

# REPUBLIC OF RWANDA



## MINISTRY OF LOCAL GOVERNMENT

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**RWANDA: ADVANCING CITIZEN ENGAGEMENT PROJECT (P172862)**  
**ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)**  
**FINAL DRAFT REPORT**

**November 2020**

## EXECUTIVE SUMMARY

In 2017, the government approached Spark Microgrants to request support to strengthen citizen engagement, increase the uptake of government social programs and improve rural livelihoods. In March 2019 (updated January 2020), Local Government Development Agency (LODA) signed an MoU with Spark for a strategic collaboration to: (a) develop a National Framework for Participatory Village Planning for all 14,000 villages in Rwanda; and (b) strengthen existing decentralization initiatives by building on historical Rwandan traditions. This partnership opens up a timely opportunity to address important gaps in Rwanda's approach both to rural poverty reduction and local governance.

From this partnership, Spark with the support of the World Bank (WB) is preparing the Advancing Citizen Engagement Project (ACEP) with the purpose of improving livelihoods for 76,323 people and capacity of communities and national and local government for citizen engagement in 249 villages in Rwanda.

The project will be implemented by Spark Microgrants, a Non-Governmental Organization (NGO) registered in Rwanda. This NGO collaborates with the Government of Rwanda (GoR) through a Memorandum of Understanding (MoU) signed between LODA and Spark Microgrants in March 2019 and updated in January 2020. The estimated cost of the proposed project for 3-year duration (2020 – 2024) amounts to US \$ 5.73 million. The Japan Social Development Fund (JSDF) will contribute US \$ 2.73 million through a Grant Agreement between the World Bank and Comic Relief, which will be the Grant Recipient. Comic Relief is an international NGO based in the United Kingdom. It will pass on the World Bank financing to Spark Microgrants pursuant to a Subsidiary Agreement. It will also provide Spark with complementary financing for the project of US\$3 million from its own resources. Comic Relief will be legally responsible for compliance with the World Bank's Environmental and Social Standards, however, Spark Microgrants will handle all implementation on the ground.

The Project will support community-driven planning and village-level livelihoods projects in 249 villages in four Districts, namely Huye of the Southern Province and Gakenke, Gicumbi and Burera Districts of the Northern Province. Village-level projects vary in their nature, as selected by villages, but may include livestock rearing (cattle, goat and sheep), small moto taxi businesses, and small crop agriculture activities. ACEP will also build the capacity of beneficiaries to engage in local governance and village-level development planning and implementation. The activities linked with village projects, such as cattle and small livestock rearing, crop projects (tea plantations, vegetable growing, etc.), moto transport business, opening small shops, investments in skill-building, or establishment of revolving funds for village savings groups, are likely to have moderate environmental and social impacts.

Given that the actual locations of the project sites, within target villages per District and activities per village are not yet confirmed, the Project was required to prepare the Environmental and Social Management Framework (ESMF) to provide guidance on the management of environmental and social impacts and risks, provide the institutional arrangements and environmental and social safeguards instruments to be prepared as part of the implementation of ACEP activities in full compliance with Rwanda regulations and World Bank Environmental and Social Framework (ESF).

During the project preparation, it was agreed that ACEP applies the following World Bank Environmental and Social Framework (ESF) standards: (i) Assessment and Management of Environmental and Social Risks and Impacts (ESS1); (ii) Labour and Working Conditions (ESS2), (iii) Resource Efficiency and Pollution Prevention and Management (ESS3), (iv) Community Health and Safety (ESS4); (v) Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6); (vi) Cultural Heritage (ESS8); and (vii) Stakeholder Engagement and Information Disclosure (ESS10).

Consultations with local leaders were organized in Gicumbi and Huye Districts of the Northern and Southern Provinces respectively. These Districts were randomly selected and both face-to-face and phone call channels were used to discuss with Gicumbi and Huye District authorities. At district level people consulted include Joint Action Development Forum (JADF) Officer, District Environmental Officer and the Director of Planning, Monitoring and Evaluation Unit in Huye District. On the other hand, the JADF Officer, District Environmental Officer and the Director of Planning, Monitoring and Evaluation Unit were consulted in Gicumbi District on September 15, 2020. Consultations using phone calls were also conducted with Spark Microgrants, Rwanda Development Board (RDB), Rwanda Agriculture and Animal Resources Development Board (RAB), Ministry of Local Administration (MINALOC) and the Rwanda Environment Management Authority (REMA). Due to the restrictions imposed by COVID-19 including limited travels, only 30% of workers allowed to go in offices and restriction on public gathering only a limited number of stakeholders were consulted. It is recommended that during implementation, further consultation be organized with wider stakeholders and communities and stakeholder engagement plan will be developed to guide the process.

Based on consultation findings and collected baseline data in project Districts, environmental and social risk is expected to be moderate. Greenhouse gases emissions and air pollution, health and safety risks, loss of biodiversity, water and soil deterioration and noise pollution are some of the environmental and social issues raised by project beneficiaries. The consulted authorities appreciated the project and promised for their support. They particularly welcomed livestock husbandry and crop production projects since most farmers are familiar with them and appreciate them. With regard to moto-taxi business, consulted leaders suggested that the moto operators be the direct beneficiaries (i.e. members of the supported villages) to minimize risks. They also requested the Project to include gender in all project activities and provide necessary and timely technical assistance to the community for the project success.

The ACEP will be implemented by Spark Microgrants in partnership with GoR. It will be supervised by a Project Steering Committee (PSC), composed of LODA, MINALOC, MINECOFIN, District Government Officials, and Spark Microgrants, which will review overall project progress and outcomes on an annual basis. Village members will also be invited to attend PSC meetings.

Spark Microgrants has enough capacity to implement and monitor all environmental and social (E&S) risks and impacts management (RIM) responsibilities. E&S RIM will be handled by three key staff in particular, the M&E specialist (focus on GRM), the Project Director, and the Country Director. However, it will be the first time for the staff to participate in the implementation of E&S RIM under a WB funded project. In light of the limited E&S RIM experience, a comprehensive training needs assessment and development of a training strategy plan should be carried out as an initial implementation activity of this ESMF, and included in the ESCP. It is recommended that training sessions incorporate aspects proposed in this framework focusing on skills in E&S RIM preparation and implementation (See Table 4).

As part of the package of ESF instruments prepared for the ACE Project (namely ESMF, SEP and ESCP), Spark Microgrants will also prepare a standalone Labour Management Procedure (LMP) applicable to project implementation. The LMP will include the number and characteristics of project workers employed by Spark (directly employed and contract staff), an assessment of the key potential labor risks, an overview of the labor legislation and other applicable policies and procedures, and a GRM for project staff. The LMP will be submitted to the Bank for review and clearance.

For effective implementation of this ESMF, an Environmental and Social safeguards awareness and education for the key stakeholders and affected communities must be an integral part of the ESMF implementation. District and local community structures should fully be involved in all steps of the

project implementation and adequately trained to implement the screening process as well as appropriate sub-project E&S screening tools.

This ESMF will apply to all ACE project activities and it should be regularly updated to respond to changing local conditions if required. Given that at national level there is no approval requirement for ESMF therefore the report will be reviewed and approved by the World Bank prior to project negotiations. Site specific instruments such as ESMPs will be also reviewed and approved by both national regulatory authority and World Bank. Upon the clearance of the ESMF by the World Bank, the Government of Rwanda, through MINALOC/ Spark Microgrants, will locally disclose the ESMF and will authorize the Bank to disclose it through its external website.

Given the nature of the project, the potential adverse impacts associated with this project are moderate and can be managed through proposed mitigation measures in this ESMF and ESMPs as appropriate. All ACEP sub-projects, activities or works that will require a full ESIA study will be screened out for funding. This framework will apply to all project activities under ACEP. It should be reviewed and approved by the World Bank prior to project appraisal. The estimated budget for ESMF implementation is US \$ 36,750 and most of the budget will be used for screening process, preparation of ESMPs, consultation, training and awareness.

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## ACRONYMS AND ABBREVIATIONS

<b>ACEP</b>	: Advancing Citizen Engagement Project
<b>BP</b>	: Bank Procedures
<b>CSA</b>	: Climate Smart Agriculture
<b>DEO</b>	: District Environment Officer
<b>DRC</b>	: Democratic Republic of Congo
<b>EA</b>	: Environmental Assessment
<b>EDPRS</b>	: Economic Development and Poverty Reduction Strategy
<b>EICV</b>	: Integrated Households Living Conditions Survey
<b>ESF</b>	: Environmental and Social Framework
<b>ESIA</b>	: Environmental and Social Impact Assessment
<b>ESMP</b>	: Environmental and Social Management Plans
<b>ESMF</b>	: Environment and Social Management Framework
<b>FAO</b>	: Food and Agricultural Organization
<b>ESS</b>	: Environmental and Social Standards
<b>GDP</b>	: Gross Domestic Product
<b>GGCRS</b>	: Green Growth and Climate Resilience Strategy
<b>FCAP</b>	: Facilitated Collective Action Process
<b>GoR</b>	: Government of Rwanda
<b>HIV/AIDS</b>	: Human Immune Deficiency Syndrome
<b>INGO</b>	: International Non-Government Organisation
<b>IPM</b>	: Integrated Pest Management
<b>JADF</b>	: Joint Action Development Forum
<b>JSDF</b>	: Japan Social Development Fund
<b>LODA</b>	: Local Government Development Agency
<b>LMP</b>	: Labor Management Procedure
<b>M&amp;E</b>	: Monitoring and Evaluation
<b>MoE</b>	: Ministry of Environment
<b>MINECOFIN</b>	: Ministry of Economic Planning and Finance
<b>MINAGRI</b>	: Ministry of Agriculture and Animal Resources
<b>MINALOC</b>	: Ministry of Local Government
<b>MoU</b>	: Memorandum of Understanding
<b>NDC</b>	: Nationally Determined Contributions
<b>PIM</b>	: Project Implementation Manual
<b>RCA</b>	: Rwanda Cooperative Agency
<b>RAB</b>	: Rwanda Agriculture and Animal Resources Development Board
<b>RDB</b>	: Rwanda Development Board
<b>REMA</b>	: Rwanda Environment Management Authority
<b>RLMUA</b>	: Rwanda Land Management and Use Authority
<b>RWRB</b>	: Rwanda Water Resource Board
<b>SDG</b>	: Sustainable Development Goals
<b>UNFCCC</b>	: United Nations Framework Convention on Climate Change
<b>VDP</b>	: Village Development Plan
<b>WBG</b>	: World Bank Group



# 1. INTRODUCTION

## 1.1. General Context

Rwanda is a small landlocked country in Eastern Africa, with arable land estimated at 46.7% of the total area of 26,338 km<sup>2</sup> and a population of around 13 million (2020). It is on a transformation way from a low-income to a middle-income country and is one of Africa's fastest growing economies, with growth averaging more than 7% every year since 2000. The Rwanda gross domestic product (GDP) per capita increased from US\$ 242 in 2000 to US\$ 787 by 2018. The poverty rate has fallen from 60.3% in 2000 to 39.1% in 2016/2017. These impressive results have been driven by strong economic growth and improved agricultural productivity as well as a commitment to good governance, both in terms of economic management and service delivery.

Despite the impressive progress on reducing poverty and building human capital, Rwanda remains one of the poorest countries in the world. It continues to face major development challenges, including high levels of rural poverty (peaking at 69 percent in Nyamasheke district) and stunting (37.4% for children below 5 years old in 2014/2015). Since 2014, poverty reduction has stagnated despite continued growth. However, the country is committed to address these challenges through continued economic growth and effective management of public sector investments.

Rwanda targets to deliver an improved standard of living for all Rwandans by 2050. This will require enhanced local government capacity as Rwanda continues to actively decentralize development planning and services delivery across multiple sectors. Strengthening implementation of the decentralization policy has been identified by the Government of Rwanda (GoR) and development partners as necessary to accelerate poverty reduction. However, despite the progress made on the institutional structures for decentralization, citizen voice and participation remain limited. Indeed, multiple analyses have identified that the centralized, top-down development model that served Rwanda well in the post-genocide transformation period is no longer suited to Rwanda's next phase of development. The 2019 joint Government of Rwanda (GoR)-World Bank Future Drivers of Growth study highlighted that the government's top-down approach to public administration impairs trust and stifles local initiative and creativity. RGB (2018) recommends increasing efforts to continue raising the level of citizens' participation in planning and budgeting and to strengthen partnerships with civil society. The same recommendation is depicted in the National Strategy for Transformation (NST1) 2017-2024.

It is in this framework that the GoR approached Spark Microgrants to strengthen citizen engagement and improve rural livelihoods. Spark Microgrants is a Non-Governmental Organization (NGO) involved in poverty reduction and social development. Spark was founded and registered in Rwanda and now works in 6 countries, managed by out of the United States. In Rwanda, it has been working on the development of rural poor communities and institutional development and capacity building. The rural poor villages were assisted in the design, implementation and management of their own socio-economic impact projects such as animal rearing, farming cooperatives, community crops storehouse, etc. Spark signed a Memorandum of Understanding (MoU) with Local Administrative Entities Development Agency (LODA) of the Ministry of Local Government in March 2019 (and updated in January 2020) for a strategic collaboration to (i) develop a National Framework for Participatory Village Planning for all 14,000 villages in Rwanda; and (ii) strengthen existing decentralization initiatives by building on historical Rwandan traditions.

Based on its experience from community – level activities and expertise in development of rural poor communities and institutional strengthening, Spark Microgrants applied to the Japan Social Development Fund to implement the Advancing Citizen Engagement Project (ACEP) to strengthen grassroots participation and sustainable rural livelihoods in Rwanda. This project closely aligns with the objectives of both the Japan Social Development Fund (JSDF) and World Bank Group's Approach

to the COVID-19 pandemic. The JSDF seeks to empower the poorest and most vulnerable groups not reached by other programs and improve their lives through direct benefits while World Bank articulates on protecting human capital and livelihoods against shocks and for economic recovery and livelihoods.

This project will support community-driven planning and village-level livelihoods projects in 249 villages from four districts of two (2) provinces (Northern and Southern provinces) in Rwanda, where Spark Microgrants has a successful track record of implementing community-based development programmes with local governments. The project duration is three years (2021 -2024).

The total project amount is US\$ 5.73 million of which US\$2.73 m will come from the World Bank-administered Japan Social Development Fund (JSDF). The remaining US\$3 m will be complementary financing from Comic Relief, a UK-based NGO. The World Bank will sign a Grant Agreement with Comic Relief, which will be the grant recipient. Comic Relief will pass on the JSDF financing to the implementing agency, Spark Microgrants, pursuant to a Subsidiary Agreement. Spark Microgrants will work under the strategic guidance of a Project Steering Committee composed of the Ministries in charge of finance (MINECOFIN) and local government (MINALOC). earmarked budget for selected sub-projects per village is limited to US\$8,000.

Considering the small size of the grant and relatively high levels of public infrastructure in Rwanda, all sub-projects to be supported will be small-scale, communally managed livelihoods activities, such as a cattle-rearing, small livestock (goats, sheep), small scale crop farming activities, and moto-taxi businesses. Other community development priorities, such as public infrastructure or services, are expected to be financed by Government or other development partner programs. Though it is not expected to have severe environmental and social risks and impacts, the ACEP applies the following World Bank Environmental and Social Framework (ESF) standards: (i) Assessment and Management of Environmental and Social Risks and Impacts (ESS1); (ii) Labour and Working Conditions (ESS2); (iii) Resource Efficiency and Pollution Prevention and Management (ESS3); (iv) Community Health and Safety (ESS4); (v) Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6); (vi) Cultural Heritage (ESS8); and (vii) Stakeholder Engagement and Information Disclosure (ESS10).

