the multistakeholder group and piloting of priority activities from the action plan. The multi-stakeholder group will be informed by an understanding of incentives that drive formalization in the context of the district and interaction with other land users and non-mining stakeholders.

Busia and Namayingo Districts of the Eastern region will be targeted for JA/LA piloting. These Districts have been selected for the following reasons:

- There is a significant presence of ASGM in the region, including approximately 6,700 miners.[81]81
- There is already some level of formalization that exists within both Districts, leaving more room for concentrated efforts on the reduction of mercury.
- The region boasts a sizeable number of location licenses.
- Mercury usage in the region remains very high, with discharge into nearby rivers and lake, and requires interventions.
- Busia is the main point of entry for mercury from Kenya into Uganda.[82]82
- There is significant interaction between the mining sector and broader community (i.e. mine sites are close to community, not operating in a more remote area).
- Significant intertwining of stakeholder interests: private sector, ASGM, landowners, fishermen, district government, NEMA, DGSM, gold buyers, agricultural sector, downstream actors, etc.
- Many stakeholders have demonstrated a commitment in working towards mercury-free and increasing formalization in the area.

A separate MSG will be created for each District ? Busia and Namayingo ? with opportunities for networking, collaboration and sharing learnings to be shared between the two District groups. The MSGs will be created following initial engagement and sensitization held with local governments and stakeholders, with support provided by the project to establish locally-driven methods for selecting MSG participants (e.g. hosting dialogue sessions, nomination meetings, etc.). The MSGs will be comprised of the following stakeholder representatives:

- Local government officers
- Customary leaders
- Cooperative/association leaders
- Cooperative/association members
- Women?s associations / miners
- Traders
- Large-scale mining companies (e.g. Algouda Ltd in Namayingo)
- Land-owners
- Processors/service providers (e.g. leaching operators)
- Representatives of other land-use sectors (e.g. agriculture, fisheries, agro-forestry)
- Financial sector representatives
- Civil society organizations (local)

Specific activities

Activity 1.2.1 Sensitize relevant stakeholders to the benefits of JA/LA approaches

The first activity under this output will focus on providing general sensitization and information to relevant stakeholders on JA/LA approaches (including project implementers). Principles of multistakeholderism, gender equality and inclusive participation and representation will be embedded in this sensitization. Support will be provided by Conservation International to carry out this activity.

Activity 1.2.2 Support local stakeholders to conduct a gap and SWOT analysis of existing formalization/access to credit/mercury reduction programs/services available at the local level

The group of local stakeholders will be supported to conduct a gap and SWOT analysis of the existing incentives, programmes and services supporting ASGM formalization, including access to finance and mercury reduction efforts. The project will lend support to the group of local stakeholders to conduct the gap and SWOT analysis ? such as through the provision of facilitators, sensitization on thematic issues, meeting and workshop support, etc. ? but the gap and SWOT analysis itself will be led and driven by the group of local stakeholders. The SWOT analysis will rely on various types of assessment tools identified through the JA/LA methodology of the global project, under the guidance of Conservation International. These will include, at minimum:

1) Underlying Drivers Assessment: This assessment will serve to identify current barriers to sustainable practices in ASGM (i.e. what are the current incentive structures that are leading ASGM actors to put aside their environment and health) and identify potential value propositions and policies that could motivate a coalition of stakeholders to act, help to lower costs of interventions and improve the feasibility of sustainable action. This assessment will be conducted by the MSG with the support of the project and expert facilitators, using the CUDLs approach (Changing Underlying Drivers in Landscapes). This approach primarily relies on directed focus group discussions, surveys and desk-based research.
2) Governance Assessment: Using a tool developed by LandScale called the Sustainable Landscape Rating Tool, the project will support the MSG to undertake a governance

assessment to identify strengths and weaknesses of the governance of the sector in the targeted districts, and where there are priorities for improvement.

The project will support the group of local stakeholders to discuss the findings of these assessments, both amongst those who directly participated but also additional stakeholders that may increasingly become interested in the findings, and will use these to formulate the basis of a dialogue on how a multistakeholder process or grouping at the District level could begin to address the findings of the assessments.

Activity 1.2.3 Create multi-stakeholder group to coordinate approach in select District(s)

Once stakeholders express a sound understanding of the analysis conducted in Activity 1.2.2, as well as an interest to implement the approaches defined in the JA/LA sensitization sessions, local stakeholders will be supported to formulate a multi-stakeholder group (MSG) to continue implementing the JA/LA approaches. Members of the MSG will be identified, with particular focus on ensuring an inclusive and gender balanced set of representatives. This is a process that may take time until year 3 or 4 of the project. It will be important to ensure all the different actors are engaged, with government taking a leading jurisdictional role.

Activity 1.2.4 Support the creation and resourcing of a multi-stakeholder group action plan

The MSG will be supported to create an action plan, define its priorities and a monitoring framework. The planning process is expected to be participatory and supported with facilitation. Different stakeholders have diverging views and interests and hence developing consensus on emotive natural resource use and access is challenging. The project will be supported by the Global Component with tools to support the planning process and training of stakeholders on the creation of the plan. This will include tools to support a process for defining key pillars of sustainability, which will define core goals and targets for the jurisdiction (e.g. LandScale, IMPACT?s SDG Library for the ASM sector, etc.). The plan will also be used to engage external actors, such as supply chain actors, to invest in responsible mining within a JA/LA approach. Implementation of the action plans will depend on the level and extent of their development during project execution.

Component 2: Financial Inclusion and Responsible Supply Chains

Most actors working in the ASGM sector have stated that their lack of access to good sources of adequate finance (i.e. on good and transparent terms, from non-predatory and licit actors, etc.) has been an impediment to their ability to invest in increased production, mercury-reduction technologies and other responsible ASGM practices. With greater access to finance, miners have stated that they can increase their production (and therefore their overall earnings) and subsequently make more investment in mercury-free technologies and other responsible ASGM practices.

This component is intended to strengthen ASGM access to mercury free technologies by increasing their overall access to the financing means to invest in them. The project will employ both a direct supply chain-oriented strategy for mobilizing access to financing via downstream actors, as well as a non-supply chain-oriented strategy focused on unlocking the potential of financial inclusion/access to financing options, such as community-based initiatives and more traditional forms of financing, such as banks. Thus, this component features two complimentary outputs: 1) increased access to finance through responsible supply chain mechanisms, and 2) increased access to finance through existing or new financial inclusion initiatives. These outputs will be delivered by fostering partnerships with motivated supply chain actors and financial institutions (including microcredit lenders), understanding current obstacles, challenges and incentives for miners/associations/traders to access financing and/or implement responsible ASGM practices, as

well as supporting existing or developing new financial inclusion programmes, either at the local community-level or vis-?-vis national financial institutions. Capacity building support will be provided to both upstream ASGM actors to progressively meet the expectations of downstream actors and/or financial institutions, while also sensitizing potential lenders to the realities of the ASGM sector.

The overall component will be underpinned by the recognition that women face particular and unique challenges when it comes to access financing, which needs to be considered throughout the implementation of the project activities. Particular attention will be paid to supporting or creating initiatives that address the barriers faced by women, such as efforts that privilege women?s leadership, provides capacity building to women, or provides them with privileged terms.

Expected outputs:

OUTPUT 2.1 Increased access to finance through responsible supply chain mechanisms are made available to artisanal miners

Activity 2.1.1 Develop partnership with two ASGM associations and conduct responsible sourcing assessments

The project will select two ASGM associations with whom support will be provided for implementing responsible sourcing practices as a pathway for accessing financing via supply chain actors (e.g. gold refiners) and/or financial institutions. Two prospective associations have been identified - Mubende United Miners Assembly (MUMA), which operates in Kassanda District and includes a number of smaller associations, including a women?s association (MUWAGOMA), and Tira Landlords, an association operating in Busia District (note that Busia District will be one of two Districts piloting the JA/LA approach). These associations were selected because they are more advanced with respect to formalization and professionalization, which make them more suitable and readier to engage with prospective mid and downstream supply chain actors (or financial institutions) that may be willing to provide access to financing. In this regard, they are also better prepared to progressively implement the planetGOLD responsible gold sourcing criteria. Additional factors considered included the production capacity of these associations, and relatively strong participation of women miners in the associations. Kassanda District and Busia District are also the two Districts with the highest mercury usage according to Uganda?s NBO study. Initial interest by both associations has been expressed, however the PSC will re-confirm this selection during the implementation phase of the project, where some form of partnership agreement with each association will be pursued to confirm commitment and expectation of both the project and the associations (e.g. Memorandum of Understanding or collaboration agreement).

Once the partnerships are finalized, the project will support the ASGM associations to undergo a responsible sourcing assessment carried out by a recognized third-party assessor (an organization that has carried out assessments based on OECD DDG or an accredited ICGLR auditor, for example). The findings of this assessment will provide a baseline for both associations to create a progressive improvement plan based on planetGOLD criteria.

Activity 2.1.2 Map incentive structures for miners, association/cooperative, traders and other private sector actors (e.g. refineries, financial institutions, etc.) to participate in and/or support responsible sourcing practices

This activity will focus on thoroughly identifying and understanding the different incentive structures underpinning the existing relationships between various ASGM supply chain actors, as well as potential motivating factors for adjusting current relationships and practices in a way that progressively moves towards alignment with the OECD DDG and ICGLR RCM. The mapping exercise will inform the engagement strategy with the different supply chain actors and private sector stakeholders, especially those who may be less inclined to changing the status quo (e.g. traders). The mapping exercise will include a detailed assessment of the export process in Uganda,

to identify process-oriented or convenience-type of incentives or disincentives to legal exports (e.g. number of steps involved, locations, costs, wait periods, etc.).

Activity 2.1.3 Develop agreements/partnerships with private sector gold supply chain actors

This activity will support ASGM associations to access finance from downstream actors by identifying and implementing an inventory financing model with a gold refiner. Through an inventory finance model, pre-financing will be provided to an exporter or an association/cooperative by Argor Heraeus, and used as a rotating fund to make artisanal gold purchases from registered miners (with the assumption that artisanal gold production will progressively meet the expectations established through the planetGOLD criteria). This gold will then be sold to Argor Heraeus. Note that inventory financing and gold sales will not be initiated until the results of appropriate responsible sourcing assessments and due diligence processes demonstrate the absence of red flags (as defined by the OECD DDG).

To achieve this, the project will engage in outreach with Argor Heraeus, supporting relationship building between the supply chain actors, and exploring possible business model arrangements between the supply chain actors that can incentivize sustained and scalable responsible ASGM practices ? including mercury-reduction. This includes the identification and implementation of an incentive-based business model ? such as the Just Gold model[83]83 ? which incorporate pricing incentives for miners to formalize or adapt to mercury-free technologies. This type of model meets the need for more immediate incentives for miners, as well as longer-term incentives for associations and cooperatives (via inventory financing and/or other types of investment). In return, miners and ASGM associations or cooperatives are expected to progressively improve their practices and to document these by sharing pertinent data and information on their supply chain with the refiner in order to demonstrate progressive improvement. This can include traceability and due diligence data, such as purchase records, daily gold production, numbers of miners registered.

The calculation of the price of gold in the Just Gold business model is further explained in Figure 4. In this model, the Just Gold price received by the miners is calculated as the LBMA spot price, minus any deductions from the exporter and cooperative to cover various costs (e.g. logistics, taxes, impurities, etc.). The Just Gold model was originally developed to incentivize legal sales and due diligence implementation (including traceability), by offering a price for both gold and the data provided to the refiner to meet traceability and due diligence expectations. However, as noted in the infographic, the model is flexible and can be adjusted to account for incentivizing additional good practice, such as mercury-free extraction methods, by offering discounted prices for gold produced with mercury. Alternatively, if the supply chain dynamics allow, a higher price could be offered for gold produced without mercury, rather than a discount.

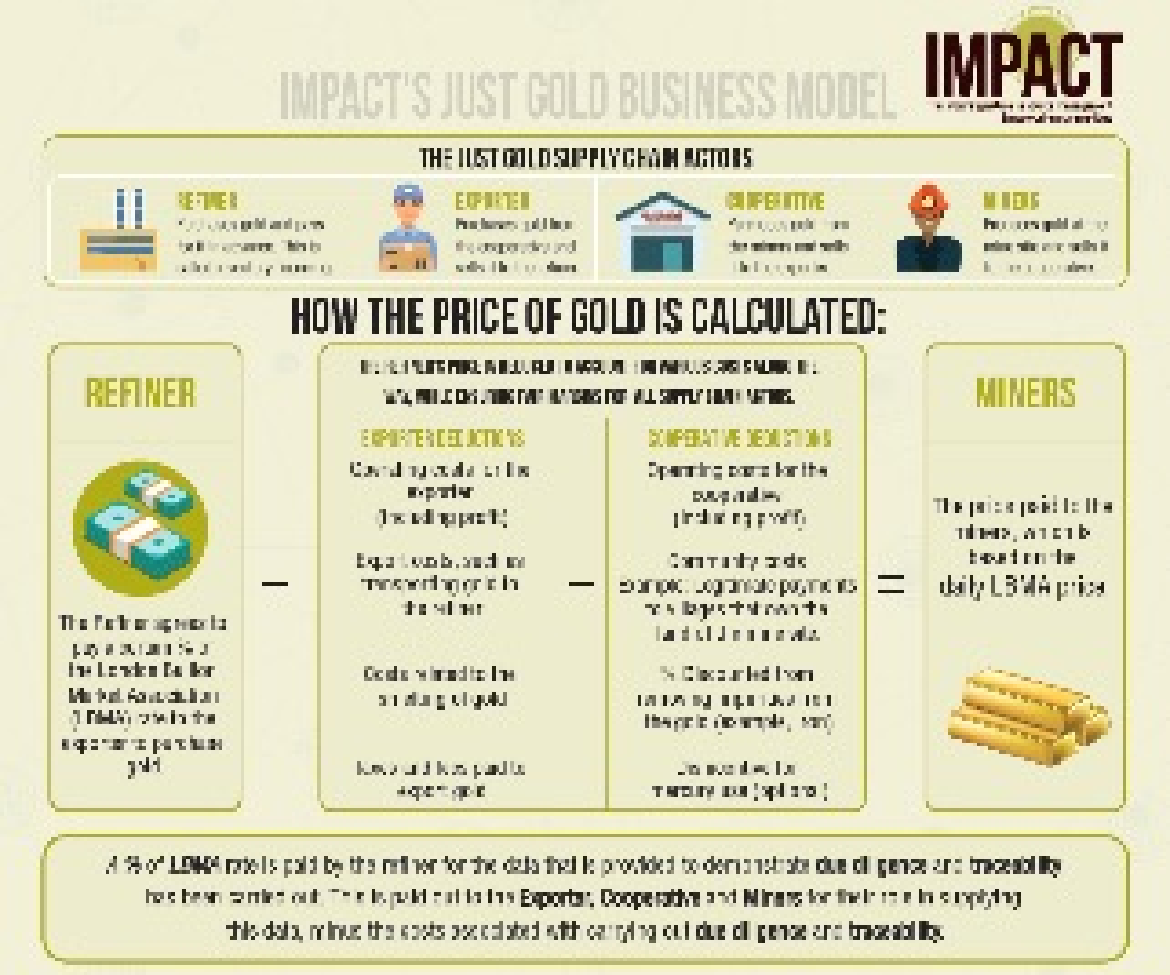

FIGURE 4: THE JUST GOLD BUSINESS MODEL[84]

The project will offer an opportunity to test the application of this model to reducing the use of mercury. It is important to note that the implementation of this type of model requires significant sensitization with ASGM associations and member miners, in order for them to understand the pricing model, to ensure that the model is offering an attractive option compared to what is on offer in the informal market, as well as to reduce the potential for unintended consequences. This includes ensuring transparency of the pricing model (e.g. posting daily LBMA prices, explaining pricing calculations, sharing assay results, etc.). Equal considerations need to be made with respect to a transitional phase and/or pilot phase that is implemented at the right time (i.e. once miners and associations have had received the necessary support in transitioning to mercury-free technologies ? including technical expertise and equipment). This is necessary to create local buy-in and ownership for the model amongst ASGM associations and miners, as well as to ensure that miners and ASGM associations actually have the ability to produce gold without the use of mercury (i.e. to ensure that this is achievable and realistic).

Activity 2.1.4 Provide capacity building support to ASGM actors to implement OECD DDG and planetGOLD responsible gold criteria

Capacity building support will be provided to the selected ASGM associations/ cooperatives to understand the OECD Due Diligence Guidance (DDG), ICGLR RCM and planetGOLD criteria, to identify and mitigate risks via corrective action plans, site-level monitoring carried out by the

project, and exploring the implementation of due diligence systems, including gold traceability mechanism(s). Included in this activity is a piloting of SAP?s Rural Sourcing Management (RSM)[85]85 application, which is a supply chain management software system originally designed and built to connect smallholder farmers to the agricultural value chain. The software has great applicability to the artisanal mining sector, and includes functionalities that allow for traceability, miner registry, monitoring of inventory financing, and more. Additional added value of this tool is that it has been developed within the African context, and has been rolled out in the agricultural sector in Uganda (and boasts training and sensitization materials that can be adapted for the ASGM sector). The project would work with SAP to modify the software to the ASGM context, and roll it out with one of the ASGM associations with whom the project will work with under this output.

The project will first focus on supporting the associations to meet the basic expectations outlined by the OECD DDG, as the minimum requirement for sourcing (and aligned with the ICGLR RCM). The project will then support the associations to build a plan to progressively reach the planetGOLD criteria, which are more stringent (requirement to be mercury free is a minimum requirement for sourcing under planetGOLD, however other planetGOLD criteria (environmental requirments and free prior informed consent) can be progressive with continuous improvement). The project will work with the associations and the downstream actors involved in the supply chain (e.g. the refiner) to prepare for a transition plan beyond the life of the project, to ensure continued implementation and clear roles and responsibilities vis-?-vis continued implementation of due diligence, traceability, monitoring, and reporting. This includes a transition to mercury free technology (also supported by activities under Outcome 3) through access to investment finance.

OUTPUT 2.2 Increased access to finance through existing or new financial inclusion initiatives are made available to artisanal miners

Activity 2.2.1 Carry out a scoping study of existing financial inclusion initiative in Uganda

This activity will seek to identify existing or previous financial inclusion initiatives (village savings and loans associations (VSLAs), for example) that have taken place in the targeted areas, either as initiatives targeting the mining sector or non-mining sectors, such as agriculture. The scoping study will review efforts and initiatives based on the options identified in planetGOLD?s *Unlocking Finance for Artisanal and Small-Scale Gold Mining A Frontier Investment Sector*. The purpose of identifying these existing initiatives is two-fold. First, it will provide an opportunity to identify potential initiatives that could be supported by the project to scale or adapt to the mining sector (in cases where an initiative may be implemented in other sectors). Second, it will provide an opportunity to identify what has and hasn?t been successful to date, and what the lessons learned from these efforts have been. Additional attention will be paid to lessons learned from other planetGOLD projects via the Global Component. The study will include recommendations on how the project can best support an existing initiative(s) ? which is preferable ? or, how the project could support the development of a new initiative if this is deemed to have the potential for greater impact.

During the PPG Phase, several initiatives were identified for future scoping, such as a number of programmes implemented by the Ministry of Gender, Labour, and Social Development. This includes the Uganda Women Empowerment Programme, which provides small loans to women to support activities aimed at increasing household incomes, or the Youth Livelihood Programme, which provides small loans to women/girls and men/boys (ages 18-30), to support livelihoods, skills development, or institutional support for small businesses. These initiatives have traditionally targeted non-mining sectors, such as agriculture, agri-forestry, or retail, and could be adapted to the ASGM sector with the advantage of already having the necessary infrastructure for roll-out. Other opportunities lie in more traditional banking sector initiatives ? such as Stanbic Bank?s Business Incubator or Finance Trust Bank, which has a particular focus on supporting access to finance for

women (their official slogan is ?Putting women first?). These initiatives will also be explored through the lens of Uganda?s National Financial Inclusion Strategy, which extends to 2022 and includes a focus on the informal sector.

In addition to these government-backed or commercial banking options, local savings and credit schemes ? notably Village Savings and Loans Associations (VSLAs) ? have been implemented by a number of organizations across Uganda. While these have become a popular model, they are less frequently implemented in ASGM areas or with the particular needs of the ASGM sector in mind. Opportunities for building on or expanding on existing models, or the possibility of establishing a programme specific to the ASGM sector, will also be explored.

Activity 2.2.2 Create partnerships with financial institutions, government programmes or development partner programmes to explore financing mechanisms targeted to the ASGM sector

This activity will act on the findings of the scoping study carried out in the previous activity and involve engaging and creating partnerships with financial institutions, government programmes, and/or development partner programmes (e.g. NGOs, UNDP, etc.) in Uganda that have already started to engage in exploration of financing options for the ASGM sector, as well as those that may be new to the sector, in order to support the development of inclusive financing mechanism(s) for the ASGM sector. These include the Stanbic Bank SME Incubator facility, other government-initiated programs, or development partner programmes (e.g. UNDP small grants programme or NGO VSLA programmes), as described above.

In keeping with the project?s Theory of Change, implementation of this mechanism will be targeted at the same ASGM associations being supported to adopt better ASGM practices and mercury-free technologies ? which have preliminarily been identified as Tiira Landlords and MUMA (with a focus on MUWOGOMA). Both associations will be engaged in a participatory process to ensure that the mechanism designed meets their needs, and also provides the right motivation and incentive to invest in better ASGM practices, notably mercury-free methods.

The project will provide technical support for the adaptation or design of the identified financial mechanism to be implemented, including support to understand the ASGM sector to the implementing partner and identifying opportunities for risk mitigation. New financial inclusion models may be identified, such as to include the use of mobile money accounts to create trade and production records for the miners. Appropriate pairing among interested financial institutions and mining associations will be assessed during the project depending on the final selection of pilot sites.

Activity 2.2.3 Support implementation of financing mechanisms targeted to the ASGM sector

The project will provide resources to support the implementation of the financing mechanism that is identified based on the two previous activities. As noted above ? preference will be given to adapting an existing mechanism to the ASGM sector rather than developing a new mechanism altogether.

The support provided by the project will include technical expertise from an expert in financial inclusion and logistical support for conducting sensitization and trainings for miners and associations accessing financing from the mechanism. Furthermore, training will be conducted with the miners on the requirements, expectations and role the miners have to play. This includes management of finance, record keeping, and implementation of responsible ASGM practices. Financial interventions will be progressively linked to purchase of equipment to transition to mercury, understanding that miner?s priority for equipment is generally for increases in production.

In addition to the support for miners, the project will also host 3 sensitization sessions for the financial sector to enable them to better understand the ASGM sector ? including both the realities and challenges the sector faces, but especially the opportunities that are presented. The objective of these sessions is to create a context in which increased knowledge and understanding of the sector

can both lead to greater comfort for engaging the sector, as well as the potential development of financial products that are well tailored to the sector. The project will use the opportunity to highlight the partnerships developed under Activity 2.2.2 and the lessons learned from the implementation of a financial mechanism

Component 3: Enhancing uptake of mercury-free technologies

The third component will deepen ASGM transition to mercury-free gold processing through application of acceptable mercury-free technologies and educating stakeholders on their role and responsibilities in supporting mercury elimination in the sector. Mercury use in Uganda?s ASGM sector varies by regions with the Central Region, followed by the Eastern Region, having the most use. Some mercury-free practices exist in Karamoja and Western Regions of Uganda and these could be leveraged for upscaling. The Eastern region of Busia and Namayingo have previously benefitted from mercury gold processing pilot interventions. However, these have not succeeded in terms of sustainability (some equipment is not being used regularly) or scalability. Technologies that have been introduced so far include direct smelting, use of centrifuges and shaking tables. Some of the reasons for failures include the lack of appropriate fit between equipment capacity and miner?s own production capacity, the recovery of mercury-free gold being more time intensive, the terms of purchase for larger equipment, such as shaking tables, that the miners were required to pay. Outside of Busia and Namayingo, knowledge of available mercury free gold processing technologies is limited.

Three complimentary outputs will contribute to this outcome which include an evaluation of current mercury use practices and challenges towards upscaling mercury-free technologies that have been introduced to date. Best available ASGM practices and technologies will be proposed to women and men in targeted sites and ASGM stakeholders educated about mercury and their role in its elimination. The lessons learned from understanding the obstacles of upscaling the mercury-free technology uptake will inform proposed approaches and mercury-free options the project can propose to women and men mining artisanal gold. While focusing on mercury free technologies, the project will provide technical support to miners with available knowledge on mining productivity and ASGM best practices. Progress in this component will be linked to the miners? ability to access finance to acquire the proposed technologies (Component 2).

Expected Outputs:

OUTPUT 3.1: ASGM stakeholders increased their awareness about mercury and the importance of its reduction

Activity 3.1.1 Confirm targeted sites

The Project Steering Committee will confirm targeted mining sites identified during the PPG Phase for carrying out sensitization on mercury, its negative impacts, and the role of different stakeholders in reducing its use. These mine sites were identified based on information gathered during the NAP process (e.g. site visits, interviews with stakeholders), as well as the planetGOLD mine site selection checklist criteria. The initial mine sites selected include: Siyanyonja and Tiira Landlords (Busia District), Buhere (Namayingo District), Nakabaat (Moroto District), Kapiyosa (Amudat District), Kagaba Hills and Kayonza (Kassanda District), Katenga (Buhweju District), Nyabiremura and Rushaga (Kisoro District) (see Annex E for a map of the targeted mine sites). Carrying out sensitization across a large number of mine sites and Districts will help to contextualize and better prepare ASGM actors and communities for legal, regulatory and policy changes that will be taking place in the ASGM ? including with respect to mercury usage. It will also help to better prepare a larger group of ASGM actors for potential future interventions ? including knowledge sharing and transfer of best practices ? beyond the mine sites and actors targeted for technical assistance and piloting of mercury-free equipment.

Activity 3.1.2 Identify relevant institutions who would carry out sensitization and training / ToT

Relevant institutions will be identified by the Project Steering Committee (PSC) to host and support sensitization efforts, such as relevant government departments/officers at the national and local levels, civil society, academic and/or technical training institutions. Emphasis will be made on institutions that can integrate the curriculum into existing programs and which are local to the various targeted Districts, in order to ensure that these sensitization efforts can be reinforced beyond the life of the project. Additional consideration will be made for institutions that may have additional activities or resources planned for conducting mercury sensitization (e.g. other donor-funded projects not identified during PPG phase). The project will aim to work with approximately 4 institutions (1 per region), however the selection of institutions will be based more on the above-mentioned factors (i.e. the PSC may select more or less than 4 institutions). Preliminarily, the project has identified the following potential institutions (consistent with stakeholders identified in the NAP):

- NEMA
- DGSM
- Local Government Officials
- Busitema University
- Makere University
- Kyambogo University
- ACEMP
- NAPE
- PROBICOU
- EWAD
- Uganda National Association for Community and Occupational Health
- Global Rights Alert
- Environment Management for Livelihood Improvement Bwaise Facility (EMLI)
- Action Center for Energy and Mineral Policy
- Uganda Environmental Education Foundation (UEEF)
- Action Coalition for Climate Change

The project will support the selected institutions via a train-the-trainer model, and will support these institutions to develop a strategy for training targeted stakeholders ? which will include both direct ASGM actors (miners, cooperative management, traders, etc.) as well as broader community representatives (traditional leaders, women?s associations, indigenous leaders, etc.). An inclusive and community-based approach to building awareness of the harmful effects of mercury is important for motivating all stakeholders, and will also lay important groundwork for the JA/LA approach in the Districts of Busia and Namayingo. Further, each District has different dynamics pertaining to whether or how mercury is being used, and what drives this use. As such, the selected institutions will be supported and encouraged to develop strategies that are best suited to their particular area and stakeholder group.

Activity 3.1.3 Creation of sensitization and training tools

This activity will support the development of a set of sensitization and training tools to be used at target project sites by the selected institutions. While the project will support the development of one set of sensitization and training tools, the selected institutions may make small modifications to these tools in order to suit the particular context where they are working. To build on past efforts, the project will first compile existing tools and guidance, and will then analyze any gaps where new material may be required, or where potential improvements may be made for existing materials. PlanetGOLD documents, resources from the Global Mercury Partnership, and previous training tools created by IMPACT in the context of its projects (e.g. a video on the harmful effects of mercury usage filmed in Kassanda District) will be useful resources to build off of and guide the development of a curriculum and tools relevant to Uganda. The identified institutions for carrying out this sensitization will play an active role in creating these tools, with support provided by the

project and with input from the PSC. Long term engagement of institutions after project end will also be discussed during the project.

Particular attention will be paid to ensuring that the sensitization and training tools are gender-sensitive ? meaning that they not only represent both women and men in how they experience the sector, but that they address potential differences in how women and men learn. This includes considering things like which languages are most commonly spoken by both women and men, or the levels of literacy common for women and men. Additionally, the institutions will be encouraged to develop training materials that do not overly stigmatize or demonize the ASGM sector for its use of mercury, but rather present the risks and negative impacts to ASGM actors themselves and the broader community, and how these may be addressed.

Activity 3.1.4 Support institutions to carry out sensitization and training with ASGM sector participants and communities

The selected institutions will be supported to roll out their respective sensitization and training strategies amongst the target audience at project sites, which includes miners, associations/cooperative representatives, gold and mercury traders, pit owners. This will include providing technical expertise to support the trainers/trainees, resources for trainings (e.g. demonstrative equipment, PPE, etc.) and other operational support. To maximize participation and convenience for participants, the trainings will be hosted as close to the mine sites as possible, and will be practical in nature (e.g. demonstrations of safer techniques, safer equipment for individuals ? such as better sluices or pans, visuals showcasing the effects of mercury usage, etc.). The project will deliver 8 trainings per District) through 1-day sessions that will target between 15-25 people, and will cover a range of topics, including the harmful characteristics of mercury, the dangers posed to miners and surrounding community members, alternatives to mercury, and protective measures through proper personal protection equipment (PPE) and safer handling techniques.

