REGIONAL CLIMATE RESILIENCE PROGRAM (RCRP) FOR EAST AND SOUTHERN AFRICA (P180171)

The Eastern Nile Technical Regional Office (ENTRO) &
Nile Equatorial Lakes Subsidiary Action Program Coordination Unit (NELSAP-CU)

Unyama-Ame Transboundary Flood Assessment & Management Plan Study

Nimule Payam Community's Grievance Report

Prepared by: RCRP Grievance Focal Point at ENTRO, 16/02/2026

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1. Background

The World Bank International Development Association (IDA) has financed the Nile Basin Initiative (NBI) centers through the Eastern Nile Technical Regional Office (ENTRO) and the Nile Equatorial Lakes Subsidiary Action Program Coordination Unit (NELSAP-CU), to implement Phase 1 of the Regional Climate Resilience Program (RCRP) for Eastern and Southern Africa, a program envisioned as a regional multi-phase engagement Series of Projects (SOP). The Program Development Objective (PDO) is to improve the management of water-related climate impacts, with the higher-level aim of strengthening the resilience of populations to climate-related shocks. The target countries are Comoros, Madagascar, Malawi, Mozambique, and South Sudan with the assistance of regional organizations, namely the African Union (AU), Southern Africa Development Community (SADC), and NBI.

Activities being implemented by ENTRO and NELSAP-CU at the regional/basin level include: 1) Development of Flood Risk Mapping for selected areas in the Baro-Akobo-Sobat (BAS) sub-basin (involving Ethiopia and South Sudan); 2) Feasibility study for flood management interventions in the Yabus catchments and associated riverine (involving Ethiopia, South Sudan and Sudan); 3) Integrated Transboundary flood management at the Elegu-Nimule border between South Sudan and Uganda; 4) Enhancing Community Awareness and Preparedness towards climate change adaptation and resilience; and 5) Strengthen capacities of ENTRO, and NELSAP-CU and their member countries.

The deliverables include 1) prefeasibility & feasibility studies; 2) preparation of Environmental and Social Impact Assessments (ESIAs), Resettlement Action Plans (RAPs), detailed engineering designs, and preparation of tender documents for any identified high priority flood management infrastructure/structures in the involved NBI member states; and 3) promotion of the use of early warning system information from the Nile Cooperation for Climate Resilience (NCCR) Flash Flood Early Warning System (FFEW) for the communities in the target flood prone areas.

During the preparation phase of the RCRP, the required environmental and social safeguard instruments were developed, including the Environmental and Social Commitment Plan (ESCP), the Stakeholder Engagement Plan (SEP), and the Labor Management Procedures (LMP). It was initially agreed that the Grievance Redress Mechanism (GRM) established under the former NCCR Project would be adapted for the RCRP.

Subsequently, ENTRO established a dedicated website for the RCRP and, in consultation with respective ENSAPT/TAC in the countries where the project is implemented, assigned GRM focal points at regional, national, and project-site levels across all project implementation areas in four participating countries, except Sudan. As a result, ENTRO is now receiving and consolidating grievance reports from the designated focal points across the various project sites.

However, the grievance raised by the Nimule Payam community in relation to the Ame/Unyama Transboundary Flood Assessment and Management Plan Study was submitted prior to the formal assignment of GRM focal points on both the South Sudan and Uganda sides. During a recent

meeting with the World Bank team (**3rd Feb. 2026**), it was agreed that this community grievance should still be formally documented and reported.

Accordingly, the GRM Focal Point under the ENTRO–RCRP has been assigned to document, track, and report on the Nimule Payam community grievance in line with the project's GRM procedures. Consequently, this report has been prepared in accordance with the standard grievance management process and captures all required information.

2. Description of the Complaint and Underlying Concerns

We, the Members of Parliament (MPs) representing the Nimule Payam community, both residents of Nimule Payam and those representing constituents living in the project area, hereby refer to the Regional Climate Resilience Project (RCRP), financed by the World Bank through the International Development Association (IDA) being implemented by the Eastern Nile Technical Regional Office (ENTRO) in collaboration with the Nile Equatorial Lakes Subsidiary Action Program Coordination Unit (NELSAP-CU).

The project activity entitled **"Integrated Transboundary Flood Management at the Elegu–Nimule Border between South Sudan and Uganda,"** implemented under the Regional Climate Resilience Project (RCRP) and executed by ENTRO in collaboration with NELSAP-CU, has been the subject of concerns raised by the local community through their representatives (Members of Parliament). These concerns have contributed to delays in the implementation of project activities.