Within the targeted districts, the specific sectors and benefiting villages are determined based on official data and priorities on malnutrition and poverty. Within the target villages, specific project activities and sites are identified as part of project implementation, based on the decisions and priorities of village members. Therefore, it is not possible to develop site specific safeguards instruments at the time of overall project preparation. At this stage, the preparation of an Environmental and Social Management Framework (ESMF) was deemed necessary in order to inform the design and give guidance on the management of environmental and social impacts and risks. The ESMF also provide the institutional arrangements as well as guidance on environmental and social RIM instruments to be prepared as part of the implementation of ACEP activities. This instrument was prepared by Consultant hired by Spark Microgrants.

The objectives of the present ESMF include:

- To establish clear procedures and methodologies for environmental and social impacts assessments, planning, review, approval and implementation of sub-projects to be financed by ACEP;
- To describe project arrangements for the preparation and implementation of sub-projects in order to adequately meet World Bank ESF and national environmental and social safeguards requirements;
- To assess the potential environmental and social impacts of envisaged sub-projects;

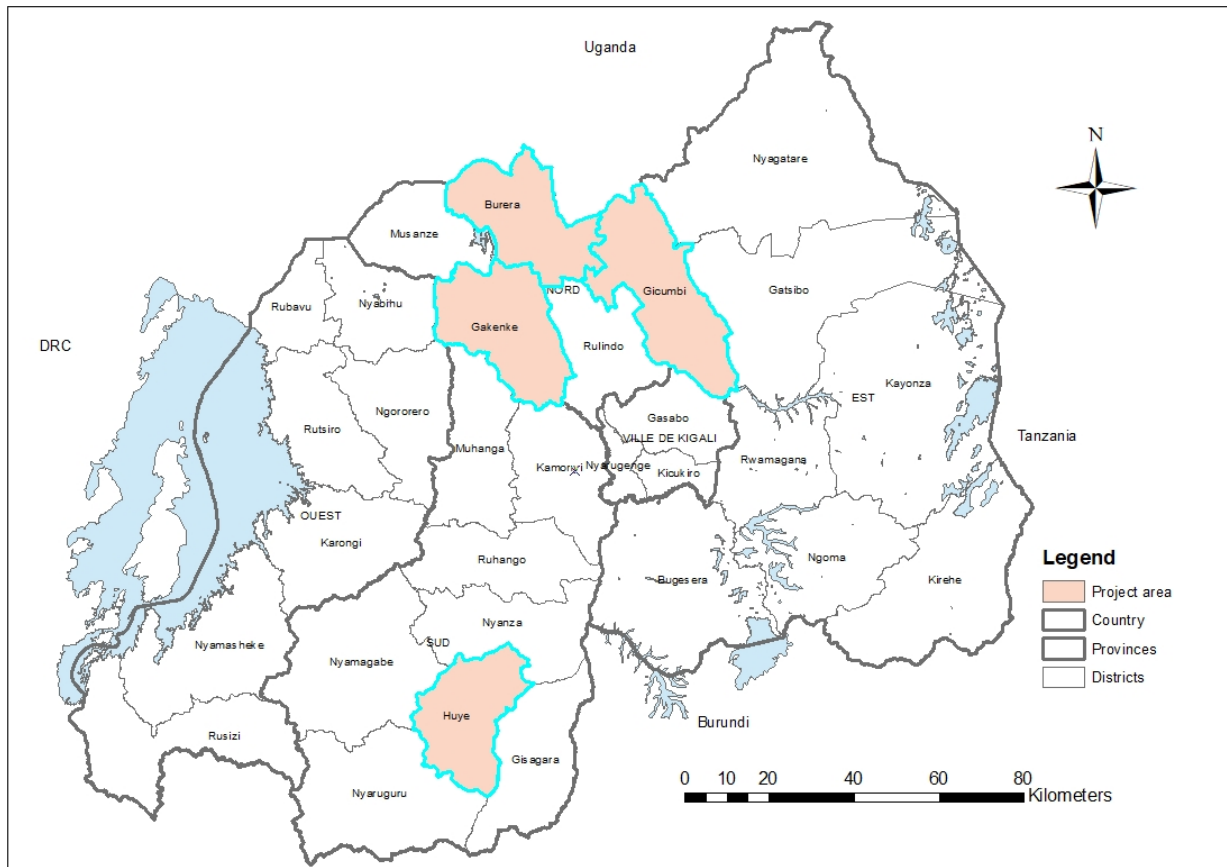
- To propose mitigation measures which will effectively address identified negative impacts, and to outline a simple Environmental and Social Management Plan (ESMP) – as a relevant EA tool identified to respond to sub-project level risks;
- To specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to sub-projects;
- To define a public consultation and disclosure process;
- To determine the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF; and
- To develop the budgetary needs required to implement the ESMF requirements

The ACEP investments associated with environmental and social concerns cover a broader range of small scale livelihoods projects including (but not limited to) cattle and small livestock rearing, crop projects (tea plantations, vegetable growing, etc.), moto transport business, opening small shops, investments in skill-building, or establishment of revolving funds for village savings groups. Once sites (villages) and beneficiaries and planned activities per village are confirmed, an Environmental and Social screening will be conducted for all sub-projects to determine the level of impacts and required instruments. Considering the nature of activities to be financed, the project impacts are likely to have moderate impacts. Thus, the environmental and social assessments required for sub-projects financed through ACEP are Environmental and Social Management Plans (ESMPs), where required, based on sub-project screening.

## 1.2. Project Description

### 1.2.1. The Project Area

The project will operate in four (4) districts of two (2) provinces of Rwanda. In the Northern Province, the project will cover 3 selected Districts, namely Burera, Gicumbi and Gakenke while Huye District is targeted in Southern Province.



**Figure 1: Project intervention districts**

### **1.2.2. Project Development Objective**

The project development objective is to improve livelihoods for 76,323 people and capacity of communities and national and local government for citizen engagement in 249 villages in four Districts of Northern and Southern Provinces in Rwanda.

The PDO will be achieved through a set of activities combining sustainable livelihood grants for poor, rural communities and capacity-building for district, sector, cell and village officials and communities on inclusive, participatory planning. The experience of the grants and the capacity-building support in the JSDF pilot areas will be captured through partnership with national and local government officials in a new framework for participatory village planning, which will be applied across Rwanda.

### **1.2.3. Project Components**

The project will be implemented through four components, as described below.

- **Component 1: Village and Local Government Capacity Building**

This component will build the capacity of local government at the district, sector and cell levels to facilitate community-driven village development processes to enhance citizen engagement in development activities and improve rural livelihoods. It will also build community capacity to engage in development planning and to manage village level sub-projects.

District, sector and cell level local Government officials will be trained on a Facilitated Collective Action Process (the 'FCAP', also known as Inzira y'Iterambere in Kinyarwanda). The FCAP is a two-year Spark Microgrants initiative on village mobilization and capacity building process to establish a platform for development coordination at the village level that will include the creation of a Village Leadership Committee and the formulation of a Village Development Plan (VDP).

- **Component 2: Microgrants**

This component will finance priority sub-projects identified in the VDPs to improve livelihood. The project will provide a village grant of US\$ 8000, disbursed over two years for each target village. Each target village will implement one small livelihoods project per year for two consecutive years (with ACEP financing of USD 4800 and USD 3200 respectively). The District Government in each of the target districts will contribute five percent of the total grant amount, while community members will make contributions in-kind. Microgrant eligibility is guaranteed for every target village provided all eligibility conditions are met, including election of a Village Leadership Committee, completion of the VDP and submission, review and approval of the sub-project proposal.

Communities will choose the sub-project(s) to be financed by the microgrant to improve the social and/or economic welfare of the village, in support of the VDP. Other than a limited set of disallowed costs, communities will have a free choice of project, as long as it meets proposal review criteria – designed to bring communal benefits to the village in support of their stated goals, gender mainstreamed, and absent of significant social or environmental risks, etc. – and is decided through community consensus with risk profile verification through a E&S screening process.

The small size of the grant and relatively high levels of public infrastructure in Rwanda means that it is anticipated that most sub-projects will be small-scale, communally managed livelihoods activities, such as a cattle-rearing, small livestock (goats, sheep), skill building programs, or moto-taxi businesses. Other community development priorities, such as public infrastructure or services are not expected under this project.

- **Component 3: National Framework for Participatory Village Planning**

The Component Three will consolidate lessons from the pilot activities under components one and two and support the government of Rwanda to prepare a National Framework for Participatory Village Planning.

Activities under this component will: (a) integrate the FCAP into existing planning systems; (b) promote the effectiveness of community-driven planning methodologies among Government stakeholders; and (c) develop a framework for a government-owned national scale initiative to strengthen participatory, village-led planning and development - a National Framework for Participatory Village Planning. The project will support a working group comprising the Ministry of Finance and Economic Planning (MINECOFIN), the Ministry of Local Government (MINALOC) and LODA to prepare the National Framework. District Mayors and Vice-Mayors from the project target areas will also be represented on the working group to bring the implementation experience from component two to bear in the policy-making process.

- **Component 4: Project Management, Monitoring and Evaluation (M&E) and Knowledge Dissemination**

This component will support project management, rigorous and innovative M&E, and knowledge dissemination through a comprehensive communications plan. M&E will include digital platforms for regular monitoring and a mixed-methods impact evaluation to explore the impact participatory processes and better engagement between local government and communities can have on poverty reduction. This impact evaluation will generate policy and program-relevant lessons for Spark, the Government of Rwanda and the World Bank.

### **1.3. Methodology for preparation of ESMF**

The preparation of the ESMF was conducted by Consultant hired by Spark Microgrants using the following approach and methodology:

#### **1.3.1. Desk review**

The preparation of ESMF involved a review on the existing baseline information and literature material. Detailed review and analysis of the national relevant legislations and policies as well as World Bank ESF, WB EHS Guidelines and other relevant documents were done.

#### **1.3.2. Public consultations**

The consultant organized consultations with Districts authorities from two of four project Districts randomly selected from September 15<sup>th</sup> to September 16<sup>th</sup>, 2020. These districts are Gicumbi in the North and Huye in the Southern Province. Consultation were also held with Spark Microgrants, Rwanda Development Board (RDB), Rwanda Agriculture and Animal Resources Development Board (RAB), the Rwanda Environment Management Authority (REMA) and MINALOC from September 14<sup>th</sup> to September 18<sup>th</sup>, 2020. Public consultation summary is provided in Chapter 4.

#### **1.3.3. Preparation of ESMF**

The preparation of ESMF for ACEP consisted of:

- Collection of baseline data on social-environment of the project areas;
- Identification of positive and negative environment and social impacts;
- Identification of environment and social mitigation measures;
- Preparation of screening procedures to be used while screening sub-project activities; and
- Formulation of environment and social management and monitoring plans, implementation arrangements and budget and grievance redress mechanisms.

## **2. POLICY, INSTITUTIONAL AND LEGAL FRAMEWORK**

This section of the ESMF outlines and reviews the existing legislations, policies and institutions and identifies requirements as well as gaps and conflicts of the relevant legal and institutional arrangements that would guide the development of the project in line with the national and international laws applicable to ACEP. Rwanda being a signatory to various international conventions and laws, it is important that national projects are in line with these laws and as such the relevant applicable international conventions are reviewed in this chapter.

### **2.1. National Environmental and Social Management Requirements**

#### **2.1.1. Policy Framework**

##### **✓ Rwanda Environment Policy**

The overall objective of the Environmental Policy is the improvement of man's wellbeing, the judicious utilization of natural resources and the protection and rational management of ecosystems for a sustainable and fair development. The policy seeks to achieve this through improved health and quality of life for every citizen and promotion of sustainable socio economic development through a rational management and utilization of resources and Environment, integrating Environmental aspects into all the development policies, planning and in all activities carried out at the national, provincial and local level, with the full participation of the population, conservation, preserve and restoration of ecosystems and maintenance of ecological and systems functions.

The ACEP investments apply this policy and will integrate the Rwanda Environment Policy in its implementation by protecting, restoring or maintaining both the quality of ecological and systems functions, involving all stakeholders in project activities and improving/ maintaining public health and safety.

##### **✓ Agriculture Policy**

The National Agriculture Policy of June 2017 seeks to make agriculture and livestock more productive at the same time ensuring proper utilization of natural resources and sustainability for future generations. The policy puts more emphasis on value addition to agricultural and livestock produce through setting up agro-processing units and enabling proper post-harvest handling to avoid losses. The policy has the mission of ensuring food and nutrition security of Rwandans by using modern agribusiness technologies, professionalizing farmers in terms of production, commercialization of the outputs and then creating competitive agriculture sector.

The main objective of Rwanda the Agriculture Policy is to intensify and transform subsistence agriculture into a market-oriented agriculture, and this requires the modern inputs, notably improved seeds/ varieties and fertilizers.

This would be achieved through:

- Promotion of new strategies that will stimulate productivity growth for a broadened nutritional food production, while embarking on new opportunities for farm income diversification, in order to secure further reductions in rural poverty, and transform the dominant subsistence farming sector into a competitive and market-led agriculture sector;
- Development and promotion of a sustainable agricultural intensification and a resilient agriculture sector to counter environmental degradation and climate change in ways that maintain sustainable agricultural growth;
- Addressing the knowledge and skills deficits in the agriculture sector to unlock significant additional agricultural as well as labour productivity gains for high quality produce and services;
- Enhancing policy and institutional coordination and collaboration amongst different relevant stakeholders operating in the sector through the creation of an effective enabling environment to render institutions more responsive.

The policy will focus on the role of agricultural inputs as drivers of higher yields and subsequent economic transformation through availing agriculture inputs, and to develop the network of agro-dealerships in the project sites. It will also intend to strengthen the market linkages and value addition potential for selected value chains. The project will emphasize on the rational use and environmentally sustainable exploitation of land for food production and enhance commercialization and access to financial services in selected agricultural value chains.

With regard to livestock sector, the policy prioritizes the increase in productivity per animal by addressing the feed deficit, animal health, genetics and markets through: i) Improve breed performance through crossing local with improved breeds; ii) Improve availability of feed (produced, agro-industrial by-products and processed feeds); iii) Strengthen disease control targeting the control and prevention of priority livestock diseases; iv) Strengthen extension services to improve the management skills of households raising livestock; v) Incentives to promote more value addition through processing and product transformation, combined with a clearer role of the public and private sector.

#### ✓ **Land policy**

The Rwanda land policy calls for rational use and sound management of national land resources, and that land use be based on established master plans. The policy also provides development of land use plans based on suitability of the areas/lands thus distinguishing the different categories of land and their purpose. On the use and management of hillsides and marshlands, the policy stipulates that marshlands meant for agriculture should be cultivated after adequate planning and Environmental Impact Assessment.

The ACEP activities will be implemented based on the suitability of the areas/lands thus distinguishing the different categories of land and their purpose and will observe the procedures of the national land policy that stipulates that land must be used for productive and development purposes without compromising its use by future generations.

#### ✓ **Health Sector Policy**

One of the objectives of Rwanda Health Sector Policy is to improve the quality of and demand for services in the control of disease. The policy identifies the most common illnesses in Rwanda and puts priority to addressing these diseases. The policy also calls for the strengthening of measures of prevention and the improvement of the management of cases building on the multi-sectoral approach. The approach consists of rapid diagnosis and treatment of cases, increase in the protection of individuals and communities using preventative methods (impregnated mosquito nets, intermittent presumptive chemo-prophylaxis treatment for pregnant mothers, management of the environment, including vector control), making decision based on evidence, monitoring, community sensitization and adapted interventions, targeted research and coordinated activities aimed at reinforcing existing health services.