To incentivize participation and complement the sensitization and training, as well as to increase interest in safer practices and mercury-free methods, the project will provide small equipment (includes PPE (gloves, masks, boots, etc.) as well as retorts, pumps, pans or sluices).to participants of the sensitization and training sessions which either help to reduce mercury usage, or which help to increase production (which can serve to remove a common barrier to using mercury-free methods, as they are generally more suitable at higher quantities). Emphasis for this equipment will be in 8 mine sites where mercury-free equipment has not substantially been introduced, and sites where larger mercury-free technology implementation will not be conducted. These sites include: Nakabaat, Kapiyosa, Cheptakol, Kayonza, Katenga, Rushaga, Nyabiremura, and Buhere. The equipment will target the specific needs of the particular sites, and consider the needs of both women and men ? which are often very different based on their different roles in production process.

Like the sensitization and training materials, the execution of the trainings will also take a gender-sensitive and inclusive approach. Provisions to remove barriers for women?s participation will be made ? such as offering childcare supervision or hosting sessions at appropriate times.

OUTPUT 3.2 Artisanal miners are capacitated with better ASGM practices (including environmental and gender equitable aspects) for both women and men involved in gold mining at targeted sites

Activity 3.2.1 Confirm Pilot Mine Sites

The Project Steering Committee will confirm two pilot mine sites and respective associations with whom to partner with in the development of ASGM best practices, and will develop an MoU. Two prospective associations have been identified: Tiira Landlords in Busia District and MUWOGOMA in Kassanda District (a member of MUMA). Tiira Landlords has demonstrated an overall capacity and commitment to transitioning to mercury-free technology, and its location in

Busia District will also optimize linkages with this component and the JA/LA approach pilot. In Kassanda District, it is proposed to work with MUWOGOMA, a group of 6 women-led associations that are part of the wider MUMA umbrella association (comprising 350 women and 50 men total). Women in Kassanda District experience greater exposure to mercury compared to men, and thus the project will directly support and empower them to make a shift to mercury-free technologies that are best suited to their needs, while also empowering them to take on a leadership role in mercury-reduction more broadly. As past experiences have shown, practices developed in the ASGM sector in Kassanda District tend to promulgate in other regions of Uganda, transition to mercury-free technologies and processing in the area will have wider, positive ramifications across the country.

The project has an approach in which the basic sensitization and training on harms of mercury is larger in scope (across all regions), but the technical assistance/partnership for introducing mercury-free technologies and transferring ownership is narrowed to two Districts/sites that are most promising/likely to have strong impact. NEMA/DGSM are quite keen to bring the project activities to a larger number of regions, but many of these are still at a level where sensitization/awareness raising is the best step ? whereas Busia/Kassanda are more advanced in formalization efforts and have had mercury-free interventions that can be built on top of.

Activity 3.2.2 Carry out environmental, gender and technical assessment at pilot mine sites

Before the interventions, an environmental, gender and technical impact assessment and baseline will be conducted, and a technical assistance plan developed with considerations for gender dimensions in ASGM processing. Current practice in some regions in Uganda is that women work in amalgamation and are most exposed to mercury. Any attempt to introduce mercury free technologies will have a huge impact on the women? livelihood and that should be taken into consideration as to how women?s roles can be integrated into a clean supply chain. The technical assistance plan will identify the technologies relevant to the context and support the project can provide, and will also identify potential technical partners in local areas ? such as equipment providers, potential equipment providers (e.g. private sector actors that may already produce or import other types of equipment for different sectors), technicians, and technical training institutions.

Activity 3.2.3 Procure test equipment and conduct piloting to inform plant design

The environmental, gender and technical assessment will inform the procurement of initial sample equipment to test and pilot in the targeted areas. This will allow for confirmation of the right technologies, inform final plant design, and allow for optimization of processes and use of technologies. It will also allow technical experts to gather initial feedback from miners and associations themselves, prior to making larger equipment investments. In addition, the project will engage with both supply chain actors and financial institutions to share information regarding the process for piloting and testing mercury-free technologies, and identifying the appropriate interventions ? including the costs, operational costs (incl. maintenance), procurement, and various challenges or risks encountered. This will help to increase the overall knowledge of these actors of the process involved, and inform their potential engagement with and financing of the sector (both within the scope of the project, as well as beyond).

Activity 3.2.4 Provide technical trainings on mercury-free equipment at select pilot sites

Mercury free approaches will be introduced to the miners in the form of technologies and collaborations. The project will identify the best suite of technology and introduce and conduct trials with the miners to ensure buy in and adaptation to local needs. An important aspect to supporting long-term transition to mercury technologies in Uganda is linked to level of production. The current production volumes by the miners are not suited to some of the mercury free production equipment that has been introduced in the past and miners preferred to stick with

mercury amalgamation. For example, a typical centrifuge is rated 1-3ton/hour and yet a miner can produce only 20kg of material. Miners fear that their gold will be lost in the high-capacity equipment. Therefore, the project will ensure that the transition to mercury-free technologies considers impact on production and the trust of miners.

The project will seek to avoid 100% financing of mercury-free technologies, and instead will look to leverage access to finance mechanisms supported under Component 2, as well as small co-financing by associations themselves. This will help to ensure buy-in from the miners and associations, and promote greater ownership over the technologies. The options for technology introduction modalities could include-co-sharing of investment with project, project facilitating a private sector investor into mercury free processing or miners collaborating with private sector and providing their ores for mercury free processing. Options such as leaching with thiosulphate could be experimented, while enhancing miners benefit from tailings is explored.

The pilot projects present two sites at different levels of technological development and exposure to mercury free technologies.

At the **MUMA site**, current technology includes manual crushing and mechanical crushing, dry ball mills, zig-zag sluices and cyanide leaching. Techniques are crude with an estimated free gold recovery between 30-50%, at best. Leaching is part of the gravity circuit business model, as all milling is provided by operator at no cost in exchange of tailings. Technology options include reducing manual labour, increasing gold liberation, classification of milled ore, enhancing gravity concentration and eliminating mercury in the mill circuit.

At the leaching stage, approaches will include negotiating a fair deal for miners for the leaching operation as well eliminating use of cyanide by non-toxic lixiviants.

Therefore, technological options are elaborated in the table below.

Crushing	**Milling**	**Concentration**	**Concentrate upgrade**	**Gold Winning**	**Leaching**	**Estimated Cost US$**
Jaw crusher	Wet ball mill/Ball mill	Centrifuge-sluice combination (Gold Kacha, iCon150 and other models)	Shaking table-preferably Holman Shaking table	Direct Smelting	Thiosulphate or optimized cyanide leaching	150,000 + 30% for maintenance/transfer costs
	Wet pan mill followed by cyclone and ball/rod mill - fine grinding					

The final circuit and equipment will be determined after carrying our metallurgical tests of the ores to recommend an optimal system. Efforts will be made to identify locally-produced technologies. Where these are not available, the project will then seek out locally-available equipment (i.e.

equipment that has already been imported and is available on the local market). Where neither of these options are available, the project will look to import the necessary equipment.

At the **Tiira Landlords site**, there is already exposure to merchandised processing systems, and different types of gravity concentration equipment. However, the equipment is used with mercury. Current systems include, crusher, wetpan mill, centrifuges, amalgamation, retort and disposal of tailings for cyanide leaching. The starting point will be optimization of current system, with addition of new equipment to enable transition to mercury-free. The options and approximate costs are outlined in the table below.

Crushing	**Milling**	**Concentration**	**Concentrate Upgrade**	**Gold winning**	**Leaching**	**Cost $US**
Crusher	Ball Mill as grinder - in series with Wet-Pan mill for	Centrifuge ? iCon150	Shaker/Gemini table	Direct smelting	Thiosulphate or optimized cyanide leaching	$150,000 + 30% for maintenance/transfer costs

Detailed analysis of the ore will guide final equipment selection. Increase in sulphide ores may require use of flotation in the circuit.

Activity 3.2.5 Support (long-term) adoption of better mining practices

Uptake on the use of technology and adaptation will be assessed and monitored on a semi-annual basis. Miners? inputs and feedback will be critical to ensure sustainable uptake and continued use, therefore a socio-economic and cost benefit analyses will be conducted to include assessment of what miner?s think about the new technologies, whether they trust them, and whether they see themselves continuing to use them is important. Furthermore, a usage assessment will also be conducted (i.e., has the technology been properly used, has there been maintenance issues, have they been using these technologies to replace mercury usage or only to reduce it, etc.). Based on the findings of these assessments, the technical assistance plan will be adapted to address identified challenges or capitalize on emerging opportunities. Partnerships with technically-oriented universities or trades programmes can be made in order to ensure that miners/associations will have the right technical support (i.e. maintenance services) as required. Lessons learned will be documented and presented to stakeholders in Uganda and the planetGOLD program.

To promote long-term adoption of the technology and encourage buy-in and commitment, the project will support Tiira and MUWOGOMA to create and implement a management and business plan for the equipment. This will include who gets to use the equipment, when, and under what terms ? emphasizing the need for inclusive access to equipment that benefits women and men. Transfer of ownership of the equipment to the associations will be done progressively and under the guidance of the MoU established with the associations. Opportunities to build in incentives for usage and uptake of the equipment will also be considered.

Component 4: Knowledge sharing, communication and local capacity building support

The fourth component of the project focuses on ensuring good communication, promoting knowledge sharing and learnings, and building capacity of local stakeholders to create a foundation for the sustainability of project outcomes. It will closely align and work with the global coordination, knowledge management and outreach of the global project under the leadership of

Conservation International and UNEP (GEF ID 10606). Further, this component is crosscutting across the first three components of the project, all of which include various capacity building strategies for relevant institutions including government, training institutions, miners? organizations, gold traders, financial services sector, CSOs and media. Additionally, these stakeholders will be provided with capacity building opportunities through the global programme ? such as attendance at various conferences, workshops and networking events.

This component also relates to the Stakeholder Engagement Plan, which has identified various ASGM stakeholders interested in participating in the project and being engaged throughout its implementation. It also identifies potential partners to the project, which will become an important part of ensuring that these partners are involved and provided with the capacity to carry forward project outcomes after the end of the project. As throughout the rest of the components, special attention will be paid to ensuring that women and other disenfranchised groups are able to fully participate in knowledge sharing and capacity building opportunities throughout the life of the project.

Expected Outputs

OUTPUT 4.1: Knowledge products and tools developed through the project are made available nationally to all GEF planetGOLD project stakeholders in Uganda

Activity 4.1.1 Host an Annual Stakeholder Workshop

The Annual Stakeholder Workshop will provide a key opportunity to bring together stakeholders from across Uganda to provide updates on their respective activities, share experiences and lessons learned, as well as to provide input into annual project planning. Opportunities can be taken to organize side sessions amongst specific stakeholders, as well as to provide networking opportunities amongst stakeholders from different regions, especially women miners.

Activity 4.1.2 Localization and distribution of GEF planetGOLD programme EIC

The project will facilitate the localization and distribution of planetGOLD programme Education, Information and Communication (EIC) materials to local stakeholder in Uganda. This will be done by translating appropriate EIC materials into local languages, adapting or simplifying existing resources where necessary, and incorporating these into sensitization and training activities conducted in components 1,2 and 3.

Activity 4.1.3 Support participation in national and regional knowledge sharing opportunities and events

The project will support various stakeholders participating in the planetGOLD project in Uganda to attend knowledge sharing activities and events hosted in Uganda, as well as additional opportunities for sharing information with regional stakeholders in East Africa. This will allow these stakeholders to share lessons learned with their peers in Uganda and in other countries. Main events will include the following:

1) ICGLR Meetings related to Formalization of the Gold Sector
2) Mining Conventions in Uganda and regionally
3) Africa Union Mining Meetings
4) Workshops hosted by academic institutions, NGOs or professional associations in Uganda or regionally relating to formalization, access to finance and/or mercury-free technologies.

OUTPUT 4.2: Knowledge products and tools developed through the project are available globally through the planetGOLD programme

In order to provide input into the monitoring and evaluation of the planetGOLD programme as a whole, the project will provide regular reporting to the global project on key indicators, activities and areas of progress. Furthermore, the project will also actively participate in various internal programme-wide coordination events, to enhance ongoing communication and knowledge sharing among the projects of the planetGOLD programme.

Activity: 4.2.1 Participate in planetGOLD Knowledge sharing activities and events

The project will support various stakeholders participating in the planetGOLD project in Uganda to attend knowledge sharing activities and events hosted by the global component, both virtually and in-person (Covid-19 restrictions permitting). This will allow these stakeholders to share lessons learned with their peers in other countries, and create a community of practice upon which different stakeholders can rely on. This will include an Annual Programme Meeting (APM) and the planetGOLD Global Forum (GF), as well as one other international forum per year, depending on the particular focus and agenda (e.g. the OECD Forum for Responsible Mineral Supply Chains, the Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development, etc.).

In addition, the project?s Communication Manager will participate in a programme communications network that includes monthly calls, a digital communications platform, trainings and sharing of information of major country-level events and activities. The Communication Manager will also attend the GF and the communications network side meeting at the APM.

Additional opportunities for sharing lessons learned and experiences from the project will also be identified, such as by hosting, either independently or through the global programme, webinars and workshops on particular thematic issues to international stakeholders.

In sum, the project will:

- Participate in a virtual inception/ implementation orientation with global program staff
- Send two representatives to each Annual Programme Meeting
- Have project managers attend bimonthly programme coordination calls
- Have project managers participate in regular (~quarterly) Programme Advisory Group (PAG) calls, and attend or delegate attendance of relevant staff to ad hoc PAG subcommittee meetings;
- Adopt stakeholder engagement strategy consistent with program guidelines

Activity 4.2.2 Produce knowledge products (Components 1, 2 and 3)

The project will produce a series of knowledge products that document the approach taken in each of the first three components, as well as the successes, challenges and lessons learned throughout the implementation of the project. These may be adapted as other planetGOLD projects develop complementary knowledge products, in order to avoid duplication or redundancy. The following knowledge products are planned:

- Lessons in Applying the Jurisdictional and Landscape Approach in Uganda?s ASGM Sector (Publication): This publication will focus on sharing the lessons learned from applying the JA/LA, which is a new approach for the sector. The publication will share both the challenges that were encountered, opportunities for improvement or replication, as well as accomplishments and successes.
- Impact of Access to Finance for the ASGM Sector (Infographics/Case studies): Infographics documenting the impact of access to finance to artisanal miners and cooperatives, including finance model chosen, data submitted to financial entities, total amount of financing disbursed, repayment rates.

- Lessons learning in implementing mercury-free technology (Video): This video will seek to specifically document how the project?s technical assistance adapts to the realities of ASGM actors in Uganda ? namely the very small quantities produced by individual actors ? in order to identify the appropriate technologies and incentives for sustaining their use. On the narrative, the report should include the initial ore assessment, rationale and final design of the circuit, total throughput, gold recovery rates, uptake by miners, and associated costs.

Activity 4.2.3 Contribute to the planetGOLD knowledge platform and programme communication activities

The project will share information and learnings with the planetGOLD knowledge platform through various communications means, such as technical briefs, blogs, news articles, videos, or photographs. This will include publication of at least one original blog article per year on plaetGOLD.org, notifying the global project for incorporation in global editorial calendar. These activities will be coordinated with the global programme to ensure maximum added value based on existing resources produced by the programme.

For reporting purposes, the project will submit data once per year to the global project on:

- The programme level indicators:
  - amount of mercury avoided
  - amount of finance mobilized (disaggregated by gender)
  - amount of mercury free/ responsible gold sold to formal markets
  - number of beneficiaries assisted in formalization by the project (disaggregated by gender)

- Additional global environmental co-benefits for which the project has set targets;
- Key achievements on project-specific outputs and activities, using template provided by global project, including reporting on efforts to ensure that all planetGOLD beneficiary mining entities conform with the planetGOLD Criteria for Environmentally and Socially Responsible Operations

The project will also provide **narrative reporting quarterly** to the global project on key activities and areas of progress toward achieving the program and project-specific indicators, using a template provided by global project.

Under this activity the project will:

- Participate in a virtual inception/ implementation orientation with global program staff
- Send at least two representatives to each Annual Programme Meeting
- Have project managers attend bimonthly programme coordination calls
- Have project managers participate in regular (~quarterly) Programme Advisory Group (PAG) calls, and attend or delegate attendance of relevant staff to ad hoc PAG subcommittee meetings;
- Adopt stakeholder engagement strategy consistent with program guidelines

Table 3 below summarizes the interaction between the global and child project under the programme.

Table 3. planetGOLD Global and Country Level Activities

Country Project Activities	Global Project Activities
Coordination and Monitoring	
Include planetGOLD programmatic indicators in results framework and submit data once per year to the global project for these indicators as well as other information on project-level achievements per project-specific loggrames	Produce annual progress report for programme that includes narrative as well as quantitative reporting from all projects on achievement of project level and programme-level indicators
Provide narrative reporting quarterly to the global project on key activities and areas of progress	Produce quarterly summaries of key activities and progress across programme for dissemination to PSC and Programme Advisory Group
Participate in inception/ implementation orientation with global program staff	Organize and facilitate inception/implementation orientation for country projects to provide clarification on cross-programmatic coordination and knowledge sharing activities
Project managers attend bimonthly programme coordination calls	Organize and facilitate bimonthly programme coordination calls
Project managers participate in quarterly Programme Advisory Group (PAG) calls, and attend or delegate attendance of relevant staff to PAG subcommittee meetings	Serve as secretariat to PAG, organize and facilitate quarterly PAG calls and subcommittee meetings
Ensure that all planetGOLD beneficiary mining entities conform with the planetGOLD Criteria for Environmentally and Socially Responsible Operations through review of the planetGOLD Environmental and Social Risk Assessment Report and the Mitigation Report	Further develop, disseminate, and socialize the planetGOLD Criteria for Environmentally and Socially Responsible Operations Assist country projects to access existing trainings and resources to implement these criteria
Adopt stakeholder engagement strategy consistent with program guidelines	Elaborate and disseminate overall stakeholder engagement guidelines for programme participants
Communications	
Develop project strategy for communications and stakeholder engagement in alignment with global communications strategy	Further refine and disseminate global programme communications strategy, including recommendations for approach and messaging
Utilize planetGOLD country logo and brand assets for all communication materials	Disseminate suite of planetGOLD country logos and brand assets (templates for fact sheets, reports, presentation slides, event banners, etc)

Adhere to planetGOLD style guide and messaging guide in production of external materials, adapting global messages to national context	Disseminate style guide and messaging guide documents to all child projects
Share and store both raw and edited photo files, video files, graphics, and other visual assets in a timely manner with the global project via a shared Google Drive for global promotion and dissemination	Create communications products to promote responsible ASGM at the international level and stories of success or lessons learned among country projects
Country project communications managers participate in programme communications network, including regular calls, digital communication platforms, trainings, and notification to the global project of significant comms-related activities or story leads at country level	Facilitate programme-wide communications network, tools for collaboration, and plans for cross-programmatic communications activities
In years when the APM is held in concert with the GF, also send the communications manager to attend the GF, and the communications network side meeting for the APM	Organize and facilitate the planetGOLD communications network side meeting for the APM
Publish at least one original blog article per year on planetgold.org, notifying global project for incorporation in global editorial calendar	Maintain global editorial calendar and support country projects in publishing original content on website and other planetGOLD communication channels
Knowledge Management	
Send 2 representatives to each planetGOLD Global Forum (GF)	Organize and facilitate the planetGOLD Global Forum every two years for exchange of lessons learned between child projects and other ASGM stakeholders
Send 2 representatives to each Annual Programme Meeting (APM)	Organize and facilitate the planetGOLD Annual Programme Meeting each year
Country project subject matter consultants (finance, gender, technology, etc) participate in regular (~quarterly) knowledge exchange meetings/networks	Organize and facilitate regular (~quarterly) knowledge exchange meetings/networks for subject matter experts
Share relevant (non-confidential) project materials, approaches and documents that may provide relevant information or serve as examples/models to other country projects. Examples of such material may include information on selection of Hg processing systems; due diligence pilot results; training materials of common interest (eg gender in ASGM).	Facilitate the sharing of relevant information and materials across all child projects, and develop original knowledge products or organize knowledge sharing opportunities on key gaps or areas of interest across the programme based on inputs received from country projects.

Ensure that all public facing documents produced by the country project are either uploaded to the planetGOLD website or link is provided if the document is housed elsewhere	Manage knowledge repository and broader knowledge sharing via the planetGOLD website, email listserv, and other dissemination channels.

1.A.4 Alignment with GEF Focal Areas

The project is directly aligned with the Chemicals and Waste Focal area, Industrial Chemicals Programme (programme 1) which seeks to eliminate or signi?cantly reduce chemicals subject to better management, in this case mercury, within the framework of the Minamata convention. The relevant focal area element is CW1-1: Strengthen the sound management of industrial chemicals and their waste through better control, and reduction and/or elimination. Within the Chemicals and Waste Focal Area, programme 1, a specific objective is the reduction and elimination of mercury from the Artisanal and Small-Scale Gold Mining Sector. The Uganda Child Project within the planetGOLD programme will contribute directly to this objective, building upon the on-going GEF-6 planetGOLD programme.

Other GEF funded programmes implemented or currently being implemented in Uganda that provide alignment with the proposed project include the ASGM NAP, GEF Small Grants Programmes (SGPs) of which 14 projects or 5.49%[86][86] of the funds that are in Chemicals and Waste, primarily mercury reduction in ASGM.

The piloting of on JA/LA approaches in formalization have a potential to integrate other stakeholders implementing GEF 6 funded projects (or projects related to GEF Focal Areas) in climate change, biodiversity and land degradation. These will be identified in the SWOT Analysis that will be conducted in the pilot Districts using assessment tools identified by Conservation International, such as Landscale.

1.A.5 Incremental/Additional Cost Reasoning and Expected Contributions from the Baseline, the GEFTF, LDCF, SCCF, and co-financing

The use of mercury in Uganda?s ASGM sector is a prevalent and systemic challenge, which is driven by a number of factors that include poverty, limited awareness, lack of formalization and support to the sector, and a lack of access to formal markets and access to financing. As a low-income country, the Government of Uganda lacks the significant resources needed to tackle this challenge which has national, regional and global environmental impacts.

Despite limited resources, a number of projects have been executed in Uganda to reduce mercury emissions from ASGM. These projects include i) UNEP, ?Global Mercury Assessment?, ii) The National Action Plan for Artisanal and Small-Scale Gold Mining in Uganda, iii) The Sustainable Management of Mineral Resources Project (SMMRP), iii) Development of mercury free processing centre in Namayingo district iv) Environmental Women in Action for Development (EWAD); Fairtrade Africa; Syanyonja Artisan Miners? Alliance (SAMA) and many others. Further, the Government of Uganda has shown its political commitment to reducing mercury usage in the sector via its ratification of the Minamata Convention.

With the support of the GEF Trust Fund, the project will provide incremental funding for formalization, access to finance and reduction of mercury use in ASGM by building on past and current mercury reduction initiatives being implemented in the country. These initiatives include the ASM formalization and biometric registration funded by the Government of Uganda, UNDP?s

SGP mercury reduction programmes, IMPACT?s SMO project focusing on environment stewardship amongst women miners (with a strong focus on mercury use), EPRM/Impact facility?s access to mercury free equipment, and work done by NEMA and its partners in line with Uganda?s commitments under the Minamata Convention. These projects have demonstrated the concept that mercury-free or reduced technologies are feasible in the local social and environmental context.

The project will provide support to a more coordinated effort between various government ministries, organizations, and stakeholders. The Project Steering Committee (PSC) will host an annual workshop for stakeholders of the project to come together, provide input, share lessons learned and planned activities, and identify collective opportunities. The project is designed to play a supportive role to national and local level actors, ensuring that they effectively continue to lead efforts in this area and providing them with the necessary resources and expertise to do so. The project is proposed as a cost-effective way of linking together a multitude of government and non-government efforts in tackling mercury reduction, which will in the end significantly increase the impact and overall value-for-money of all of these projects as duplication and redundancy is avoided, while synchronicity and alignment allow for better results.

In addition, the project will also benefit from knowledge sharing, lessons learned and capacity building materials that have been created within the planetGOLD global component, as well as any future resources created through the planetGOLD programme. The project will build on lessons learned from private sector initiatives on financing ASGM sector, such as the Stanbic Bank?s Business Incubator. Lessons learned on regional approaches such as implementation of the ICGRL and OECD Due Diligence Guidance will provide a solid footing for engagement with responsible market players for the mercury-free gold produced through the project.

The project will support national and local actors to coordinate their efforts, and will directly or partially contribute to their planned interventions identified in the NAP, including in the areas of formalization, financial inclusion and mercury reduction. In particular, the project will contribute to the following key interventions outlined in Uganda?s national strategy outlined in the NAP (which PROCIBOU, a co-financing partner to the project, was closely involved with):

1. Holding sensitization campaigns on mercury use and its dangers
2. Developing and producing communication materials to illustrate the disadvantages of whole ore amalgamation and other worst practices and solutions
3. Conducting demonstrations on alternative methods to mercury use, for example, by using gravitational methods and cyanide technologies
4. Developing ASGM popularized guidelines on sustainable gold mining and processing
5. Demonstrating to miners existing mercury containment tools/technologies including retorts and fume hoods
6. Distributing of mercury containment tools/ technologies including mercury-free processing technologies to ASGMs
7. Facilitating the establishment of designated gold processing units at each ASGM mine site
8. Updating environmental regulations to incorporate restrictions on open burning of amalgam in residential areas/ settlements/ dwellings/ mining camp sites
9. Supporting the use of mercury-free and mercury capture technologies
10. Developing a legal and regulatory framework that clearly defines ASGM operations and provides for the adequate monitoring of their activities
11. Reviewing relevant laws/regulations to incorporate provisions of ASGM/ASM formalization strategies
12. Building the capacity of ASGMs and extension staff to manage the ASGM sector
13. Training of ASGM Trainers and youth miners on best ASGM practices and technologies
14. Training of inspectors on ASGM activity monitoring, ASGM protocols, standards and regulations
15. Train responsible officers in management of mercury

16. Training ASGMs on rules and procedures for forming associations, cooperatives and companies
17. Facilitating miners to access financial credit
18. Raising awareness of ASGMs and surrounding communities on the dangers of mercury use in gold extraction and alternative including pollution mitigation measures (e.g. popular versions of IEC materials, community meetings, dialogues, advertisements, etc.)
19. Undertaking community outreach programmes to emphasise the risks vulnerable populations face in and around mine sites
20. Facilitating vulnerable groups to form groups, associations or cooperatives and SACCOs
21. To develop market-based mechanism s for the promotion of reduced mercury use by 2024
22. Establishment of incentives and disincentives for the use of alternative methods to mercury in ASGM operations
23. Enforcing OECD and ICGLR standards on gold mining and trade such as the implementation of the ICGLR ASM gold strategy and the Regional Certification Mechanism standards
24. Sensitising miners on mercury-free technologies, costs and benefits
25. Constructing demonstration and piloting sites to demonstrate alternatives technologies and best practices in gold mining and processing in ASGM sector
26. Establishing demonstration sites at mercury-free mine sites to demonstrate shafts and pits construction
27. Developing targeted messages and holding targeted stakeholder meetings in regard to effects of mercury on human health and environment, existing alternatives and mitigation measures
28. Documenting and dissemination of information on mercury use and its dangers
29. Holding meetings for publicity ASG miners to disseminate information on effects of mercury on human health and environment and BATs
30. Holding Training of Trainers/Change Agents workshops on effects of mercury on human health and environment and BATs
31. Documenting, popularising and disseminating of good ASGM practices

Through the piloting of JA/LA approaches, additional environmental benefits related to biodiversity, climate change and land degradation will be added to the baseline.

The project boasts a number of co-financing partners, including various ministries of the Ugandan government (notably, NEMA and the DGSM/MEMD), along with other national and international organizations, such as Argor Heraeus, SAP, IMPACT, NAPE, ACEMP, RRA (work fully in the Karamoja region), and PROBICOU. All of these actors have been and are continuing to contribute to formalization, access to financing and mercury reduction in Uganda?s ASGM sectors, and will be able to capitalize on the coordination and collaboration that is facilitated through the project.

The project will provide opportunities for up-scale and replication by building on lessons learned on the mercury reduction efforts in country and through lessons from global efforts. It is expected that mercury reduction efforts will be deepened through holistic and innovative approaches to formalization with technical support such as research, networking and knowledge exchange being provided by the Global Component.

The project will support the development of catalytic relationships between ASGM cooperatives and associations with downstream market actors and financing instruments, in order to provide enhanced access to incentives, resources and support for transitioning to mercury-free practices. By supporting ASGM actors to progressively meet responsible sourcing expectations of downstream and financing markets, the project can help bridge a gap that currently exists between those wanting to engage with ASGM actors and their need to ensure that they are sourcing according to international best practice and legal requirements. At the same time, the project can also help to establish realistic expectations for downstream market and financing actors to better understand the

ASGM sector and how it can support mercury-free production through their provision of access to financing.

For detailed information on co-financing contributions, please refer to Appendix 3.

1.A.6. Global environmental benefits

Mercury reduction targets in Uganda are estimated based on mercury use in the national ASGM sector as stated in Minamata Initial Assessment (MIA) and more recently, in the 2019 Draft National Action Plan (as well as any additional information from on-going projects that may not be publicly available). Several variables were used to estimate current mercury use in each country, such as yearly volume of gold production by ASGM, and the mercury to gold ratios given the type of amalgamation technologies used in different mercury-using areas. Mercury reduction targets are furthermore estimated based on variables such as number and location of ASGM sites, number of ASGM miners, current practices, capacities, and distribution of achievable reductions over the years of project implementation. The Uganda child project is expected to deliver global environmental benefits in chemicals and waste and to some extent biodiversity, international waters, land degradation particularly through application of landscape approaches. The country is expected to achieve a 15 metric tonnes reduction in mercury over a 5-year period. It is expected that mercury use reduction will be replicated as a consequence of the project?s theory of change which will support formalization efforts, remove barriers to access to finance and promote access to finance, increase adoption of mercury-free technologies, and promote increased knowledge amongst all stakeholders on the impacts of mercury usage and how to reduce its use. Uganda?s experiences will further contribute to GEB through replication in other countries. As such, in the 10 years following the programme, it is anticipated that a replication by a factor of 3 will be achieved, representing an additional 45 metric tonnes reduction in mercury (totalling at 60 metric tonnes). These activities in the reduction of mercury use are directly aligned with GEF?s long term goal of curbing the exposure of humans and the environment to harmful chemicals through a significant reduction in the use and release of mercury.