The following points are issues of concern raised by community members:

Before the commencement of project implementation, the community requires the National Government of South Sudan to lead consultations with the Nimule Local Government and communities to reach an agreement on:

i) Their engagement in different stages of project implementation
ii) Outstanding border-related issues with Uganda
iii) The issues of Livestock in the project area.

3. Description of the harm that is, or may be resulting from failures or omissions by RCRP project ENTRO-NELSAP-CU

In fact, no harm has been caused to the community as a result of the project. Rather, the concerns raised by the community led to delays in project implementation and required additional time and budget for consultations at various levels. However, the situation has created a loss of trust between the community, government, and implementing agencies, leading to resistance or conflict. In addition, it heightened tensions between host/indigenous communities (Ma'adi) and neighboring communities, including internally displaced persons (IDPs), the Dinka, and further escalated long-standing, unresolved border issues between South Sudan and Uganda.

4. List (if known) the relevant World Bank ESIA principles, standards, or procedures you believe have not been followed

a) Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure

- **Most directly applicable** ESS10 requires:

✓ Early, meaningful, and continuous stakeholder engagement throughout the project life cycle
✓ Inclusive consultation, particularly with affected communities and vulnerable groups
✓ Timely disclosure of relevant project information in accessible formats and languages
✓ A functional Grievance Redress Mechanism (GRM)

- **Potential non-compliance**:

✓ Inadequate consultation before project commencement
✓ Limited engagement with local authorities (Payam/County level)
✓ Insufficient disclosure of project scope, risks, and benefits
✓ Inaccessible GRM

b) Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts

ESS1 requires:

✓ Identification of **social risks** (including conflict, border sensitivities, and community tensions)
✓ Integration of stakeholder feedback into project design and mitigation measures
✓ Ongoing risk monitoring and adaptive management

- **Potential gaps**:

✓ Social risks related to **inter-communal tensions, IDPs, and cross-border dynamics** not adequately assessed
✓ Insufficient mitigation measures for consultation-related risks
✓ Limited updating of ESIA/ESMP based on community feedback

b) Environmental and Social Standard 7 (ESS7): Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities

If the Ma'adi community qualifies under ESS7 (most likely in fact, which must be confirmed through a project-specific social assessment), this standard applies.

ESS7 requires:

✓ Meaningful consultation in good faith
✓ Respect for customary institutions and decision-making processes

✓ In some cases, Free, Prior, and Informed Consent (FPIC)

- **Potential gaps**:

✓ Indigenous community concerns not adequately addressed
✓ Consultation not conducted through culturally appropriate channels
✓ Insufficient recognition of traditional leadership structures

c) Environmental and Social Standard 4 (ESS4): Community Health and Safety

ESS4 covers risks related to:

✓ Social conflict and security risks
✓ Community safety arising from project-related activities

- **Potential gaps**:

✓ Failure to assess how inadequate consultation could **trigger social unrest or tensions**
✓ Lack of conflict-sensitive engagement approaches

d) World Bank ESF Core Principles

Beyond specific ESSs, the following core principles may not have been fully observed:

✓ Transparency and accountability
✓ Participation and inclusion
✓ Conflict sensitivity and do-no-harm approach

5. List the actions taken to solve the concern

5.1 Steps followed to resolve the complaint

Step 1: The Nimule communities raised their concerns regarding the project through their representatives, the Members of Parliament, and formally conveyed them to the local authorities (Mr. Nyika Charles). The concerns expressed by the community include, among others, their participation at different stages of the project, unresolved border matters between South Sudan and Uganda, and livestock-related issues, which they believe should be addressed prior to the commencement of project activities. These concerns were subsequently communicated to Eng. Chut Isaac, the Technical Advisory Committee (TAC) member for South Sudan.

Step 2. On December 11, 2024, Eng. Chut Isaac communicated the community's concerns by email to the NELSAP-CU Regional Coordinator, Dr. Isaac A. Alukwe, and to Eng. Isaac Liabwel C. Yol, the Regional Climate Resilience Project (RCRP) Lead Technical Specialist. In his communication, he proposed that consultations be conducted at different levels, including:

i) National-level consultations involving Members of Parliament representing the community, community leaders, and key national government institutions.

ii) State-level consultations with relevant state authorities and community representatives; and

iii) Awareness-raising sessions in the project area in Nimule, involving local government officials and community leaders.