In both livestock and humans, infectious diseases are caused by pathogens and many of them have ability to infect both animals and humans, and therefore may be transmitted between them. (i) Direct contact with animal's bodily fluids (saliva, faeces and blood) through touching and infected animal's skin or being bitten by an infected animal; (ii) indirect contact within areas where infected animals live and (iii) various diseases vectors like insects feeding on the blood of humans and animals, etc are possible various contact routes for disease transmission.

The project will emphasize more on community sensitization on integrative health risk management, including human, livestock and environmental health within one framework.

### ✓ **National Strategy for Transformation (NST1)**

The National Strategy for Transformation (NST1) entails interventions to enable the transformation journey towards achieving Vision 2050 aspirations. It merges the 7 Year Government Program (2017-2024) and the national medium-term development strategy, which were previously standalone documents. It integrates far-sighted, long-range global and regional commitments by embracing: (i) the Sustainable Development Goals (SDGs), (ii) the African Union Agenda 2063 and its First 10-Year Implementation Plan 2014-2023, (iii) the East African Community (EAC) Vision 2050 and (iv) the COP 21 Paris Agreement on Climate Change and other agreements.

The NST1 focuses on three pillars, mainly Economic Transformation, Social Transformation and Transformational Governance and considers the seven (7) cross-cutting areas to attain inclusive and sustainable development: Capacity Development, HIV/AIDS and Non-Communicable Diseases, Disability and Social Inclusion, Gender and Family Promotion, Regional Integration and International Positioning, Disaster Management, Environment and Climate Change.

The objectives of the economic transformation pillars include (i) Create decent jobs for economic development and poverty reduction, (ii) Accelerate Urbanization to facilitate economic growth, (iii) Promote industrial development, export promotion and expansion of trade related infrastructure, (iv) Develop and promote a service-led and knowledge-based economy, (v) Increase agriculture and livestock quality, productivity and production and (vi) Sustainably exploit natural resources and protect the environment. The social transformation targets to (i) Move towards a Poverty Free Rwanda, (ii) Ensure a Quality Healthy Population, (iii) Develop a Competitive and Capable Rwandan Population, (iv) Ensure Quality of education for all aiming at building a knowledge-based economy and (v) Transition to a Modern Rwandan Household in urban and rural areas.

The present project is in line with economic and social transformation pillars of the NST1 as it will raise agriculture and livestock quality, productivity and production, promote resilience and enhance graduation from poverty and extreme poverty and eradicate malnutrition and ensure quality healthy population.

### ✓ **National Water Resources Management Policy**

The water policy aims at fair and sustainable access to water, improvement of the management of water resources, etc. through reforestation on hillsides and water catchments areas. This policy would seem in conflict with other sector policies including agriculture and marshland development. The policy also needs to adopt a holistic approach to the management of water resources and integrate other policies related to it including the forest, wetlands, agriculture and land.

This policy is relevant to ACEP sub-projects as some of the project activities will involve water use, pollution and declining water quality to some extent. This project will promote best technology for waste management (animal waste and moto fuel) to minimize water pollution.

### ✓ **Green Growth and Climate Resilience Strategy**

Rwanda adopted the national Green Growth and Climate Resilience Strategy (GGCRS) in 2011 with the vision for Rwanda to be a developed climate-resilient and low-carbon economy by 2050. The mainstreaming and implementation of the GGCRS is mandated to the ministry responsible for environment and climate change, which is currently the Ministry of Environment. The GGCRS stipulates 4 strategic objectives:

- Energy security and a low-carbon energy supply that supports the development of Green Industry and Services;
- Sustainable land use and water resource management that results in food security;
- Appropriate urban development and preservation of biodiversity and ecosystem Services; and



- Social protection, improved health and disaster risk reduction that reduce vulnerability to climate change.

The strategic objectives are elaborated in an implementation framework of 14 Programmes of Action.

Rwanda submitted its Intended Nationally Determined Contributions (INDC) for adaptation and mitigation under the requirements of the UNFCCC in 2015 and subsequently confirmed Nationally Determined Contributions (NDCs) in 2016 following the ratification of the Paris Agreement. The NDCs were developed with the 14 Programmes of Action of the GGCRS as the main reference. Rwanda's NDCs are also appropriately aligned to the Sustainable Development Goals (SDGs) agenda 2030.

Adaptation and climate risk management programmes of action of the GGCRS involve the "Sustainable Intensification of Small-Scale Agriculture" and "Agricultural Diversity in Local and Export Markets" which are aligned to NDC measures for mainstreaming agro ecology, utilizing resource recovery and reuse, using fertilizer enriched compost, mainstreaming IPM and adding value to agricultural products. The programmes are also in alignment with SDG 2: "End hunger, achieve food security and improved nutrition and promote sustainable agriculture".

#### ✓ **International Conventions**

Rwanda being a signatory to some of the international conventions that are relevant to the ACEP, it is imperative that proposed ACEP sub-projects and activities are screened in light of the commitments made under such conventions:

- United Nations Convention on Biological Diversity
- Paris Agreement
- United Nations Framework Convention on Climate Change (UNFCCC)
- Stockholm Convention on persistent organic pollutants

The above conventions are relevant to the present project since this project will involve greenhouse gas emissions and plants used as forage. Appropriate measures should be taken to conserve biodiversity and foster climate resilience, and low greenhouse gas emissions development, in a manner that does not threaten food production and community livelihoods.

### **2.1.2. Legal and Regulatory framework**

This section describes the relevant policies and strategies, legal instruments, institutional arrangement and framework applicable to the implementation of ACEP with respect to environmental safeguards compliance.

#### **a) Rwandan Constitution**

The constitution is the supreme law of the country. Any law, decision or act contrary to this Constitution is without effect. The Articles 22 and 53 of the Constitution of the Republic of Rwanda, promulgated in 2003 and revised in December 2015, articulate the rights and responsibilities of all citizens and the role of the state regarding the environment by providing that every citizen is entitled to a healthy and satisfying environment and that every person has the duty to protect, safeguard and promote the environment respectively. The guidance of the Constitution on environmental preservation and management as a crosscutting issue is reflected in the National Vision 2050 and the National Policy on Environment of 2017.

The Constitutional rights as articulated in Vision 2020 and Vision 2050 and Environment Policy are given effect by the Law No. 48/2018 of 13/08/2018 on environment. The Constitution also recognizes the ownership of property and every person's right to private property. Under Article 34 of the Rwandan constitution, every citizen has a right to private property, whether personal or owned in association with others.

Furthermore, it states that private property, whether individually or collectively owned, is inviolable. However, this right can be interfered with in case of public interest, in circumstances and procedures determined by law and subject to fair and prior compensation. The Article 35 stipulates that private ownership of land and other rights related to land are granted by the State. The constitution provides that a law should be in place to specify modalities of acquisition, transfer and use of land.

The ACEP activities will likely to have adverse environmental impacts on land, water, biodiversity and air resources. The mitigation measures for environmental protection will be guided by the law No 48/2018 of 13/08/2018 on Environment.

#### **b) Law on Environment**

The most relevant legislation for this study is the Law on Environment. The legislation sets out the general legal framework for Environment protection and management in Rwanda. It centres on avoiding and reducing disastrous consequences on Environment. The Ministry of Environment puts in place the instructions and procedures for the environment conservation. Until very recently, REMA was responsible for the approval of ESIA reports; this responsibility has now been transferred to Rwanda Development Board (RDB) where there is a department for ESIA, responsible for review and approval of all ESIA reports.

This project will observe the law No 48/2018 of 13/08/2018 on environment by preparing Environmental and Social Impact Assessment (ESIAs) or Environmental and Social Management Plans (ESMPs) in order to ensure reduction of disastrous consequences on the Environment in its activities. The project will also monitor the compliance with environmental safeguards in all sites.

#### **c) Law n° 43/2013 of 16/06/2013 governing land in Rwanda**

The law No 43/2013 of 16/06/2013 governing land in Rwanda is the law that determines modalities of allocating, acquisition, transfer and management of land in Rwanda. It also establishes the principles applicable to rights recognized over all lands situated on Rwanda's national territory and all rights united or incorporated with land, whether naturally or artificially.

According to the Law, Land in Rwanda is categorized into two: Individual land and Public land. The latter is also subdivided into two categories: the state land in public domain and the state land in private domain. The Article 12 and 13 of the land law stipulates that State land in the public domain consists of all land meant to be used by the general public or land reserved for organs of State services as well as national land reserved for environment conservation. The ACEP activities shall respect the land use plans of the area where the land is located.

#### **d) Ministerial order N° 003/2008 of 15/08/2008 relating to the requirements and procedure for environmental impact Assessment**

The Article 1 stipulates that Environmental Impact study is a systematic way of identifying environmental, social and economic impacts of a project before a decision of its acceptance is made. In Article 3, the developer submits an official application which includes a project brief of the proposed project to the authority (RDB). Article 4 specifies that within thirty (30) calendar days after receipt of the project brief and after its analysis, RDB shall submit the Terms of reference to the developer for the Environmental impact study.

#### **e) Ministerial order N°001/2019 of 15/04/2019 establishing the list of projects that must undergo an environment impact assessment, instructions, requirements and procedures to conduct environmental impact assessment**

Article 3 and the appendices of this Order specify the works, activities and projects that have to undertake an environmental impact assessment (ESIA), partial ESIA or no ESIA before being granted permission to commence.

As per the present regulation, the ACEP activities are not subject to the environmental impact assessment, and Environmental and Social Management Plans will be prepared instead of an ESIA. However, the authorized organ may request the developer to conduct an environmental impact assessment if planned activities are found to have negative and irreversible impacts on the environment which are similar in nature to the work, activity or project that must undergo ESIA.

**f) Ministerial Order N°009/11.30 of 18/11/2010 on stray cattle and other domestic animals**

Article 2 stipulates that all animal husbandry in Rwanda should be carried out in a kraal or specifically known farm. The Order outlines the conditions under which livestock and poultry can be kept, including that poultry must be housed at least 2m from main roads, herdsman must accompany animals being moved at all times. These regulations will apply to any animals purchased or bred as part of village sub-projects supported by the ACE project, and are expected to be enforced by local authorities.

**g) Ministerial Order N° 012//11.30 of 18/11/2010 on animal slaughtering, meat inspection**

This order stipulates that all slaughter of animals requires authorization from the District authority, and supervision by District veterinary staff to prevent the spread of infectious diseases and ensure hygienic slaughter. ACE project affected community sub-projects engaging in animal slaughter will be required by District authorities to comply with the Order.

**h) Law N° 54/2008 of 10/09/2008 determining the prevention and fight against contagious diseases for domestic animals in Rwanda<sup>1</sup>**

This Law determines preventive and other measures to fight against domestic animal diseases in Rwanda. The role of Veterinary Doctors and the Rwanda Animal Resources Development Authority (RARDA) in ensuring effective and continuous epidemic control is outlined, and the scope of measures they may take to do so. All livestock sub-projects supported by the ACE project will be required by the Government to operate in accordance with this law. Adherence to the legal provisions is expected to be supported by the linkages the project will facilitate between authorised veterinary workers employed by District authorities for proposed livestock sub-projects.

### **2.1.3. Institutional Framework for Environmental and Social Management in Rwanda**

The institutional framework for environmental management is currently enshrined in the Law 48/2018 of 13/08/2018 on Environment.

**a) Ministry of Environment (MoE)**

This Ministry is composed of two sectors: Water Resources and Environment. Environment is a crosscutting. MoE is responsible for the development of policies, laws and regulations as well as coordination of all activities in the management of water resources activities and environment, as well as their follow up and evaluation. The Ministry of Environment has the following main responsibilities:

- ✓ To develop and disseminate the environment and climate change policies, strategies and programs
- ✓ To monitor and evaluate the implementation and mainstreaming of environment and climate change policies, strategies and programs across all sectors, especially productive sector;
- ✓ To oversee and evaluate institutions under its supervision by providing guidance on the implementation of specific programs to be realised by the institutions under its supervision and local government;
- ✓ To mobilise the necessary resources for the development, protection and conservation of the environment for the climate change adaptation and mitigation.

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<sup>1</sup> [https://rwandatrade.rw/media/Official\\_Gazette\\_no\\_20\\_of\\_18.05.2009.pdf](https://rwandatrade.rw/media/Official_Gazette_no_20_of_18.05.2009.pdf)

**b) Ministry of Agriculture and Animal Resources (MINAGRI)**

The Ministry of Agriculture and Animal Resources (MINAGRI) will provide technical support in improving crop and livestock productivity in project sites.

**c) Rwanda Environment Management Authority (REMA)**

Rwanda Environment Management Authority (REMA) was established in 2004 to act as the implementing organ of environment-related policies and laws in Rwanda. REMA is also tasked to coordinate different environmental protection activities undertaken by environmental promotion agencies; to promote the integration of environmental issues in development policies, projects, plans and programmes; to coordinate implementation of Government policies and decisions taken by the Board of Directors and ensure the integration of environmental issues in national planning among concerned departments and institutions within the Government; to advise the Government with regard to the legislation and other measures relating to environmental management or implementation of conventions, treaties and international agreements relevant to the field of environment as and when necessary; to make proposals to the Government in the field of environmental policies and strategies; etc.

**d) Rwanda Development Board (RDB)**

RDB was created by Organic Law N° 53/2008 of 02/09/2008 with a mission of improving the well-being of all Rwandans by fast-tracking development, catalyzing sustainable economic growth, and creating prosperity for all. According to the recent restructuring of government institutions, RDB was assigned the responsibility of reviewing the ESIA report and authorizing the project to proceed by issuing an ESIA certificate.

**e) Spark Microgrants**

Comic Relief will be the grant recipient, with overall responsibility for compliance with environmental and social requirements of the Project. Spark Microgrants will implement the ACEP and will monitor the compliance with environmental and social requirements across project sites.

**f) Communities**

The 249 communities in targets Districts who receive project funding to establish village sub-projects will be obliged to act in accordance with all national laws and regulations related to the type of project they are implementing. In addition, village-level leadership committees and elected village officials will be responsible for supporting implementation of the environmental and social management framework.

**g) Local Governments**

The ACEP will be implemented in four districts of Rwanda, namely Huye of Southern Province, Gicumbi, Burera and Gakenke of Northern Province. Under the general guidelines and procedure for ESIA, each district is tasked to perform the following functions as necessary to support risk mitigation measures, where environmental or social risks are identified as per the sub-project screening exercise;

- At the request of RDB, review village sub-project briefs so as to advise on Terms of Reference;
- Provide information or advice to developers and ESMP Experts when consulted during the ESMP process;
- At the request of RDB, review ESMP reports and provide comments to RDB;
- Organizing public hearings and informing RDB;
- Host public hearings as well as individual consultations;
- Gather written comments from public and transmit them to RDB;
- To be actively involved in the implementation of Environmental and Social Management Plans (ESMP) and Monitoring Plan and work closely with all concerned Stakeholders.

## 2.2. World Bank Environmental and Social Framework

The World Bank has recently adopted Environmental and Social Framework (ESF) that is replacing the environmental and social safeguard policies that have been in use previously. The ESF Environmental and Social Standards (ESSs) are designed to avoid, minimize, reduce or mitigate the adverse environmental and social risks and impacts of the project. They provide guidelines for Bank and borrowers in the identification, preparation, implementation and monitoring of programs and projects.