With respect to biodiversity, international waters, land degradation, the primary benefits will derive from broader programming on production of responsible artisanal gold, which will take a progressive improvement approach. Partner associations with whom the project will work with will benefit from environmental impact assessments that will reach beyond the use of mercury to include other harmful environmental processes (e.g. non-remediation of land, deforestation, impacts on biodiversity, etc.), and mitigation plans will identify, communicate and support best practice in these areas. The project will also endeavor to engage other actors engaged in environmental programming in these areas that may not be focused on the ASGM sector, and whom the associations and local communities could potentially collaborate in order to expand the extent to which they can address a myriad of environmental issues. The co-benefits indicator will be determined by the global project during the inception phase of the proramme.

The project will carry out sensitization on the harms of mercury usage in the ASGM sector, demonstrate safer and mercury-free methods (including the distribution of personal protective equipment), and build capacity for using new mercury-free processing equipment introduced by the project, all of which will contribute to improved environmental practices across the selected sites. Because the project will carry out multiple sensitization sessions in each targeted mine site, we assume we will be able to cover a considerable number of individuals across these landscape areas (including in those that have a larger surface area). Using available figures from Uganda?s mining cadaster, it is estimated that the project will contribute to improved practices in landscape areas within a minimum surface area of 4976 hectares. This includes all potential pilot sites. Please note that surface area figures were only available for some of the sites where the project plans to intervene, and thus the target number is a conservative estimate.

From Uganda?s Mining Cadaster

Buhweju: 35.158 sqkm

Kassanda: 1 sqkm

Busia: 0.3191 sqkm

Moroto: 13.29 sqkm

The number of direct beneficiaries of GEF?s investment in this programme includes 2250 women and 2250 men, including women and men artisanal miners (including those engaged in non-digging tasks, such as washing, crushing, processing, etc.), traders, exporters, ASM community members, government officials supporting the ASM sector, and private sector actors supporting the sector (e.g. representatives of artisanal miner associations).

1.A.7. Innovation, Sustainability and Potential for Scaling Up

Innovation

The project TOC provides key innovation in areas of formalization and deepening mercury reduction through the development of the Jurisdictional Approach (JA)/Landscape Approach (LA), integration with regional approaches in the area of mercury reduction and/or formalization of the ASGM sector, identifying collaborative partnerships with the private sector, and strengthening financial inclusion and bankability of miners.

Piloting JA/LA approaches

The legal and regulatory approach to formalization has failed in many countries. Legal frameworks are hardly implemented nor adequately address the various and often conflicting priorities of stakeholders within landscapes. JA approaches with jurisdictional authorities and coalition of stakeholders have potential to address ASGM formalization in a more holistic manner. In additional to formalization and mercury reduction, other environmental benefits such as biodiversity and water protection will be addressed.

Approach to financial inclusion and access to finance

The challenge of ASGM accessing formal financing and markets includes informality, poor record keeping, lack of information about mineral deposits, lack of provenance of mineral supply chains and poor understanding of formal financial systems of ASGM. The project has identified a two-pronged approach to addressing the barriers created by a lack of access to financing. The first approach is to identify and collaborate with a gold refiner further downstream to establish a supply chain relationship with two ASGM associations that includes inventory financing ? a source of financing for associations that allows them to create a consistent and predictable sourcing relationship with a reputable downstream actor. The project will support the exploration of a business model that will be beneficial to all supply chain actors, and which will serve as an incentive for continued improvement of practices related to mercury usage and responsible ASGM (as described in the planetGOLD criteria). Embedding an incentive driven model amongst the supply chain actors is more likely to be sustainable past the life of the project. Furthermore, a successful business model in this context could be replicated with other ASGM associations once the right economic incentives and drivers are considered.

In addition to working directly with a gold refiner further downstream, the project will seek to mobilize existing access to finance programmes in Uganda operated by the government, financial institutions and NGOs/multilateral organizations. There are many access to finance initiatives that exist in Uganda, however they are not engaged in the ASGM sector and do not have general familiarity with it. Furthermore, some deem the sector as too high risk. The project will endeavor to share knowledge and information with the initiatives to learn about the sector and the opportunities in it, as well as to partner with a favourable programme to adapt it to the ASGM sector and support its roll out. A particular emphasis will be made to ensuring that the programme

considers and addresses the unique challenges that women face in access financing. By working with existing programmes and institution in Uganda that are already knowledgeable in access to finance, this initiative is more likely to be sustained beyond the project end-date. Further, if other access to finance initiatives are shown successful examples both in Uganda, as well as examples from other projects within the global programme, they will be more likely to demonstrate interest in expanding into the ASGM sector.

Private sector engagement

The project will explore collaboration with private sector to enhance formalization, access to finance and markets. Past experiences from gold formalization projects have demonstrated that creating sourcing relationships between upstream ASGM supply chains with downstream gold refiners can be challenging, and require long-term investment in engagement, collaboration and identifying the appropriate incentives for all actors. As such, the project will focus on early engagement with the private sector in Uganda and internationally, while identifying opportunities for and investing in progressive improvements amongst upstream supply chain actors in line with OECD Due diligence guidance and ICGLR Certification Mechanism. With committed and engaged downstream and financing actors, the project can test different business models for mercury-free supply chains that encourage and incentivize mercury-free techniques, increasing the likelihood of continued uptake.

Sustainability and Scaling Up

The project will address major barriers that have been identified as impeding efforts in Uganda to reduce the use of mercury in the ASGM sector. These include: 1) A lack of an effective legal, regulatory and policy framework that clearly guides the ASGM sector and promotes formalization; 2) lack of access to financing to invest in mercury-free technologies; 3) lack of awareness, knowledge and capacity to access or use mercury-free technologies, and 4) lack of effective coordination, knowledge sharing and promotion of best practices amongst stakeholders.

The project will focus on supporting local and national level government officials to develop the knowledge, understanding and skills required for ensuring that ASGM actors are sensitized on the developing ASGM legal, regulatory and policy framework, and are supported to abide by it. The project will invest in technical extension expertise to help develop an effective training programme for national level government officials, so that they can in turn build the capacity and support local-level governments to carry out sensitization and fulfill their roles as required under the legal, regulatory and policy framework.

A key element of sustainability will be achieved through the JA/LA approaches. The JA approaches processes of building stakeholder coalition and setting landscape priorities and linkages with market actors build relationships that outlive the project. Landscape plans can continue being implemented long after the project. Care is needed with leadership changes at the jurisdictional level as experience shows that change of leadership could affect the JA momentum. Engaging private sector actors establishes collaborative business relationships with ASGM which if profitable and mutually beneficial, could continue beyond the life of the project. Models of access to finance to aid transition to mercury free technologies, once developed and functional, will ensure upscaling and continuous access by the sector over the longer term.

Efforts to understand incentives for responsible and mercury-free gold production are key to sustainability, and will underpin engagement with two ASGM associations that will be supported through the project to improve their practices and access financing via downstream actors and/or financial institutions. Incentives that are immediate, such as a higher price or more convenient selling location, often work best in the sector. The project will therefore seek to identify both immediate and long-term incentives for progressively adopting improved practices, which can promote continued implementation beyond the life of the project. Further, successes from these

models can serve as positive examples and potential incentive to other ASGM associations in order to encourage uptake and investment in responsible and mercury-free processes.

Knowledge sharing in country and with other countries, along with capacity building of local structures and institutions will ensure technical knowledge, support services and skills are built close to the mining operations. Embedding the project into local structures and stakeholder mandates (local training institutions, ASM organizations, etc.) will also assist the project?s sustainability

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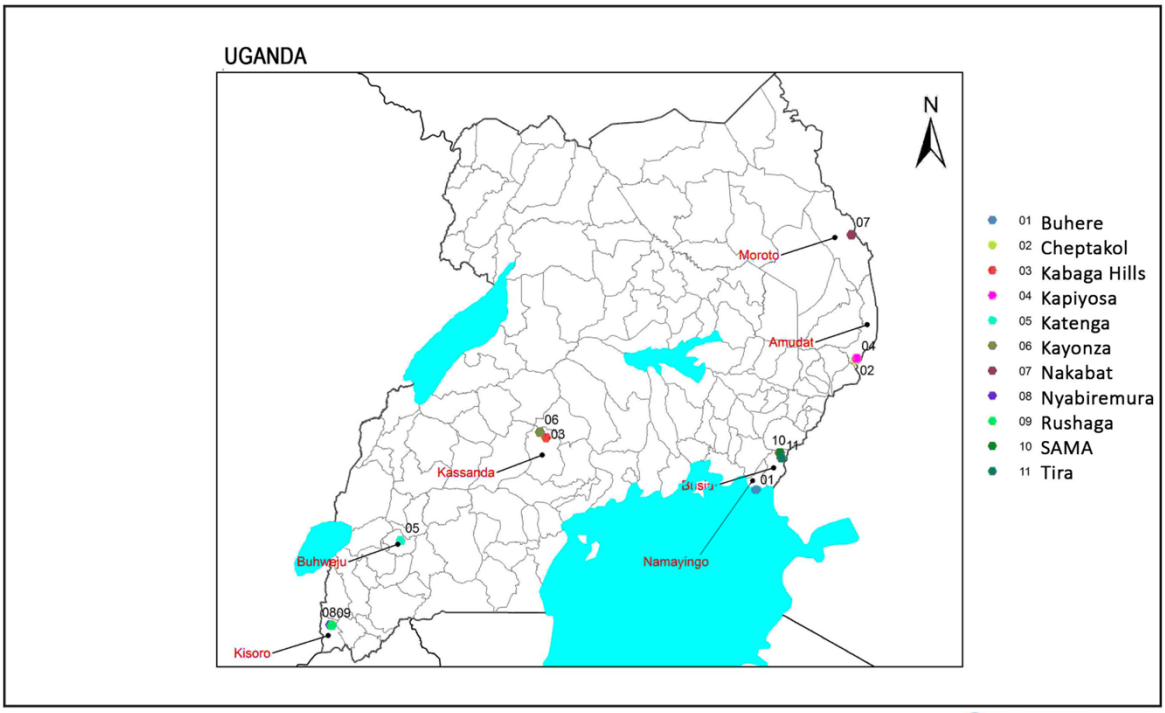
1b. Project Map and Coordinates

Please provide geo-referenced information and map where the project interventions will take place.

Global Opportunities for the Long-term Development of ASGM (GOLD+) in Uganda



The designations employed and the presentation of material on this map do not imply the expression of any opinion whatsoever on the part of the Secretariat of the United Nations concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries

This map is intended for illustrative purposes only and should NOT be used to derive any information regarding the project's operations. No activities planned in any disputed territories

1c. Child Project?

If this is a child project under a program, describe how the components contribute to the overall program impact.

This child project is part of the planetGOLD programme. The objective of the programme is to reduce the use of mercury in the ASGM sector in the participating countries through a holistic, multisectoral integrated formalization approach, and increase access to finance leading to adoption of sustainable mercury free technologies and access to traceable gold supply chains.

The Child project?s theory of change and objectives are thus aligned with the overall programme and focus on 4 key pathways to achieve the programmatic outcome. These include an emphasis on supporting formalization of the ASGM sector, promoting access to finance for the ASGM sector through making ASGM supply chains more responsible, introducing mercury-free technologies and equipment, and supporting knowledge sharing of best practices and learnings.

Under the first component, the project will support the Ugandan government to continue existing efforts to create and implement a formalization framework for the ASGM sector by supporting the development or finalization of laws, regulations and policies that will guide formalization efforts across the country. Furthermore, the project will support the piloting of jurisdictional/landscape approaches in two Districts where ASGM is taking place, and will support a broader, multistakeholder approach to formalization. Given that this approach has not been widely used in the ASGM sector, the pilot projects will provide lessons learned and help generate potential best practices for its application in the ASGM sector of other countries both in and external to the global programme.

Under the second component, the project will support improvements to the responsible sourcing practices of two ASGM associations, and engage with various actors involved in access to financing and microcredit efforts in Uganda (e.g. refiners, banking institutions, credit associations,

government-led lending programmes) to promote the expansion of their services or the provision of pre-financing to the ASGM sector. This work will include an initial scoping study to identify potential partners with whom the project can work with and provide guidance or technical expertise. Activities under this component will contribute to increased knowledge, understanding and willingness to provide access to financing to the ASGM sector. Finding sustainable financing solutions for the ASGM sector will be the key objective of this component.

Under the third component, the project will carry out sensitization on the harms of mercury usage and practices to reduce these harms and eliminate the use of mercury altogether. This includes the roll out of mercury-free processing equipment with two ASGM associations. Transition to mercury-free equipment is necessary to reducing usage of mercury in the sector, but has proven difficult for a variety of reasons. The project will consider existing lessons learned from prior efforts to introduce new equipment, and share additional lessons learned throughout the project. This is particularly important as efforts to adapt to the realities of ASGM ? particularly given the rural nature of mining (which means essentials such as electricity or gas can either be inaccessible or very expensive), the small quantities that are produced and the economic dependency that some miners have on gold and mercury traders ? need to be considered when making any significant changes to the ways in which processing is conducted and mine sites are organized (especially from a gendered perspective). This component will be the main driver on contributing towards mercury reduction and avoidance from the child project towards the programme as a whole.

The fourth component will focus on taking lessons learned, knowledge products and tools or resources from the global coordinating project and supporting the dissemination of these amongst Ugandan stakeholders. Additionally, the project will also support the development of knowledge products from the project in Uganda and share these with the rest of the programme and the rest of the global ASGM community. This will allow a fluid exchange of ideas, experiences, lessons learned and best practices across a wide range of countries and stakeholders.

At the national level, the project will support the creation of a space in which efforts of multiple stakeholders ? including various levels of government, private sector, academia and civil society ? can better coordinate and streamline their efforts related to mercury reduction, so that both resources and impact can be maximized.

Furthermore, Uganda and the various stakeholders to the project participate in a wide range of initiatives, meetings and events related to responsible natural resource management within the region ? such as the International Conference on the Great Lakes Region (ICGLR) or various regional mining events. These additional forums and events provide additional opportunity for stakeholders in the project to share the lessons learned and promote greater action and collaboration to address mercury reduction efforts in the sector (particularly where shared resources, such as Lake Victoria, are concerned).

And finally, the project will contribute to the overall objectives of the planetGOLD programme by participating in joint communications and planning activities to ensure alignment, efficiency and effective communication throughout the project?s duration.

2. Stakeholders

Select the stakeholders that have participated in consultations during the project identification phase:

Civil Society Organizations Yes

Indigenous Peoples and Local Communities Yes

Private Sector Entities Yes

If none of the above, please explain why:

Please provide the Stakeholder Engagement Plan or equivalent assessment.

1.1. Introduction

This Stakeholder Engagement Plan (SEP) is designed to be an operational tool that will define principles and protocols for effective engagement of a variety of stakeholders throughout the GEF GOLD+ project in Uganda. The project?s stakeholders will be categorized in two groups namely; primary and secondary stakeholders. The stakeholder engagement envisioned will be holistic, aiming to achieve: identification of affected, interested and concerned stakeholders; provision of timely and accessible information; relevant and contextually sensitive consultation; wide participation by all relevant stakeholders. The project, throughout its lifetime, will maintain dialogue between government ministries, departments and agencies (MDAs), local governments in gold mining districts, mining communities, private sector actors, national and in-country international NGOs and development partners.

2. Approach for Engaging Stakeholder Throughout Project Implementation

2.1. Principles of Stakeholder Engagement

Stakeholder Engagement shall be guided by the following internationally acceptable principles:

Inclusiveness- the practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalized, such as those having physical or mental disabilities or belonging to other minority groups. This will be achieved by encouraging and planning for broad participation.

Trust ? a firm belief in the reliability, truth, or ability of someone or something. Trust will be achieved by providing various platforms for open and respectful dialogue at all levels.

Transparency- operating in such a way that it is easy for others to see what actions are performed. Transparency will be proven by the timeliness of response to affected stakeholders? concerns.

2.2. Definitions

Consultation: Consultation involves information exchanges among the government, the Implementing Agency, the project executing agencies, and other stakeholders. Although decision making authority rests with the government, the Implementing Agencies, and the project executing agencies, periodic consultations throughout the project cycle help managers make informed choices about project activities. More important, it provides opportunities for communities and local groups to contribute to project design, implementation, and evaluation.

Public Involvement: Public involvement consists of three related, and often overlapping, processes: information dissemination, consultation, and stakeholder participation. Stakeholders are the individuals, groups, or institutions which have an interest or "stake" in the outcome of a GEF-financed project or are potentially affected by it. Stakeholders include the recipient country government; project executing agencies; groups contracted to carry out project activities and/or consulted at various stages of the project; project beneficiaries; groups of people who may be affected by project activities; and other groups in the civil society which may have an interest in the project.

Stakeholder: An individual or group that has an interest in the outcome of a GEF-financed activity or is likely to be affected by it, such as local communities, Indigenous Peoples, civil society organizations, and private sector entities, comprising women, men, girls and boys.

Stakeholder participation: Where stakeholders collaboratively engage in the identification of project concepts and objectives, selection of sites, design and implementation of activities, and

monitoring and evaluation of project outcomes. Developing strategies for incorporating stakeholder participation throughout the project cycle is particularly necessary in projects which have impacts on the incomes and livelihoods of local groups, especially disadvantaged populations in and around project sites (e.g., indigenous peoples, women, poor households).

2.3. Legal requirements for public consultation in Uganda

According to Ugandan law, public consultation is included in the project development process where a given project may significantly affect the quality of the environment, and are part of the environmental impact assessment. However, for other projects which might involve policy and system set up, public participation and consultation is still necessary.

The most important Ugandan legislation concerning public participation and access to information in the decision- making processes of the mining sector are as follows:

The Constitution of the Republic of Uganda,1995, as amended

The National Environmental Management Act, 2019

Generally, across ministries, departments and agencies, public consultation is good practice especially when policies, laws and regulations are being developed.

2.4. GEF guidelines on stakeholder engagement and participation

All GEF funded projects are required to meet best international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in the GEF Policy on Public Involvement in GEF Projects.

The project stakeholder engagement activities should be robust and enough disclosure on information should be made in order to promote better awareness and understanding of its strategies, policies and operations. During this disclosure, the project is required to:

? Identify people or communities that are or could be affected by the project as well as other interested parties;

? Ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them, through a process of information disclosure and meaningful consultation; and

? Maintain a constructive relationship with stakeholders on an on-going basis through meaningful engagement during project implementation.

2.5. Stakeholder Engagement throughout the Project Preparation Grant (PPG) Phase

The ongoing Covid-19 pandemic brought about particular challenges to conducting meaningful stakeholder engagement throughout the project ? especially given limitations on movement and face-to-face gatherings. Despite these challenges, the implementation agencies, the National Environmental Management Authority (NEMA) and the executing agency were able to create several opportunities for stakeholder engagement throughout the PPG Phase, which included the following:

1) An online Project Launch event was held on February 18th 2021 which included participation from a variety of government departments, civil society organizations, the GEF and representatives from the implementing agencies to present the PPG Phase plan and proposed timeline.

2) Bilateral calls with different government departments in Uganda, notably the DGSM, NEMA, Ministry of Water and Environment and Ministry of Gender, Labour and Social Development

3) Bilateral calls with Africa Centre for Energy and Mineral Policy (ACEMP), National Association for Professional Environmentalists (NAPE), Resource Rights Africa (RRA), Africa Centre for Media Excellence (ACME)

4) One-on-one stakeholder discussions carried out during field site visits at 6 mine sites. A list of individual stakeholders consulted during the mine site visits is provided in Annex II. The issues identified by these stakeholders is summarized in Table 2.

5) An online Validation Workshop was held on September 2nd 2021 to validate the proposed planetGOLD+ project plan.

6) Following the validation workshop, a small subgroup led by NEMA met to make minor adjustments and finalize the alternative scenario.

3. Stakeholder Identification, Interests and Roles

In order to ensure inclusive participation and consultation, the following stakeholders have been identified for consultation through the lifetime of the programme. The list includes the identified social groups and persons that are associated with the programme in different ways at all stages as follows:

? persons and social groups affected directly or indirectly by the outcomes of the programme?s implementation;

? persons and social groups who are able to influence and decide the outcomes and the manner of the programme?s implementation or make decisions based on the outputs of the programme;

? persons and social groups that participate in the programme implementation directly.

Particular effort will be taken to ensure that women and representatives of other vulnerable groups (e.g. ethnic or religious minorities, youth, etc.) are adequately represented and able to fully participate in the consultation and engagement that will take place throughout the duration of the programme.

TABLE 1: STAKEHOLDER IDENTIFICATION, ROLES AND INTERESTS

Stakeholders to be affected, directly or indirectly, by the outcomes of the programme?s implementation		
Stakeholder	**Examples**	**Role / Interests**
Miners	Diggers, transporters, processors, crushers, etc.	Provide information and perspectives regarding their needs, realities, concerns, risks and incentives/ideas related to formalization and addressing mercury use; participate directly in project activities
Cooperatives or associations	UGASM- Uganda Association of Artisanal and Small-Scale Miners, MUMA - Mubende United Miners Assembly, Bukana Artisanal ASGM Association, Odura Kluwasio Artisanal Miners Association (AMA), Kyoyima Omuto Akiryanga Akuze Artisanal Women Group, Syanyonja Artisanal Miners Alliance (SAMA), Cheptakol Mining Agency	Provide information and perspectives regarding their needs, realities, concerns, risks and incentives/ideas related to formalization and addressing mercury use; participate directly in project activities

Traders (gold and/or mercury)	Kampala Capital City Authority	Provide information and perspectives regarding their needs, realities, concerns, risks and incentives/ideas related to formalization and addressing mercury use
Land owners / investors		Provide input and engaged in good faith discussions related to land use and planning for ASGM actors
Community leaders / representatives (including customary leaders)		Assisting in the development and implementation of the project within ASGM communities, and in monitoring and evaluating progress and impact
Indigenous representatives (mining and non-mining, where applicable)	The Batwa of Kisoro Uganda	Provide information and perspectives regarding their needs, realities, concerns, risks and incentives/ideas related to formalization and addressing mercury use; provide input regarding potential positive and negative impacts of the ASGM sector on their lives
Women?s associations or networks in ASGM communities	6 women?s associations within MUMA (Mubende), e.g. MUWOGOMA, Section 1-Uganda Ltd, Lugingi Small Scale Miner, Amiinah Treasure Mineral & Jewellery and Earth Movers-Uganda	Provide information and perspectives regarding their needs, realities, concerns, risks and incentives/ideas related to formalization and addressing mercury use; participate directly in project activities
Medium or larger-scale mining companies	Algouda Ltd (medium scale mining company in Namayingo)	Engage in discussion regarding land use with ASGM actors, explore models for co-existence (where relevant) and opportunities for providing support for ASGM (e.g. technical support, buying programmes, etc.)
Other land users who don?t officially own their land	Some farmers, timber trade, tourism companies, etc.	Provide their perspective and views on the ASGM sector, including positive and negative impacts, challenges and opportunities, and ideas for responding to them.
Stakeholders able to influence and decide on the programme implementation (or indirect implementation), or use the programme outcomes for decision making		
Stakeholder	**Examples**	**Role**

The Uganda National Environment Management Authority (NEMA)	N/A	NEMA will serve as the Chair of the Project Steering Committee. NEMA will coordinate with DGSM, NFA and other relevant government agencies to ensure appropriate application of the National Environment Act, effective monitoring, and development of suitable requirements for the minerals sector. NEMA oversees and provides direction to District Environment Officers, whose functions may include inspection, monitoring and provision of guidance to ASGM area.
Ministry of Water and Environment	N/A	Participate in project implementation (e.g. train-the-trainer approaches, sensitization on the harmful effects of mercury, etc.); participate in project monitoring
Ministry of Energy and Mineral Development (MEMD) / DGSM	N/A	Participate in project implementation (e.g. train-the-trainer approaches, sensitization on the harmful effects of mercury, etc.); participate in project monitoring; provide statistics and information about the ASGM sector
National Forest Authority (NFA)	N/A	Collaborate with DGSM and other key agencies to harmonize policies and legislation with respect to mineral development in forest reserves; Develop guidelines related to mining activities in forest reserves; Sensitize Regional Forest Officers and Forest Rangers on mining policies and legislation and promote collaboration and communication with respect to environmental compliance monitoring.
Ministry of Finance, Planning and Economic Development (MFPED)	N/A	Provide financing for implementation of the NAP; support market-based formalization/mercury-reduction efforts
Financial Intelligence Authority (FIA)	N/A	Provide input vis-a-vis Uganda?s efforts to combat money laundering in the ASGM sector
Ministry of Internal Affairs (Police Minerals Protection Unit)	N/A	Engagement at local project level; support conducive environment for formalization

Uganda Revenue Authority	N/A	Provide input based on current formalization/tax collection efforts in ASGM
Ministry of Health	N/A	Participate in project implementation (e.g. train-the-trainer approaches, sensitization on the harmful effects of mercury, etc.); participate in project monitoring; provide statistics and information about the ASGM sector
Ministry of Gender, Labour, and Social Development	N/A	Participate in project implementation, with an emphasis on supporting activities/sub activities designed to ensure gender-mainstreaming within the project (e.g. identifying financial inclusion mechanisms to support women, supporting gender-sensitive sensitization on harmful effects of mercury, etc.)
Ministry of Local Government	N/A	Mobilize and coordinate local government support for formalization; support sensitization and trainings for local government officials as needed
Local Governments in the ASM gold mining districts	Chief Administrative Officers (CAOs) of the mining districts	Provide overall support and buy-in for the project; participate in project activities (e.g. jurisdictional/MSG pilot)
Traditional leaders		Traditional leaders in Uganda play a somewhat informal governance role in Uganda?s ASGM sector, having significant influence in their communities. In some areas (e.g. Karamoja) they play a more direct role in mining; Provide public support to the project and encouragement for all stakeholders to participate.
Downstream private sector (gold refineries, jewelry companies, etc.)	Argor	Provide financial and in-kind support; engage in supply chain relationships with relevant and appropriate actors; provide mentorship and capacity building.
NGOs at regional, national and international level whose work focuses on the mining sector	ACEMP UNACOH NAPE PROBICOU GRA	Provide sensitization and awareness-raising on the impacts of mercury usage; promote alternatives; conduct research; facilitate dialogue.

Media (journalists, radio, etc.)	TBD Africa Centre for Media Excellence (ACME) is ran by former journalists and devotes a lot of time and resources on training journalists to report effectively and efficiently on the mining sector	Share information regarding the issues (impacts of mercury on health and environment, for example) and on the project.
Academic and training institutions (e.g. universities, vocational training institutes, etc.)	Makerere University Kyambogo University (which has a major focus on technical training)	Conduct research and shar knowledge with stakeholders on relevant issues; Provide trainings and knowledge transfer to miners/cooperatives; incorporate ASGM into university programming and curriculum; participate in data collection and monitoring, where possible.
Banks and credit providers (private banks, central bank, rural development banks, etc.)	Stanbic Bank Business Incubator, Finance Trust Bank Pride Microfinance Ltd	Provide financing for ASGM; provide financial support to the project. Provide insight into risk perception of ASGM sector and perspectives on ASGM related issues and proposed solutions.
Stakeholders that participate in and/or are responsible for the programme implementation		
The implementing agency staff	UNEP	
The executing agency staff	IMPACT	

4. Stakeholder Concerns Analysis

The programme implementation will be underpinned by collection and analysis of stakeholder expectations and concerns with the aim of taking appropriate responsive measures throughout the programme?s lifetime. This will ensure buy-in of the programme.

THE FOLLOWING TABLE SPELLS OUT THE EXPECTATIONS AND CONCERNS OF KEY STAKEHOLDER GROUPS, WHICH HAVE BEEN COLLECTED VIA A COMBINATION OF LITERATURE REVIEW, ONE-ON-ONE OR FOCUS GROUP INTERVIEWS AT THE MINE-SITE LEVEL, AND THE INCEPTION AND VALIDATION WORKSHOPS.