In his email communication, Eng. Chut further emphasized that the proposed consultations are critical to clarifying misunderstandings among local communities and to fostering a conducive and supportive environment for the effective implementation of the RCRP project.

Step 3. On December 18, 2024, Ms. Milly Mbuliro, serving as Water Resources Officer/GIS/Modeler and Coordinator of the Regional Climate Resilience Project (RCRP) South Sudan–Uganda (Unyama Study) at NELSAP-CU at that time, communicated the community's concerns at Nimule side South Sudan, as well as the budget implications of the stakeholder consultation meetings proposed by Eng. Chut at various levels, to Ms. Laura Bonzanigo, the World Bank Task Team Leader (TTL) for the RCRP project. In her email, the following individuals were copied (CC): Azeb Mersha, Isaac Alukwe, Isaac Chol, Thomas Jang, Joan KeniKenigidhe, Seith Mucune, Wilfred Oiok, Seith Mugame, Terence Ngoda, Sami Osman, and Isaac Liabwel.

In her email, Ms. Milly indicated to TTL Laura that the engagement on the Elegu side had gone smoothly; however, NELSAP-CU had encountered some challenges during the engagement on the Nimule side of South Sudan. She highlighted issues communicated to them by the MPs, including the community's request for the National Government of South Sudan to engage directly with the Nimule local government instead of NELSAP-CU, as well as concerns regarding pending political boundary issues. She also noted that NELSAP-CU had been instructed to halt data collection and instead carry out the stakeholder consultations proposed by Eng. Chut. She further emphasized that NELSAP-CU's suggestion of stakeholders' engagements be undertaken as recommended by NEL TAC member Chut for the entire RCRP project, including the national component and the three regional sub-components: Unyama, Yabus and BAS, taking into account that these issues are likely to recur during implementation.

Step 4. Targeted Consultations/meetings at different levels to resolve communities concern:

- National level consultation was conducted (**7th February 2025**), Juba, South Sudan, involving Members of Parliament representing the community, CSOs, ENTRO, community leaders, and key national government institutions.
- Sub-national level in Torit (**Feb. 10, 2025),** involving relevant state authorities and community representatives
- Local level in Nimule (1st on Feb. 12, 2025, involving relevant state authorities and community representatives.
- **On 24-25 September 2025** discussions were held on the way forward for the project to proceed on the Nimule side, back-to-back with the Situational Analysis & Flood Risk Mapping Assessments validation workshop. During this discussion, remarks were made by TAC CO-Chair Eng. Chut Isaac Chol, in which he urged the

team to wrap up any issues, including what has been discussed in the earlier engagements on the same.

Discussion points include:

- ✓ The issues of Livestock in the project area.
- ✓ Border issues:
- ✓ Awareness creation and give the go-ahead for the project on Nimule-Side
- ✓ Refugees' locations,

- ➢ Regional level **on Sept. 25, 2025**, Nairobi, Kenya, in the presence of Uganda representatives.
- ➢ Finalized at the local level in Nimule on **Oct. 31 & Nov. 02, 2025**.

The cumulative total number of participants, counted without duplication across the series of meetings held at different levels, was 217. This included 172 male and 45 female participants, with women accounting for 21 percent of total participation.

5.2 Final decisions/Resolution

Following a series of consultations and a final local-level meeting held in Nimule on 31 October and 2 November 2025, the community agreed to proceed with the flood assessment/study and flood risk management activities outlined below:

- ✓ Conduct stakeholder mapping and engagement.
- ✓ Undertake a situational assessment and analysis on the South Sudan side of the project area;
- ✓ Collect additional information from relevant institutions at the national, state, and local levels; and
- ✓ Present the validation findings at the forthcoming validation workshop.

Subsequently, based on the community's agreement, the Ministry of Water Resources and Irrigation of South Sudan issued a formal letter (Annex 1) dated 6 November 2026 to the NELSAP-CU Regional Coordinator, communicating the Government's decision to proceed with the project study. The Ministry further instructed the consultant team to immediately mobilize the project area and carry out the remaining project study activities (Annex 2 resolution of the meeting).