This ESMF has been designed so that all ACEP activities funded under the World Bank will comply with both the Environmental laws of the Government of Rwanda and the ESF of the Bank. The Bank's environmental and social standards (ESSs) are presented below:

- Assessment and Management of Environmental and Social Risks and Impacts (ESS1);
- Labour and Working Conditions (ESS2),
- Resource Efficiency and Pollution Prevention and Management (ESS3),
- Community Health and Safety (ESS4);
- Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5);
- Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6);
- Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7)
- Cultural Heritage (ESS8);
- Financial Intermediaries (ESS9)
- Stakeholder Engagement and Information Disclosure (ESS10).

The World Bank (WB) and GoR agreed that ACEP applies most of the environmental and social Standards of the WB, except ESS5, ESS7 and ESS9. The project will not involve any land acquisition, restriction on land use or involuntary resettlement under this project and therefore ESS5 is not relevant at this stage. With regard to ESS7, this standard is not applied/relevant because the country does not possess among its nation: (i) a group self-identified as distinct indigenous group and recognized as such by others, (ii) collective attachment to geographically distinct habitats, ancestral territories, areas of seasonal use or occupation, etc, (iii) no group with customary cultural, economic, social or political institutions distinct or separate from mainstream society or culture, and (iv) no group speaking a distinct language or dialect often different from the official language or languages of the country or region where they live. Spark Microgrants is not a Financial Intermediary; it is an international NGO; thus, ESS9 is not relevant.

The Environmental and Social Standards ESS1 applies to all projects for which the Bank investment project financing is sought. The ESS1 establishes the importance of (i) the borrower's existing environmental and social framework in addressing the risks and impacts of the project; (ii) an integrated environmental and social assessment to identify the risks and impacts of a project; (iii) effective community engagement through disclosure of project related information, consultation and effective feedback; and (iv) management of environmental and social risks and impacts by the borrower throughout the project life cycle. The Bank requires that all environmental and social risks and impacts of the project be addressed as part of the environmental and social assessment conducted in accordance with ESS1.

The ESS2 to ESS10 applies to this investment and set out the obligations of the borrower in identifying and addressing environmental and social risks and impacts that may require particular attention. These ESSs establish objectives and requirements to avoid, minimize, reduce and mitigate risks and impacts, and where significant residual impacts remain, to compensate for or offset such impacts. They are outlined in more detail below. Given that only small-scale community projects will be funded under this project (8,000\$ per village over 2 years, \$4800 and \$3200 for project years 1 and 2

respectively, for individual sub-projects), expected impacts remain low to moderate. However, this ESMF provides mechanisms of addressing any impacts that may arise.

ESS 2 applies to project workers including full-time, part-time, temporary, contracted, and seasonal workers. Spark Microgrants will prepare a standalone Labour Management Procedure (LMP) applicable to project implementation. The LMP will include the number and characteristics of project workers employed by Spark (directly employed and contract staff), an assessment of the key potential labor risks, an overview of the labor legislation and other applicable policies and procedures, and a GRM for project staff. The LMP will be submitted to the Bank for review and clearance.

ESS 3 is considered relevant as the project will have direct or indirect consequences on resource efficiency and pollution management. Small-scale CDD sub-projects such as livestock rearing/fattening require efficient and effective use of fodder, water and other resources. Small-scale sub-projects, including livestock and moto-taxi business and small-scale farming activities, may have limited environmental pollution (dust, air/greenhouse gas emissions and noise) problems. To manage these issues, the project will use GoR's laws and guidelines (for animal husbandry and others. The project will also consider the WB industry Sector EHS guidelines for Agribusiness, including the EHS Guidelines for annual crop production mammalian livestock production, dairy processing, and meat processing ([https://www.ifc.org/wps/wcm/connect/10d733d9-6d68-4139-bf39-2a45219310a0/Annual\\_Crop\\_EHS+Guidelines\\_2ndConsultation\\_Jan2016.pdf?MOD=AJPERES&CVID=laufUPW;](https://www.ifc.org/wps/wcm/connect/10d733d9-6d68-4139-bf39-2a45219310a0/Annual_Crop_EHS+Guidelines_2ndConsultation_Jan2016.pdf?MOD=AJPERES&CVID=laufUPW;) <https://www.ifc.org/wps/wcm/connect/737ca363-552e-4b70-b9e0-c234e7fca120/Final%2B-%2BMammalian%2BLivestock%2BProduction.pdf?MOD=AJPERES&CVID=jkD2BYQ;> <https://www.ifc.org/wps/wcm/connect/c44f2786-a977-40d0-8190-88e23286eed3/Final%2B-%2BDairy%2BProcessing.pdf?MOD=AJPERES&CVID=jqel4s9>). While commercial level production and processing activities are not anticipated, these technical reference documents are available as is relevant to household-level agriculture and livestock subprojects. It will also take into account FAO's Guidelines to mitigate the impact of the COVID-19 pandemic on livestock production and animal health" (<http://www.fao.org/3/ca9177en/CA9177EN.pdf>). The preparation of NFPVP (Component 3), along with detailed design and implementation manuals to support adoption of the National Framework, may have direct or indirect risks and impacts on resource efficiency and pollution management; thus, there is a need to integrate the principles and objectives of ESS3 (and other relevant ESSs) in the NFPVP during its preparation stage. To address these potential risks and impacts, all required actions have been included in the project design and ESF instruments (ESMF, SEP and ESCP), and will be further detailed in site specific ESSs instruments (ESMPs) for sub-projects during implementation, as required.

ESS 4 is relevant but not critical, due to the small-scale nature of the CDD sub-projects and the limited financial resources. Also, the local communities will be the primary beneficiaries and owner of the sub-projects as the project seeks to improve their livelihoods and build their capacities for effective, transparent and accountable development planning and inclusive leadership and decision-making, among others. However, there will be some community health and safety issues related to CDD sub-projects, including livestock rearing/fattening, small-scale farming activities, and moto-taxi businesses, due to local air pollution, greenhouse gas emissions, dust and noise pollution. The preparation of NFPVP, along with detailed design and implementation manuals to support adoption of the National Framework, may have direct or indirect risks and impacts on community health and safety; thus, there is a need to integrate the principles and objectives of ESS4 (and other relevant ESSs as required) in the NFPVP during its preparation stage. To address these risks and impacts, all required actions have been included in the project design and ESF instruments (ESMF, SEP and ESCP), and will be further detailed in site specific ESSs instruments (ESMPs), which includes GBV actions, for sub-projects during implementation. Based on Rwanda's epidemiological situation in the country, the project will also adopt the World Bank's Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting

(<https://worldbankgroup.sharepoint.com/sites/wbunits/opcs/Knowledge%20Base/Public%20Consultations%20in%20WB%20Operations.pdf>) as well as relevant WHO guidelines during public events and consultations conducted under the project.

ESS 6 is relevant to the project. The CDD sub-projects envisaged by the project are small in scale and expected to be carried out in existing villages. Also, they are not expected to be carried out in environmentally sensitive areas, including natural critical habitats. The project will also take into consideration GoR's Guidelines for Animal Husbandry, and good practice on animal welfare, per the IFC Good Practice Note<sup>2</sup>, which is in line with the World Bank ESF. The preparation of National Framework for Participatory Village Planning (NFPVP), with detailed design and implementation manuals to support adoption of the National Framework, may have direct or indirect environment and/or social impacts on biodiversity and living natural resources; thus, the ToRs for the preparation of NFPVP will need to integrate the principles and objectives of ESS6 (and other relevant ESSs as required) to ensure the outputs are consistent with the WB ESF.

Overall, the project has prepared the ESMF, SEP and ESCP to manage its potential environmental and social risks and impacts in manner consistent with the ESSs and satisfactory to the World Bank. Also, site-specific ESSs instruments (ESMPs) for CDD sub-projects will be prepared, implemented and monitored during implementation.

ESS 8 is relevant as the project, including its small-scale CDD sub-projects, may have risks and impacts on cultural heritage, including graves/small memorial shrines, or access to those. The preparation of NFPVP along with detailed design and implementation manuals to support adoption of the National Framework, and and its subsequent implementation may have direct or indirect risks and impacts on cultural heritage; thus, the ToRs for the preparation of NFPVP will need to integrate the principles and objectives of ESS8 (and other relevant ESSs as required) to ensure the outputs are consistent with the WB ESF. To manage these risks and impacts, all required actions, including chance finds procedure, have been incorporated in the ESF instruments (ESMF, SEP and ESCP) and will be further detailed in site-specific ESSs instruments (ESMPs) for CDD sub-projects.

### 2.3. Comparison between Rwandan and World Bank ESF

This section compares the similarities and differences between the National requirements and the World Bank Environmental Social Framework. There is no big difference in regards to environment and Social management framework between national requirements and World Bank ESF/ESSs. Some gaps identified between the national Rwandan legislation and the World Bank ESSs are presented below:

**Table 1: Differences between Rwanda regulations and World Bank ESSs**

Area	Rwandan Law	World Bank ESSs
Environmental safeguards instruments	Rwandan national legislation is silent on the ESMF, regional or sectoral EA. It makes emphasis on ESIA.	All EA instruments are considered depending on the project.
Project risk categorization/ classification	The Rwandan regulation does not have the same project categorization as the World Bank but specifies projects/ activities requiring full ESIA study or partial ESIA and others which do not require it.	Depending on the type, location, sensitivity and scale of the project and nature and magnitude of its potential impacts, the WB classifies the proposed projects into High, Substantial, Moderate or Low risks.

<sup>2</sup> <https://www.ifc.org/wps/wcm/connect/c39e4771-d5ae-441a-9942-dfa4add8b679/IFC+Good+Practice+Note+Animal+Welfare+2014.pdf?MOD=AJPERES&CVID=kGxNx5m>

Consultation and participation	The consultation and participation is recognized as important during ESIA study	The ESS1 and ESS 10 recognizes the importance of early and continuing engagement and meaningful consultation with stakeholders
Documents Approval and Disclosure	The law specifies the Institution competent for ESIA review and approval (i.e. RDB) but remains silent on its disclosure.	ESSs 1 and 10 require that prepared documents are approved by the Bank and disclosed at WB external website after disclosure by the client
Implementation and Monitoring	The law gives the monitoring responsibility to the project implementing agency as well as REMA.	The client has the responsibility to monitor the environmental and social performance of the project in line with legal agreement including ESCP on an ongoing basis.
Grievance mechanism and accountability	The responsibility is given to local administration and courts depending on matter's level.	The Bank requests the client to provide a grievance mechanism, process or procedures to handle grievances raised. A GRM specific to project workers has to be established based on the requirements of ESS 2.

#### 2.4. World Bank Industry Sector Guidelines for Agribusiness

In addition to the WB ESF, borrowers and projects are required to apply the relevant requirements of the World Bank Group Environmental, Health and Safety Guidelines (EHSGs). The Environmental, Health, and Safety Guidelines are technical reference documents with general and industry specific examples of Good International Industry Practice (GIIP). The General EHS Guidelines contain information on cross-cutting environmental, health, and safety issues potentially applicable to all industry sectors. The EHS guidelines should be used together with the relevant Industry Sector Guideline(s).

The WB industry Sector EHS guidelines for Agribusiness cover EHS Guidelines for annual crop production<sup>3</sup>, aquaculture, breweries, dairy processing, fish processing, food and beverage processing, mammalian livestock production, meat processing, perennial crop production, poultry production, poultry processing, sugar manufacturing and vegetable oil processing. The ACEP is associated with the mammalian livestock production<sup>4</sup>, dairy processing<sup>5</sup> and meat processing<sup>6</sup> guidelines, to the extent that village sub-projects engage in these activities. While commercial level production and processing activities are not anticipated, these technical reference documents are available as is relevant to household-level agriculture and livestock sub-projects. In addition, the Good Practice Note on Animal Welfare<sup>7</sup> is available as a reference document available for use alongside the EHS guidelines as relevant.

<sup>3</sup> [https://www.ifc.org/wps/wcm/connect/766c4c6e-e4b1-41ef-a980-3610bce404e8/Annual+Crop+Production+EHS+Guidelines\\_2016+FINAL.pdf?MOD=AJPERES&CVID=lfe82iC](https://www.ifc.org/wps/wcm/connect/766c4c6e-e4b1-41ef-a980-3610bce404e8/Annual+Crop+Production+EHS+Guidelines_2016+FINAL.pdf?MOD=AJPERES&CVID=lfe82iC) . This is relevant to large-scale production, harvesting, post harvesting processing and storage of major annual crops, including cereals, pulses, roots and tubers, oil-bearing crops, fiber crops, vegetables, and fodder crops, located in both temperate and tropical regions. It does not include the processing of raw materials into semi-finished and finished products.

<sup>4</sup> Please refer to <https://www.ifc.org/wps/wcm/connect/737ca363-552e-4b70-b9e0-c234e7fca120/Final%2B-%2BMammalian%2BLivestock%2BProduction.pdf?MOD=AJPERES&CVID=jkD2BYQ> . This applies to relevant to cattle ranching and farming, dairy farming, and hog and pig farming, sheep and goat farming .

<sup>5</sup> <https://www.ifc.org/wps/wcm/connect/c44f2786-a977-40d0-8190-88e23286eed3/Final%2B-%2BDairy%2BProcessing.pdf?MOD=AJPERES&CVID=jqeI4s9> This applies to the reception, storage, and industrial processing of raw milk and the handling and storage of processed milk and dairy products.

<sup>6</sup> <https://www.ifc.org/wps/wcm/connect/7d6d1efb-bd46-4973-bafc-1ab8d723da46/Final%2B-%2BMeat%2BProcessing.pdf?MOD=AJPERES&CVID=jqezz8W> This is relevant to meat processing, focusing on bovine and porcine slaughtering and processing from reception of the animals until the carcasses are ready for sale or further processing.

<sup>7</sup> <https://www.ifc.org/wps/wcm/connect/c39e4771-d5ae-441a-9942-dfa4add8b679/IFC+Good+Practice+Note+Animal+Welfare+2014.pdf?MOD=AJPERES&CVID=kGxNx5m>



The Environmental, occupational health and safety and community health and safety issues primarily include Crop Residue and Solid Waste Management, Water Management, Pest Management, Biodiversity and Ecosystems, Genetically Modified Crops, Energy Use, Air Quality and Greenhouse Gas (GHG) Emissions. Occupational health and safety (OHS) issues associated with annual and perennial crop production include the physical hazards (operational and workplace hazards, machinery and vehicles, confined and restricted space entry, exposure to organic dust), risk of fire and explosion as well as biological and chemical hazards.

The potential exposure to pesticides and presence of pesticides or by-products in potentially harmful concentrations in foodstuffs and postharvest products, potential exposure to pathogens associated with the use of manure, potential exposure to air emissions from fires, burning of crop waste, residues, or solid waste and increased risk of vehicle or machinery injuries on roads and access routes around the community are the major community health and safety risks.

These guidelines referenced above provide specific recommendations and performance indicators to monitor to minimize risks to communities. The ACEP Project is anticipated to partner with the Government of Rwanda's agricultural and Livestock extensions workers and other technical experts to support the application of good practices in agriculture and animal husbandry in village sub-projects, utilising existing regulatory instruments and guidelines supported by the Ministry of Agriculture, REMA, and other regulatory authorities. These guidelines will also be available to the Project as technical reference documents to be applied as needed. Specifically, the GPN on animal welfare offers guidance on disease prevention and management, meat quality (including humane slaughter and animal handling and transport), emerging market producers in developing countries that can capitalise on premiums for ethically produced products, and overall good management practices in animal welfare.