TABLE 2 STAKEHOLDER ANALYSIS

Stakeholder group	Region	Expectations/Needs	Concerns	Recommendation for Stakeholder engagement

Miners, coops & associations	Kassanda District (formerly part of Mubende District), Central Region	1) Access to finance 2) Technical assistance to increase production 3) Have equipment supply and maintenance services close to the mine. 4) Increased awareness on mercury especially amongst women miners	1) Frustration with formal access to finance initiatives (e.g. banks, Operation Wealth Creation, etc.) 2) Lack of technical knowledge/tools leads to miners? perceptions of being ?cheated? on price by buyers 3) Access to land/mining rights/licensing 4) Mercury-free techniques (e.g. borax) are more time consuming and cumbersome 5) Women over-exposed to mercury as they exclusively work in amalgamation. 6) Health issues amongst women and men- respiratory, musco-skeletal issues.	1) Emphasis on access to finance as key focus area of the project, and on an approach tailored to the ASGM sector 2) Emphasis on transparent relationships and supply chains 3) Solutions adapted to miners? context to transition from mercury use. 4) Establishment of services close to the mine site 5) Miners education and awareness raising

	Kisoro, Western Region	1) Support for official organization (not currently recognized as an official structure) 2) Support for formalization 3) Accessing to financing 4) Access to fair markets 5) Improving gold recovery and productivity 6) Support for women engagement in mining	1) Lack of trust ? frequently raided by Mineral Police and District Officers 2) The cost of travelling to Entebbe to engage DGSM is prohibitive and general cost of formalization is high, they are not informed of the process and there are limited areas in the area to apply for a location license. 3) Currently no mining is taking place in the protected park area, however there were indications that if the conditions merited it, miners would be willing to take the risk in mining there. 4) Risk of mercury introduction in the region as a result of miners? migration from other regions. 5) The Batwas get used as labour without fair compensation	1) Education/preventative approach 2) Multisectoral approach (?green gold? tourism, etc.) 3) Strengthening women participation. 4) Protection of indigenous groups
	Buhweju District, Ankole sub-region, Western Region	1) Support with formalization 2) Mercury free technology 3) Access to finance	1) Disturbances by authorities and mineral police 2) Conflict with license holders	1) Multi-stakeholder education on duties and rights. 2) Technical support to the sector

	Moroto District, Karamoja sub-region, Northern Region	1) Sensitization to mercury impacts 2) Support to register (formalize) so that miners can access credit through micro-credit initiatives 3) Access and training on mercury-free methods	1) Mercury/environmental issues were not viewed as largest concerns ? which are around physical security (increasing gun violence, theft, etc.) and food insecurity. 2) Women and girls are active in mining in the area; many girls report experiencing instances of SGBV but are not able to report these. 3) Mine closures/enforcement. 4) Lack of trust amongst miners/government.	1) Insecurity and lack of trust amongst various stakeholders in this area will need careful consideration with respect to stakeholder engagement in the area.
	Amudat District, Karamoja sub-region, Northern Region	1) Support for formalization, both with respect to registration but also organizing the associations (e.g. Cheptakol Mining Agency) 2) Bring government services closer to the mine site 3) Increased awareness of the harms of mercury 4) Increased awareness of mercury-free technologies	1) Threat of eviction/loss of access to land 2) Being cheated on gold sales (i.e. traders using calibrated scales, etc.)	1) Awareness raising and clarity around government processes for formalization 2) Support for addressing conflict with larger operations (e.g. Victoria Base)

	Busia and Namayingo Districts, Eastern Region	1) There is need to sensitize miners to first accumulate the ore and process at once using borax or other mercury free technologies 2) Sensitization on the cost/benefit of mercury usage (i.e. it may be faster, etc., however the negative health and environmental impacts are severe) 3) Support for management of cooperatives/associations	1) The miners noted that the biggest problem to the elimination of mercury in gold mining are; (1) level of processing/sustenance mining ? where miners processing small amounts of ore to recover gold on a daily basis, mercury becomes a faster option and less hectic, (2) mindset ? miners mindset have to change towards mercury free mining and this can be done through sensitization, (3) easy access to mercury ? there is need to restrict mercury access and make borax and other mercury free technologies more available. 2) Miners identified the following challenges to formalization; Miners willingness to form groups, since the majority prefer to work individually; limited resources to register the groups and limited expertise to manage the groups. Groups according to miner?s face difficulties in decision making since members have different interests and concerns, conflicts and mismanagement.	1) Understand challenges with existing mercury-free equipment 2) Develop approaches to work with existing equipment and/or secure new equipment to address needs of miners

Government (central and local)	Kassanda District (formerly part of Mubende District), Central Region	1) MoU between the project and the district	1) Uncoordinated government interventions at mine site. 2) Pollution of wetlands 3) Mercury health impacts on the miners	1) Multi-stakeholder coordination mechanism is required 2) Awareness raising on mercury impacts
	Kisoro District, Western Region	1) Training for local government officers 2) Taxation and royalties 3) Formalization of the sector 4) Technical support to the sector- equipment, access to finance	1) Mining is largely seen as central government function; capacity of local officers to better understand the mining sector is needed 2) Working conditions in ASGM 3) Risk of mercury being introduced from other areas 4) No NGOs/CSOs have done any work /outreach on ASGM issues in the district.	1) Survey of ASGM in the district 2) Technical support to the sector
	Buhweju District, Ankole sub-region, Western Region	1) Clarity on stakeholders? rights 2) Mercury alternatives 3) Access to finance 4) Formalization of the sector 5) Contribution to local economic development	1) Conflicts related to access to mineral rights. 2) Mercury awareness amongst ordinary miners is very low 3) Corruption in public spaces 4) Illegal mining happens in the park and protected areas 5) Domestic violence on the increase due to women participation in mining 6) Children drop out of school to pursue mining	1) Stakeholder education on land, minerals rights and obligations 2) Awareness raising ? mercury, environmental protection

	National	1) Increased support for capacity building / resources to carry out their role 2) Coordination amongst other interventions (e.g. donor-funded activities, private sector, etc.) 3)	1) Spread of mercury-usage to areas currently not using mercury (e.g. Kisoro) 2) Sustainability of interventions (e.g. appropriate equipment)	1) NEMA to coordinate engagement with other ministries 2) Participation and engagement with other ministries via working groups, national workshops, etc.
Private Sector (Downstream companies, such as gold refiners)	International	1) ASGM supply chains meet due diligence requirements 2) Progressive improvement/formalization by supply chain actors 3) Progressive improvement of practices, e.g. mercury reduction	1) Circumstances that may increase supply chain risks 2) Lack of progressive improvement	1) Collaboration and communication between project partners 2) Capacity building support provided by the project to improve responsible sourcing practices / engage in risk mitigation
Civil Society	National	1) Supporting youth in the sector 2) Supporting women in the sector 3) Addressing child labour in the sector 4) Capacity building and resources are needed for government (e.g. DGSM)	1) Some areas are not receiving enough support/attention (e.g. Karamoja) 2) More coordination needed between different stakeholders intervening in the sector	1) Close coordination with Uganda-based NGOs working to support ASGM formalization, mercury reduction, etc. 2) Identification of collaboration activities and support provided by the project and other donors

5. Roles and Responsibilities for Stakeholder Engagement

The following table outlines the key responsibilities for each of the various institutions responsible for implementing the GOLD+ project in Uganda (specific to stakeholder engagement).

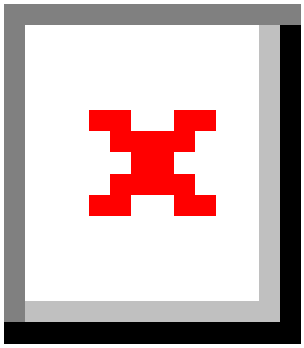
Organization	Responsibilities
NEMA	Facilitation of regular stakeholder engagement meetings; provide input and approval for various communications materials for the project, as needed; host, lead and/or participate in consultative meetings with various stakeholders; lead and/or support the implementation of specific stakeholder engagement activities and sensitization, such as community meetings, popular theatre, etc.

UNEP/CI	Responsible for overall project supervision, including adequate and appropriate stakeholder engagement throughout the project; sharing information on stakeholder engagement related to the global programme (e.g. global programme grievance mechanisms, best practice, etc.); member of the PSC
IMPACT	Coordinating regular stakeholder meetings (preparing agenda, invitations, logistics, etc.); support the drafting of various communication materials (e.g. brochures, etc.); support the implementation of specific stakeholder engagement activities and sensitization, such as community meetings, popular theatre, etc.

The Project Steering Committee will review, adapt as necessary and finalize this stakeholder engagement plan at the onset of the project. The Project Manager will have overall responsibility for ensuring the implementation of the stakeholder engagement plan throughout the span of the project. Given that multistakeholder engagement, coordination amongst stakeholders, and knowledge sharing are all pivotal components of this project, the project team will include a Government and Stakeholder Engagement Coordinator. This person will help to execute the stakeholder engagement plan and will work in close collaboration with NEMA as the Chair of the Project Steering Committee and lead government agency for the planetGOLD project in Uganda. The Government and Stakeholder Engagement Coordinator will be responsible for supporting regular updates and information sharing with stakeholders via various communications mediums designed for each particular stakeholder group (e.g. email updates, webinars, community meetings, etc.). The Gender and Inclusion Officer will also play a role in supporting the Stakeholder Engagement Coordinator to ensure that women and other potentially vulnerable or disenfranchised groups are provided with the support needed to effectively participate in the stakeholder engagement process.

NEMA will be responsible for facilitating regular stakeholder engagement meetings ? primarily via an annual stakeholder workshop ? with the support of the executing agency. NEMA will be responsible for coordinating and communicating with other government ministries and departments using official communication and information dissemination channels, supported by the Government and Stakeholder Engagement Coordinator.

6. Stakeholder Engagement Cycle



The programme will engage and communicate with various identified stakeholders as outlined below.

Stakeholder	Means of Engagement	Occurrence	Location
Miners, traders, associations/cooperatives, community-based organizations, traditional leaders, local governments	Local stakeholder meetings	Quarterly	Mine sites and surrounding communities
	Direct participation in project activities	Ongoing	
	Popular theatre	As needed	
	Media (print, radio)	As needed	
	Ad-hoc meetings/focus group sessions	As needed	
	Brochures/signs	As needed	
	Participation in PSC-hosted meetings	As needed	Kampala
Government agencies and departments	Official communication channels	As needed	Kampala
	Regular project updates (e.g. listserv)	Semi-annually	Kampala
	Participation in PSC-hosted meetings	Annual	Kampala
NGOs (national level)	Participation in PSC-hosted meetings	Annual	Kampala
	Regular project updates (e.g. listserv)	Semi-annually	Kampala
	Participate in specific activities	As needed/relevant	Kampala

Private sector	Participation in PSC-hosted meetings	Annual	Kampala
	Regular project updates (e.g. listserv)	Semi-annually	Kampala

7. Budget and Resources

The project budget makes provisions for supporting stakeholder engagement throughout implementation vis-?-vis the following:

? A dedicated staff person to supporting and coordinating stakeholder engagement with the government and external stakeholders.

? An annual planning meeting where stakeholder representatives can participate and share their views and experiences.

? Regular site-level engagement sessions, where project beneficiaries and other stakeholders can share progress, challenges, concerns and any other information.

? Communications materials (e.g. pamphlets, community theatre, etc.)

8. Monitoring and Evaluation

Effective stakeholder engagement and coordination is key to the overall success and ultimate sustainability of the project. In order to monitor the effectiveness of the stakeholder engagement conducted throughout the project, the following indicators will be used for monitoring and reporting purposes. The executing agency will be responsible for collecting the necessary information to monitor and report on the effectiveness of the stakeholder engagement conducted throughout the project.

No.	**Indicator**	**Target**	**Source**	**Reporting period**
1.	Number of stakeholders participating in Annual Project Workshop (Kampala)	TBD	Participant list	Annually
2.	Percentage of stakeholders who rate as satisfactory the level at which their views and concerns are considered by the programme	70%	Evaluation survey at Annual Workshop	Annually
3.	Number of engagement/consultation sessions held (meetings, workshops, trainings, consultations, etc.) with stakeholders throughout the programme	Based on final activity plan	Activity monitoring reports	Annually
4.	Number of participants (women and men) at project information/sensitization sessions at the mine site or District level	TBD, location specific	Participant list and/or session report	Annually
5.	Percentage of stakeholder concerns resolved	70%	Log of stakeholder concerns received	Annually

6.	Number of project updates (e.g. newsletter, e-update or in-person updates at Annual Stakeholder Workshop) shared with stakeholders (bi-annually)	2 per year	Newsletters	Annually
7.	Number of partnerships formalized between the project and stakeholders (e.g. MoUs, joint-activities, etc.)	TBD	Partnership announcements, programme reports	Annually

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Annex I: Participants of the planetGOLD+ PPG Phase Inception Workshop

No.	**Name of Participant**	**Organization**	**Gender**
1.	Kutesakwe Jennifer	NEMA	F
2.	Nancy Allimadi	NEMA	F
3.	Peruth Atukwatse	NAPE	F
4.	Patience Nyawere	NEMA	F
5.	Monica Angom	NEMA	F
6.	Namukuve Fauzia	Ministry of Water and Environment (MWE)	F
7.	Tumwesigye Robert	PROBICOU	M
8.	Muheiirwe Tabaaro	DGSM	M
9.	Twebaze Paul	PROBICOU	M
10.	Kwete Justus	Kyambogo University	M
11.	Don Binyina	ACEMP	M
12.	Wilbur Nsiyona	Uganda Revenue Authority (URA)	M
13.	Eunice Asinguza	NEMA	F
14.	Geoffery Kamese	Uganda National Association of Community Occupational Health (UNACOH)	M
15.	Birungi Clemencia	NEMA	F
16.	Semanda Kassim	Ministry of Trade, Industry and Cooperatives	M
17.	Kahima Rebman	SaferWorld Uganda	M

18.	Christine Akello	NEMA	F
19.	Waiswa Ayazika	NEMA	M
20.	Anne Nakafeero	NEMA	F
21.	Patience Nsereko	NEMA	F
22.	Carolyne Nakajubi	ACTION AID-UG	F
23.	Edward Ssekika	Centre for Social Environmental Rights (CSER)	M
24.	Scarlet Mubokyi	Ministry of Gender, Labour and Social Development (MoGLSD)	F
25.	Francis Odong Gimoro	Ministry of Gender, Labour and Social Development (MoGLSD)	M
26.	Lynn Gitu	IMPACT	F
27.	Patience Singo	IMPACT	M
28.	Kady Seguin	IMPACT	F
29.	Courtney McGeachy	CI/GEF	F
30.	Ludovic Bernaudat	UNEP	M
31.	Bret Ericson	UNEP	M

Annex II: Inception Meeting Report

Meeting Report
Workshop for the Global Opportunities for Long-term Development of Artisanal and Small-Scale Gold Mining (ASGM) Sector Plus (GOLD+) Programme
Project Preparation Grant (PPG) Phase ? Inception Meeting

Held on February 18th 2021

On February 18th, the National Environmental Management Authority (NEMA), United Nations Environment (UNEP), Conservation International, the Global Environmental Facility (GEF) and IMPACT hosted an inception workshop for the project preparation grant phase of the Global Opportunities for Long- term Development of Artisanal and Small-Scale Gold Mining Sector (GOLD+) Programme in Uganda. The inception workshop offered an opportunity for various stakeholders to learn about the GOLD+ Programme, and more specifically, about the project preparation grant (PPG) phase that lays the groundwork for the GOLD+ Programme to commence in Uganda. Given the ongoing Covid-19 pandemic, the meeting took place virtually.

The meeting was opened with remarks by **Ms. Anne Nakafeero**, who provided an overall introduction to the project. She outlined the programme components for GOLD+, which include:

- ? Enhancing formalization in the ASGM sector
- ? Financial inclusion and responsible supply chains
- ? Enhancing uptake of Hg-free technology
- ? Knowledge sharing, communication and local capacity building support
- ? Monitoring and evaluation
- ? Global coordination, knowledge management and outreach

She then shared that the total available financing for the GOLD+ Programme in Uganda, which is being provided by the GEF Trust Fund is an amount of USD 6,703,500 (including the PPG phase and agency fees for project management services associated with the implementation of the GOLD+ project). The institutional arrangements for the PPG phase include the following:

i. Lead Agency for the Child Project: UNEP
ii. GEF Agencies: UNEP and Conservation International
iii. Implementing Agency: NEMA
iv. National collaborating partners and stakeholders: Government Ministries, Agencies and Departments including local governments, private sector, academia, civil society organizations and artisanal gold miner associations.
v. Executing Agency: IMPACT

The PPG phase normally runs for 12 months, though the GEF has provided an extension of 6 months due to the current Covid-19 pandemic and associated delays. The long-term institutional arrangements for the GOLD+ project in Uganda will be confirmed during the PPG phase.

Ms. Nakafeero then went on to share the specific objectives of the inception workshop, which included:

1. To introduce the programme/project concept and propose amendments if any
2. Review the programme/project workplan and propose amendments if any
3. To guide IMPACT on the nature of the baseline information to be collected
4. To guide IMPACT on the geographical scope for the baseline information
5. To agree on activity outputs and associate timelines for the PPG phase

Ms. Nakafeero then thanked the participants for their participation and attendance to the workshop.

Following these introductory remarks, **Mr. Patience Singo** was invited to introduce **IMPACT,** which will act as the executing agency during the PPG phase. IMPACT is a non-profit organization headquartered in Ottawa and registered in Uganda, with an objective of improving natural resource governance in areas where security and human rights are at risk, and ensuring that local communities benefit from their natural resources. Mr. Singo thanked the various stakeholders on the call whose work has made it possible for this project to take place. Mr. Singo outlined some of IMPACT previous experience and work, including working closely with the Directorate of Geological Survey and Mines (DGSM) in Uganda on the implementation of the International Conference on the Great Lakes Region (ICGLR) Regional Certification Mechanism, which promotes and supports formalization in the artisanal gold and 3T sectors (tin, tantalum, tungsten). IMPACT is also implementing a 3-year project in Uganda which seeks to empower women in the artisanal mining sector, with a particular emphasis on addressing gendered environmental impacts and supporting women in environmental stewardship. This project will be implemented in Mubende.

Next, **Ms. Christine E. Akello,** Acting Executive Director of NEMA, was provided an opportunity to make opening remarks. She thanked GEF, UNEP and Conservation International for their support, noting the work that had been done to date in relation to the Minamata Convention. With a significant amount of preparation underway and preparation of

various documentation and baseline studies, Ms. Akello welcomed the opportunity to put these into action through the project to obtain meaningful results. A regional and holistic approach to addressing mercury usage in ASGM supply chains is of great importance to stakeholders in Uganda, and this project provides an excellent opportunity to accomplish this.

During the baseline collection process, NEMA identified a challenge related to the expense of alternatives to mercury, which needs to be considered in creating a response ? especially given that Uganda is an emerging economy. Uganda is also developing a revised Mining Act- the Mines and Minerals Bill, which will also have implications for the artisanal gold sector. It will be the first time that the regulatory framework in Uganda applies to artisanal mining, to ensure that certain guidelines and standards are in place. This project fits into this objective of regulating the sector, and will provide a reference point for implementation of the law once it is adopted. Ms. Akello then thanked all of the stakeholders for participating in the inception workshop.

Mr. Ludovic Bernaudat of UNEP then proceeded to make remarks, noting their appreciation for the opportunity to host the inception workshop. Mr. Bernaudat noted Uganda?s active participation and leadership in the Global Mercury Partnership for several years and the initial creation of the Minamata Convention. The Planet Gold programme was started under the leadership of UNEP under the name GEF GOLD, with an original 8 countries that came together with several GEF agencies to implement projects aimed at formalizing the ASGM sector, providing finance, eliminating mercury use and then communicating about results and lessons learned. Last year, Conservation International joined to develop a second phase of the programme, known as GOLD+, in additional countries, which has opened the current opportunity in Uganda. These projects can be seen as supporting the initial implementation of the National Action Plan

(NAP). In the following 10 months, we will work closely with the government and other stakeholders to prepare for the 5-year project and establish administrative arrangements.

Ms. Courtney McGeachy, Director of the GOLD+ Program at Conservation International then made opening remarks to introduce the programme. As the programme supporting the Minamata Convention, PlanetGOLD has an ambitious mercury reduction target as its main objective. To achieve this, the programme supports formalization and mercury-reduction in the ASGM sector, with a particular focus on eliminating barriers to accessing finance which could support the adoption of mercury-free technologies. Another key component is knowledge management, outreach and communication.

There are currently 9 active countries in the programme, with another 8 in development. Additional information on these projects can be found on the PlanetGOLD website.

As the second phase of programming, a key difference in GOLD+ is the introduction of the jurisdictional approach to ASGM formalization. Under this approach, a framework for holistic, multisectoral and multi- stakeholder manner will be developed, with a strong focus on engagement capacity building and adaptive management at the regional level.

The global programme includes a specific element of coordination, collaboration and engagement across the different countries where PlanetGOLD is being implemented, including with a variety of stakeholders such as refiners, investors, jewelers, banks, NGOs and more. PlanetGOLD also has an advisory group for the programme across a range of stakeholder groups.

Following the presentation of the PlanetGOLD+ programme, Mr. Bret Ericson, Technical Consultant with UNEP, to present on the PPG phase for Uganda. The PPG phase supports the development of the CEO Endorsement document, which is a very large (approx. 200-400page) set of documents defining the programme. To support the creation of this document, GEF provides some resources to draft the document, collect baseline information, identify stakeholders, finalize the project design (including a Theory of Change and Alternative Scenario), confirm co-financing arrangements and develop technical appendices.

UNEP has contracted IMPACT for the development of the CEO Endorsement document for submission in September. This was based on IMPACT?s significant experience in the ASGM sector, their long-term involvement in the Global Mercury Partnership and their physical presence as an organization registered and operating in Uganda (especially given ongoing covid-19 restrictions on movement).

If approved, the project in Uganda will run from 2022-2027.

Following Mr. Ericson?s presentation, **Ms. Lynn Gitu** of IMPACT shared the workplan for the PPG Phase. Ms. Gitu noted that IMPACT will work closely with NEMA to execute the working plan. Lynn shared the following table with participants:

	Document sections	Responsible	F	M	A	M	J
CEO Endorsement Document	Global Environment problem, root causes & barriers	IMPACT					
	Global Baseline	IMPACT					
	Global Baseline - Formalisation	IMPACT					
	National baseline	IMPACT					
	Alternative scenario	IMPACT					
	Alignment with GEF Focal Area	IMPACT					
	Incremental cost reasoning & contribution from baseline	IMPACT					
	GEB	IMPACT					
	Innovation, Sustainability and potential for scaling up	IMPACT					
	Maps	IMPACT					
	Stakeholders engagement plan	IMPACT					
	Gender	IMPACT					
	Private Sector	IMPACT					
	Risks	IMPACT					
	Institutional Arrangements	IMPACT					
	Consistency with National Priorities	IMPACT					
	Knowledge Management	IMPACT					
	Monitoring and Evaluation	IMPACT					
	Benefits	IMPACT					
Annexe s	Logical Framework, problem tree, solution tree, ToC	IMPACT					

	Responses to project reviews	IMPACT					
	Status of PPG	UNEP					
	Project coordinates	IMPACT					
	Core Indicators	IMPACT					
	Taxonomy	IMPACT					
Appendices	Budget, workplan, supervision plan	IMPACT					
	Co-finance letters	UNEP/NEMA/IMPACT					
	Implementation arrangements	IMPACT					
	Consultants to be hired	IMPACT					
	SRIF & Risk mitigation plan	IMPACT					
	Communication & KM strategy	IMPACT					
	Acronyms	IMPACT					
	ASGM study	IMPACT					
	Gender Analysis	IMPACT					
Meetings & key steps	Inception workshop	NEMA/IMPACT					
	Validation workshop	NEMA/IMPACT					
	UNEP review	UNEP					
	Submission to the GEF	UNEP					

With regards to timelines for the PPG and project implementation, **Mr. Ludovic Bernaudat** then shared the following:

- March 2020 ? Uganda Child Project Proposed
- June 2020 ? Programme Approved
- November 2020 ? Executing Agency (IMPACT) contracted
- February 2021 ? Inception Meeting
- June 2021 ? Validation Workshop
- July & August 2021 ? UNEP Internal submission and review

- September 2021 ? Submission of CEO Endorsement document to the GEF Secretariat. The document is than circulated for 4 weeks to the GEF Council, and after 4 weeks the

project is endorsed (assuming it is aligned with GEF standards and expectations). The funds for the project are then dispersed and implementation can begin.

- January 2022 ? Implementation begins (pending approval)

Note that Mr. Bernaudat also indicated that timelines for the GEF process must be abided by.

Ms. Lynn Gitu then opened the discussion to discuss the target areas for the proposed project, noting that a prioritization and justification of where the project is implemented is needed. Ms. Anne Nakafeero of NEMA was asked to lead the discussion. She noted that time was short for this particular workshop, but that this conversation would continue amongst stakeholder throughout the PPG phase. Currently, 5 regions are being reviewed as per the baseline information previously collected by NEMA, which include:

- Karamoja
- Ankole
- Kigezi
- Eastern Region
- Central Region

Within these regions, Ms. Nakafeero noted that there are certain districts which are considered ?mercury hotspots. These are defined in the Mercury Initial Assessment (MIA) Report and the Draft National Action Plan (2019) prepared by NEMA, and include: Busia and Namayingo (Eastern Region); Kassanda and Mubende (Central Region); Buhweju and Ibanda (Western Region), Moroto, Amudat, Kaabong and Nakapiripirit Districts (Karamoja Region). It was also noted that there are several CSOs in Uganda that have taken initiative to address mercury reduction in several areas, developing demonstration sites for mercury reductions techniques (e.g. borax). It will be important to consider these existing efforts when selecting the geographical scope for the project. It was also suggested by NEMA that a questionnaire or checklist could be developed to help guide this process and identify priorities. IMPACT agreed that this would be prudent, and that there is an existing template for this.

The following additional questions and information were shared by participants.

Mr. Don Binyina Bwesigye of ACEMP noted the participation by the DGSM at the workshop and the pending Mining Act approval, sharing that ACEMP is engaging with the Ministry of Energy and Mineral Development to carry out a biometric registration project in support of the formalization of the artisanal mining sector (likely beginning in March). He noted his desire to ensure that IMPACT and NEMA will engage the multistakeholder group and the Ministry of Energy and Mineral Development to ensure that in the planning phase for GOLD+, alignment is made with this registration project and identify common objectives and ensure coordination and harmonization between the two. Both Mrs. Gitu and Mrs. Okello noted this, and reiterated the intention to work closely with the Ministry of Energy and Mineral Development.
Mr. Morris Tabaaro of the DGSM shared a message from the DGSM, echoing their appreciation for the work of other stakeholders such as NEMA and IMPACT, as well as their acknowledgement that this project feeds into the plans of the DGSM.

Ms. Namukuve Fauzia of the Ministry of Water and Environment then intervened to also echo appreciation for the work of the various stakeholders. She noted the support of the ministry to the implementation of the project, particularly in respect to alternative technologies that can minimize negative environmental impacts.

Mr. Semanda Kassim from the Ministry of Trade shared his appreciation on behalf of the ministry. The major concern of the ministry is the economic impact of the project, and echoed the importance of ensuring alternative technology can be introduced. Uganda has model cooperatives which have good governance structures, and the Ministry would like to engage to support the use of these models.
Mr. Morris Tabaaro (DGSM) asked how the limitations from using an online platform for this workshop will be addressed, given that many stakeholders cannot join through this channel.

Mrs. Gitu noted that stakeholder engagement will be carried out during the mine site visits, in a manner that respects the need for COVID-19 safety protocols. While this will not entirely fill the gap, Mrs. Gitu also noted that this may be considered during the implementation period of the full project, to ensure meaningful stakeholder consultation and coordination is maximized.

Mr. Wilbur Nsiyona from the Uganda Revenue Authority (Customs Department) noted that most of the inputs of mercury into the ASGM sector are illegal and illicitly traded. He inquired about which strategies were being considered to address this, including how it comes in and how it can be discouraged. Mrs. Gitu noted that one of the key components of the GOLD+ programme is on access to finance and responsible supply chains. She noted that ASGM actors often do not have access to financing to improve their practices or access other technology, and thus they are often reliant on gold traders as a source of financing. To meet their debt requirements, miners need to produce substantive amounts of gold and often require mercury to meet these needs (which, in many cases, is also supplied by the gold trader). As such, a strong understanding of the systemic nature of this challenge must be acknowledged and well understood in order to identify meaningful interventions. Mrs. Okello also noted that there is already some data that has been collected on this element throughout the MIA and Baseline for the Draft NAP.

Mr. Kwete Justus added his voice to the Acting Director of NEMA to emphasize the existing data and information that is already available, and how this should guide the decision-making of where the project should be implemented. He thanked stakeholders, particular NEMA, and encouraged regular opportunities for engagement. He also noted the importance of academia in providing relevant information and data, as well as in distributing knowledge and information.

The meeting was adjourned by Mrs. Gitu, with appreciation for the participation by all participants.