Annex 1: Letter from the Ministry of Water Resources and Irrigation from Republic of South Sudan on the continuation of Ame/Unyama Transboundary Flood Assessment and Management Plan Study between South Sudan and Uganda

The Republic of South Sudan
Ministry of Water Resources and Irrigation
Juba
Office of the Undersecretary

RSS/MWRI/J/US/337/25

6th November 2025

Dr. Isaac Alukwi
Regional Project Coordinator,
Nile Equatorial Lake Subsidiary Action Program (NELSAP-CU),
Kigali, Rwanda

Subject: **Ame/Unyama Transboundary Flood Assessment and Management Plan Study Continuation between South Sudan and Uganda**

Reference to the aforementioned subject, the Ministry of the water resources and irrigation (MWRI), would like to present its compliments to your esteemed institutions for continued support and collaboration. Following the first stakeholders' consultation which took place in Juba, Torit and Nimule, the community requested ample time for wider consultation and conclude on their decision on the project.

In September 2025, a situational analysis validation workshop was held in Nairobi. During the workshop the teams from both countries discussed in an informal meeting the status of the project and how to move forward; and the outcomes was to carry out a second stakeholders' consultation meeting on the side of South Sudan to brief the community about the outcomes of the informal meeting and seek their opinion on the way forward.

The second consultation meeting was held in Nimule from the 31st of October to the 2nd of November 2025, in Which the project stakeholders (community) agreed on the Flood assessment/study and Flood Risk Management Plan as indicated below:

1) Carry out the Stakeholders Mapping and engagement,
2) Carry out a situational assessment and analysis at the South Sudan side (project area),
3) Collect more information from the relevant institutions (National, State, and local level),
4) Present the report for validation in the upcoming validation workshop.

In the light of the above, MWRI would like to take this opportunity to inform you on the government decision for the project study to go ahead; and request the NELSAP-CU to proceed with the assessment/study in South Sudan side. While instructing the consultant team to immediately mobilize and dispatch to the project area and carry out the outstanding activities. The Resolution of the recent stakeholders' consultation on Ame/Unyama Flood Assessment and Management Plan in Nimule, Eastern Equatoria State is attached.

Physical Address: Plot No. 11, Block No. AXII, Hai el-Cinema ,**P. O. Box:** 476, Juba, South Sudan Website: www.mwri.goss.org

Annex 2: Resolution- continuation of Ame/Unyama Transboundary Flood Assessment and Management Plan Study between South Sudan and Uganda

AME/UNYAMA RIVER TRANSBOUNDARY FLOOD ASSESSMENT AND MANAGEMENT PLAN BETWEEN SOUTH SUDAN AND UGANDA

The 3rd consultative meeting on Amee/Unayma transboundary flood assessmnet and management plan was held in the Catholic Diocese of Torit hall (Nimule town) from 31st October to November 1st, 2025. The meeting was attended by his worhsip Nimule town Municipality (the chair), supreme leader of Madi Community World wide (Lopirigo), the representatives from the national and sate governements and the Madi community.

The following are the key issues and the resolutions the community members came up with:

Issues	Resolutions
1. General comments	1. There are gaps identified surrounding the project that led to its delay. 2. The communities need to be involved at all stages of the project for proper collaborations. 3. This is a learning curve for all the project stakeholders. 4. The input given to the consultant should be incorporated to further inform and enrich the study. 5. Clear communication strategy for the project needs to be adopted. 6. There is a need for Enviromental and Social (E&S) grievance redress mechanism to support grievance handling in the project is critical and should be developed. 7. Stakeholder engagement plan to be developed as part of the project deliverables. 8. Collaboration among stakeholders is very vital. 9. Consultant to reach out to the Republic of South Sudan (RSS) Ministry of Water Resources and Irrigation (MWRI) for national level data collection and other important information with respect to the study. 10. Emphasis of the importance of the project to the communities, thus leaders are mandated to continue sensitizing the communities during the project cycle. 11. The project information flow should be strenthened and streamlined from the National ministries to states/local gov't and communities.
2. Border Issues	1. The community urges the National government to reactivate the South Sudan International Border Technical Committee to address Nimule border issue with Uganda as per 1st Jan 1956. 2. The consultant should only focus on hydrological boundaries but not political boundary. 3. There should be a desclaimer that all the maps generated and used for the assessment/study of Amee/Unyama river has no issues to do with geopolitical boundaries and should not be cited for future references.

GRM focal point Name:	Signature	Date
Assefa Gudina Muleta (PhD)	_____	16/02/2026

Contact address(es): ENTRO, Addis Ababa, Ethiopia

Telephone number(s): +251911056845

Email address(es): Agudina@nilebasin.org