### **3. ENVIRONMENT AND SOCIAL BASELINE CONDITIONS**

#### **3.1. Overview of Project Districts**

The project will be implemented in four Districts of Rwanda, including three in the Northern Province and one in Southern Province. These districts are Huye of the South and Gicumbi, Gakenke, and Burera of the Northern Province.

##### **3.1.1. Burera District**

Burera District is one of the five Districts of Northern Province with a total area estimated at 664.5 km<sup>2</sup> and a population of 336,455 (EICV 3), predominantly female (176,187 people are women corresponding to 52.3 % of the total population). It is bordered by the Republic of Uganda in the North and East, by Gakenke and Rulindo Districts in the South and by Musanze District in the West. It is divided into seventeen (17) administrative sectors namely Bungwe, Butaro, Cyanika, Cyeru, Gahunga, Gatebe, Gitovu, Kagogo, Kinoni, Kinyababa, Kivuye, Nemba, Rugarama, Rugendabari, Ruhunde, Rusarabuye and Rwerere with a total of 69 cells and 571 villages distributed in all sectors.

##### **3.1.2. Gakenke District**

Located in the Northern Province, this district has a total area of 704.06 km<sup>2</sup> and a population of 338,586 of which 53% are female (EICV3). The district is made of 19 administrative sectors, 97 Cells and 617 Villages. The sectors include Busengo, Coko, Cyabingo, Gakenke, Gashenyi, Janja, Kamubuga, Karambo, Kivuruga, Mataba, Minazi, Mugunga, Muhondo, Muyongwe, Muzo, Nemba, Ruli, Rusasa and Rushashi. The District borders with Musanze and Burera in the North, Kamonyi and Muhanga in the South, and Rulindo and Ngororero in the East and West respectively.

##### **3.1.3. Gicumbi District**

Gicumbi district is located in the East of the Northern Province and covers an area of 829 km<sup>2</sup> and a population of 438,818 dominated with females (229,502 females or 52.3%) (EICV3). The district is divided into 21 sectors (Bukure, Bwisige, Byumba, Cyumba, Giti, Kaniga, Manyagi, Miyove, Kageyo, Mukarange, Muko, Mutete, Nyamiyaga, Nyankenke II, Rubaya, Rukomo, Rushaki, Rutare, Ruvune, Rwamiko and Shangasha.), 109 cells and 630 villages. It is a hilly district bordered with Burera district in the North-West, Uganda in the North and Nyagatare and Gatsibo districts in East. Gicumbi District also borders with Rwamagana and Gasabo Districts in the South and Rulindo in West.

##### **3.1.4. Huye District**

Situated in the Southern Province, Huye District is made of 14 administrative Sectors, namely Huye, Ngoma, Tumba, Karama, Gishamvu, Simbi, Rwaniro, Kinazi, Rusatira, Maraba, Mbazi, Kigoma, Mukura, Ruhashya. It has also 77 Cells with a total of 508 villages. Its population was 314,022 in 2014(EICV 3). with female predominance (51.7%). It borders with Gisagara, Nyaruguru, Nyamagabe and Nyanza Districts in the East, South, West and North respectively.

#### **3.2. Physical Environment**

Rwanda is a mountainous landlocked country, located in Central Africa, at latitude 2.00 S and longitude 30.00 E, bordered to its south by Burundi for about 290km, Tanzania to its east for 217 km, Uganda to its north for 169km and the Democratic Republic of Congo (DRC) to its west for 217 km. Rwanda has a total surface area of 26,338 sq. km of which the total land area is 24,948 sq. km and 1,390 sq. km is land and water respectively.

Burera, Gakenke and Gicumbi Districts lie in the highland area of the northern part of the country while Huye is in the middle land. Their physical environment is illustrated below.

##### **3.2.1. Climate and weather conditions**

The average annual temperature ranges between 16°C and 22°C, without significant variations. There are two rainy seasons and two dry seasons within Rwanda that are controlled by the Inter-Tropical

Convergence Zone (ITCZ), as it travels back and forth between the Equator and Tropic of Capricorn throughout the year. One rainy season occurs from March-May and another from September-December. Rwanda receives an average annual rainfall of around 1,295 mm, with the highest monthly rainfall occurring in April, which has an average monthly rainfall total of 157 mm.

Burera District is characterized by steeply sloping hills connected either by valleys steep sided or by flooded marshes. The annual rainfall ranges from 1400 to 1800 mm while annual average minimum and maximum temperature is 9<sup>o</sup>C and 25<sup>o</sup>C, respectively.

The climate of the district of Gicumbi alternates between dry and rainy seasons with winds from the tropics and the monsoon from the Indian Ocean and Lake Victoria. The eastern district enjoys a temperate climate with an equatorial average annual temperature of 20<sup>o</sup>C. In the region of high altitude, the annual average temperature average oscillates between 11<sup>o</sup>C and 15<sup>o</sup>C. Towards the altitudes of 2000 meters, the climate is cold and wet. In general, rainfall is abundant but irregular. It varies from 1,000 mm in the east-southern and western parts of the district to 1564 mm in high altitude areas of the district (ie highlands of Buberuka).

The climate in Gakenke district is generally humid climate with an average annual temperature varying between 16<sup>o</sup>C and 29<sup>o</sup>C. The humid wind comes from East to West. The rainfalls are relatively abundant and ranges between 1,100 and 1,500 mm per year. Gakenke district has four different seasons: the short rainy season (September- December), short dry season (January-February), the long rainy season (March- early June) and long dry season (July- end August). This climate makes Gakenke district to be a favorable region of agricultural activities.

With regard to Huye District, the district enjoys a moderate type subequatorial climate. The monthly minimum and maximum temperature varies between 12.8 and 26.4<sup>o</sup>C respectively with an average of 19.1<sup>o</sup>C. The average annual rainfall is 1,147 mm. The June – August is the driest period with less than 30 mm rainfall. As on the whole of the country, the climate is marked by 4 quite distinct seasons: a long rainy season (semi February - May), a long dry season (June - semi September), a short rainy season (semi September - December) and a short dry season (January - semi February).

### **3.2.2. Relief and topographic conditions**

Rwanda has a hilly and mountainous relief with an altitude ranging between 900 m and 4,507m.

The components of that relief are:

- *Congo-Nil Ridge* overlaying Kivu Lake with an altitude between 2,500 m and 3,000 m. It is dominated in the Northwest by the volcanic ranges consisting of five volcanic massifs of which the highest is Kalisimbi with 4,507 m.
- *The central plateau* represents a relief of hills with an altitude ranging between 1,500 m and 2,000 m.
- *The lowlands of the East* are dominated by a depression characterized by hills with more or less round top and 1,000 to 1,500 m in altitude. The lowlands of the South-West in Bugarama plain with an altitude of 900 m are part of the tectonic depression of the African Rift Valley.

The districts of the Northern Province fall in the highland generally characterized by a succession of steep hills separated by deep and narrow valleys. The District of Huye is located on a central plateau with a topographic unit of collinear type in its central part, in the East and the South. It occupies the tabular tops of the hills with an average altitude of 1700 m; it goes down up to 1450 m towards the farm from Songa. In its Western part, it rises as one moves towards the West to culminate with more than 2000 m at the top of the Huye mount. Bottoms melt marshy are located at an altitude of 1650 m

### **3.2.3. Hydrology**

Rwanda has abundant water resources estimated at 417,000 ha, including 101 lakes covering almost 128,000 hectares, water courses (7,260 ha) with 6,400 km of rivers and 860 marshlands spanning an estimated 278,000 hectares.

The country is divided into two hydrographical basins with a separating line called Congo-Nile Ridge, moving from the North to the South and approximately perpendicular to the volcanic chain, making natural obstacles exchange between the catchment basins of the Northern Kivu and the Southwest of Uganda and those of Rwanda.

The Project areas fall in the Nile basin in Rwanda which covers 67 % of the National territory and drains 90% of Rwandan waters by two main rivers namely Nyabarongo and Akanyaru, tributaries of Akagera. The latter is the main tributary of Lake Victoria with an average outflow of 256 m<sup>3</sup>/s at Rusumo station and thus considered as the source of Nile. The major rivers in Gicumbi district are Mwanze, Mulindi; Muturirwa, Walufu and Bulimba. The district has also a few water supplies scattered here and there and likely to provide hydro-electrical power. The flow of these rivers and supply systems varies seasonally. Gicumbi district shares Lake Muhazi with other districts.

The District of Gakenke is endowed with reserves that could provide enough water for both consumption and agricultural purposes. These include substantial rainfall (between 1,100 and 1,500 mm per year) and the abundance of watercourses. The main rivers flowing in Gakenke district are Cyacika, Bahimba, Isumo, Busanane, Kiyebe, Senzare, Gaseke, Kinoni, Nyamuhanga, Base and Mugobore. The District of Gakenke enjoys parts of Ruhondo Lac on the side of Kamubuga and Kivuruga Sectors. Alongside Gakenke district, two main rivers go along which are Mukungwa River at the western side of the district, and Nyabarongo River at its South. The last two rivers pour their water in Akagera River, tributary of Nile River.

The district of Burera has an important hydrographic network composed of lakes Burera (55 km<sup>2</sup>) and Ruhondo (28 km<sup>2</sup>), marsh of which the Rugezi (6,735 hectares), several rivers such as Rugezi, Cyeru, Kabaya, Kabwa and many other sources. Burera and Ruhondo lakes are 90 and 50 m deep respectively.

The hydrographic network of the District of Huye consisted of rivers in the West (like Kadahokwa which is directed North in the South); Rwamamba river in the center, and in the East, there is the large valley of Rwasave drained by the river of Kihene directed of North in the South. These rivers are drained towards Migina which is the affluent of the Akanyaru river. Mwogo river is the Western North of the District and deverses in Nyabarongo. The District of Huye is very rich in marshy valleys along the rivers and of the brooks, which constitutes a potential to be developed.

#### **3.2.4. Underground water**

The Rwandan underground water is dominated by the water of wetlands covering some 278,000 ha. The catchment/watershed of these wetlands are the many hills that catch rainwater and drain slowly to the lower areas where the marshlands modify the movement of water in the channel network by lowering the peak flow and volume of flood discharges. Groundwater in most of these marshlands areas is found at a depth of 8 m. The marshlands provide recharge of the ground water through percolation during water retention time in the area. The outflow of the underground renewable water resource is estimated at 66m<sup>3</sup>/s.

Out of this, the 22,000 known sources contribute an output of 9m<sup>3</sup>/s. In general, little information is available on underground resources. The total area of marshlands of Rwanda is estimated at about 278,000 ha which are partially exploited depending on their degree of flooding.

#### **3.2.5. Lakes**

Rwanda has some 28 lakes of significant size and 73 lakes of small size. Six largest are located entirely within the national territory: Ruhondo, Burera, Muhazi, Mugesera, Ihema and Rwanyakizinga. Three others, Rweru, Cyohoha and Kivu, are shared with neighboring countries. The largest and most spectacular is Lake Kivu. It lies at 1,460 m above sea level and is 90 km long (North-South) and 49 km wide (East-West). From an average depth of 220 m, it plunges to a maximum depth of 475 m.

The project areas are dominated with Muhazi, Ruhondo and Burera lakes in Northern Province. The District of Huye does not have any lake.

### **3.2.6. Quality of water**

In Rwanda, the quality of water is generally good with a pH ranging between 6 and 7.5. Surface water often carries a lot of soil sediments and, in mining and volcanic regions, the water can contain traces of arsenic, lead, mercury, fluoride, iodide and other toxic metalloids and heavy metals, leading to water resources degradation.

The physico-chemical pollution of water is not frequent due to the low level of industrialization and use of agricultural chemical inputs. The microbiological pollution is often observed and it comes from various domestic wastes and debris carried by rain water. The pollution of watercourses and lakes by the water hyacinth and other invasive species is a very recent and alarming phenomenon in Rwanda.

### **3.2.7. Wetlands**

Wetlands cover a total area of 278,000 ha or about 10.6 % of the national territory, including sections of Burera, Gakenke, and Gicumbi Districts. They include a variety of ecosystems, ranging from large, permanently flooded swampy peat-lands to smaller, seasonally flooded wetlands with a more mineral soil. The wetlands are composed of marshes, lakes, rivers and streams representing around 10.6 % of the national territory. In the highlands of the Northwest, there are Burera and Ruhondo lakes as well as the marshland of Rugezi.

The wetlands serve as troughs for sediment particles and play an important role in the national water balance by acting as a buffer, thus reducing the maximal flow rates during the rainy season and maintaining a relatively high flow rate during the dry season. Currently, an estimated 94,000 ha have been brought under agriculture, the large majority of this being spontaneous agriculture with maize, sweet potatoes and beans. In addition, the wetlands are used for a variety of traditional activities including the collection of leaves to make handicrafts, extensive grazing and making of bricks. Wetlands also provide a spawning habitat for fish, and are of great significance for biodiversity conservation. They play a role of alleviating the erosive force of water and thus facilitate the deposit of sediments in suspension that could block watercourses downstream.

Given the importance that the Government of Rwanda attaches to wetlands, in 2003, Rwanda ratified the RAMSAR Convention (or convention on wetlands) and has already registered on the RAMSAR list the site of Rugezi and identified other potential sites that will be registered in the future, like the complex of Mugesera-Rweru, Kamiranzovu marshes and the wet zones of the Akagera National Park.

### **3.2.8. Soils**

The Rwandan pedology is characterized by six types of soils namely: Soils derived from schistose, sandstones and quartzite formations (50%); Soils derived from granite and gneissic formations (20%); Soils derived from basic intrusive rocks (10%); Soils derived from recent volcanic materials (10%); Soils derived from old volcanic materials (4%); Alluvial and colluvial soils (6%). There is also an assortment of deposits of minerals such as tin, wolfram, Colombo tantalite and gold with the mining sector playing significant role in the national economy and as one of the key drivers of foreign direct investment in the country. Rwanda's soils contain many of the metal compounds found in laterite soils, but are generally lighter, more fertile, more workable, and less problematic to farmers than true laterite soils. There are two sub zones, with vastly different soils. To the northwest and the lower portions of the larger river valleys are very fertile volcanic soils covering approx. 10% of the country. Elsewhere, the largely metamorphic bedrock has produced generally poor quality with fertility varying and depending on extent of erosion and leaching.

About 30% of Rwanda's land is suitable for farming, and another 30% for grazing. Except where the land is seriously eroded or leached by heavy farming, the soils have good humus content and fertility. Intensive food crop production, often on steep slopes, has led to serious soil erosion. Pastureland

has also been overgrazed in many areas. Population pressure on the richer lands is sufficiently intense that soil damage, which is due to leaching, erosion, and intensive farming without adequate fertilizer, is an increasingly serious problem. The over dependence on agriculture, high population density, and rugged mountainous terrain with steep slopes that makes them prone to serious erosion and leakage of nutrients, and being among the least users of mineral fertilizers, combine to deplete the soils of needed nutrients and consequent reduction in agricultural productivity and production.

Rates of nutrient depletion range from moderate, 30 to 60 kilograms of NPK per hectare per year in the humid forest areas and wetlands to high, above 60 kilograms in the highland areas. It is estimated that in bad years, the difference between nutrient inputs and nutrient losses in Rwanda can be as bad as 136 kilograms of NPK per hectare. Nutrient imbalances are highest where fertilizer use is particularly low and nutrient loss, mainly from soil erosion, is high.