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Annex III: Individual Meetings with Stakeholders during Mine Site Visits

Central Region
Mine Site: Kagaba Hill Mine Site, Kassanda District (formerly part of Mubende District)
? Chief Administrative Officer ? Mubende United Miners Assembly representatives, miners (women and men) ? MUWOGOMA (women miner?s association that is part of MUMA)
Western Region
Mine Site: Nyabaremura Mine Site, Kisoro District
? Chief Administrative Officer ? District Technical Officers (Senior Environment Officer, District Labour Officer, Senior Agricultural Engineer, Environment Officer, District Planner, Communications Officer) ? District Internal Security Officer ? Local Council 3 -Local Council I ? ASGM Miners (approximately 20, including shaft leaders, diggers, processors)
Northern
Mine Site: Rupa Gold Mine, Moroto District
? District officials ? Focus group with women gold miners
Mine Site: Cheptakol Mine Site, Amudat District
? Local Government Officers (Ms. Ariong Deborah Alinga - Environmental Officer, Amudat District official) ? Focus group with Cheptakol Mining Agency members
Eastern Region
Mine Site: Buhera Mining Site, Namayingo District

? Bukana Artisanal ASGM Association representative (Gilbert Mulongo, Chairman)
? Members, Bukana Artisanal ASGM Association
? Members, Odura Kluwasio Artisanal Miners Association (AMA)
? Members, Kyoyima Omuto Akiryanga Akuze Artisanal Women Group
? Local gold buyers
? Local leaders
? District Natural Resources Officer (DNRO) Namayingo
? Alijauda Mining Company (LSM, not operational)

Mine site: Syanyonja, Busia District

? Syanyonja Artisanal Miners Alliance (SAMA) (Wabwire Benjamin ? Chairman)
? Members of mining associations in Tiira
? Gold buyers

Annex IV: Validation Workshop Participant List and Workshop Summary

Validation Meeting for the GEF GOLD+ Program held on 2nd September 2021

Participants:

NAME	ORGANISATION	NAME	ORGANISATION
Peruth Atukwatse	NAPE-UG	Anne Nakafeero	NEMA
Nakawuma Rose	Independent Consultant	Monica Angom	NEMA
Lynn Gitu	IMPACT	Jjemba Kanakulya	KACIITA
Carolyne Kirabo	Action Aid Uganda	Bukya John Bosco	UGASM
Victoria Reichel	IMPACT	Ludovic Bernaudat	UNEP
Caroline Kanyago	Gender expert	Emmanuel Kibirige	UGASM
Morris Muheiirwe	DGSM	Robert Tumwesigye	PROBICOU
Namukuve Fauzia	MWE	Eng. Odong Francis Gimoro	MGLSD
Robert Tumwesigye	PROBICOU	Grace Halla	UNEP
Paul Twebaze	PROBICOU	Justus Kwetegyeke	Kyambogo University
Don Binyina Bwesigye	ACEMP	Inaki Rodriguez	UNEP
Courtney McGeachy	CI	Margaret Tuhumwire	EWAD
Phaedon Stamatopoulos	Argor Heraeus	Patience Singo	IMPACT
Patience Nyawere	NEMA	Henry Mukasa	GIZ
Joanne Lebert	IMPACT	Kady Seguin	IMPACT

- The meeting?s main goal was to present the Alternative Scenario to stakeholders and close out the Project Preparation Phase of the GOLD+ project.
- The following is what was discussed;

No.	Participant	Contribution/Suggestions
1.	**Justus Kwetegye**	? When considering the target group especially for awareness raising, there should be a focus on the youth living in the gold mining areas as the number of this demographic getting involved in mining is increasing daily. ? In order for project to collect positive information about artisanal gold mining, focus should be on miners and their unadulterated stories as well as on the journalists interested in reporting in this sector.
2.	**Fauza Namukuve**	? Will the project financially support some associations to grow and develop? **Ans:** generally, yes this will happen.
3.	**Peruth Atukwatse**	? What specific equipment or methodologies will be provided by the project? **Ans:** this is largely dependent on the specific needs of the pilot mine sites.
4.	**Jjemba Kanakulya**	? The mining sector is lucrative, issues relating to child labour and gender should be top priority. **Ans/Comment:** between the OECD due diligence guidelines, the ICGLR RCM and the Planet GOLD criteria, elimination of child labour at the mines is a bare minimum goal or expectation in the building responsible supply chains conversation. A gender action plan has been developed for this project to ensure women participation.
5.	**Phaedon Stamatopoulos**	? Negative press is a reality in the ASM gold mining sector as miners are often depicted as very informal or practically illegal, non-compliant to standards etc? ? The market is leaning towards realism more and more as long as miners make a commitment to improve their practices and work to resolve them.
6.	**Don Binyina Bwesigye**	? There is need for closer/ more in-depth engagement with DGSM, capacity building, some financial resourcing in order for them to be an effective regulator

7.	**Robert Tumwesigye Baganda**	? What is the role of the national association of artisanal miners in this project? Would it not be more prudent to work directly with UGASM than individual associations within specific mining areas? ? What exactly does this project mean by financing? **Ans:** The project will mainly focus on supporting miners access international markets specifically through inventory financing provided by supply chain actors. ? What shall be the role of NGOs in Uganda in this project? **Ans:** Will generally support the project in awareness raising on dangers of mercury use.
8.	**Monica Angom**	? Mercury use is dynamic. There is a chance that the miners in Kisoro could begin to use mercury in gold mining because of influence of other gold miners. Awareness raising on the immediate term, medium term and long-term negative effects of mercury on health and environment needs to be intensive in this area so that the aversion to its use sticks ? Consideration should be made of some other relevant regulations that are under development like the National Chemical Regulations whose finalisation and passing could be supported by this project. ? Another meeting to finalise the content of the CEO endorser document or primarily the alternative scenario needs to be had so that all can be comfortable or on board.
9.	**Margaret Tuhumwire**	? Karamoja region is quite far behind in terms of interventions in the gold mining sector whether it is awareness on the dangers of using mercury or access to finance or access to mercury free technology/equipment. Even the prevailing issue of poor access to hydroelectric power needs consideration. There should be affirmative action in the project for this region?s sake. ? Hope that the programme will work towards creating synergies and partnerships that can impact outcomes of some other critical issues in the sector like need for elimination of child labour in the sector. ? In Eastern Uganda, the gold mining areas (Busiitema, Buteba and Sukuda) are so close to each other and this proximity might allow the project to affect many more sites than say only the Tira Landlords site
10.	**Way forward**	? It was agreed that updates will be made to the Alternative scenario and shared with NEMA and DGSM before addition to the CEO endorsement document

[1] Global Environment Facility, Policy on Stakeholder Engagement, 2017. Page 7 https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.53.05.Rev_.01_Stakeholder_Policy_4.pdf

[2] Ibid

[3] A list of participants can be found in Annex 1.

[4] National Environmental Management Authority (NEMA), Draft National Action Plan 2019, page 56

[5] The field team was unable to access mine sites due to insecurity at the time of the field visits. In lieu, a focus group discussion was held with local officials and a group of women miners near Rupa Sub-county headquarters.

In addition, provide a summary on how stakeholders will be consulted in project execution, the means and timing of engagement, how information will be disseminated, and an explanation of any resource requirements throughout the project/program cycle to ensure proper and meaningful stakeholder engagement

Stakeholders in the context of the project are defined as organizations, institutions and groups which are directly or indirectly impacted by and/or which have a direct potential finanail or administrative interest in project interventions. Thus, the identification and engagement of stakeholders for project execution focus on those who have the most relevant and direct impact on project activities and outcomes, as well as those who will be direct project beneficiaries. All the stakeholders identified can bring a diversity of perspectives and expertise, connect issues and opportunities across programmes, agencies and sectors and help to ensure the success of the project within Uganda. Stakeholder engagement is also critical to support the institutionalization of the project?s outcomes and to ensure its sustainability through continuation of the outputs after project is completed.

Stakeholder groups consulted during the development of the project?s activities included government agencies, civil society, the private sector, regional and international organisations with responsibility over mining, environmental management, customs, standards development, legislation, health, gender, indigenous communities and public education. These stakeholders contributed to the overall understanding of national priorities and validation of the developed activities. They will continue to play a critical role in ensuring that national priorities are effectively addressed and that the overall goals of the project are met during execution.

Stakeholders will be engaged at varying levels during the project?s execution to ensure their support and active involvement in the project?s activities, to raise awareness on the hazards associated with mercury in the ASGM sector. PSC meetings will be organised on an annual basis to discuss the progress of activities and amendments to the schedule, as needed. Additionally, IMPACT, as the main executing agency, will provide regular project updates to the PSC. The Project Management Unit (PMU) will support the organisation of meetings related to specific project activities, and ensure that national stakeholders are continuously engaged and updated throughout the project. Stakeholders will be invited to national meetings, training workshops and awareness raising activities and will also be engaged directly through dissemination of meeting notes, draft reports, and technical documents for their review. Regular project updates will be provided via email, meetings and online publications on the planetGOLD website and national media platforms.

Other national, regional and international stakeholders will be engaged as needed throughout the project.

The primary means of engaging the stakeholders will be through individual consultations, email correspondence, virtual meetings, and face to face communication during workshops and meetings, as needed for project activities. Supplemental communication will be conducted through surveys and questionnaires, where necessary.

For stakeholder assessment/engagement plan and a table of identified key project stakeholders critical to project execution, their expected engagement and contribution to the project, please refer to Appendix 7.

Select what role civil society will play in the project:

Consulted only;

Member of Advisory Body; Contractor; Yes

Co-financier; Yes

Member of project steering committee or equivalent decision-making body; Yes

Executor or co-executor; Yes

Other (Please explain)

3. Gender Equality and Women's Empowerment

Provide the gender analysis or equivalent socio-economic assesment.

Gender inequality has been well documented in Uganda?s artisanal mining sector. Women?s participation and experience in the sector is shaped by this inequality, and results in limiting women?s access to land, capital, and higher-paying positions. Cultural taboos related to women?s role in society can also hinder women?s participation, as many are stigmatized for their involvement in the sector.

Women are involved in processing of gold, and thus can have higher exposure to mercury. At times, they may not be aware that they are processing tailings that have mercury in them.

At the same time, participation in the ASGM sector can prove to be economically beneficial for women ? a they can often earn a higher income compared to other livelihoods (e.g. agriculture, tailoring, small business, etc.). As such, the sector can be a source of economic and social empowerment, as women often use their earnings to either further their position in the sector or to invest in other livelihood sources. Increased economic conditions can sometimes translate to increased social standing as well, which can change perceptions of women?s contribution to the household and community.

Legislative, regulatory and policy changes, as well as technical interventions in the ASGM sector can impact women and men differently. In some cases, these changes or interventions can have disproportionate impacts on women and men, and can serve to perpetuate or increase gender inequality in the sector. Careful consideration of potential impacts on women and men should be carefully considered in advance, with adjustments being made to mitigate any potential adverse impacts. Congruently, opportunities for potentially contributing to increased gender equality and empowering women in the sector should equally be considered. The approach of a gender impact analysis has been built into a number of project activities that will be carried out through the course of this project. The assessment will be conducted using IMPACT?s Toolkit: Gender Impact Assessments for Projects and Policies Related to Artisanal and Small-Scale Mining, which was released in 2020 and provides a set of resources and guidance to policymakers and project

implementers on meaningfully considering the gender implications of particular policies or projects. The toolkit was created based on field-work and IMPACT?s experiences in DRC, Uganda and Rwanda, and had direct input from Ugandan government representatives, who participated in several workshops during the development of the toolkit. The toolkit is currently being used with Ugandan stakeholders in the context of IMPACT?s Digging for Equality project.

The dedicated gender related budget allocations are described below:

1. Women-focused sensitization and/or training sessions, where needed. This has been budgeted for at approximately 79,800 USD, which represents 30% of the overall training session budget.
2. A gender and inclusion training specialist, who will be tasked with both carrying out various trainings with the Project Steering Committee, project staff, and individuals who will carry out trainings and sensitization sessions within the project activities (via the Train-the-Trainer approach). This will include guidance and advice on ensuring training and sensitization materials are gender sensitive and inclusive. The allocated budget for this specialist totals 90,000 USD throughout the life of the project.
3. Technical support (e.g. equipment) dedicated to the specific needs and roles of women miners (primarily via partnership with MUWOGOMA). The estimated dollar amount for this support is 200,000 USD.
4. Support for building women miner networks, associations or other collaborative and knowledge sharing platforms. This is included in the costs associated with the annual stakeholder workshop (as dedicated sessions for women will be held alongside this).
5. Gender-based analysis on project interventions and proposed legal, regulatory and policy changes created with the support of the project. Resources for this have been factored into the cost of a dedicated staff person (Gender and Inclusion Officer ? 161,000 USD)

The gender dynamics in Uganda?s ASGM sector are further elaborated in the project?s Gender Analysis and Preliminary Action Plan (Appendix 6).

Does the project expect to include any gender-responsive measures to address gender gaps or promote gender equality and women empowerment?

Yes

Closing gender gaps in access to and control over natural resources; Yes

Improving women's participation and decision making Yes

Generating socio-economic benefits or services or women Yes

Does the project?s results framework or logical framework include gender-sensitive indicators?

Yes

4. Private sector engagement

Elaborate on the private sector's engagement in the project, if any.

Private sector engagement is pivotal to the success of the project, given that mercury-reduction requires a substantial change in practice within the artisanal and small-scale gold mining sector, and that many of the root causes for mercury usage relate to access to finance and formal markets. Private sector actors with a direct role in the use of mercury in Uganda include miners, ASGM associations/cooperatives, service providers (e.g. related to equipment, and gold/mercury traders.

Miners and associations are the primary actor targeted for behavioural change through the project, given they are the primary users. Miners and associations were consulted during the PPG phase and informed the design and development of the project. The project will continue to engage with them in a number of ways, both as direct beneficiaries of particular activities, but also through the project?s stakeholder engagement plan. This will ensure that the views and realities of miners and associations can directly shape the project throughout its implementation, and result in changes that are sustainable beyond the life of the project period.

The project will also engage with gold traders and exporters, to understand their motivations and incentives for formalization and use of legal sales channels for gold ? given that a significant amount of gold leave Uganda informally. These traders are often also the suppliers of mercury, and thus engagement with them can help mitigate risks of these traders undermining the project. The perspectives of traders and exporters will be important for the Government of Uganda to consider when developing regulations in support of the new Mining and Minerals Bill (2020), once its adopted by parliament, as these will have significant repercussions on whether or not traders and exporters are encouraged and motivated to use legal sales channels.

Gold refiners will be engaged throughout the course of the project in order to support and develop sourcing relationships with the ASGM sector that include the provision of inventory financing to exporters and associations (i.e. where money is advanced to an exporter or cooperative to be used as cash flow for purchasing gold). Many gold refiners, particularly LBMA accredited refiners, have been hesitant to source from artisanal mines. During the PPG phase, the project engaged a partner refiner, Argor Heraeus, as a co-financer of the project. The project will support two ASGM associations to enter into a sourcing arrangement with Argor Heraeus by progressively applying responsible sourcing practices and developing a business model that incentives these improved practices (including mercury-reduction). This will also allow the project to explore the conditions for a potential market equilibrium for the demand and supply of mercury-free gold.

Private sector engagement will also occur with the financing sector, notably through Uganda-based banks that are demonstrating potential interest in increasing their services to the sector. Given that mercury-free technologies often represent a higher investment than mercury, and that mercury supply and informal financial services are often closely tied, the unbankability and lack of access to finance for miners and their associations is a root cause of mercury-usage in the sector. Therefore, the engagement with the financial sector will be an important aspect to the success of the project.

5. Risks to Achieving Project Objectives

Elaborate on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved, and, if possible, the proposed measures that address these risks at the time of project implementation.(table format acceptable):

Table 5: Risk Matrix

Risk	Risk rating	Proposed mitigation measures
Covid-19 related risks		

Covid-19 restrictions (movement, large gatherings, travel, etc.)	Medium	Uganda has experienced several lockdowns since the start of the Covid-19 pandemic. Vaccinations are being distributed, but at a slow rate. It is likely that rolling lockdowns could continue to restrict movement within Uganda and limit the possibility of indoor/large gatherings. The project team will closely monitor the Covid-19 case numbers and analysis in order to shift activities as needed. Activities will either be postponed to a later date post-lockdown, or may be adapted to account for restrictions (i.e. small meetings, outdoors, online events, etc.). Covid-19 precautions will be followed (e.g. working from home when needed, wearing face masks, hand sanitizing, etc.).
Shifting priorities due to Covid-19 pandemic	Medium	It is possible that national and local government authorities are preoccupied with combatting Covid-19 and future recovery efforts. The project will rely on its stakeholder engagement plan in order to ensure that adequate consultation and engagement is had to validate project interventions and adapt as needed. Given the economic importance of the ASGM sector to many local communities, the project may be in a position to link its activities to local development plans in order to support economic recovery post-covid.
Political / Governance-Related Risks		
Delayed legislative /regulatory processes for the Mining and Minerals Bill (2020)	Low	The Mining and Minerals Bill (2020) was originally drafted in 2019, and then delayed due to the Covid-19 pandemic and election at the beginning of 2021. It is possible that further delays occur, which may impact the project?s planned activities related to promulgating and sensitizing miners, ASGM associations and other stakeholders on the new formalization framework in Uganda. The project has included activities to provide technical expertise to parliamentarians in order to support the adoption of the Bill. Further, activities can be amended to focus on other existing pieces of the formalization framework that have already been adopted (e.g. the Minerals Policy (2018), the ICGLR RCM, or others) while awaiting for the new mining law to be adopted.

Elections in Year 3 of the project result in delays, changes in priorities, etc.	Medium	A national election will be held in Year 3 of the project. This can often result in a substantial period of time where government ministries and departments are less active or able to carry out different tasks. Further, elections can also bring about changes in priorities, staff turnover at higher-levels within ministries, as well as insecurity. The project will seek to mitigate these challenges by recognizing this risk in the project workplan, closely monitoring the political and security situation, and ensuring early engagement with any new government officials with whom the project may engage with to ensure awareness and support of the project.
Staff turnover at NEMA, DGSM, and other government ministries/departments	Low	The project is emphasizing institutional capacity building across a number of ministries and departments, as well as levels of government (national and local) in order to maximize the impact of the project. This will help mitigate against potential shifts in key personnel that are trained. Furthermore, the identification and partnership with other training institutions or partners (e.g. universities, NGOs) will also help to mitigate this risk.
Environmental / Climate Risks		
Miners do not trust or buy-in to mercury-free technologies	Medium	Miners in Uganda have demonstrated that they do not always trust that mercury-free technology captures gold as efficiently as mercury amalgamation. This can present a risk to the project in promoting uptake of mercury-free technologies. This risk will be mitigated via effective trainings that include demonstrations and clear communication (as well as the provision of equipment), as well as a number of sensitization sessions that continue to highlight the harms of mercury usage. In addition, cost benefit and socio-economic analyes will be conducted to use as convincing evidence for the miners to adopt new technologies.
Lack of prioritization of reducing mercury usage by miners, including when financing is available (or miners simply do not endorse mercury-free processing methods)	Medium	Poverty often prevents miners from prioritizing health and environmental impacts, as they often are more focused on addressing basic needs (food, housing, school fees, etc.). The project will mitigate these risks by engaging with ASGM associations supported by the project on expectations and goals, focusing on identifying incentives that can encourage miners to prioritize mercury reduction, as well as on securing access to the financing needed to invest in mercury-free technologies. Project activities on sensitization on the harmful effects of mercury, and a broad-based approach to sensitization (i.e. multistakeholder) will help to mitigate the potential for miners or ASGM associations to reject mercury-free processing.

Programmatic / Other Risks		
Risk-averision of gold refiners	Medium	Some gold refiners have been hesitant to source from artisanal gold supply chains, or are actively avoiding them, due to perceived human rights, social, labour and environmental risks. This has contributed to the difficulty the sector has had to access formal markets (formal and transparent supply chains with formal financing). The project has sought to mitigate this by engaging with a partner gold refiner during the PPG phase, and by including activities that will directly support two ASGM associations in Uganda to implement the best practices needed to meet the expectations of the global market when it comes to responsible production and sourcing.
Supply chain partners are unable to establish commercial terms (or, competitive commercial terms compared to the informal market)	Medium	It is possible that the ASGM associations and supply chain actors further downstream (trader, refiner, etc.) are unable to agree to commercial terms (e.g. price, timing of payments, etc.) that are comparable with the informal market, or competitors in the formal market that do not promote responsible or mercury-free gold production. To help mitigate this risk, the project plans to carry out engagement with supply chain actors and conduct a supply chain mapping to identify the incentive structures, pricing dynamics, relationships and other dynamics (e.g. logistics, services, etc.) to support the establishment of an economically feasible model that benefits all actors in the supply chain and promotes improved practices.
Low risk threshold by financial istitutions / other potential providers of access to credit	Medium	Like gold refiners, financial insitutions and other lenders have been hesitant to provide access to financing for the ASGM sector due to reputational risks and financial risks. The project is seeking to mitigate this risk through its support to formalization, identification of formalized associations with whom the project can partner, as well as engagement through the PPG phase with financial institutions in Uganda that have shown openness to expanding services to the sector. Furthermore, the project?s emphasis on improved practices for ASGM miners will also help mitigate this risk by reducing the reputational risks to lenders and creating stronger management systems (e.g. record keeping, policies, etc.).

Land conflict	Low	The lack of an effective formalization framework for the ASGM sector coupled with the prioritization of large-scale mining has led to some conflict over access to land in some parts of Uganda (e.g. Mubende). The project will mitigate this risk by supporting clear communication of the emerging formalization framework (e.g. Minerals Policy (2018), the pending Mining and Minerals Bill (2020) with all stakeholders. It will also work with ASGM associations where access to land has already been secured, and is less likely to derail planned project activities.
Efficient and lucrative alternative mercury-free gold processing techniques are not appropriate (or not available) for ASM	Medium	There is a challenge with respect to mercury-free technologies that relates to the very small quantities that are generally produced by ASGM miners. This is reflective of a significant portion of the ASGM workforce, and therefore is critical to addressing mercury usage in the sector writ large. The project has considered this by including a pilot phase for mercury-free equipment to test its adaptability to typical miner realities. It has also identified some initial technologies to pilot. Furthermore, the project will seek to identify, to the extent feasible, technologies that are already available in Uganda or the region (either produced there, or existing imported equipment).
Interference by mercury traders	Medium	Informal gold traders are often the suppliers of mercury, and can have complex economic and/or social relationships with miners which can be difficult to break. These traders can become spoilers to the project by acting in direct competition to formal and legal sales channels. The project will mitigate this risk through two key strategies: 1) the project will seek to replace the financing offered by informal traders with other legitimate sources, and 2) the project will engage with informal traders in order to understand the key barriers they face to formalization and use of legal channels, and identifying potential incentives for them to formalize.

Inability to identifiy a gold exporter that meets minimum due diligence expectations of refiners	Medium	Identifying a gold trader with whom the artisanal gold mining associations selected for the project can work with to supply gold to the international market, will be important. However, the informality and general secrecy that characterizes the artisanal gold trade in Uganda could make this difficult, and traders/exporters may not be willing to participate in minimum due diligence processes. The project will seek to mitigate this risk through early engagement with prospective traders, and the identification of incentives that may entice them to participate in the supply chain. Furthermore, the project will support an in-depth supply chain study to assess the incentives and economic drivers motivating the actions of all supply chain actors.
ASGM associations and miners are unable to meet the standards established by planetGOLD	High	ASGM associations have had limited capacity to implement or demonstrate implementation of responsible sourcing standards and criteria. The project will mitigate this risk by providing significant technical support and accompaniment to the ASGM associations to meet these criteria, as well as identifying incentives to do so (i.e. access to finance). Emphasis will be made on supporting the management of the associations to increasingly take on more responsibility, building from the minimum baseline (i.e. adherence to OECD DDG) to progressively meeting the more stringent criteria outlined by planetGOLD.

Please also refer to the Risk Mitigation Plan in Appendix 9 for further information.

6. Institutional Arrangement and Coordination

Describe the institutional arrangement for project implementation. Elaborate on the planned coordination with other relevant GEF-financed projects and other initiatives.

ORGANOGRAM-LEVEL

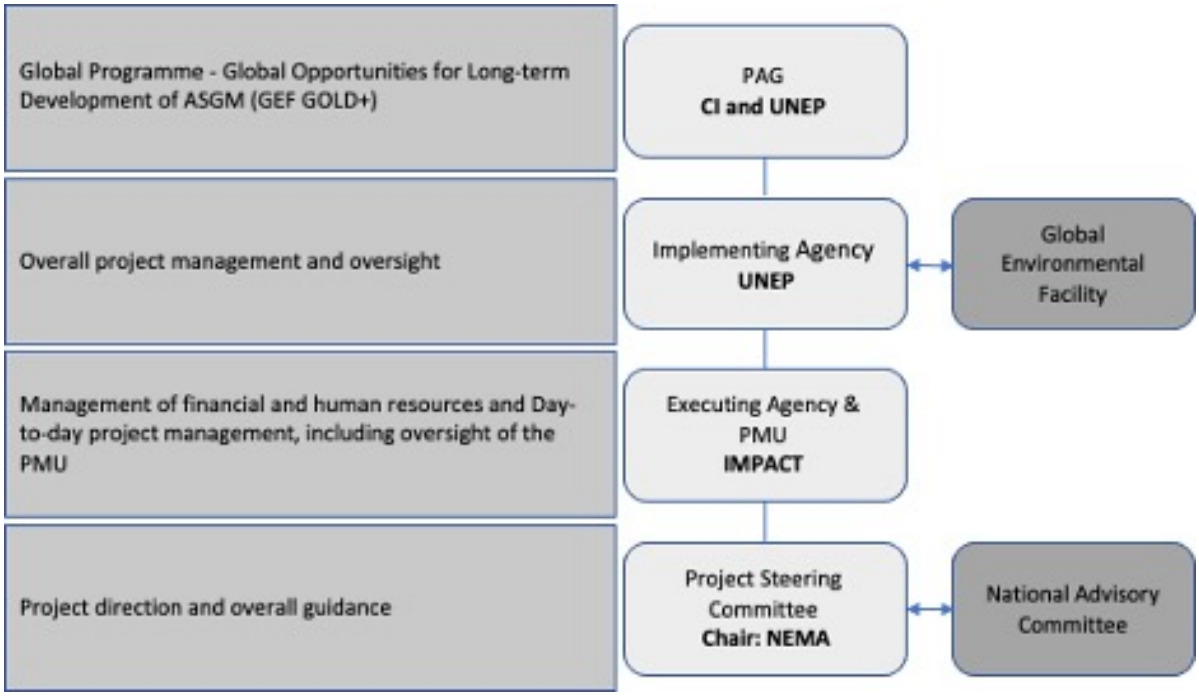

FIGURE 5: PROJECT GOVERNANCE STRUCTURE

Below is a general description of each management body:

? Implementing Agency (IA): UNEP will serve as the IA. The IA will be responsible for the overall project supervision, overseeing the project progress through the monitoring and evaluation of activities and progress reports of the established components. It will be responsible for quality assurance procedures, organize contracting, in coordination with NEMA and the Executing Agency (EA), approve progress reports and clear disbursement. The IA will also monitor progress to ensure the proper quality of outputs. UNEP will report project implementing progress to GEF. The IA will also take part in the Project Steering Committee (PSC) and can request PSC to meet outside of the planned schedule as deemed necessary.

? Executing Agency (EA): IMPACT will serve as the EA. With the guidance of the PSC, the EA is responsible for the overall management of the financial and human resources directly related to project execution in the country. It will function as the general oversight for the project and will be accountable to the implementing agency for the achievement of project outputs and outcomes. The EA will take guidance from the GEF implementing agency and the PSC in all matters concerning the project.

In the delivery of its functions, it will participate in PSC and National Advisory Committee meetings. A Project Management Unit (PMU) will be embedded within IMPACT, and will be in charge of the day-to-day management of the project. This will be composed of a Country Project Manager and other project staff who will be directly under IMPACT?s supervision, and who will have access to a wide range of experts and specialists throughout the execution of project activities. The PMU will regularly provide updates to the PSC and will submit quarterly progress reports. Annual workplans and progress reports will be submitted to the PSC for endorsement. The PMU will also be responsible for the daily project finances with approval from the EA. The PMU will:

- be responsible for the efficient and timely preparation and execution of project activities;

- provide on-the-ground coordination to facilitate project execution; prepare concept notes, plans, summaries, and reports as required by the project in a timely manner; facilitate coordination meetings and other related dialogues
- with the guidance of the PSC;
- form part of any technical working group that may be established by the project;
- identify, develop, and foster contacts and relationships that will be beneficial for the project;
- execute the project communication strategy including information dissemination with the guidance of the PSC;
- apply the project?s knowledge management approach
- execute a regular project monitoring plan
- functions as secretariat of the PSC

? Project Steering Committee (PSC): The PSC will be chaired by NEMA and provide project direction and overall guidance to project implementation, making critical decisions on strategic matters. The three members of the PSC will include NEMA, DGSM, and UNEP. The PMU (functionally IMPACT) will serve as the Secretariat and provide annual workplans for endorsement and regular progress reports. The PSC will consist of representatives of the beneficiary country, the IA, and the EA. It will also ensure the timely delivery of project outputs and the eventual achievement of the project outcomes by reviewing workplan and progress reports. Additional stakeholder representatives from academia, NGOs and other relevant areas may be invited to join the PSC during the project execution as experts or observers, including members of the National Advisory Committee (see below). At all times, the PSC and its activities will comply with the policies, conditions and regulations of the UN and the GEF.

? National Advisory Committee (NAC): Uganda will establish a multistakeholder national advisory committee to advise the PSC and support efficient project delivery with all relevant national and local stakeholders. The NAC will periodically participate in PSC meetings, as needed, and may be relied on for bilateral meetings to provide input into project planning and implementation. The PSC and National Advisory Committee will also facilitate collaboration of the project with other country initiatives, stakeholders and institutions. The composition of the NAC will be confirmed by the PSC at the beginning of the project, but this will likely mirror the same composition of the National Stakeholder Advisory Committee Group for the National Action Plan, whose members were drawn from:
    - Miner organisations - like cooperatives and/or associations for example, Busia Mining Association
    - Miners/miner representatives
    - Community leaders and local government from ASGM areas for example L.C.1, county/subcounty chiefs, RDC
    - Indigenous groups - members from the local community
    - Technical expert in gold mining
    - Environmental and human health organisations
    - Academic and research organisations - universities and research institutions
    - Legal professionals
    - Representatives from large scale mining
    - Other relevant land holders
    - Police and customs officials
    - Gold buying agents, gold traders, mercury traders
    - Waste management specialists - environmental and public health officials
    - Private sector partners such as large-scale mining companies or equipment providers
    - Financial/banking sector - micro finance, Sacco groups
    - Representatives of the United Nations country teams

- Women-based organisations dealing with mining, for example, Empowered Women in Action

Roles of the key stakeholders:

NEMA, as the project counterpart and Minamata Convention Focal Point will have the following specific roles:

? Chair the Project Steering Committee

? Coordinate the Government?s efforts through communication and information dissemination to relevant government stakeholders to support effective implementation of the project;

? Serve as the main convening body of the government;

? Guide IMPACT, as the executing agency, during the implementation process of the project

? Take an active role in applying and disseminating the lessons derived from the Project in the ongoing development of policies and regulations in or related to the extractive sector in Uganda.

? Provide advice, information, and other relevant data on the appropriate policy frameworks and legislation at the national level that must guide the implementation of the project;

? Provide guidance to IMPACT and local partners organization/s in collecting, documenting, analysing and sharing with appropriate stakeholders for possible adaptation and/or replication, information on successful models, best practices and lessons learned from the Project;

? Facilitate communication and information dissemination within the ministry and with other stakeholders as appropriate.

UNEP as implementing agency will have the following role:

? Participate to project Steering Committee Meetings and ensure decisions are compliant with GEF and UNEP?s rules

? Participate to project Steering Committee Meetings and ensure project is implemented as planned

? Communicate with the GEF on project implementation

? Validate quarterly reports received from IMPACT in coordination with NEMA

? Validate and finalise PIR and forward to the GEF

? Organise Mid-Term Review

? Organise independent Terminal Evaluation

IMPACT as executing agency will have the following role:

? Coordinate the PMU

? Report quarterly to UNEP and NEMA on expenditure and progress

? Prepare annual Project Implementation report

? Provide independent financial audit to UNEP in coordination with NEMA

? Recruit staff/consultants and contract sub-contractors as per TORs and budget

The Project Management Unit will:

? Manage the day-to-day management of the project according to workplan and budget approved by Steering Committee;

? Review reports from consultants and sub-contractors against TORs.

? Act as secretariat to the Steering Committee;

? Prepare documents for the Project Steering Committee (state of expenditures, work plan, TORs for consultants and sub-contractors, agenda);

? Monitor, track and report on gender mainstreaming progress

? Take Steering Committee minutes and circulate for approbation.

The Project Steering Committee will, under the chairmanship of NEMA:

? Approve TORs for PMU (only at beginning of project):

? Discuss and approve work and budget plan (annually);
? Discuss and approve TORs for consultants and subcontractors;
? Guide communication and information dissemination
? Provide oversight of gender mainstreaming activities
? If needed, propose adjustments to project plan;
? Host an annual stakeholder workshop (with logistical support and organization provided by the PMU).

The National Advisory Committee will:

? Attend PSC meetings, when needed;
? Assist in the selection of the national consultants and experts;
? Advise on the development of the project progress, and ensuring alignment with other national priorities, projects and programming;
? Provide technical expertise and experiences, as needed.
?

The planetGOLD global project will :

? Produce annual progress report for programme that includes narrative as well as quantitative reporting from all projects, including Uganda, on achievement of project level and programme-level indicators, as well as produce quarterly summaries of key activities and progress across programme, including Uganda, for dissemination to PSC and Programme Advisory Group

? Organize and facilitate inception/implementation orientation for country projects, including Uganda, to provide clarification on cross-programmatic coordination and knowledge sharing activities

? Organize and facilitate bimonthly programme coordination calls

●Further develop, disseminate, and socialize the planetGOLD Criteria for Environmentally and Socially Responsible Operations, and assist country projects to access existing trainings and resources to implement these criteria

●Elaborate and disseminate overall stakeholder engagement guidelines for programme participants, and further refine and disseminate global programme communications strategy, including recommendations for approach and messaging

●Disseminate suite of planetGOLD country logos and brand assets (templates for fact sheets, reports, presentation slides, event banners, etc), and disseminate style guide and messaging guide documents to all child projects

●Create communications products to promote responsible ASGM at the international level and stories of success or lessons learned among country projects

●Facilitate programme-wide communications network, tools for collaboration, and plans for cross-programmatic communications activities, organize and facilitate the planetGOLD communications network side meeting for the APM, including supporting travel of country communications managers, and maintain global editorial calendar and support country projects in publishing original content on website and other planetGOLD communication channels

●Organize and facilitate the planetGOLD Global Forum every two years for exchange of lessons learned between child projects and other ASGM stakeholders, and organize and facilitate the planetGOLD Annual Programme Meeting each year [to be organized back to back with GFs in years when the GFs take place]

●Organize and facilitate regular (~quarterly) knowledge exchange meetings/networks for subject matter experts

●Facilitate the sharing of relevant information and materials across all child projects, and develop original knowledge products or organize knowledge sharing opportunities on key gaps or areas of interest across the programme based on inputs received from country projects

●Establish, monitor and manage grievance mechanisms at both global and child project levels

●Manage knowledge repository and broader knowledge sharing via the planetGOLD website, email listserv, and other dissemination channels

7. Consistency with National Priorities

Describe the consistency of the project with national strategies and plans or reports and assesments under relevant conventions from below:

NAPAs, NAPs, ASGM NAPs, MIAs, NBSAPs, NCs, TNAs, NCSAs, NIPs, PRSPs, NPFE, BURs, INDCs, etc.

? - ASGM NAP (Artisanal and Small-scale Gold Mining) under Mercury
? - Minamata Initial Assessment (MIA) under Minamata Convention
? - National Biodiversity Strategies and Action Plan (NBSAP) under UNCBD

Detailed below are the national priorities, plans, policies and legal frameworks in Uganda that are consistent with the child project and the objectives of the planetGOLD programme and Coordination and Knowledge Management Global Child Project.

Minamata Convention on Mercury: National Action Plan

The Minamata Convention on Mercury: Uganda is party to the Minamata Convention since January 2019, and has elaborated its National Action Plan and lodged it with the Minamata Secretariat. By completing its NAP Uganda is committed to implement the requirements of the Convention as described below:

●To undertake, subject to the availability of resources, capacity?building and training activities to support parties to facilitate the development, review and constant updating of NAPs in a manner commensurate with the reporting under Article 7 of the Convention,

● To produce effective strategies, including gender mainstreaming, to prevent a resurgence of mercury use in ASGM by supporting educational, outreach and capacity building initiatives; the promotion of research into sustainable mercury alternative practices; the provision of technical and financial assistance; and fostering partnerships to assist in the implementation of their commitments under Article 7.

Some activities within the project components will address the implementation of strategies elaborated in the NAP. This will in turn build on the MIA findings and recommendations which sited ASGM as a major source of mercury losses to the environment.

The 3rd National Development Plan (NDP III)

The third National Development Plan (NDP III)[1] goal is to increase household incomes and improve the quality of life of Ugandans through various sectors, including mining. The NDP III, published in 2020, outlines several objectives to which the Child project will directly contribute, such as:

1) Completion of the legislative, regulatory and policy framework for ASGM.

2) Improvements to various practices in the ASGM sector, including health and safety and due diligence processes.

3) Strengthening of local government capacity to monitor and regulate mining activities.

2019 Draft Mining and Minerals Bill

Uganda is in the process of amending the Minerals Law (2003) through the draft Mining and Minerals Bill 2019, which seek to address the plethora of ASGM challenges ranging from formalization, supply chain, capacity building and access to services. The project through its components and supported by the Global Child project will benefit Uganda?s formalization efforts. The project comes at a critical time to support Uganda?s formalization efforts once the related amendments are formally adopted, particularly in providing resources to help prepare and train government officials responsible for implementing Uganda?s ASGM framework to conduct sensitization with ASGM sectors on the new framework, and the services and support that is available to them through various government departments.

The 2nd National Biodiversity Strategy and Action Plan

The Strategic Objectives of NBSAP II[2], the Strategic Plan for Biodiversity includes strengthening stakeholder co-ordination and frameworks for biodiversity management; to facilitate and enhance capacity for research, monitoring, information management and exchange on biodiversity; to put in place measures to reduce and manage negative impacts on biodiversity; and to enhance awareness and education on biodiversity issues among the various stakeholders. The piloting of JA/LA approaches for ASGM formalization lends itself well with aligning with some of the Biodiversity priorities.

Uganda Financial Inclusion Strategy 2017-2022

Uganda?s Financial Inclusion Strategy[3], developed by the Ministry of Financial Planning and Economic Development (MoFPED) and Bank of Uganda (BoU), has five key focus areas: i) Reduce financial exclusion and barriers to access financial services; ii) Develop the credit infrastructure; iii) Build the digital infrastructure; iv) Deepen and broaden formal savings, investment and insurance usage; and v) Protect and empower individuals with enhanced financial capability.

Uganda?s United Nation Development Assistance Framework (UNDAF) (Note that only the 2016-2020 document was available on the UNDAF website during project development)

The project will support the Government of Uganda to achieve the priorities outlined in Uganda?s DAF (2016-2020) by supporting the collection of important baseline, midterm and final data and information that can inform strategic and programmatic development by the Government of Uganda and other stakeholders (e.g. local government, community actors, private sector, etc.) to tackle mercury usage in the ASGM sector. This will include important socioeconomic data pertaining to women and men living and working in ASGM communities. In particular, the project will reinforce the following areas of strategic intent outlined in Uganda?s DAF:

1) Governance/Institutional Development: Particularly with respect to building the capacity of government in Uganda to support and regulate the ASGM sector, including in efforts to reduce mercury usage.

2) Human Capital/Health: Particularly, supporting Uganda?s working in the ASGM sector to enjoy healthier lives by reducing the use of mercury.
3) Sustainable & Inclusive Economic development/Natural Resource Management and Climate Change Resilience: Particularly, ensuring natural resource management is gender responsive, effective and efficient, reducing emissions, negating the impact of climate-induced disasters and environmental degradation on livelihoods and production systems, and strengthening community resilience.

Finally, the project will assist Uganda in fulfilling their legal obligation as a party to the Minamata Convention to reduce mercury use in the ASGM sector under Article 7. Uganda will serve as leaders for other countries that are facing similar constraints on the issue.

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[1] http://www.npa.go.ug/wp-content/uploads/2020/08/NDPIII-Finale_Compressed.pdf
[2] http://nema.go.ug/sites/all/themes/nema/docs/NBSAP%20Uganda%202015%20-%20Re-designed.pdf
[3] https://bou.or.ug/bou/bouwebsite/bouwebsitecontent/publications/special_pubs/2017/National-Financial-Inclusion-Strategy.pdf

8. Knowledge Management

Elaborate the "Knowledge Management Approach" for the project, including a budget, key deliverables and a timeline, and explain how it will contribute to the project's overall impact.

Under the planetGOLD programmatic knowledge management approach, each Child Project includes a component dedicated to Knowledge management and Communications (component 4). This component is expected to lead to the outcome of planetGOLD programme?s experiences being available not only to direct and indirect project stakeholders in-country, but also to other Child Projects and the Global Project.

In addition, the Knowledge Management Strategy for the project will be closely linked to the Monitoring and Evaluation plan (coordinated by the EA) as well as the Stakeholder Engagement Plan, which identified a series of ASGM stakeholders interested in participating in the project and being engaged throughout its implementation.

At the country level, the project will develop or adapt knowledge products and tools and make them available nationally to all GEF planetGOLD project stakeholders in Uganda. It will develop and build on existing country?specific communication and knowledge management plans or platforms to ensure efficient cascading of information down to the community level and to ensure sustainability of interventions and inclusion of gender considerations. These mechanisms will be embedded in existing federal, local government or academic institutions facilitating use of knowledge products after the end of the project. In alignment with the Global Project, the Ugandan child project will facilitate the localization and distribution of GEF planetGOLD programme Education, Information and Communication (EIC) materials to local stakeholders in Uganda.

On the global level, the child project will be closely aligned with the global coordination, knowledge management and outreach project of the programme. Knowledge products and lessons learned at the local and national level will be shared with the global project, which will make these experiences available through the planetGOLD platform and other outreach strategies. This will foster a community of practice among participating countries and will allow for the sharing of successful models with a wide range of global actors and stakeholders.

Sharing of the Ugandan experience with the Global Component will also take place through the participation of representatives of the Ugandan child project to the Global Forum (GF) and each Annual Programme Meeting (AMP). Their participation will also provide them with the opportunity to

learn from other country projects, and to incorporate this knowledge into the Uganda country project. Country project subject matter consultants (finance, gender, technology, etc.) will also participate in regular knowledge exchange meetings/networks organized by the Global Component. This way, the facilitated exchange between ASGM experts and practitioners, governments, gold buyers and miners will support an ongoing exchange of experiences, as well as development of global expertise and capacity building on ASGM issues and networking and learning, to influence the global ASGM dialogue agenda and policy development. More concretely, three knowledge products will be produced which are each aligned with the essence of each of the three components of the GEF planetGOLD programme: Formalization, Access to Finance and Mercury-free technologies. The EA will ensure that all publicly available documents produced by the country project are either uploaded to the planetGOLD website or link is provided if the document is housed elsewhere.

For further information on Communications Plan at the programmatic level, please refer to Appendix 12.

9. Monitoring and Evaluation

Describe the budgeted M and E plan

The project will follow UN Environment standard monitoring, reporting and evaluation process procedures. Reporting requirements and templates are an integral part of the UN Environment legal instrument to be signed by the executing agency and UN Environment.

Project M&E will be conducted in accordance with established UN Environment and GEF procedures and will be provided by the EA. The M&E plan includes inception report, annual review and final evaluations. The Project Management Unit (PMU) will be responsible for stakeholder engagement, gender monitoring, and outreach to the broader community in the country. The M&E plan will be reviewed and revised as necessary during the project inception workshop to ensure project stakeholders understand their roles and responsibilities vis-?-vis project monitoring and evaluation. Indicators and their means of verification may also be fine-tuned at the inception workshop. Day-to-day project monitoring is the responsibility of the PMU but other project partners will have responsibilities to collect specific information to track the indicators. It is the responsibility of the PMU to inform UN Environment of any delays or difficulties faced during implementation so that the appropriate support or correlative measures can be adopted in a timely fashion.

The Project Steering Committee (PSC) will receive periodic reports on progress and will make recommendations to UN Environment concerning the need to revise any aspects of the Results Framework or the M&E plan. Project oversight to ensure that the project meets UN Environment and GEF policies and procedures is the responsibility of the Task Manager of the Implementing Agency. The Task Manager will also review the quality of draft projects outputs, provide feedback to the project partners, and establish peer review procedures to ensure adequate quality of scientific and technical outputs and publications.

Project supervision will take an adaptive management approach. The Task Manager will develop a project supervision plan at the inception of the project which will be communicated to the project partners during the inception workshop. The emphasis of the Task Manager supervision will be on outcome monitoring but without neglecting project financial management and implementation monitoring. Progress vis-a-vis delivering the agreed project global environmental benefits will be assessed with the Steering Committee at agreed intervals. Project risks and assumptions will be regularly monitored both by project partners and UN Environment. Risk assessment and rating is an integral part of the Project Implementation Review (PIR). The quality of the project monitoring and evaluation will also be reviewed and rated as part of the PIR. Key financial parameters will be monitored quarterly to ensure cost-effective use of financial resources.

In line with the GEF Evaluation requirements and UNEP?s Evaluation Policy, GEF Full-Sized Projects and any project with a duration of 4 years or more will be subject to an independent Mid-Term

Evaluation or management-led Mid-Term Review at mid-point. All GEF funded projects are subject to a performance assessment when they reach operational completion. This performance assessment will be either an independent Terminal Evaluation or a management-led Terminal Review.

In case a Review is required, the UNEP Evaluation Office will provide tools, templates, and guidelines to support the Review consultant. For all Terminal Reviews, the UNEP Evaluation Office will perform a quality assessment of the Terminal Review report and validate the Review?s performance ratings. This quality assessment will be attached as an Annex to the Terminal Review report, validated performance ratings will be captured in the main report.

However, if an independent Terminal Evaluation (TE) of the project is required, the Evaluation Office will be responsible for the entire evaluation process and will liaise with the Task Manager and the project implementing partners at key points during the evaluation. The TE will provide an independent assessment of project performance (in terms of relevance, effectiveness and efficiency), and determine the likelihood of impact and sustainability. It will have two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UNEP staff and implementing partners. The direct costs of the evaluation (or the management-led review) will be charged against the project evaluation budget. The TE will typically be initiated after the project?s operational completion If a follow-on phase of the project is envisaged, the timing of the evaluation will be discussed with the Evaluation Office in relation to the submission of the follow-on proposal.

The draft TE report will be sent by the Evaluation Office to project stakeholders for comment. Formal comments on the report will be shared by the Evaluation Office in an open and transparent manner. The project performance will be assessed against standard evaluation criteria using a six-point rating scheme. The final determination of project ratings will be made by the Evaluation Office when the report is finalized. The evaluation report will be publicly disclosed and will be followed by a recommendation compliance process. The evaluation recommendations will be entered into a Recommendations Implementation Plan template by the Evaluation Office. Formal submission of the completed Recommendations Implementation Plan by the Project Manager is required within one month of its delivery to the project team. The Evaluation Office will monitor compliance with this plan every six months for a total period of 12 months from the finalisation of the Recommendations Implementation Plan. The compliance performance against the recommendations is then reported to senior management on a six-monthly basis and to member States in the Biennial Evaluation Synthesis Report.

Table 6: M&E Summary Table

Type of M&E activity	Responsible Parties	Budget from GEF	Budget co-finance	Time Frame
Inception Meeting	EA	15,000		Within 2 months of project start-up
Inception Report	EA			1 month after project inception meeting
Measurement of project progress and performance indicators	EA		25,000	Annually
Baseline measurement of project outcome indicators, GEF Core indicators (Tracking tools?)	EA (Tracking Tools not applicable in C&W focal area)			Project inception

Type of M&E activity	Responsible Parties	Budget from GEF	Budget co-finance	Time Frame
Mid-point measurement of project outcome indicators, GEF Core indicators (Tracking tools?)	EA			Mid Point
End-point measurement of project outcome indicators, GEF Core indicators (Tracking tools?)	EA			End Point
Quarterly Progress/ Operational Reports to UNEP	EA			Within 1 month of the end of reporting period (quarterly)
Project Steering Committee (PSC) meetings and National Steering Committee meetings	EA	50,000	25,000	Once a year minimum
Reports of PSC meetings	EA			Annually
Project Implementation Review (PIR) report	EA and IA		25,000	Annually, part of reporting routine
Monitoring visits to field sites	EA			As appropriate
Mid Term Review/Evaluation	IA	30,000		At mid-point of project implementation
Terminal Review/Evaluation *(whether a project requires a management-led review or an independent evaluation is determined annually by UNEP?s Evaluation Office)*	IA	40,000		Typically initiated after the project?s operational completion
Audit	EA	30,000 (Part of PMC)		Typically initiated after the project?s operational completion
Project Operational Completion Report	E EA			Within 2 months of the project completion date
Co-financing report (including supporting evidence for in-kind co-finance)	EA			Within 1 month of the PIR reporting period, i.e. on or before 31 July
Publication of Lessons Learnt and other project documents	EA			Annually, part of quarterly reports & Project Final Report

10. Benefits

Describe the socioeconomic benefits to be delivered by the project at the national and local levels, as appropriate. How do these benefits translate in supporting the achievement of global environment benefits (GEF Trust Fund) or adaptation benefits (LDCF/SCCF)?

Given the prominence of the ASGM sector as the largest contributor of mercury emissions in Uganda, the elimination of mercury usage through the project?s support and interventions will have considerable direct and indirect health benefits from the local to the global level. In addition to the

direct health benefits brought on by this reduction, positive spin-off effects, such as increased economic productivity (either in the ASGM sector or elsewhere) that may be achieved as women and men experience better overall health. It will also reduce potential costs associated with health services related to mercury exposure (e.g. doctor visits, etc.).

Additional environmental benefits will be seen through the introduction of mercury-free technologies which will reduce contamination of waterways near project sites, decreasing negative harms to aquatic animals as well as terrestrial animals dependent on these waterways. Environmental assessments conducted at pilot sites will also identify additional risks and remediation strategies for the partner associations supported by the project.

It is expected that increases in formalization in the ASGM sector can have positive socioeconomic benefits for miners as they may increase their access to government services and financing services, which can in turn reduce dependency on more predatory forms of lending that can be common in the sector. In addition to providing capital for investing in mercury-free technologies, increasing access to financing for ASGM miners may also positively contribute to investments in improved productivity (and hence increased income), improved health and safety measures, and the ability of miners to reduce dependence on child labour (i.e. by having money to pay for school fees).

The project?s emphasis on women?s active participation and gender equality will have the positive benefit of contributing to women?s empowerment in the sector and a reduction in gender inequality that is pervasive throughout the sector in many of the project locations.

11. Environmental and Social Safeguard (ESS) Risks

Provide information on the identified environmental and social risks and potential impacts associated with the project/program based on your organization's ESS systems and procedures

Overall Project/Program Risk Classification*

PIF	CEO Endorsement/Approval	MTR	TE
	Low		

Measures to address identified risks and impacts

Elaborate on the types and risk classifications/ratings of any identified environmental and social risks and impacts (considering the GEF ESS Minimum Standards) and any measures undertaken as well as planned management measures to address these risks during implementation.

Identification	
Project Title	*Global Opportunieis for Long-term Development of ASGM Sector (GEF planetGOLD) in Uganda*
Managing Division	*Economy Division*
Type/Location	
Region	*Africa*
List Countries	*Uganda*
Project Description	*The project is one of the child projects in the planeGOLD programme. The project plans to: To reduce the use of mercury in the ASGM sector in Uganda through a holistic, multisectoral, integrated formalization approach, and increase access to traceable gold supply chinas and finance for adoption of sustainable mercury free technologies*
Relevant Subprogrammes	*N/A*
Estimated duration of project	*60 months*
Estimated cost of the project	*USD$5,500,000*
Name of the UNEP project manager responsible	Mr. Ludovic Bernaudat
Funding Source(s)	GEF
Executing/Implementing partner(s)	IMPACT (Canadian NGO)
SRIF submission version	*N/A*
Safeguard-related reports prepared so far *(Please attach the documents or provide the hyperlinks)*	? *Feasibility report [ ]* ? *Gender Action Plan [X]* ? *Stakeholder Engagement Plan/Mapping Exercise [X]* ? *Safeguard risk assessment or impact assessment [X]* ? *ES Management Plan or Framework [ ]* ? *Indigenous Peoples Plan [ ]* ? *Cultural Heritage Plan [ ]* ? *Others* _____

A. Summary of the Safeguards Risk Triggered

Safeguard Standards Triggered by the Project	Impact of Risk[1] (1-5)	Probability of Risk (1-5)	Significance of Risk (L, M, H) *Please refer to the matrix below*
SS 1: Biodiversity, Ecosystems and Sustainable Natural Resource Management	1	1	L
SS 2: Climate Change and Disaster Risks	1	1	L
SS 3: Pollution Prevention and Resource Efficiency	2	1	L
SS 4: Community Health, Safety and Security	2	1	L
SS 5: Cultural Heritage	1	1	L
SS 6: Displacement and Involuntary Resettlement	1	1	L
SS 7: Indigenous Peoples	1	1	L
SS 8: Labor and working conditions	1	1	L

B. **ESS Risk Level**[2] **-**

5	H	H	H	H	H
4	M	M	H	H	H
3	L	M	M	M	M
2	L	L	M	M	M
1	L	L	L	L	L
#	1	2	3	4	5

Refer to the UNEP ESSF (Chapter IV)
and the UNEP?s ESSF Guidelines.

Low risk **X**

Moderate risk

High risk

Additional information required

C. Development of ESS Review Note and Screening Decision

Prepared by

Name: __Mr. Ludovic Bernaudat_____ Date: _28 October 2021_____

Screening review by

Name: _Yunae Yi Date: 15 November 2021

Cleared[3]

D. Safeguard Review Summary (by the safeguard team)

This is a low-risk project. However, as it aims to increase access to finance to artisanal miners, financial benefit and related risks should be designed to protect the most vulnerable and marginalized people in this project context. Guiding principles (Section 3, GP questions 1-10) should be respected as much as possible.

E. Safeguard Recommendations (by the safeguard team)

? No specific safeguard action required

? Take Good Practice approach[4]

? Carry out further assessments (e.g., site visits, experts? inputs, cons affected communities, etc.)

? Carry out impact assessments (by relevant experts) in the risk areas d develop management framework/plan

? Consult Safeguards Advisor early during the full project developm phase

? Other _____

Screening checklist	Y/N/ Maybe	Justification for the response (please provide answers to each question)
Guiding Principles (these questions should be considered during the project development phase)		
GP1 Has the project analyzed and stated those who are interested and may be affected positively or negatively around the project activities, approaches or results?	Y	The project will make an effort to include any potentially affected stakeholders in the decision making process, in particular vulnerable and marginalized groups
GP2 Has the project identified and engaged vulnerable, marginalized people, including disabled people, through the informed, inclusive, transparent and equal manner on potential positive or negative implication of the proposed approach and their roles in the project implementation?	Maybe	The project has identified but not yet engaged vulnerable and marginalized people in the project development process
GP3 Have local communities or individuals raised human rights or gender equality concerns regarding the project (e.g. during the stakeholder engagement process, grievance processes, public statements)?	N	No issues have been raised during project development
GP4 Does the proposed project consider gender-balanced representation in the design and implementation?	Y	A gender action plan has been developed and will be implemented
GP5 Did the proposed project analyze relevant gender issues and develop a gender responsive project approach?	Y	Please see response above
GP6 Does the project include a project-specific grievance redress mechanism? If yes, state the specific location of such information.	Y	It is the role of the executing agency to address any problems and challenges during project execution

GP7 Will or did the project disclose project information, including the safeguard documents? If yes, please list all the webpages where the information is (or will be) disclosed.	N	This decision will be made during the inception workshop
GP8 Were the stakeholders (including affected communities) informed of the projects and grievance redress mechanism? If yes, describe how they were informed.	N	Only project partners and Ministry representatives who will be involved in the activities were informed
GP9 Does the project consider potential negative impacts from short-term net gain to the local communities or countries at the risk of generating long-term social or economic burden?[5]	Y	The project will aim to improve and social and economic conditions of artisanal miners through better environmental practices
GP10 Does the project consider potential partial economic benefits while excluding marginalized or vulnerable groups, including women in poverty?	Y	The project will ensure that the costs of changing to mercury free technologies or becoming formalized will not drastically increase for the artisanal miners
Safeguard Standard 1: Biodiversity, Ecosystems and Sustainable Natural Resource Management		
Would the project potentially involve or lead to:		
1.1 conversion or degradation of habitats (including modified habitat, natural habitat and critical natural habitat), or losses and threats to biodiversity and/or ecosystems and ecosystem services?	N	No, the project will have no impact on natural habitat
1.2 adverse impacts specifically to habitats that are legally protected, officially proposed for protection, or recognized as protected by traditional local communities and/or authoritative sources (e.g. National Park, Nature Conservancy, Indigenous Community Conserved Area, (ICCA); etc.)?	N	The project will have no impact to natural habitat
1.3 conversion or degradation of habitats that are identified by authoritative sources for their high conservation and biodiversity value?	N	The project will not convert or degrade any habitats

1.4 activities that are not legally permitted or are inconsistent with any officially recognized management plans for the area?	N	No such activities are planned under the project
1.5 risks to endangered species (e.g. reduction, encroachment on habitat)?	N	The project poses no risks to endangered species
1.6 activities that may result in soil erosion, deterioration and/or land degradation?	N	The project will not result in soil erosion, deterioration and/or land degradation. The project is trying to improve landscape/mining areas through jurisdictional approaches
1.7 reduced quality or quantity of ground water or water in rivers, ponds, lakes, other wetlands?	N	The project will not reduce quality or quantity of ground water or other water bodies; the project will introduce best practices to prevent mercury entering waterways
1.8 reforestation, plantation development and/or forest harvesting?	N	The project will not involve reforestation, plantation development and/or forest harvesting
1.9 support for agricultural production, animal/fish production and harvesting	N	The project will not involve agricultural production, animal/fish production and harvesting

1.10 introduction or utilization of any invasive alien species of flora and fauna, whether accidental or intentional?	N	The project will not involve introduction or utilization of any invasive alien species of flora and fauna
1.11 handling or utilization of genetically modified organisms?	N	The project will not handle or utilize genetically modified organisms
1.12 collection and utilization of genetic resources?	N	The project will not collect or utilize genetic resources
Safeguard Standard 2: Climate Change and Disaster Risks		
Would the project potentially involve or lead to:		
2.1 improving resilience against potential climate change impact beyond the project intervention period?	N	The project will not improve resilience against potential climate change impact
2.2 areas that are now or are projected to be subject to natural hazards such as extreme temperatures, earthquakes, extreme precipitation and flooding, landslides, droughts, severe winds, sea level rise, storm surges, tsunami or volcanic eruptions in the next 30 years?	N	The project will not involve areas that are now or are projected to be subject to natural hazards
2.3 outputs and outcomes sensitive or vulnerable to potential impacts of climate change (e.g. changes in precipitation, temperature, salinity, extreme events)?	N	The project will not lead to outputs and outcomes sensitive or vulnerable to potential impacts of climate change
2.4 local communities vulnerable to the impacts of climate change and disaster risks (e.g. considering level of exposure and adaptive capacity)?	N	The project will not involve local communities vulnerable to the impact of climate change and disaster risks
2.5 increases of greenhouse gas emissions, black carbon emissions or other drivers of climate change?	N	The project will not increase GHG emissions

2.6 Carbon sequestration and reduction of greenhouse emissions, resource-efficient and low carbon development, other measures for mitigating climate change	N	The project will not involve carbon sequestration and reduction of GHG emissions
Safeguard Standard 3: Pollution Prevention and Resource Efficiency		
Would the project potentially involve or lead to:		
3.1 the release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts?	N	The project will not release any pollutants to the environment, it is actually trying to prevent further release of mercury into the environment
3.2 the generation of waste (both hazardous and non-hazardous)?	Y	The project will aim to reduce the usage of mercury and generation of mercury containing wastes
3.3 the manufacture, trade, release, and/or use of hazardous materials and/or chemicals?	Y	The project will aim to reduce the uses and releases of mercury through mining practices
3.4 the use of chemicals or materials subject to international bans or phase-outs? (e.g. DDT, PCBs and other chemicals listed in international conventions such as the Montreal Protocol, Minamata Convention, Basel Convention, Rotterdam Convention, Stockholm Convention)	N	The Minamata Convention Article 7 includes the reduction of mercury use in the ASGM sector. This project is aligned with the above.
3.5 the application of pesticides or fertilizers that may have a negative effect on the environment (including non-target species) or human health?	N	The project will not involve application of pesticides or fertilizers
3.6 significant consumption of energy, water, or other material inputs?	N	The project will not have significant consumption of energy, water, or other material inputs

Safeguard Standard 4: Community Health, Safety and Security		
Would the project potentially involve or lead to:		
4.1 the design, construction, operation and/or decommissioning of structural elements such as new buildings or structures (including those accessed by the public)?	N	The project will not involve the design, construction, operations and /or decommissioning of structure elements
4.2 air pollution, noise, vibration, traffic, physical hazards, water runoff?	N	The project will not lead to air pollution, noise, vibration, traffic, physical hazards nor water runoff
4.3 exposure to water-borne or other vector-borne diseases (e.g. temporary breeding habitats), communicable or noncommunicable diseases?	N	The project will not lead to exposure of waster borne or other vector borne diseases
4.4 adverse impacts on natural resources and/or ecosystem services relevant to the communities? health and safety (e.g. food, surface water purification, natural buffers from flooding)?	N	The project will not have adverse impacts on natural resources
4.5 transport, storage use and/or disposal of hazardous or dangerous materials (e.g. fuel, explosives, other chemicals that may cause an emergency event)?	N	The project will not involve transport, storage use and or disposal of hazardous or dangerous materials
4.6 engagement of security personnel to support project activities (e.g. protection of property or personnel, patrolling of protected areas)?	N	The project will not engage security personnel
4.7 an influx of workers to the project area or security personnel (e.g. police, military, other)?	N	The project will not lead to an influx of workers to the project area
Safeguard Standard 5: Cultural Heritage		
Would the project potentially involve or lead to:		