Rwandan soils are naturally fragile. The highland soils are particularly prone to erosion and landslides especially regions of the Congo Nile ridge, valleys and lowlands (peat lands) as well as highland meadows. The slopes of hills are exposed to erosion notably in the case of clay, sandy or gravelly soils. In the wide water surfaces of eastern regions like Bugesera and Rusizi, the valleys are of vertisols and alluvial types are fertile. The slope slight as they may be, are threatened by erosion due to the weak permeability of soils.

### **3.2.9. Air quality and pollution level**

Rwanda has one of the lowest emissions per capita in the world, estimated at 0.65 tonnes CO<sub>2</sub>/person (including land use change), compared to a global average of 4.63 tonnes CO<sub>2</sub>/person (Nsengimana *et al.*, 2011). The majority of greenhouse gases (GHG) emissions were CO<sub>2</sub> (87%) at 531 Gg, dominated by transport (52%) and industrial processes (28.5%).

The air pollution from dust particles and vehicle emission is increasingly growing. During the dry season, there is a marked increase in air borne diseases due to dust particles emission especially in urban areas (REMA, 2009). Poorly maintained roads, old mopeds, motorcycles and vehicles cause an increasing concentration of different air pollutants (Henninger, 2009). The air pollution resulting from dust is expected to increase during rehabilitation works and terrace making, especially during dry seasons. Adequate mitigation measures should be proposed to minimize air pollution levels as well as diseases and ill-health effects associated with transport.

## **3.3. Biological Environment**

Rwanda is covered with diverse ecosystems that include mountains, forests, gallery forests, savannahs, wet and aquatic zones, wood and agro ecosystems. All these ecosystems have a rich flora and fauna. From the initial environment assessment, the proposed sub projects do not affect any critical natural habitats, as it will be implemented in the already cropped areas.

### **3.3.1. Protected areas**

Rwanda has four national parks (Nyungwe, Akagera, Volcanoes and Mukura -Gishwati national Parks) and some forest reserves like Muvumba Acacia forest gallery. Volcanoes National Park border Gakenke and Burera Districts in the Northwest of Rwanda. Nyungwe, Mukura –Gishwati and Volcano National Park) are highland forests with a high degree of biological diversity and rare animal species, such as mountain gorillas, Ruwenzori colobus monkeys and golden chimpanzees.

It is estimated that about 2,150 plant species are found in Rwanda, of which 700 species have medicinal value. Rwanda as a whole is known for its rich variety of flora is accompanied by an equal variety of fauna, including several species of birds and primates. The country has more than 275 species of birds, 24 of which are endemic to Albert Rift. Towards the east of the country lies the Akagera National Park, the forests galleries and wooded savannahs. Population pressures have already drastically reduced the land area of natural forests of Rwanda from about 30 % to presently fewer than 10 % in less than a century for agricultural, pastoral and settlement purposes. In general,

for a period of about 40 years, the surface area of the natural forests of Rwanda underwent a decrease of about 65 % between 1960 and 2002. The search for arable lands, extensive farming, illegal felling of forests for firewood, production of charcoal and poles for construction in urban areas, as well as improper land use have drastically contributed to the reduction of the surface area of forests. This led to biodiversity loss. Within the project areas (target villages), there are no protected areas.

### **3.3.2. Aquatic Biodiversity**

The ecosystems of the Rwandan wetlands inhabit a rich biological diversity of animal and vegetation (more than 104 plant species have been identified), except for Lake Kivu, Bulera and Ruhondo, due to their limnological characteristics. The Kivu lake contains very poor aquatic flora and the density of the phytoplankton is relatively low due to the lack of mixture of layers (the nutrients are found at the bottom of the lake). Aquatic fauna in the lake is also poor due to its physical isolation.

In contrast, the aquatic flora and fauna of the Northern lakes (Burera and Ruhondo), are poor due to the physico-chemical situation unfavourable to their development and the isolation of these two lakes. The concentration of the plankton is less important in Lake Bulera than in Ruhondo due to its high depth which limits light penetration, thus reducing plankton growth in Burera lake. This lake is about 90 m deep while Ruhondo lake does not exceed 50 m of depth.

Lake Muhazi is landlocked, isolated, and located at 40 km from Kigali city. Its ichthyologic fauna is very limited. Three endemic species and other nine introduced species are found within the lake. The lake is very rich in phytoplankton. The macroflora of the marshes is mostly composed of wide spaces of papyrus with some zones of *Miscanthidium*. The low layer is covered with *Cyclosorus stratus*.

The Rugezi marshland, is protected area located between Gicumbi and Burera districts covering 6,735 ha. It is one of the headwaters of the Nile situated within Buberuka highland at 2100m altitude. In its natural state, Rugezi has been playing a significant ecological, hydrological, socio-economical, historic and recreational role in Rwanda. It is an important bird area recognized by the BirdLife International in 2001 and is reported to be the habitat of 43 birds species.

### **3.3.3. Biodiversity in agricultural systems**

#### **a) Croplands**

Rwanda agricultural land presently covers around 55.8 % of the total surface area of the country and is continuously cultivated. The time between two growing seasons is the only period of respite. These areas have various crops that play an essential role in the national economy.

These crops are usually grouped in two categories: subsistence and cash crops. Some of the food crops in project areas include Cassava, maize, Rice, bean, peas, soybean, banana, vegetables and fruits in Huye District, wheat, Irish potato, maize, bean, cassava, fruits and vegetables in Gicumbi, Burera and Gakenke Districts. The cash crops are dominated by coffee. The importance of each crop varies according to regions. Some crops, like bananas, potatoes, different varieties of wheat, sorghums and beans are subject to high commercial trade. Potatoes, beans, cassava and bananas are present everywhere for the daily diet of the people. The cash crops are very few and limited to coffee.

#### **b) Pastoral zones**

In Rwanda, the essential part of animal husbandry is comprised of one family ownership with a small number of animals per household. As agriculture occupies the biggest portion of land, the cows graze in paddocks, on roadsides, and in some parts of marginal lands. This obliges farmers to adopt the zero grazing or semi-permanent farming and grow fodder crops such as *Tripsacum laxum*, *Setaria spp*, *Desmodium spp*, *Pennisetum purpureum*, *Mucuna pruriensis*, *Cajanus cajan*, *Calliandra calothyrsus*, *Leucaena diverifolia*, *Sesbania sesban*, etc. However, one can notice the development of ranching in Nyagatare, Gatsibo, Kirehe and Kayonza Districts of Eastern Province and Gishwati area in Nyabihu District of West. Pastoral land or pastures are very limited across the project areas.

### c) Forestry and tree cultivation

Tree planting in Rwanda was limited to some plants around households such as *Ficus thoningii*, *Euphorbia tirucalli*, *Erythrina abyssinica*, *Vernonia amygdalina*, *Dracaena afromontana*, etc., but cultivation of woody perennials for timber, energy uses or other services was not customary. The first forest plantations were created in 1920 and 1948 and only consisted of Eucalyptus. Later on other tree species were introduced. These included *Pinus spp*, *Callistris spp*, *Grevillea robusta*, *Cedrella spp*, *Cupressus spp*. The Arboretum of Ruhunde (Huye District) has 206 species among which 146 feuillus, 56 resinous and a species of bamboo.

Those species proved to be dangerous for the biological patrimony (predominantly eucalyptus) because they drain and further acidify soils that already are acidic, which in turn causes reduction or even extermination of the undergrowth. Thus planting those species eventually leads to erosion. The tree-covered surface area was estimated at 256,300 hectares in 1998. Despite efforts of diversifying tree species, it was estimated that 99 % of planted trees consisted of Eucalyptus spp. A replacement of those trees by agroforestry species, such as Grevillea, Cedrella, Maesopsis, Calliandra, Leucena proves to be of urgent need, including developing agroforestry in agricultural zones.

## 3.4. Socio-Economic Environment

### 3.4.1. Population and demographic characteristics

Rwanda is classified among the most densely populated countries of the world. The Fourth Rwanda Population and Housing Census of 2012 places Rwanda's population at 10,515,973 residents, of which 52% are women and 48% men. The current estimation (2020) indicates that the country has 12,952,218 people. The population density in 2012 was 415 inhabitants per square Kilometer. The population in project areas is 1,427,881 people of which 52.3% are female. The table below presents demographic data per District.

**Table 2: Total District population and population density**

District	Population	Female	Male	Area (km2)	Density (Inhab/km2)
Burera	336,455	176,187	160,268	664.50	506
Gakenke	338,586	179,451	159,135	704.06	481
Gicumbi	438,818	229,502	209,316	829.00	529
Huye	314,022	162,349	151,673	581.50	540
<b>Total</b>	<b>1,427,881</b>	<b>747,489</b>	<b>680,392</b>	<b>2,779.06</b>	<b>514</b>
%		<b>52.3</b>	<b>47.7</b>		

Source: NISR (2012)

The population of Rwanda is still largely rural, with more 70% living in rural areas. The majority of the population of Rwanda lives in private households with an average size of 4.3 persons. Households are a bit smaller in urban areas with 4.0 persons. The Rwandan population is young, with one in two persons being under 19 years old. People aged 65 and above account for only 3% of the resident population; this has consequences in that the demographic dependency ratio, measuring the number of potential dependent persons per 100 persons of productive age, is 93 at national level (NISR, 2012). In the project Districts, the population is predominantly rural. It oscillates around 83% in Huye District and ranges between 94.8 and 98.2% in Northern Province Districts, with the lowest and highest rate in Gicumbi and Burera Districts (NISR, 2012).

### 3.4.2. Human settlements

For years, rural settlements in Rwanda have been and continue to be scattered in some regions of the country. For a long time, they have been characterized by unplanned occupation of space, thus doing harm to environment by wastage of land and soil erosion. However, in December 1996, the Government adopted a national human settlement policy aimed at establishing an improved rural human settlement model, grouping settlements in villages generally known as IMIDUGUDU, which meet the criteria of environmental viability through the reorganization of the national space, land reform, improved housing quality, etc. Grouped settlements, Imidugudu, can be found in all project areas.



### **3.4.3. Energy and transport**

In Rwanda, Woody fuels, biomass wastes, methane gas of Lake Kivu representing 57 billion m<sup>3</sup> and solar energy are the sources of energy used in households, industries and handcrafts. The transport sector is generally dominated by road transport. In the sub sector of air transport, the country has two international airports (Kigali and Kamembe) and aerodromes (Huye, Rubavu and Musanze) used in internal transport. Lake transport is used mainly on Lake Kivu for connecting districts of the Western Province.

As stated above, the population in the project Districts is predominantly rural. The transport sector is dominated by road transport. All administrative sectors in Gicumbi District are connected to electricity network and about 42,409 households (43.3%) are connected to national grid or off-grid. As of June 2020, the electricity access in Burera, Gakenke and Huye Districts was 41; 32 and 46% respectively (REG, 2020). The firewood remains the main source of cooking energy.

### **3.4.4. Agriculture**

Agriculture is the main socio-economic activity in the project areas. It is an important sector of the Rwandan economy with a contribution of 33% to the GDP. The agriculture production system is based on small family exploitations whose production is consumed by the owners. The systems of crops are complex, based on the diversification of productions and the association of crops. The little use of chemical fertilizers and pesticides, the low level of equipment and the very limited use of research-based technologies result in small yields which are also very vulnerable to climatic changes.

The extensive agriculture practiced by the Rwandan population contributes to the degradation of environment. The agriculture intensification at the level of projects was often realized without taking into account the adverse environmental impacts from inputs like fertilizers, pesticides, herbicides etc. In all four districts, the agriculture and livestock husbandry are the major activities and main source of income for farmers.

### **3.5. Cultural Heritage**

Rwanda's cultural heritage is rich and diversified. It contains sacred hills, forests and trees with legendary history, traditional huts and royal palace countrywide, churches and other colonial buildings and structures. It also includes caves and rocks with bas-reliefs marking the legendary or historical events that have occurred on the site, thermal springs and wells used for ritual purposes, genocide against Tutsi memorial sites and designated burial sites which are located in different administrative districts where the project activities will be implemented.

Therefore, Government of Rwanda and its partners have the obligation to preserve and perpetuate this cultural heritage for present and future generations because, on the one hand, it brings in a lot of money as do agriculture, industry, gold or oil and, on the other, it maintains harmony and social balance between peoples. A chance finds procedure will be followed if previously unknown cultural heritage is encountered during project activities. It will be included in all site-specific ESSs instruments (ESMPs) for CDD sub-projects. The chance finds procedure is also reflected in Environmental and Social Commitment Plan (ESCP) for ACEP. See annex 3 for further information on the chance finds procedure customized in the context of Rwanda.

## **4. PUBLIC CONSULTATION AND PARTICIPATION**

### **4.1. Overview**

Community engagement and stakeholder engagement is the major component of the proposed project and requirement for both World Bank and national environmental and social policies. The consultation and engagement process focuses on providing information on the proposed project in a manner that can be understood and interpreted by the relevant audience, seeking comment on key issues and concerns, sourcing accurate information, identifying potential impacts and offering the opportunity for alternatives or objections to be raised by the potentially affected parties; non-governmental organizations, members of the public and other stakeholders. Consultation has also been found to develop a sense of stakeholder ownership of the project and the realization that their concerns are taken seriously, and that the issues they raise, if relevant, are addressed in the environment and Social management process and will be considered during project design refinement.

Given that the project affected people and affected community are not yet identified, initial consultations were held with stakeholders at central level and district authorities from September 14<sup>th</sup> to September 18<sup>th</sup>, 2020. Further, consultations are recommended during identification of beneficiaries, activities and during the preparation of site-specific instruments. Details are available in Annex 2.

### **4.2. Objectives and Purpose of Community Engagement and Stakeholder Consultation**

Public consultation and stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. Stakeholder engagement is an on-going process that involves the following elements; stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism and on-going reporting to affected communities.

#### **4.2.1. Purpose**

- To prepare communities on potential emergency scenarios that could be caused by the project and can affect the community.
- To build a trusting relationship with the affected communities and other interested stakeholders based on a transparent and timely supply of information and open dialogue.
- To ensure effective engagement with local communities and other key stakeholders throughout all phases of the project.
- To actively build and maintain productive working relationships, based on principles of transparency, accountability, accuracy, trust, respect and mutual interests with affected communities and other stakeholders.
- To get stakeholder input on impacts and mitigation design.

### **4.3. Public Consultations and Participation**

Public participation and community consultation has been taken up from September 14<sup>th</sup> to September 18<sup>th</sup>, 2020, and should continue to be an integral part of project implementation as well as social and environmental assessment process of the project, guided by the Project's Stakeholder Engagement Plan (SEP). Consultation is used as a tool to inform project affected people, beneficiaries and stakeholders about the proposed activities both before and after the development decisions are made. It assisted in identification of the problems associated with the project as well as the needs of the population likely to be impacted. This participatory process helps in reducing the public resistance to change and enabled the participation of the local people in the decision-making process. Initial public consultation has been carried out by Spark with key institutions involved in the project implementation and environmental management, including LODA, MINALOC, MINECOFIN, district Government officials in Gicumbi, Gakenke, Burera and Huye Districts.