5.1 activities adjacent to or within a Cultural Heritage site?	N	The project is not involved with cultural heritage sites
5.2 adverse impacts to sites, structures or objects with historical, cultural, artistic, traditional or religious values or to intangible forms of cultural heritage (e.g. knowledge, innovations, practices)?	N	The project does not have adverse impacts to sites, structures or objects with historical, cultural, artistic, traditional or religious values
5.3 utilization of Cultural Heritage for commercial or other purposes (e.g. use of objects, practices, traditional knowledge, tourism)?	N	The project does not utilize cultural heritage or commercial or other purposes
5.4 alterations to landscapes and natural features with cultural significance?	N	The project does not alter landscapes and natural features with cultural significance
5.5 significant land clearing, demolitions, excavations, flooding?	N	The project does not lead to significant land clearing, demolitions, excavations, flooding
5.6 identification and protection of cultural heritage sites or intangible forms of cultural heritage		
Safeguard Standard 6: Displacement and Involuntary Resettlement		
Would the project potentially involve or lead to:		
6.1 full or partial physical displacement or relocation of people (whether temporary or permanent)?	N	The project does not involve physical displacement or relocation of people
6.2 economic displacement (e.g. loss of assets or access to assets affecting for example crops, businesses, income generation sources)?	N	The project does not lead to economic displacement
6.2 involuntary restrictions on land/water use that deny a community the use of resources to which they have traditional or recognizable use rights?	N	The project will not lead to involuntary restrictions on land/water use

6.3 risk of forced evictions?	N	The project will have no risk of forced evictions
6.4 changes in land tenure arrangements, including communal and/or customary/traditional land tenure patterns (including temporary/permanent loss of land)?	N	The project will not lead to change in land tenure arrangements
Safeguard Standard 7: Indigenous Peoples		
Would the project potentially involve or lead to:		
7.1 areas where indigenous peoples are present or uncontacted or isolated indigenous peoples inhabit or where it is believed these peoples may inhabit?	N	In Uganda, the government considers all people indigenous and there are some groups with special indigenous status. However, not a signficant number of individuals from indigenous groups participate in the ASGM sector
7.2 activities located on lands and territories claimed by indigenous peoples?	N	The project will not involve activities located on lands and territories claimed by indigenous people
7.3 impacts to the human rights of indigenous peoples or to the lands, territories and resources claimed by them?	N	The project will not involve indigenous people
7.4 the utilization and/or commercial development of natural resources on lands and territories claimed by indigenous peoples?	N	The project will not involve indigenous people
7.5 adverse effects on the development priorities, decision making mechanisms, and forms of self-government of indigenous peoples as defined by them?	N	The project will not involve indigenous people

7.6 risks to the traditional livelihoods, physical and cultural survival of indigenous peoples?	N	The project will not involve indigenous people
7.7 impacts on the Cultural Heritage of indigenous peoples, including through the commercialization or use of their traditional knowledge and practices?	N	The project will not involve indigenous people
Safeguard Standard 8: Labor and working conditions		
8.1 Will the proposed project involve hiring or contracting project staff ?	Y	The project will hire many international and international experts for all 4 components of the project
If the answer to 8.1 is yes, would the project potentially involve or lead to:		
8.2 working conditions that do not meet national labour laws or international commitments (e.g. ILO conventions)?	N	The project will provide working conditions that meet national labor laws
8.3 the use of forced labor and child labor?	N	The project will not involve forced labor nor child labor
8.4 occupational health and safety risks (including violence and harassment)?	N	The project will not have any occupational health and safety risks
8.5 the increase of local or regional unemployment?	N	The project will not increase local or regional unemployment
8.6 suppliers of goods and services who may have high risk of significant safety issues related to their own workers?	N	The suppliers and services providers to the project will not have high risk of significant safely issues related to their own workers

8.7 unequal working opportunities and conditions for women and men	N	The project will not lead to unequal working opportunities and conditions for women and men

[1] Refer to UNEP Environmental and Social Sustainability Framework (ESSF): Implementation Guidance Note
to assign values to the Impact of Risk and the Probability of Risk to determine the overall significance of Risk (Low, Moderate or High).

[2] **Low risk**: Negative impacts minimal or negligible: no further study or impact management required.

Moderate risk: Potential negative impacts, but limited in scale, not unprecedented or irreversible and generally limited to programme/project area; impacts amenable to management using standard mitigation measures; limited environmental or social analysis may be required to develop a Environmental and Social Management Plan (ESMP). Straightforward application of good practice may be sufficient without additional study.

High risk: Potential for significant negative impacts (e.g. irreversible, unprecedented, cumulative, significant stakeholder concerns); Environmental and Social Impact Assessment (ESIA) (or Strategic Environmental and Social Assessment (SESA)) including a full impact assessment may be required, followed by an effective comprehensive safeguard management plan.

[3] This is signed only for the full projects latest by the PRC time.

[4] Good practice approach: For most low-moderate risk projects, good practice approach may be sufficient. In that case, no separate management plan is necessary. Instead, the project document demonstrates safeguard management approach in the project activities, budget, risks management, stakeholder engagement or/and monitoring segments of the project document to avoid or minimize the identified potential risks without preparing a separate safeguard management plan.

[5]For example, a project may consider investing incommercial shrimp farm by clearing the nearby mangrove forest to improve the livelihood of the coastal community. However, long term economic benefit from the shrip farm may be significantly lower than the mangroves if we consider full costs factoring safety from storms, soil protection, water quality, biodiversity and so on.

Supporting Documents

Upload available ESS supporting documents.

Title	Module	Submitted
10618 Appendix 8a - SRIF	**CEO Endorsement ESS**	
10618 - Appendix 8b - COVID questions	**CEO Endorsement ESS**	

Title	Module	Submitted
10618 - Appendix 9 - Risk Mitigation Plan	**CEO Endorsement ESS**	

ANNEX A: PROJECT RESULTS FRAMEWORK (either copy and paste here the framework from the Agency document, or provide reference to the page in the project document where the framework could be found).

Project: GEF GOLD Uganda: Contribution towards the elimination of mercury in the ASGM sector						
Project Objective	**Objective level Indicators**	**Baseline**	**Targets and Monitoring Milestones**	**Means of Verification**	**Assumptions & Risks**	**Link to SDGs**

Contribute to the reduction of mercury use in the ASGM sector in Uganda.	? # quantity of mercury reduced and avoided ? # quantity of gold produced without mercury ? # quantity of gold produced fulfilling planetGOLD environment and social criteria ? # of miners formalized[1] *(women/men)* ? $ amount of investments from new or existing financial inclusion mechanisms or responsible supply chain mechanisms made supporting mercury-free technologies.	15,233 kg of mercury used (per year, national level Uganda)[2] 1,930 kg of gold is produced without mercury; 5,151 kg of gold is produced with mercury (per year, national level Uganda)[3] 0kg of gold produced fulfilling planetGOLD environment and social Baseline values remain to be determined[4] (*women/men*)	**End of project Target:** 210 kg of mercury reduced (in the project areas); 15 tons of mercury avoided including other ASGM sites, by replication and uptake at project end (through the global project, additional 45 tons of mercury to be avoided in the 10 years following end of project, totalling at 60 tons) 67kg of gold produced without mercury in the project areas[5]; 5 tons of gold produced without mercury through other ASGM sites, by replication and uptake 15kg of gold produced fulfilling planetGOLD environment and social criteria 95% of miners formalized within targeted miner associations (in conformance with Mining Bill) (*of which at least 50% are women*) # of miners formalized at other ASGM sites in Uganda, by replication	Country level reporting Association records DGSM statistics Processing plant records DGSM bio-metric register Tracking investments and funds mobilized	**Risks**: Change in the political and economic situation during the lifetime of the programme impacts its implementation Avoided mercury volumes from targeted areas could be displaced to neighbouring areas as mercury traders would like to compensate for losses. ***Assumptions:*** Governments are engaged in creating enabling environment for formalization. Private Sector considers ASGM an investment opportunity with managed risks.	*SDG 5.c:* *Adopt and strengthen sound policies and enforceable legislation for the promotion of gender equality and the empowerment of all women and girls at all levels* *SDG 9.3:* *Increase access of small-scale industrial and other enterprises, in particular in developing countries, to financial services, including affordable credit, and their integration into value chains and markets* *SDG 9.4: By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and*

Component 1: Formalisation optimisation						
Outcome 1	**Outcome Indicators**	**Baseline**	**Targets and Monitoring Milestones**	**Means of Verification**	**Assumptions & Risks**	**Link to SDGs**
Government and other national stakeholders increased their capacity to formalize the ASGM sector.	? # of new regulations or legal initiatives implemented, that target the formalization of the ASGM sector and reduction of mercury (impact class 4) ? # of actions implemented under JA/LA (impact class 4)	The Ugandan government is undertaking steps to formalize the ASM sector, but miners fail to fulfil formalization requirements. Additional supporting activities are needed to reinforce the efforts. A multi-sectorial approach has yet not been part of the Ugandan formalisation strategy.	***Mid-Point Target:*** 2 new regulations or legal initiatives that target the formalization of the ASGM sector and the reduction of mercury ***End of project Target:*** 4 new regulations or legal initiatives that target the formalization of the ASGM sector and the reduction of mercury At least 2 actions implemented under JA/LA	- formalization biometric system (Ministry of Energy and Mineral Development (MEMD) - Workshop and meeting reports - Policies and laws developed	**Risks** Governments sideline the issue of ASGM and fail to put it forward as an agenda for policy change and support Inability or lack of capacity for governments to provide adequate support services **Assumptions** Governments engaged in creating enabling environment for formalization. The legal framework will advance formalization.	*17.14 Enhance policy coherence for sustainable development* *17.15 Respect each country?s policy space and leadership to establish and implement policies for poverty eradication and sustainable development* *17.17 Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships*

Component outputs	Output Indicators	Baseline	Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	Link to SDGs

Output 1.1: Legislative, regulatory and policy frameworks for formalizing the ASGM sector are adopted and implemented by government.	? # of participants reached in national consultation workshop on drafted regulations *(women/men)* (output indicator 10.1) ? # of governmental institutions that have received technical support for the implementation of new regulation related to mercury reduction in ASGM sector (output indicator 10.3) ? # of miners sensitized on existing laws, regulations and policies (output indicator 10.1) ? # of drafts finalized by the Regulations working group (output indicator 4.1)	With the 2020 Mining Bill awaiting approval, the ASGM sector has lacked a clear and easily understood formalization framework. Many ASGM miners, associations and traders have limited knowledge on existing laws, regulations regarding formalization processes and responsibilities. Sensitization on the new framework amongst these actors will be critical to ensuring its effective implementation.	**Mid-Point Target:** 60 participants reached in national consultation workshop on drafted regulations *(women/men)* 5 governmental institutions that have received technical support for the implementation of new regulation related to mercury reduction in ASGM sector 1 draft finalized by the Regulations working group **End of project Target:** 1400 of miners sensitized on existing laws, regulations and policies *(of which at least 50% are women)* 3 drafts finalized by the Regulations working group	- Workshop reports -List of participants -Knowledge assessment results at workshops - National Policies issued/ implemented - Workshop/ training reports - District-levels plans on formalization	**Risks** Inability or lack of capacity for governments to provide adequate support services **Assumptions** National, provincial and district governments work cohesively and ensure transfer of knowledge and utilize capacity to facilitate development of formalization strategies. Ugandan national government signs the 2020 Mining Bill and remains engaged in creating an enabling environment for formalization.	

Output 1.2. The jurisdictional and multi-stakeholder approach is piloted at selected ASGM mine sites at the local level.	? # of relevant stakeholders that have participated in workshops introducing JA *(women/men)* (output indicator 10.1) ? # of relevant stakeholders participating in multi-stakeholder group for JA *(women/men)* (output indicator 10.1) ? # of knowledge products/guidance document produced on JA/LA to strengthen formalization in ASGM sector (output indicator 4.1) ? # of multi-stakeholder groups for JA to support ASGM formalization launched (output indicator 11.2)	Jurisdictional and multi-stakeholder approaches for natural resource governance that go beyond traditional sector considerations have been successfully piloted in some countries but not yet in Uganda and not yet specifically in the ASGM sector.	**Mid-Point Target:** At least 20 of relevant stakeholders have participated in workshops introducing JA *(women/men)* **End of project Target:** At least 10 relevant stakeholders participating in regular meetings of MSG for JA *(women/men)* At least 1 knowledge product /guidance document produced on JA/LA to strengthen formalization in ASGM sector At least 1 multi-stakeholder-group (MSG) for JA support ASGM formalization launched	- Activity documentation - List of participants - Knowledge assessment results - Multi-sided platform developed	**Risks** Inability or lack of capacity for governments to provide adequate support services. **Assumptions** Ugandan government engaged in creating enabling environment for formalization. Ugandan government open to innovative governance approaches.	
Component 2: Financial Inclusion and Responsible Supply Chains						
Outcome 2	**Outcome Indicators**	**Baseline**	**Targets and Monitoring Milestones**	**Means of Verification**	**Assumptions & Risks**	**Link to SDGs**

Miners in Uganda accessed financial products to invest in mercury-free technologies.	? $ mobilized by buyers/refiners/mining companies for inventory financing/technical partnerships with ASGM operations (impact class 12) ? $ accessed by miners in targeted ASGM associations from new financial inclusion mechanisms *(women/men)* (impact class 12)	*Most actors working in the ASGM sector (and most importantly informal ones) have stated that their lack of access to finance has been an impediment to their ability to invest in increased production, mercury-reduction technologies and other responsible ASGM practices. Women are disproportionally lacking access to finance.*	**Mid-Point Target:** At least 50,000$ mobilized by buyers/refiners/mining companies for inventory financing/technical partnerships with ASGM operations At least 5,000$ accessed by miners in targeted ASGM associations from new financial inclusion mechanisms*(of which at least 50% by women)* **End of project Target*:*** At least 200,000$ mobilized by buyers/refiners/mining companies for inventory financing/technical partnerships with ASGM operations At least $45,000 accessed by miners in targeted ASGM associations from new financial inclusion mechanisms *(of which at least 50% by women)*	- Data from appropriate financial institutions or relevant mechanisms - Revolving fund management records -Transaction records of refiners - Surveys and interview	**Risks** Expectations from downstream actors are not compatible with the reality of ASGM operators. Financial services might be primarily accessed to cover other needs than mercury-free technologies. Financial illiteracy might increase the credit default rate of miners. **Assumptions** Governments engaged in creating enabling environment for transparent supply chain investments. Financial sector able to overcome barriers (perceived or real) to providing finance	*1.4 By 2030, ensure that all men and women, in particular the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance.* *8.10 Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all.*

Component 2 outputs	Output Indicators	Baseline	Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	Link to SDGs

Output 2.1. Increased access to finance through responsible supply chain mechanisms are made available to artisanal miners.	? # of kg of gold sold through formal market (originating from the project areas) (output indicator 3.2 as best practice adopted) ? # of buyers/refiners offered inventory financing (output indicator 12.2) ? # of ASGM actors (ASGM associations, traders, refiners) sensitized on OECD Due Diligence Guidance implementation and responsible sourcing *(women/ men)* (output indicator 10.1)	*No responsible supply chains with ASGM actors in targeted areas so far.*	***Mid-Point Target:*** 10 ASGM actors (ASGM associations, traders, refiners) sensitized on OECD Due Diligence Guidance implementation and responsible sourcing (i.e. planetGOLD criteria) *(women/ men)* **End of project Target:** At least 45 kg of gold sold through formal market (in the project areas, cumulative). At least 1 buyer/refiner offered inventory financing to project sites At least 30 ASGM actors (ASGM associations, traders, refiners) sensitized on OECD Due Diligence Guidance implementation and responsible sourcing i.e. planetGOLD criteria)*(women/ men)*	- Revolving fund management records -Transaction records of refiners - Surveys and interview - Export data - Surveys and interviews with downstream supply chain participants	**Risks** Expectations from downstream actors are not compatible with the reality of ASGM operators **Assumptions** Governments engaged in creating enabling environment for transparent supply chain investments Financial sector able to overcome barriers (perceived or real) to providing finance. Downstream actors show increased interest in buying mercury-free ASM gold ASGM perceive value in implementing OECD DDG.

Output 2.2. Increased access to finance through existing or new financial inclusion initiatives are made available to artisanal miners.	? # of financial inclusion mechanisms identified and/or implemented (output indicator 12.3) ? # of miners sensitized on new financial inclusion mechanisms *(women/men)* (output indicator 10.1) ? # of miners using new financial inclusion mechanisms (e.g. through organisation in savings groups, cooperatives etc.)*(women/men)* (output indicator 3.2) ? # of institutional partners reached with the aim of creating a financial inclusion mechanism for ASGM (output indicator 12.2)	*Lack of financial inclusion mechanisms is one of the main barriers to the development of non-mercury ASGM operations, especially female operators.*	**Mid-Point Target:** At least 1 financial inclusion mechanism *ident ified* for each district. 140 miners sensitized on new financial inclusion mechanisms (of which at least 50% are women) 3 institutional partners reached with the aim of creating a financial inclusion mechanism for ASGM **End of project Target:** At least 1 financial inclusion mechanism *impl emented* in each district. 650 miners sensitized on new financial inclusion mechanisms *(of which at least 50% are women)* 450 of miners use new financial inclusion mechanisms (e.g. through organisation in savings groups, cooperatives etc.) (*of which at least 50% are women*)	- Activity documentation - List of participants - Database of financing institutions - Surveys and interviews - Tools for investors	**Risks** Financial sector is unable to overcome barriers (perceived or real) to providing finance. **Assumptio ns** Identified investors are interested and engaged in potential ASGM investing Miners are willing to access finance and transition to mercury free process ASGM toolkit is produced on investment potential

Component 3: Enhancing uptake of Mercury-free technologies						
Outcome 3	**Outcome Indicators**	**Baseline**	**Targets and Monitoring Milestones**	**Means of Verification**	**Assumptions & Risks**	**Link to SDGs**

Miners in Uganda adopted mercury-free processing techniques.	? % of miners in targeted ASGM associations adopted mercury-free technologies via the project (*men/women*) (impact class 3) ? # of targeted ASGM associations that have implemented the planetGOLD environmental and social standard (impact class 3) ? X % increase of average monthly gold productivity with the use of mercury-free technologies (equals uptake) (impact class 3)	*Mercury continues to be traded and used in the ASGM sector. Alternative, mercury-free technologies are not always suitable for the realities of artisanal miners, and their benefits are not always clear to miners.*	***Mid-Point Target:*** At least 50% of targeted ASGM associations implemented the planetGOLD environmental and social standard ***End of project Target:*** 50% of miners in targeted ASGM associations adopted mercury-free technologies via the project *(of which at least 50% are women)* 100% of targeted ASGM associations have implemented the planetGOLD environmental and social standard 2% increase on average monthly gold productivity with the use of mercury-free technologies (equals uptake)	- Progress reports - Knowledge assessment results - planetGOLD compliance assessment.	**Risks** ASGM operators are unable/ unwilling to break their existing informal contractual arrangements and are unwilling to pay taxes. Miners are unwilling to take up mercury-free practices because of mistrust of (real or perceived) lack of efficiency of those methods. Better practices are adopted during the project and then abandoned by miner groups once the project support stops. **Assumptions** Miners endorse the conversion to mercury-free gold processing methods.	*3.9 By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination*

Component 3 outputs	Output Indicators	Baseline	Targets and Monitoring Milestones	Means of Verification	Assumptions & Risks	Link to SDGs
Output 3.1. ASGM stakeholders increased their awareness about mercury and the importance of its reduction.	? # of institutions identified/trained to carry out training on mercury sensitization (output indicator 10.1) ? # of sensitization and training tools developed (output indicator 3.2) ? # of miners in project areas sensitized on harmful effects of mercury *(women/men) (*output indicator 10.1)	*Many ASGM operators lack knowledge about the negative health and environmental impacts of mercury use.*	***Mid-Point Target**:* At least 4 of institutions identified to carry out training on mercury sensitization 1 set of training curricula developed At least 750 miners in project areas sensitized on harmful effects of mercury *(of which at least 50% are women)* ***End of project Target:*** At least 2000 miners in project areas sensitized on harmful effects of mercury *(of which at least 50% are women)*	- Progress report - Finalized curricula and training materials - Knowledge assessment results - Surveys and interviews	**Risks:** Varying levels of education and literacy amongst mineworkers causing differences in the ability to enhance knowledge and capacity Women are unable to participate in training or access equipment due to gendered biases **Assumptions:** Suitable participants for ASGM training are selected Training strategies are suitable for target participants	

*Output 3.2*Artisanal miners are capacitated with better ASGM practices (including environmental and gender equitable aspects) for both women and men at selected ASGM mine sites at the local level.	? # of completed planetGOLD Environ-mental and Social Risk Assessment Reports and Mitigation Reports (output indicator 2.1) ? # of miners in targeted ASGM associations trained on planetGOLD Environmentally and Socially responsible criteria, including mercury-free technologies (output indicator 10.1) ? # of Hg-free processing systems in ASGM target associations installed (output indicator 3.1) ? # quantity of mercury reduced and avoided (output indicator 1.1)	*Information is not completely available and not properly synthesized in a useful manner for ASGM sites. ASGM operators lack knowledge about and access to alternative, mercury-free technologies*.	***Mid-Point Target**:* At least 100 of miners trained on planetGOLD Environmentally and Socially responsible criteria, including mercury-free technologies*(of which at least 50% are women)* No mid-term target for mercury reduction as proposed intervention will take time to measure results ***End of project Target:*** At least 300 of miners trained on planetGOLD Environmentally and Socially responsible criteria, including mercury-free technologies*(of which at least 50% are women)* 2 Hg-free processing systems in ASGM target associations installed 210 kg of mercury reduced (in the project areas) 15 tons of mercury avoided including other ASGM sites, by replication and uptake at project end (through the global project, additional 45	- Detailed assessment and contextual study - Progress report - Finalized curricula and training materials - Knowledge assessment results - Surveys and interviews - Agreement with relevant institutions - Commissioning reports from ASGM processing systems	**Risks** Men and women are not interested in or are unable to participate in training or in taking up better practices. Varying levels of education and literacy amongst mineworkers causing differences in the ability to enhance knowledge and capacity. Women are unable to participate in training or access equipment due to gendered biases. Delays in importation of equipment. **Assumptions** Suitable participants for ASGM training are selected

Component 4: Knowledge sharing, communication and local capacity building support						
Outcome 4	? Outcome Indicators	**Baseline**	**Targets and Monitoring Milestones**	**Means of Verification**	**Assumptions & Risks**	**Link to SDGs**
Information and knowledge shared led to improvement in the management of ASGM sector in Uganda.	? # of beneficiaries changing their practices as a result of improved awareness (impact class 8)	*Information is scattered among the different locations and not properly organized in a useful manner to ASGM stakeholders.*	***End-Point Target:*** 2000 direct beneficiaries changing their practices		**Risks** Coordination between various ASGM initiatives on the ground Lack of political will to communicate continued commitment.	
Component 4 outputs	**Output Indicators**	**Baseline**	**Targets and Monitoring Milestones**	**Means of Verification**	**Assumptions & Risks**	**Link to SDGs**

*Output 4.1.*Knowledge products and tools developed through the project are made available nationally to all GEF planetGOLD project stake-holders in Uganda.	? % of completion on delivery of communications materials produced and disseminated that follow planetGOLD branding, style guide and messaging guide (output indicator 8.1) ? # of Ugandan project institutional/corporate stakeholders reached with information, education, and communication (IEC) materials (output indicator 10.1) ? # blogs, news articles, events, photo essays, videos, etc published on planetgold.org or on other planetGOLD digital communication platforms; # hits on website (output indicator 9.3) ? # of beneficiaries accessing published/available knowledge generated from components 1,2, and 3 (output indicator 8.2)	Currently Uganda does not have an organized country-level communication platform.	***Mid-Point Target:*** At least 4 communi-cations materials produced and disseminated that follow planetGOLD branding, style guide and messaging guide (40% completion) At least 10 Ugandan institutional/corporate project stakeholders reached with IEC materials and other awareness raising tools At least 5 blog posts, news articles, events, photo essays, videos, etc on planetgold.org or on other planetGOLD digital communication platforms; at least 25 hits on website per year ***End-Point Target:*** At least 8 communications materials produced that follow planetGOLD branding, style guide and messaging guide (100% completion) At least 20 Ugandan institutional/corporate project	Communication strategy/plan - IEC Materials developed - Website - Distribution list of IEC materials - Website data - Websites developed - Articles published in knowledge hub - Incentives developed	**Assumptions** Interest by the ASGM stakeholders at the local, national, and international levels remain high Programme stakeholders are willing to use the branding assets

*Output 4.2.*Knowledge products and tools developed through the project are available globally through the GEF planetGOLD programme.	? # of project representatives participate in each planetGOLD global forum and annual programme meeting ? # of project experts that participate in regular (~quarterly) knowledge exchange meetings to share relevant approaches and information with other country projects ? # of knowledge products produced and disseminated (in relation to components 1, 2 and 3)		***Mid-Point Target:*** At least 2 national project representatives participate in each planetGOLD global forum and annual programme meeting At least 3 project experts that participate in regular (~quarterly) knowledge exchange meetings to share relevant approaches and information with other country projects ***End of project Target:*** At least 2 project representatives participate in each planetGOLD global forum and annual programme meeting At least 3 project experts that participate in regular (~quarterly) knowledge exchange meetings to share relevant approaches and information with other country projects At least 3 knowledge products produced (in relation to components 1, 2	- Activity documentation - List of participants - journals, platforms - ASGM relevant related websites, groups and association	**Assumptions** Interest by the ASGM stakeholders at the local, national, and international levels remain high. Relevant information can be synthesized in a manner that is useful to a variety of ASGM stakeholders.

[1] With the introduction of the Ugandan Mining Bill, the definition of what a ?formalized miner? means will necessarily shift, from a terminology that is simply acknowledging a biometric registration (Baseline data is based on this definition) to a terminology that will consider various subsets of conditions (enrolment of miners in collectives, individual and collective permits and registrations, individual and collective payment of taxes, etc.).

[2] and [3] ?National Action Plan for Artisanal and Small-Scale gold Mining in Uganda, in Accordance with the Minimata Convention on Mercury?, p. 71

[4] As the registration of miners following the current legislative process is ongoing, the EA will establish baseline values during the baseline study amongst the miners of the target areas.

[5] As per ratio Hg:Au established for Uganda (2.96 rounded here to 3; see ?National Action Plan for Artisanal and Small-Scale gold Mining in Uganda, in Accordance with the Minimata Convention on Mercury?, p. 73).

[6] Based on targets of $100,000 of inventory financing per participating mining association (2 in total for output 2.1, *totalling $200,000*) and 450 miners mobilizing new financial mechanisms at an amount of $100/person (output 2.2, *totalling $45,000*).

ANNEX B: RESPONSES TO PROJECT REVIEWS (from GEF Secretariat and GEF Agencies, and Responses to Comments from Council at work program inclusion and the Convention Secretariat and STAP at PIF).

USA		
Project (Country)	**Comment**	**Agency Response**

Suriname	**Within the Suriname child project, we would like clarity on the significant discrepancy between the cited amount of total annual mercury release from ASGM (0.086 MT) and the project target of reducing Hg use by 6 MT over 4 years.**	
Suriname	**Also, in Suriname project, in the next iteration of the child project we would like to see coordination with the U.S. Department of State project also working on ASGM and mercury-free technologies.**	

Republic of Congo	**Within the Republic of Congo child project, the executing agency is the Basel Convention Regional Center in Dakar, Senegal, justified by its expertise in implementation of chemical conventions. We are concerned that the proposed executing agency is not in-country, and additionally has very little experience with Minamata Convention nor with ASGM, or with biodiversity, the other focus of this program. We would like to understand better the choice of this executing agency, and what alternatives exist.**	**After consultation with the National Counterparts, The Republic of Congo child project will be executed by the Centre Africain pour la Sante Environnementale (CASE) based in Abidjan, Cote d?Ivoire. CASE will set up an office in Brazzaville. CASE has the required expertise and experience as it is already an executing agency for UNEP on ASGM project and it has supported the development of the NAP in the Republic of Congo (contracted by the executing agency).**

Nigeria	**Within the Nigeria child project, the executing agency is also the Basel Convention Coordination Center for Africa Region. While they are at least based in Nigeria, we have similar concerns as above about their suitability for these issues, including if they have the contacts or substantive understanding of the ASGM sector to effectively manage the projects. We understand the EU is supporting an effort across Africa to build capacity in the small-scale mining sectors, especially of the geological survey agencies. This may be a more effective way to make progress on mercury in ASGM.**	**The comment is acknowledged, and the team would like to clarify that the execution arrangements involving the Basel Convention Coordination Center for Africa Region (BCCC-Nigeria) considered and endorsed at the concept stage were discussed during the project preparatory phase.** **The project decision-making committee (incl. relevant Ministries, private sector stakeholders, representatives of the mining sector and UNIDO) concluded during the preparatory phase that a combination involving national executing partners (Federal Ministry of Environmental FMENV and Federal Ministry of Mines and Steel Development FMMSD) and the BCCC-Nigeria would be the most appropriate approach.** **The BCCC-Nigeria will be involved as a co-executing partner in particular regarding their specific international experience on jurisdictional approaches.** **The proposed institutional and execution arrangements are explained in the CEO Endorsement Document.**

Madagascar	**Within the Madagascar child project, the project includes $2 million of recurring expenses from the MEDD. It is our understanding that their budget has recently been significantly downsized, and we would request confirmation of this support in the next iteration of project development.**	**The MEDD has confirmed $3 million co-financing contribution for the GOLD+ Madagascar project.**

Madagascar	**Also, within the Madagascar child project, we would like further information in the next iteration of the project on the justification for selecting GIZ as a basis to build on. They are mentioned as an ?excellent basis for the proposed GOLD+ Madagascar project to build on?, since GIZ has a very small-scale mining component under their Programmed?Appui ? la Gestion de l?Environnement or PAGE Programme. However, we understand that GIZ does not cover all the areas that will be covered by this project and have a distinct domain of expertise and experience than this project, namely in fair-trade affiliated very small-scale mining.**	**At the time of project submission, the PAGE Programme delivered outputs that have systemic importance for the GOLD+ Madagascar Project: a) Support to the Ministry of Mines and Strategic Resources? five-year sustainable development strategy for the ASGM sector (SDDEMAPE); b) Roadmap for responsible ASGM in Madagascar, including an action plan for the professionalization of artisanal miners through the implementation of a ?Fairmined Malagasy? certification and traceability system; and c) Introduction of practices that could lead to Fairtrade certification in ASGM pilot sites.** **While the GOLD+ Madagascar project has a broader scope, the SDEEMAPE strategy and ASGM roadmap have been included in the project design.** **During the GOLD+ Madagascar inception phase, the project team will explore whether the activities carried out by the PAGE programme can be replicated and/or scale up across the GOLD+ Project sites.**

Madagascar	**We look forward to greater clarity on CSO involvement in the next iteration. This will also be critical, given ongoing efforts at mining code reform in Madagascar. CSOs were very active during the government ?s efforts to reform the mining code at the end of 2019. Related, are there planned contributions from this project to ongoing efforts for mining code reform, and/or considerations for the potential implications of reform for the implementation of this project?**	**CSOs will be involved in the following areas: a) improvement of gold supply chain; b) waste management in ASGM sites; c) advocacy and awareness raising on the extractive sector in Madagascar and health and environmental risks related to the use of mercury; d) development of skills at the national level; e) development and implementation of education strategy for ASG miners; and f) awareness raising on good governance of natural resources.** **The GOLD+ Madagascar project, under its component 1, will work jointly with national authorities and ASGM stakeholders to identify gaps and opportunities across policy and regulatory framework (incl. the Mining Code). Where appropriate, the Project will provide technical support to strengthen legislative and capacity gaps in relation to formalization.**

Madagascar	**Finally, in the next proposal iteration, we would like to better understand the relationship between the proposed activities and the MECIE (Mise en Compatibilit ? des Investissements avec l'Environnement). We understand that the proposed activities are subject to environmental impact study and approval of an environmental commitment program, subject to this decree, but did not see this referenced within the project documents.**	**The project has allocated funds in the budget plan and developed the ToR to carry out an Environmental and Social Impact Assessment (ESIA) of the proposed activities in the selected mining sites as required by the Mining Code No. 99-022 of 19 August 1999 and as amended by Law No. 2005-021 of 17 October 2005.**

Congo & Uganda	**The child projects for Congo and Uganda should coordinate with current gold formalization and supply chain efforts by the International Conference on the Great Lakes Region (ICGLR), of which both Uganda and Congo are members. http://www.icglr-rinr.org/index.php/en/. The ICGLR was also instrumental in the establishment of the OECD Due Diligence Guidance, which is a key supply chain component for this program. Up to this point, there has not been much focus on mercury in the PPA, mostly due to lack of funding for the specific issue. We strongly encourage coordination with this strong Partnership working on ASGM in this region of Africa, and further encourage coordination**	**In Uganda, the Executing Agency has a strong relationship with and significant work experience with the ICGLR. IMPACT has been a technical partner to the ICGLR for a decade. IMPACT is also a member of the PPA, and a staff member of IMPACT (who will be a team member of the project) is currently a member of the Governance Committee of the PPA. This offers an excellent opportunity to support the Ugandan government and other stakeholders in the project to create greater linkages with these various initiatives and bodies (note that the Ugandan government has already been active in both the ICGLR and the OECD through the Ministry of Mines (notably DGSM)** **In the Republic of Congo, the Ministry of Environment as chair of the project?s steering committee will ensure that the development of the project benefits and shares synergies from the ICGLR experiences, not only in the field of ASGM formalization but also in terms for forest resources management as it has been identified as feature of importance in the Congo child project. Links with the Congo Basin Programme have also been established.** **Finally, OECD is a strong partner and co-financer of the global project of planetGOLD.**

Global	**Overall, for Program component 6, Global coordination, knowledge management and outreach, there seems to be a lack of focus on the private sector gold buyers and users. Large companies (refiners, jewelers, electronics) can benefit from GOLD+ data and other insights as they increase implementation of gold sourcing due diligence programs. If this program can better consider and be sensitive to ongoing private sector due diligence policies and programs, then the program?s sustainability can be greatly amplified. Eventually, funding for these types of projects, and demand for responsible mercury free gold, will come from the downstream supply chain.**	**Refiners and jewelers are active members of the Programme Advisory Group of the current planetGOLD which will be continued under GOLD+. Private sector has been fully involved in the development of the planetGOLD criteria.**

Global	**A related supply chain concern is that in our view, the current program potentially hides supply chain issues under the ?lack of access to finance? heading. While they are related, lack of access to finance is not completely a supply chain question, and vice versa. Critical supply chain issues that should be considered include transparency, customs and trade, consumer demand (how do we mainstream responsible gold for the final consumer), responsible production, and coordination with company due diligence measures (OECD DDG). To couple these supply chain issues with another large issue like access to finance dilutes the importance of both of these barriers.**	**The comment is duly noted and will be taken into consideration where applicable.**

GERMANY		
Madagascar	In Madagascar, apart from the BMZ/GIZ PAGE project already mentioned further synergies could be generated with the ProD?CID project. The ProD?CID project works on anti-corruption at national scale as well as on community development (community service, finance and local economic development) in the regions Analamanga, Boeny and DIANA in Madagascar. GER therefore kindly asks to consult the PAGE and the ProD?CID project during the further project preparation phase.	The ProD?CID project has been identified as a potential partner for piloting jurisdictional approaches within the Malagasy ASGM sector. During the inception phase, ProD?CID staff (national and DIANA-based) will be involved. BMZ/GIZ PAGE project staff and other relevant stakeholders (Focal Point, Gender Officer and Head of DIANA) were consulted during the project preparatory phase and will be involved in the implementation phase as well. Formal collaboration agreements with both initiatives will be explored, and synergies between the GOLD+ Project and the activities planned under both ProD?CID and PAGE Phase 2 will be pursued.

Madagascar	**In addition, the project proposal points out on page 9 that there is a Co-Finance/ grant investment of 8,631,495 USD from GIZ?s PAGE project. This information is incorrect. GIZ PAGE is not a donor of the upcoming project, but the implementing agency. Therefore, GER kindly asks to list the Federal German Ministry for Economic Cooperation and Development (BMZ) as the donor agency with the GIZ as the implementing agency.**	**The comment is duly noted, and changes will be done where applicable.**

Honduras	**In Honduras, the German Civil Peace Service (CPS) works on environmental conflicts and might be a relevant stakeholder/ partner for cooperation.**	
Uganda	**In Uganda, the BMZ/GIZ project Responsible Fisheries Business Chains Project (RFBC) is interested in cooperating around the issue of tracing mercury in fish in Lake Victoria.**	**Outreach with BMZ/GIZ will be carried out to identify potential synergies and opportunities for collaboration. The Executing Agency has already engaged representatives from GIZ who are responsible for supporting the ICGLR to share information about the project and will broaden this engagement to those involved in the RFBC.**
Global	**To include the international multi-stakeholder working group on Women and Mining (www.womenandmining.org) as a global knowledge-sharing partner on gender aspects of the proposal.**	**Noted and included.**

Global	**Education institutions appear in the Sources of Co-financing but are not specifically mentioned as stakeholders. Please include them.**	**Noted and updated.**

Global	**Monitor the outcome additional environmental parameters could be added such as monitoring the mercury concentrations in fish and/or along the food chain in the affected areas. The evaluation of the GEF GOLD program has noted that other issues (apart from mercury pollution) caused by ASGM (e.g. deforestation, harmful replacement technologies, child labour, indigenous peoples rights) could have been better addressed. While they cannot be accurately assessed before sites have been selected, Germany asks the project to fully consider these risks and to ensure co-benefits once possible.**	**The comment is duly noted, and changes will be made where applicable. All country level projects have been instructed to analyze co-benefits. Please see individual country level comments for details.**

Global	**According to the evaluation of the GEF GOLD program the reduction of mercury use after project completion varies significantly in different project regions. In light of these results, Germany appreciates further clarification on whether the application of a uniform replication factor for all countries is appropriate. In the current proposal the replication factor after project completion is 3. The final project proposal should state how obstacles for replication identified in the evaluation (e.g. lack of government enforcement of mercury bans, lack of training and lack of availability of replacement parts for nonmercury technology) will be tackled by the project.**	**Since each country has their own reduction target, in-country replication through component 4 and continuation/replication of project interventions at project sites would lead to doubling of the target. Furthermore, dissemination to neighboring countries and global knowledge sharing efforts through the global project would lead to another level of reduction equivalent to the original target. Therefore, in sum, the programme target is 3 times the country's specific reduction target.**

Switzerland		
Global	**We welcome this program, but it is unclear to us, how the lessons learned from the GEF GOLD Program were included in the design of the GEF GOLD+ Program. Institutional Learning is key to us, so could you clarify how this program builds on the lessons learnt on AGSM in particular from the GEF GOLD Program so far?**	**The GEF GOLD agencies have been fully involved in the development of the CEO endorsement document.**

Global	**Page 16, Para 41: It is estimated that nearly 100% of all mercury used in ASGM is released into the environment (Global Mercury Project, UNIDO 2007). Is there no more recent literature you could quote for this?**	**Response Pending**
Global	**Page 17, Para 44: the access to finance for the transition to mercury free practices in the ASGM sector is a key challenge in particular in the informal sector, but it is unclear to us how GEF GOLD+ will tackle this challenge after the GEF GOLD program has already addressed this challenge and was not fully successful.**	**Comment is duly noted. Please see country level ProDocs for details on country specific financial mechanisms.**

Global	**Component 2: Please further clarify more specifically which concrete measures will be taken to include responsible supply chains and traceability in the program, since we consider them as key.**	**PlanetGOLD criteria was designed to guide traceability and supply chain criteria for the program. The criteria can be found here: https://www.planetgold.org/sites/default/files/planetGOLD_Criteria_for_Environmentally_and_Socially_Responsible_Operations_Feb21.pdf**

Global	**Please further elaborate how you will ensure the sustainability of the program. The information contained is very limited. Please e.g. add an element on institutional strengthening, since we consider this to be crucial for the sustainability of the program. Governments often do not issue any regulation for ASGM or issue last minute regulations which often leads to an even larger illegal / informal ASGM sector. Institutional intermediary steps and well thought through policies are key for the long-term success.**	**Response Pending**

Global	**Could you clarify what will happen with the mercury still in use at this stage and the various mercury waste stocks in the ASGM areas of the recipient countries of the program? Where will the mercury waste be treated and by whom? Who will transport it? The treatment of the waste is key to ensure that the mercury intake to the environment will be avoided / limited as much as possible.**	**The comment is duly noted. Please reference individual country ProDocs for details regarding in country mercury protocols.**
STAP		

Global	**Section B of the PIF indicates that the project will have six components. However, Section 3 of the PIF (the proposed alternative scenario) only presents four components. The components on "monitoring and evaluation of country-level child projects" and that on "global coordination, knowledge management, and outreach" are not described. These are essential parts of the project and should be fully presented.**	**To clarify, the country level child projects have 4 components, while the Global child project has 2, totaling 6 components. The Global child project will focus on global coordination and knowledge management. Each country level project has reporting requirements at the global level as well as individual M&E resources for the respective projects.**

Global	**The project will adopt the jurisdictional approach (JA) as a framework for structuring interventions. The second paragraph on page 28, however, highlights some of the challenges associated with the JA, including unrealistic expectations, political turnover, limited public sector capacity, and lack of broader support and incentives. Yet, the PIF is silent on how the project will overcome these challenges to ensure success. STAP recommends that this should be done.**	**This comment is duly noted and additional information regarding how the JA approach will be piloted is included in the ProDoc. Through the jurisdictional approach, the market- and policy-based interventions could be bridged for greater impact on the ground. This includes encouraging governments, businesses, local communities, and NGOs to work together towards common goals, such as improving local livelihood, eliminating mercury and maintaining natural ecosystems through coordinated strategies across the sector. By involving and educating all the relevant actors across the ASGM landscape, the efforts to improve the perception of the ASGM sector, including raising awareness about the challenges and opportunities the miners are facing, can be magnified.**

Global	**Component 4 will support capacity building, knowledge sharing, and communication, including "using online education and digital marketing tools to support the traditional participatory workshop and training model to help institutionalize sustainable mining methods at the community level." It is, however, unclear how online education and digital marketing tools will be used given the remoteness of ASGM operations. Does this project intend to provide digital access to ASGM miners? The details of how this component will be achieved need to be elaborated.**	**Response Pending**

	Further clarification is needed on replication estimates of the global environmental benefits. A reduction of 70 metric tons in mercury use is expected in the participating countries. Another 210 metric tons is expected via replication. It is, however, unclear if the replication will occur in the participating countries or whether it will occur indirectly through the transfer of knowledge from this project to other countries (given the global nature of the project). This needs to be clarified. Also, how was the replication factor of 3 determined?	**GEF investments are predicated on the delivery of global environmental benefits in biodiversity, climate change mitigation, international waters, land degradation and chemicals and waste. The global project will support child project countries in their efforts to achieve an aggregate of more than 129.138 metric tonnes reduction in mercury and engage more than 202,500 direct beneficiaries over a 5-year period through sharing lessons. It is expected that mercury use reduction will be replicated through sharing lessons on the planetGOLD platform, webinars at national and global level. As such, it is anticipated that through technology replication, additional mercury will be reduced attributed to lessons learned. After 10 years following the project, it is anticipated that a replication by a factor of 3 will be achieved, representing an additional 387.414 metric tonnes reduction in mercury globally. These activities in the reduction of mercury use are directly aligned with GEF?s long term goal of curbing the exposure of humans and the environment to harmful chemicals through a significant reduction in the use and release of mercury. Since each country has their own reduction target, in-country replication through component 4 and continuation/replication of project interventions at project sites would lead to doubling of the target. Furthermore, dissemination to neighboring countries and global knowledge sharing efforts through the global project would lead to another level of reduction equivalent to the original target. Therefore, in sum, the programme target is 3 times the country's specific reduction target.**

	It is good that the PIF acknowledged that the project would contribute to other GEF core indicators, including the area of land restored, area of landscapes under improved practices, and greenhouse gas emission reduction. The PIF did not, however, present clearly how the interventions will lead to these benefits. We encourage that the project proponent elaborates further on this and provide a detailed estimation of all expected GEBs at the PPG stage.	**The comment is duly noted, and changes will be made where applicable. All country level projects have been instructed to analyze co-benefits. Please see individual country level comments for details.**

	For a project that will depend on significant multi-stakeholder engagement for its success, the stakeholder section of the PIF is inadequate. Please provide a detailed analysis of stakeholders expected to be engaged in the project in the participating countries. Please, also highlight how they will be engaged, their expected role in the project, and whether they have been engaged already or if this is ongoing.	**The comment is duly noted, and a detailed stakeholder engagement plan has been included in CEO endorsement submission.**

	It is good that the PIF acknowledges the potential impacts of projected climate change, for example, desertification on on achieving project objectives. The effects of climate change may also influence decisions on ASGM sites? We recommend that a detailed analysis of climate risk and management strategy should be presented for the project.	**The comment is duly noted. Please reference country level ProDocs for respective climate risks analysis.**

ANNEX C: Status of Utilization of Project Preparation Grant (PPG). (Provide detailed funding amount of the PPG activities financing status in the table below:

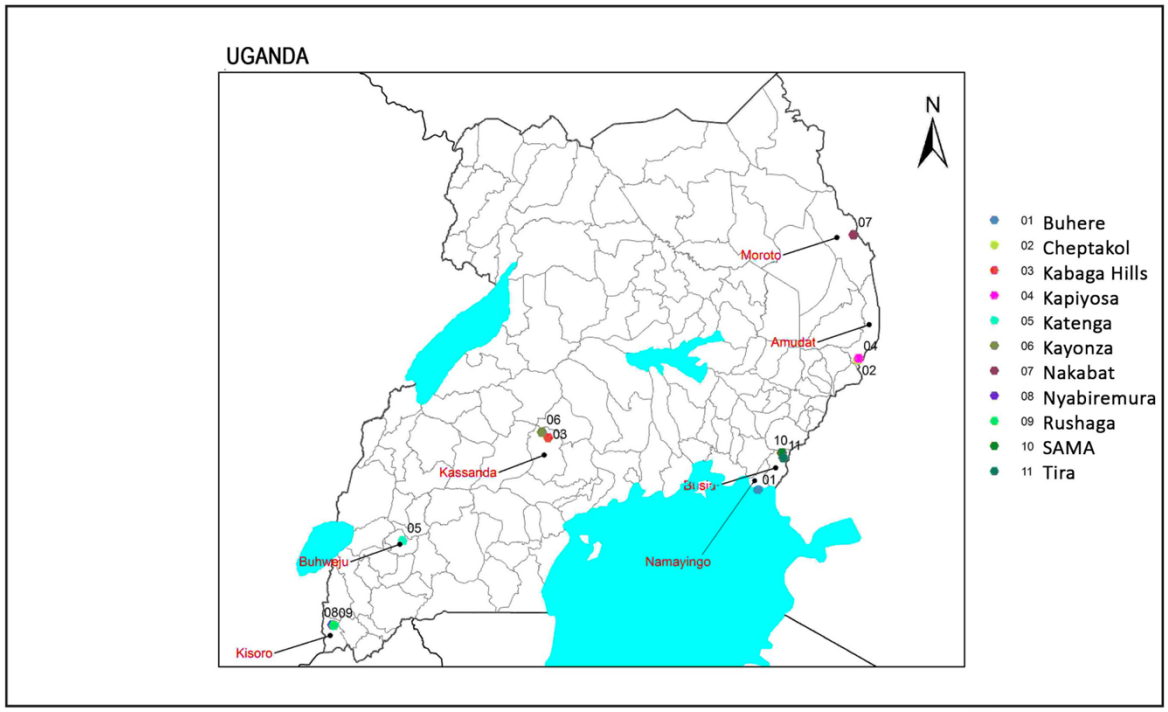
Project Preparation Activities Implemented	*GETF/LDCF/SCCF Amount ($)*		
	Budgeted Amount	*Amount Spent To date*	*Amount Committed*
Subcontract to Impact	**150,000**	**104,788.77**	**5,211.23**

ASGM Consultants	**50,000**	**11,111.75**	**28,288.25**
Total	**150,000**	**127,012.27**	**22,987.73**

ANNEX D: Project Map(s) and Coordinates

Please attach the geographical location of the project area, if possible.

Global Opportunities for the Long-term Development of ASGM (GOLD+) in Uganda



The designations employed and the presentation of material on this map do not imply the expression of any opinion whatsoever on the part of the Secretariat of the United Nations concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries

This map is intended for illustrative purposes only and should NOT be used to derive any information regarding the project's operations. No activities planned in any disputed territories

Number	Location	Coord1	Coord2
1	Buhere	0.166680833	33.81669
2	Cheptakol	1.44919	34.78881
3	Kabaga Hills	0.69619	31.77858

4	**Kapiyosa**	**1.46573**	**34.80209**
5	**Katenga**	**-0.303622**	**30.35963**
6	**Kayonza**	**0.7500925**	**31.71691**
7	**Nakabat**	**2.666721389**	**34.75005**
8	**Nyabiremura**	**-1.12096**	**29.67555**
9	**Rushaga**	**-1.1275**	**29.69226**
10	**SAMA**	**0.54864**	**34.0526**
11	**Tira**	**0.500195556**	**34.06688**

ANNEX E: Project Budget Table

Please attach a project budget table.

			BUDGET ALLOCATION BY PROJECT COMPONENT/ACTIVITY *						
			Project Component 1: Formalization	**Project Component 2: Market Access**	**Project Component 3: Improved practices**	**Project Component 4: Communication**			
			Component 1	**Component 2**	**Component 3**	**Component 4**	**PMC**	**M&E**	**Total**
UNEP BUDGET LINE/OBJECT OF EXPENDITURE								US$	**US$**
10	**PROJECT PERSONNEL COMPONENT**								
	1100	**Project Personnel**							
	1101	Project Management Support					164,600		**164,600**
	1102	Knowledge Transfer/Capacity Development Expert	44,750	44,750	44,750	44,750			**179,000**
	1103	Gender and Inclusion Officer	40,000	45,000	45,000	31,000			**161,000**
	1104	Senior Governance, Legal and Regulatory Advisor	244,970						**244,970**

	1105	Responsible ASGM Advisor		212,870					**212,870**
	1106	Local Environmental Advisor			165,570				**165,570**
	1107	Gender and Inclusion Training Specialist	40,000	22,500	20,000	7,500			**90,000**
	1108	ASGM Procurement, Logistics and Supply Chain Expert		37,500	56,500	5,000			**99,000**
	1109	Senior Communication Expert	12,500	7,500	12,500	60,000			**92,500**
	1110	Association/Cooperative Capacity Building Expert(s)		75,000					**75,000**
	1111	Training and Sensitization Coordinator	50,000	12,500	40,000				**102,500**
	1112	Downstream Engagement Expert		60,000					**60,000**
	1113	Financial Inclusion Expert		30,000					**30,000**
	1200	**Consultants**							
	1201	Communications Consultant	25,000	5,000	12,500	75,000			**117,500**
	1202	ASGM Association Technical Support Consultants		200,000					**200,000**
	1203	Formalization Expert (s)	80,000						**80,000**
	1204	JA/LA Approach Advisor	20,000						**20,000**
	1205	Training Specialist (s)	20,000	80,000	25,000				**125,000**
	1206	Access to Financing Specialist(s)		75,000					**75,000**
	1207	SAP RSM Trainer(s)		30,000					**30,000**
	1208	ASGM Business Model Expert		18,000					**18,000**
	1209	Senior ASGM Technical Advisor(s)			83,000				**83,000**
	1210	Senior Environment Advisor			80,000				**80,000**
	1299	Sub-Total	577,220	955,620	584,820	223,250	164,600	0	**2,505,510**
	1300	**Administrative support**							
	1301	Finance Officer*					40,904		**40,904**
	1302	HR, Procurement and Administration officer*	72,024	72,024	72,024	72,024			**288,096**
	1399	Sub-Total	72,024	72,024	72,024	72,024	40,904	0	**329,000**
	1600	**Travel on official business (above staff)**							

	1601	Travel	54,700	81,400	45,000	37,800			**218,900**
	1699	Sub-Total	54,700	81,400	45,000	37,800	0	0	**218,900**
	1999	**Component Total**	**703,944**	**1,109,044**	**701,844**	**333,074**	**205,504**	**0**	**3,053,410**
20	**SUB-CONTRACT COMPONENT**								
21	**2100**	**Subcontract (UN organization)**							
	2199	Sub-Total							
22	**2200**	**Sub-contracts (SSFA, PCA, non-UN)**							
	2201	Communications (formatting, layout, design, illustrations, etc.)	29,500	26,000	45,000	56,000			**156,500**
	2202	Local consultants (data collection, M&E)	5,000	5,000	5,000	5,000			**20,000**
	2203	Local community-based consultants/organizations (NGOs, universities, etc.)	57,000	90,000	175,000				**322,000**
	2204	JA/LA assessments (SWOT Analysis)	120,000						**120,000**
	2205	Responsible Sourcing Assessment		25,000					**25,000**
	2299	Sub-Total	211,500	146,000	225,000	61,000	0	0	**643,500**
	2999	**Component Total**	**211,500**	**146,000**	**225,000**	**61,000**	**0**	**0**	**643,500**
30	**TRAINING COMPONENT**								
	3200	**Group training (field trips, WS, etc.)**							
	3201	Expert group training (formalization)	88,000						**88,000**
	3202	Expert group training (market access)		90,000					**90,000**
	3203	Expert group training (improved practices)			88,000				**88,000**
	3299	Sub-Total	88,000	90,000	88,000	0	0	0	**266,000**
	3300	**Meetings/conferences**							
	3301	Formalization/jurisdictional approach meetings	75,500						**75,500**
	3302	Financial Inclusion/Responsible ASGM		32,500					**32,500**

	3303	Improved mercury-free practices			12,500				**12,500**
	3304	Communication / Knowledge sharing meetings/workshops (including national workshops and inception workshop)				76,000		15,000	**91,000**
	3305	Project Steering Committee Meetings (annual)						50,000	**50,000**
	3306	International meetings, conferences, events (GEF, planetGOLD, UNEP, etc.)				76,000			**76,000**
	3399	Sub-Total	75,500	32,500	12,500	152,000	0	65,000	**337,500**
	3999	**Component Total**	**163,500**	**122,500**	**100,500**	**152,000**	**0**	**65,000**	**603,500**
40	**EQUIPMENT & PREMISES COMPONENT**								
	4100	**Expendable equipment (under 1,500 $)**							
	4101	Office supplies (paper, ink, pens, folders, staples, etc.)					18,400		**18,400**
	4102	Office equipment (computers, printer, headsets, monitors, mouses, etc.)	9,250	11,750	11,750	10,250			**43,000**
	4103	Office furniture (desks, chairs, monitor stands/raisers, etc.)	5,500	8,500	8,000	6,500			**28,500**
	4104	PPE / Small Equipment			70,000				**70,000**
	4105	Cell phones / tablets / laptops (M&E data collection, support to ASGM associations, RSM pilot, etc.)		15,000					**15,000**
	4106	Office costs Uganda (rent, utilities, communications costs, etc.)	53,700	53,700	53,700	53,700			**214,800**
	4107	Organizational Operational Costs Specific to the Project (project-related general audit costs, professional fees, etc.)	26,250	26,250	26,250	26,250			**105,000**
	4199	Sub-Total	94,700	115,200	169,700	96,700	18,400	0	**494,700**
	4200	**Nonexpendable equipment (beyond 1,500$)**							**0**

	4201	Hg Free Systems (including pilot equipment, installation & maintenance costs)			400,000				**400,000**
	4202	Local transportation and fuel	18,500	12,500	14,500	22,500			**68,000**
	4299	Sub-Total	18,500	12,500	414,500	22,500	0	0	**468,000**
	4999	**Component Total**	**113,200**	**127,700**	**584,200**	**119,200**	**18,400**	**0**	**962,700**
50	**MISCELLANEOUS COMPONENT**								
	5200	**Reporting costs (publications, maps, NL)**							
	5201	Translation of essential documents	23,375	23,375	23,375	23,375			**93,500**
	5299	Sub-Total	23,375	23,375	23,375	23,375	0	0	**93,500**
	5300	**Sundry (communications, postage, etc)**							
	5301	Communication, postage, freight, etc.					4,000		**4,000**
	5302	Closing costs (e.g. mailing files, records, etc.)					4,000		**4,000**
	5303	Computer software, anti-virus, cloud storage, conference call licenses, etc.	8,848	8,848	8,848	8,848			**35,390**
	5399	Sub-Total	8,848	8,848	8,848	8,848	8,000	0	**43,390**
	5500	**Evaluation**							
	5501	Mid-term evaluation (UNEP)						30,000	**30,000**
	5502	Final Evaluation (UNEP)						40,000	**40,000**
	5503	Final Audit					30,000		**30,000**
	5599	Sub-Total	0	0	0	0	30,000	70,000	**100,000**
	5999	**Component Total**	**32,223**	**32,223**	**32,223**	**32,223**	**38,000**	**70,000**	**236,890**
	TOTAL		**1,224,367**	**1,537,467**	**1,643,767**	**697,497**	**261,904**	**135,000**	**5,500,000**
			5,103,096				**261,904**	**135,000**	
			5,500,000						

*Project components 1,2, and 3 will require many national and international contracts and component 4 will have substantial organization of national workshop/meetings, therefore, the HR/Procurement/Administration Officer have been charged against outputs. The Finance Officer is charged to the PMC to report on these expenditures.

ANNEX F: (For NGI only) Termsheet

Instructions. Please submit an finalized termsheet in this section. The NGI Program Call for Proposals provided a template in Annex A of the Call for Proposals that can be used by the Agency. Agencies can use their own termsheets but must add sections on Currency Risk, Co-financing Ratio and Financial Additionality as defined in the template provided in Annex A of the Call for proposals. Termsheets submitted at CEO endorsement stage should include final terms and conditions of the financing.

ANNEX G: (For NGI only) Reflows

Instructions. Please submit a reflows table as provided in Annex B of the NGI Program Call for Proposals and the Trustee excel sheet for reflows (as provided by the Secretariat or the Trustee) in the Document Section of the CEO endorsement. The Agencys is required to quantify any expected financial return/gains/interests earned on non-grant instruments that will be transferred to the GEF Trust Fund as noted in the Guidelines on the Project and Program Cycle Policy. Partner Agencies will be required to comply with the reflows procedures established in their respective Financial Procedures Agreement with the GEF Trustee. Agencies are welcomed to provide assumptions that explain expected financial reflow schedules.

ANNEX H: (For NGI only) Agency Capacity to generate reflows

Instructions. The GEF Agency submitting the CEO endorsement request is required to respond to any questions raised as part of the PIF review process that required clarifications on the Agency Capacity to manage reflows. This Annex seeks to demonstrate Agencies? capacity and eligibility to administer NGI resources as established in the Guidelines on the Project and Program Cycle Policy, GEF/C.52/Inf.06/Rev.01, June 9, 2017 (Annex 5).