#### **4.4. Stakeholders**

Key stakeholders have been identified and initial discussions held with decision making bodies, key stakeholders, sector institutions and specialist experts were made on the very concepts and nature of the proposed project, giving emphasis on levels of public participation, role of key stakeholders and joint contributions of these actors to the success of the project. In addition, the scope of the proposed project and possible means of maximizing local communities' social, economic and environmental benefits from the project implementation were underlined. Key stakeholders identified for consultation during preparation and implementation of project and this ESMF include but not limited to the following:

##### **At national level:**

- Ministry of Environment (MoE);
- Rwanda Environment Management Authority (REMA)
- Ministry of Local Government (MINALOC)
- Rwanda Development Board (RDB).
- Rwanda Agriculture and Animal Resources (RAB)
- Rwanda Governance Board (RGB)
- Local Government Development Agency (LODA)

##### **At local level:**

- Districts and Sector officers managing environment and community development
- Community members (once identified)

The SEP outlines in more depth the how stakeholders will be engaged throughout the project.

#### **4.5. Public participation – methods and process**

The consultant organized consultations with Districts authorities from two of four project Districts randomly selected. These districts are Gicumbi in the North and Huye in the Southern Province. Consultation were also held with Spark Microgrants, Rwanda Development Board (RDB), Rwanda Agriculture and Animal Resources Development Board (RAB), the Rwanda Environment Management Authority (REMA) and MINALOC. At district level consulted people included Joint Action Development Forum (JADF) Officer and District Environmental Officer and the Director of Planning, Monitoring and Evaluation Unit was also contacted. In order to comply with local Covid-19 pandemic restrictions, face-to-face interview were used in Huye and Gicumbi districts. Further phone calls were used to consult with Spark Microgrants, RDB Environmental Expert, Director of Social Affairs Unit of MINALOC, Environmental Safeguards Specialist of SPIU World Bank funded projects under Rwanda Agriculture and Animal Resources Board (RAB) and the Ag Director of Environmental Regulation and Pollution Control Unit of REMA. The phone calls and face-to-face meeting were arranged between September 15 and 17<sup>th</sup>, 2020. List of all people consulted is presented in annex

Stakeholders consulted were informed of the proposed project, potential project impacts and risks and provided their feedback on the project interventions.

Due to the fact that project villages are not yet confirmed, consultations with the communities were not conducted at this stage. They are scheduled to be held before the start of project activities in every village. Consultation methods including focus group discussions (FGD), community meetings and official meetings with stakeholders will be considered during project implementation and if the COVID-19 pandemic restrictions allow. Focus groups meetings should bring together opinion leaders in the village (ie teachers, shops keepers, church leaders, etc), youth group and gender/ women representatives. The community meetings will include all members of the villages. However, in line with COVID-19 restrictions, village members will be split into small groups which will be conveyed for the community meetings. Official meetings will include village leaders, cell and Sector and District authorities. The meetings will be organized by the Project staff and can be individual contact or done

at every administrative level depending upon their locations, staff availability and local Covid-19 restrictions.

#### **4.5.1 Feedback from initial consultation**

The Project stakeholders' consultations were carried in order to provide information on the proposed project and to collect first-hand information on concerns, perceptions and opinions on the proposed ACEP project. All institutional, local governance and target beneficiary stakeholder views are critical for confirming relevance of proposed interventions for effectiveness and efficiency of proposed approaches and for impact and sustainability of the intended positive changes.

The stakeholder's consultation meetings help in highlighting the socio-economic and environmental concerns and impacts that could arise from the project and coming up with appropriate mitigation measures. They were also found to develop a sense of stakeholder ownership of the project and the realization that their concerns are taken seriously, and that the issues they raise, if relevant, to be addressed in the ESMF and will be considered during project design refinement and development of sub-project specific ESMPs.

Two Districts were randomly selected for consultations: these are Gicumbi and Huye Districts. District leaders/ staff, including JADF officer, District Environmental Officer and Director of Director of Planning, Monitoring and Evaluation Unit are stakeholders consulted contacted. The consultations with the community beneficiaries were not organized since the villages to be developed by the project are not yet confirmed. Face-to-face consultation in Huye and Gicumbi Districts were conducted with district used to discuss with Gicumbi and Huye Districts authorities. The phone calls and face-to-face meetings were held on September 15 and 17th, 2020 respectively. Other institutions consulted include Rwanda Environment Management Authority (REMA), Rwanda Agriculture and Animal Resources Development Board (RAB), Spark Microgrants, Rwanda Development Board (RDB) and Ministry of Local Government (MINALOC).

Stakeholders were consulted on ACEP interventions, mostly livelihoods development activities (including livestock rearing, crop production, moto-taxi business, etc), project implementation arrangements, roles and responsibilities of stakeholders and expectations from them. Potential environmental and social impacts likely to occur during project implementation and grievance redress mechanisms were also discussed and participants were asked to share lessons from past experiences that could be of great importance for the successful ACEP implementation. Stakeholders consulted appreciated the Project because of its contribution to the development of their respective Districts and welcomed it. They thanked the Government of Rwanda, the Donors and Spark Microgrants for the support and promised their full collaboration and project ownership during project implementation.

The consulted authorities welcomed livestock husbandry and crop projects since most farmers are familiar with them and appreciate them. With regard to potential moto-taxi business, consulted leaders suggested that the moto operators be the direct beneficiaries (i.e. members of the supported villages) to minimize risks. They also requested the Project to include gender in all project activities and provide necessary and timely technical assistance to the community for the project success. They also suggest that livestock activities be open to a range of animal species like pig, poultry, etc depending upon beneficiaries' preference and species adaptation. This will be addressed during sub-projects identification which will use participatory approach and beneficiaries will be allowed to select projects they fill are appropriated in their respective communities.

Subsequent consultations with Spark Microgrant on the design of the sub-project activities confirmed that these preferences are not excluded by the project design, and that community members will be able to select the project and project implementation arrangements most suitable to their village context. The project should work with the participating Districts to resolve the issue of unavailable

veterinary products, improved seeds, agrochemicals and special trainings on animal care and diseases control. They also requested Spark Microgrants to involve districts in every step of the project, right from the design to the operation phase to raise project awareness and increase its ownership by the community. Spark has confirmed that through the secondment of staff to Sector offices and the appointment of 'District Coordinators' to each District, this request will be supported.

#### **4.6. Public Disclosure**

The WB disclosure standard requires that E&S and RIM instruments are disclosed in country and through the World Bank external website. These reports should be made available to project affected groups/Beneficiaries and the public at large. Public disclosure of E&S and RIM instruments such ESMF, ESMP is also a requirement of the Rwanda's environmental procedures.

Spark Microgrants will disclose this ESMF, by making copies available at its head office and at District offices. Copies will be made for easy consultations every time it is needed. Further, this ESMF and associated environmental and Social Management Plans will be disclosed at SPARK websites. Further, SPARK will authorize the World Bank to disclose electronically this ESMF and specific instruments through its external website

## **5. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATIONS MEASURES**

This chapter identifies potential impact that could arise from the activities proposed under the project. The identified impacts apply to the socio-economic environment as well as the bio-physical environment. These impacts can be positive or negative and direct or indirect. All ACEP sub-projects, activities or works that will require a full ESIA study will be screened out for funding.

### **5.1. Positive Impacts**

The ACEP implementation across four districts will bring about many positive impacts and improvement of community livelihoods. The identified positive impacts for different phases of the project cycle are discussed in the following sections:

#### **a) Employment opportunities**

During the planning, design and construction of animal sheds (cowshed, goat sheds, sheep sheds, etc), preparation of land for crop production and moto-taxi business, new jobs will mostly be created for the unskilled labour and this will be sourced from the local residents. Indirect employment will be in the form of suppliers that will be required for planning and design of project components.

#### **b) Skills transfer**

During the design and construction for sub-project component such as animals' sheds, crop production, the project beneficiaries will be technically assisted and local residents will work with project experts. This process of working together will transfer design and planning tools and other useful guideline to locals.

#### **c) Income generation, increased public revenues and poverty reduction**

The construction of animal sheds will need various materials, some of them found locally and provided by beneficiaries while others (nails, roofing tiles, sheets, etc) will be bought. For other types of livelihoods projects such as moto-taxi businesses, other inputs will need to be purchased from local markets. The small shopkeepers will benefit from the sale of required materials. Revenues may also be collected by both the national and local authorities from the selling of construction materials.

This project will also promote increased agricultural productivity, diversification of agricultural crops and commercialization of agriculture from subsistence. The improvement in crop productivity and animal husbandry as well as other livelihood activities may raise incomes for the rural poor above the poverty line.

#### **d) Increased household incomes and improved livelihoods**

The project will be implemented in 249 villages with 76,323 people approximately and is expected to support village-level sub-project including but not limited to livestock rearing (both cattle and small livestock) and small business. Most of rural communities are surviving from agriculture alone or combined with livestock. Village projects, such as rearing livestock or running taxi-moto businesses, may generate additional income for project beneficiaries or increase household assets through livestock ownership.

#### **e) Improved Soil conservation**

The cattle or small livestock will produce organic manure that can either directly be used by business owners or other beneficiaries for soil fertility improvement and crop productivity increase.

#### **f) Strengthening grassroots participation and sustainable rural livelihood in Rwanda**

The project will empower the poorest and most vulnerable groups and will establish a platform for cooperation between NGOs and local and national government to strengthen the decentralization process in Rwanda at a strategic time in its evolution. During its implementation, beneficiaries will

also be capacitated on different topics like animal feed and nutrition, animal health and husbandry, improving crop – livestock integration, human – animal diseases spread, compliance with E&S and RIM, etc.

The capacity building will be done through training, and cross-village exposure visits, and will impart skills and knowledge to beneficiaries required for the smooth running of the sub-projects.

#### **g) Market creation**

The project may create market for farm inputs including feeds, veterinary products, animal products, etc. It may also create opportunities for moto spare parts and other small business inputs.

#### **h) Improved access in rural areas**

In some remote areas, the lack of effective transport affects people businesses. Very few buses or not at all operate in those areas. Most villages residents walk to get out of their areas or come back. Sub-projects related to any moto-taxi business may improve access and mobility for villagers in their rural areas.

#### **i) Empowerment of project beneficiaries in sub-project implementation – including good farming practices and business management**

During ACEP implementation, beneficiaries will be capacitated on different topics like good animal husbandry practices, compliance with E&S and RIM requirements, small business management, collective savings and loan management, etc. The Project will build on village organization to help them transform into dynamic, successful and sustainable enterprises/social impact projects. The capacity building will be done through training, and cross-village exposure visits, and will impart skills and knowledge to beneficiaries required for the smooth running of the sub-projects.

#### **j) Environmental Protection**

The project will promote a wide range of activities including agriculture, animal husbandry, small businesses like shops, transport via motos, saving businesses and other livelihoods activities. During the implementation of these activities, the project will ensure that planned activities are executed in a more environmentally acceptable way.

### **5.2. Negative Impacts**

The proposed project will not have major environmental and social impacts given that small scale micro-grants will only be provided to communities. These will be allowed to choose among a wide range of projects as per their wishes. Eligible projects include livestock rearing, crop projects (tea plantations, vegetable growing, etc.), opening small shops, moto-taxis, investments in skill-building, establishment of revolving funds for village savings groups, etc. Most of these ACEP activities are anticipated to be without adverse impacts or likely to have moderate impacts and risks during their implementation. The predictable impacts, mainly associated with agriculture, livestock, moto-taxi sub-projects are depicted below.

#### **5.2.1. Potential negative impacts**

##### **a) Design and Planning and construction phase of village sub-projects**

The adverse impacts expected during this phase include:

##### **(i) Noise pollution**

There may be movement of people transporting construction materials at project site. This could slightly increase levels of noise, thus causing noise pollution. This is a temporary impact and will only happen few hours given that there are no major construction works planned.

##### **(ii) Loss of trees and other vegetation**

Only small clearance for the construction of animal sheds is expected and could lead to loss of biodiversity. It is anticipated that planned activities for various ACEP sites may cause changes in the existing biodiversity (i.e. tree component change, grass component, etc). Above all, the CDD

sub-projects envisaged by the project are not expected to be carried out in environmentally sensitive areas, including natural critical habitats\

**(iii) Community Health and Safety risks**

Injuries caused by handling of construction materials, using sharp objects, communicable diseases due to interactions among the workers or with service providers, vandalism of construction materials, etc are some issues likely to happen during construction phase. Further, moto business may come with accidents especially in rural areas.

**(iv) Cultural Heritage Risks**

There may be chance finds of significant cultural or historical sites or artefacts in the course of project implementation, which present risks and impacts on cultural heritage, including graves/small memorial shrines, or access to those. To manage these risks and impacts, all required actions, including chance finds procedure, have been incorporated in the ESF instruments (ESMF, SEP and ESCP) and will be further detailed in site-specific ESSs instruments (ESMPs) for CDD sub-projects. The procedure for chance finds is detailed in Annex 3.

**b) Operation Phase of Village sub-projects**

The potential environmental and social risks and impacts of this project to human health and the environment are expected to be moderate as the earmarked budget for all community-driven development (CDD) sub-projects per village is limited to US\$ 4,200 first year and 3,800\$ second year /village. Any cattle and goats/sheep- fattening/rearing activities, crop production activity, transport business are likely to have moderate predictable and easily mitigated environmental and social impacts since they are micro-projects and not carried out in environmentally sensitive areas. The expected impacts are detailed below:

**(i) Greenhouse gas emission and local air pollution**

In general, some of the proposed such as livestock or moto business emit a wide range of air pollutants that have serious negative impacts on humans and environment when implemented in large scale. These emissions include ammonia (NH<sub>3</sub>) and nitrogen oxides (NO<sub>x</sub>) or nitrous oxides (N<sub>2</sub>O) from livestock farming and manure management; fine particulate matter from crushing of animal beddings by movement of livestock and manure management; volatile organic compounds (VOC) and methane (CH<sub>4</sub>) from metabolic processes of manure; CO<sub>2</sub>, etc.

However, the contribution of ACEP activities to greenhouse gases emission and air pollution is so limited and expected to be minor since the activities to be financed through ACEP are small scale in nature.

**(ii) Health and safety risks**

Any livestock projects are likely to have minor impact on disease transmission or other health factors between humans and animals. The risks associated with animal husbandry include the occurrence of infectious diseases, and the high antibiotic use in livestock production contributing to emergence of antibiotic resistance and its spread from animals to humans. In addition, accidents leading to injuries and fatalities by livestock, moto-taxi or other causes may occur.

Besides safety issues (including fatalities and injuries), moto-taxis may have some undesired effects like crime (theft), health risks, etc. Either moto will be stolen or motorcycle taxi drivers will be involved in robbing their clients and pedestrians.

The gender-based violence (GBV) may also exclude potential women beneficiaries from becoming moto-taxi operators if there are cultural and other related issues. The child labour used as moto – taxi operators leading to increased school dropout etc.



### **(iii) Noise pollution**

The livestock reared in sheds may make noise and potentially affect people nearby. The noise is often more annoying at night or during leisure time. The noise problem may be recorded during animals feeding or delays in feeding them, cleaning of animal housing, animals treatment time, transporting manure and slurry, etc. The moto – taxi, when leaving or coming back from their workplace or if the village is located near the road, also generates noise problems.

Many noise problems can be prevented by good management, consideration and ensuring a good standard of maintenance of plant and equipment. The hierarchy for control should be to:

- Prevent generation of noise at source by good design and maintenance;
- Minimise or contain noise at source by observing good operational techniques and management practice.
- Increase the distance between the source and receiver.
- Use physical barriers or enclosures to prevent transmission to sensitive receptors.
- Sympathetic timing and control of unavoidably noisy operations

Under this project, most animal sheds will be either within a household compound or in a given location nearby households. The noise pollution will mostly be controlled through (i) good design and maintenance and (ii) observing good operational techniques and management practice.

### **(iv) Water and soil quality degradation**

The zero grazing system has become a common practice in many districts of the country. It is likely that cattle, goat and sheep in the project areas will be fed under sheds. Intensive forage production and harvest to feed animals in stalls may lead to severe land degradation and biodiversity losses, but is not expected to materials due to the small size of the grants. Sub-project screening for risks of land and soil degradation and biodiversity loss, while technical support suitable to the project type will also ensure compliance with risks mitigation laws and regulations. The animals will also need water for their subsistence. The livestock intensive/ extensive systems can lead to water pollution through waste runoff, but intensive commercial farming will not be viable within the project scope. Most motorcyclists clean their motos in water bodies and this leads to water quality degradation and pollution.

### **(v) Spread of pesticides' use related diseases**

The project will not directly support the application of IPM technologies, but will ensure the provision of subject matter technical advisors to each village, who will offer training, support, and supervision in line with Government-endorsed best practices.

The use of agrochemicals (fertilizers and pesticides) and good quality seeds is compulsory for increased crop production. In addition to environmental risks, the use of chemicals will have adverse impacts on human health. In order to prevent, reduce, or control the potential chemicals impacts caused by accidental spills during the transfer, mixing, storage and application of pesticides, pesticides should be stored, handled, and applied in a way consistent with the recommendations for hazardous materials management presented in the General EHS Guidelines<sup>8</sup>.

As per these Guidelines, the pesticide transport, storage, handling and use under local conditions need much improvement. Similarly the disposal of containers requires much more effort. The following are the recommended pesticide storage practices:

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<sup>8</sup> [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_policy\\_ehs\\_annual\\_crop\\_production](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_policy_ehs_annual_crop_production)

### **a) Storage**

- ✓ Store all pesticides in a lockable container or store that has sufficient space in which to capture any spills without contaminating the environment.
- ✓ Stores should be set away from water sources, residential areas, as well as livestock and food storage areas.
- ✓ Communities will procure spill kits and institute suitable control measures in case of accidental spillage, under the guidance of district authorities.
- ✓ Store all pesticides in their original, labeled containers, and ensure that storage instructions are followed.
- ✓ Keep a register of all pesticides procured, recording when they were received, the amount used, the amount remaining in store, and their location.

### **b) Handling**

- ✓ Operators must read, understand, and follow product label directions for safe mixing, application and disposal; use trained personnel for critical operations (e.g., mixing, transfers, filling tanks, and application);
- ✓ Communities will ensure that spills are cleaned up immediately using appropriate spill kits; spills should not be washed away into watercourses or drains.

### **c) Application**

- ✓ Give preference to the application method with the lowest EHS risk and ensure non target organisms are not affected;
- ✓ Communities will be supported by technical advisers to select pesticide application technologies and practices designed to minimize off-site movement or runoff (e.g., low-drift nozzles, using the largest droplet size and lowest pressure that are suitable for the product);
- ✓ Establish buffer zones around watercourses, residential and built-up neighborhoods, as well as livestock and food storage areas;
- ✓ Ensure that all equipment is in good condition and properly calibrated to apply the correct dosage;
- ✓ Insist that applications occur under suitable weather conditions; avoid wet weather and windy conditions;

### **d) Disposal**

- ✓ Any unused dilute pesticide that cannot be applied to the crop—along with rinse water, and out-of-date or no-longer approved pesticides—should be disposed of as a hazardous waste, as per FAO guidelines;
- ✓ Empty pesticide containers, foil seals and lids should be triple rinsed, and washings used in the pesticide tank should be sprayed back onto the field or disposed of as hazardous waste in a manner consistent with FAO guidelines and according to the manufacturer's directions.
- ✓ Containers should be stored safely and securely under cover prior to their safe disposal; they should not be used for other purposes.

It is anticipated that ACEP will promote the use of Integrated Pest Management (IPM)<sup>9</sup> during its implementation, in line with the National Integrated Pest Management Framework of Rwanda (2018).

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<sup>9</sup> IPM is an effective, environmentally-sensitive and economically-sound approach to the management of pest organisms. The Government of Rwanda most recently updated its IPM Plan in 2018. <http://documents1.worldbank.org/curated/en/616431527233082577/pdf/Integrated-pest-management-plan.pdf>

Based on the above information, capacity building for farmers and extension staff, pesticides dealers in IPM practices and pesticides use will be an important component of technology transfer for crop intensification during ACEP, if any crop production sub-projects are selected.

**(vi) Risks and impacts on cultural heritage**

The CDD sub-project activities, including the crop farming, may have risks & impacts on previously unknown heritage, including graves/small memorial shrines. Under such circumstances, the chance finds procedure is applied. The procedure (see Annex 3) includes a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence-off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; and to identify and implement actions consistent with the requirements of this WB ESS8 and GoR national law, among others. All these will be detailed in the site specific ESSs instruments (ESMPs) for CDD sub-projects. It is also reflected in the ESCP for ACEP.

**5.2.2. Localized Impacts**

In relation to environmental and social impacts, most of the activities planned under the ACEP project will vary from no impacts to moderate impacts in scale. Consequently, the significance of the direct negative environmental and social impacts is likely to be moderate.

**5.2.3. Cumulative Impacts**

Many of the sub-projects may result in cumulative impacts on humans and natural resources. Cumulative impacts are those that may result from individually small-scale activities with minimal impacts but which over time can combine to have a significant impact. Cumulative impacts can also be defined as impacts that potentially develop from the combined impacts of more than one sub-project. These include for instance:

- Increased use of veterinary products which may have downstream impacts; and
- Land use change as a result of a proliferation of livestock, crop or other productive sub-projects.

Communities in target villages will be provided with an opportunity to learn how to avoid or mitigate localized impacts from initial sub-projects throughout the project, so that measures can be integrated in subsequent activities. This learning is integrated into the project design, including joint sector-level meetings with neighbouring village leaders from across the to exchange ideas and address any of the risks of their selected projects as a whole. In addition, implementation support to the project by District and Sector-level authorities responsible for environmental and social risks management and local economic development is design to ensure strong technical advice to villages on the medium- to long-term impacts and risks of their selected projects.

**5.3. Guidelines for Mitigation Measures**

All significant adverse impacts are considered for either design of the sub-projects to avoid such impacts or impact mitigation. Specific measures have been suggested in this section and include provision of alternatives and pollution control. The mitigation measures are applied to significant impacts arising from construction, operation and maintenance aspects of the various project activities. Spark is responsible for ensuring villagers identify risks, determine mitigation measures, and include the mitigation measure as part of the request for microgrant funding via the sub-project proposal. The mitigation measures are presented in the following table in a descriptive format. Sub-projects should be screened by Spark and village mitigation measures identified and approved with sub-project proposals. This will include the use of a sub-project screening tool (See Annex 1) and rigorous project approval criteria, which will be approved by the Bank as part of the Project Implementation Manual, compliant with the ESMF. Comic Relief, as the grant recipient, is responsible for Spark's overall environmental and social risk compliance.

**Table 3: General Environmental and Social Impacts and their Mitigation for ACEP**

Project Activities	Specific activities	Negative impact	Mitigation measure	Implementation Responsibility	Budget
<b>Village Development Planning Phase (Component 1)</b>					
Village and Local Government Capacity Building	Site selection and sub-project designs	Conflict over project beneficiaries due to disagreement and misunderstanding	- Involve all the stakeholders in site selection (organizing consultation meetings, sites visits with stakeholders)	Spark	No additional budget required – included in project design and Cost Table
		Labour exploitation	- Ensure at the design stage, through sub-project screening forms, that any wage labour resulting from village sub-project implementation is only allocated to adults, and pays people fairly, void of gender or any other discrimination.	Spark	No additional budget required – included in project design and Cost Table
	Capacity building of local government at the District, Sector and Cell levels and the community	Limited knowledge of local authorities in enhancing citizen engagement in development activities and improving livelihoods	- Training local authorities on a Facilitated Collective Action Process (FCAP, also known as Inzira y'Iterambere in Kinyarwanda)	Spark	No additional budget required – included in project design and Cost Table
		Limited knowledge of local community and low ownership of project activities	- Training rural community on engaging communities in development planning and management of village level sub-projects.	Spark	No additional budget required – included in project design and Cost Table
		Gender-based violence – risk of harassment and violence against women who leave their homes to attend meetings	- Grievance Redress Mechanism will be established to identify and mitigate any unexpected social impacts of the project and seek redress	Spark	No additional budget required – included in project design and Cost Table
<b>Sub-Project Implementation Phase (Component 2)</b>					
Sub-project implementation	Materials Transport & Construction of animal sheds and/or other small structures	Loss of biodiversity	- Use wood for the construction of animal sheds and avoid to cut down immature trees.	Local Government authorities working on the Project	No additional budget required – TA is included in the Cost Table for the project, while implementation would be included in village sub-project budgets

	Construction works	Health and Safety risks	<ul style="list-style-type: none"> <li>- Provide PPEs to all construction workers and enforce their use</li> </ul>	Local Government authorities working on the Project	No additional budget required – would be included in village sub-project budgets
	Provision of wage labor	Exploitation of child labor, and/or unfair access to labor opportunities	<ul style="list-style-type: none"> <li>- Ensuring any wage labour resulting from village sub-project implementation is only allocated to adults, and pays people fairly, void of gender or any other discrimination.</li> <li>- Ensuring people from marginalised groups have equal or preferential access to wage labour opportunities</li> </ul>	Spark	No additional budget required – included in project design and Cost Table
	Village sub-project implementation, including but not limited to livestock rearing/ fattening, moto-taxi business and crop production projects	Greenhouse gas emission and local air pollution	<ul style="list-style-type: none"> <li>- Manage properly animal waste (organic manure) and promote their recycling (eg compost making) and recovering nutrients and energy from animal waste (e.g. biogas).</li> <li>- Ensuring villages have plans for motorbike/other transport upkeep in line with regulations on emissions and vehicle registration</li> </ul>	Local Government authorities working on the Project	No additional budget required – TA is included in the Cost Table for the project, while implementation would be included in village sub-project budgets
		Health and safety risks	<ul style="list-style-type: none"> <li>- Provide PPEs to all contract workers and enforce their use</li> <li>- Safe operation of vehicles by authorised drivers only</li> </ul>	Local Government authorities working on the Project	No additional budget required – would be included in village sub-project budgets
		Water and soil quality degradation	<ul style="list-style-type: none"> <li>- Regular maintenance of motos in service stations and approved areas;</li> <li>- Establishment and adoption of appropriate waste disposal plan;</li> <li>- Adequate sanitary facilities and compost pits location and design should take into consideration distance from water sources.</li> <li>- Pest-pesticide management supported by authorised District technical advisers</li> </ul>	Local Government authorities working on the Project	No additional budget required – TA is included in the Cost Table for the project, while implementation would be included in village sub-project budgets
		Loss of biodiversity	<ul style="list-style-type: none"> <li>- Forage planting and proper management practices</li> </ul>	Local Government authorities working on the Project	No additional budget required – TA is included in the Cost Table for the project, while implementation

					would be included in village sub-project budgets
		Risks & impacts on previously unknown cultural heritage	- Apply chance finds procedure (see Annex 3 for further info) if previously unknown cultural heritage, including graves/small memorial shrines, or access to those, is encountered during project activities.	Spark	No additional budget required – included in project design and Cost Table
		Gender-based violence – risk of harassment and gender-based violence as women’s mobility, incomes, and assets may change as a result of involvement in the project, affecting community-level gender relations.	- Grievance Redress Mechanism will be established to identify and mitigate any unexpected social impacts of the project and seek redress	Spark	No additional budget required – included in project design and Cost Table
<b>National Framework for Participatory Village Planning (Component 3)</b>					
National Framework for Participatory Village Planning	Preparation of the National Framework for Participatory Village Planning	It may have direct and/or indirect environmental and/or social impacts	- Make reference to and integrate the WB ESSs in the ToRs for NFPVP preparation; - Ensure the integration of the ESSs principles and objectives in the NFPVP during preparation as per the agreed ToRs - The framework prepared and submitted on time for review and clearance	Spark	No additional budget required – included in project design and Cost Table
<b>Project Management (Component 4)</b>					
Project Management and staffing	Staff recruitment, onboarding, management and termination	Labour exploitation and/or mistreatment	- Develop a Labor Management Procedure for the Project - Implement internal/staff-oriented grievance redress mechanism (GRM)	Spark Microgrants	No additional budget required – included in project design and Cost Table

## 6. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCESS

### 6.1. Introduction

This chapter of the ESMF describes the process for ensuring that environmental and social concerns are adequately addressed through mitigation measures, institutional arrangements and procedures used by the Project for managing the identification, preparation, approval and implementation of sub-projects. It sets out the reporting systems and responsibilities of the institutions in implementing the ESMF including the details to be addressed by the ESMF and the specific steps to be undertaken to ensure adherence to the ESMF. The project and sub-project preparation and reporting will be done through Sparks Microgrants as the focal point for environmental compliance.

### 6.2. Environment and Social Management Process

#### 6.2.1. Sub-project screening categorization

The screening process intends to:

- Determine the potential of selected sub-projects as to whether they are likely to cause negative environmental and social impacts;
- Determine appropriate mitigation measures for activities with adverse impacts
- Incorporate mitigation measures into sub-project designs;
- Review and approve sub-project proposals
- Monitor environmental and social parameters during project implementation

The classification of each sub-project under the appropriate environmental and social risk category will be based on the provisions of the World Bank environmental and social framework (WB ESF), especially Assessment and management of environmental and social risks and impacts (ESS1) and Rwandan regulation.

As per the World Bank ESF, the environmental and social screening of each proposed sub-project will result in its classification in one of the four categories: high risk, substantial risk, moderate risk and low risk sub-project depending on the type, location, sensitivity, and scale of the sub project and the nature and the magnitude of its potential environmental and social impacts as well as the capacity and commitment of the borrower to manage environmental and social risks and impacts in a manner consistent with the ESSs.

High risk projects are likely complex, large scale/ size, sensitive or high value site. The impacts may be long term, permanent, irreversible, significant. Cumulative, transboundary may be hard or impossible to mitigate. On the other side, the substantial risk projects are less complex, medium scale / size and site less sensitive. Their impacts are less adverse, mostly predictable, temporary, and reversible; some potential cumulative/ transboundary and more readily/ reliably mitigated. With regard to moderate risks, the project impacts are low magnitude, predictable, likely temporary/ reversible, site- specific and easily mitigated. Low risk projects are projects with minimal or negligible impacts.

An Environmental and Social Impact Assessment (ESIA) is required for projects with high and substantial risks and can be prepared by independent experts while no environmental and social assessment for low risk projects. An Environmental and Social Management Plan (ESMP) is recommended for small projects with moderate risk.

The Rwanda regulation on projects that must undergo environmental and social assessment defines three levels of impact which are determined through the screening process as follows:

- a) Projects which are likely to have significant adverse environmental and social impacts that are sensitive, diverse or unprecedented. The impacts under this category affect broader area than the sites or facilities subject to physical works. This category is equivalent to Impact Level 3 (IL3) in Rwanda's General Guidelines for EIA (2006). These include all constructions with above 500 persons capacity or in a plot size exceeding 1000m<sup>2</sup>; industries, warehouses, prisons, churches, hotels, agricultural and breeding activities which use chemical fertilizers and pesticides in wetlands, etc. They require a full ESIA to be conducted.
- b) Projects which are likely to have potential adverse environmental and social impacts, which are less adverse than those of IL3 projects on human populations or environmentally important areas including wetlands, forests, grasslands and any other natural habitat. The impacts are usually site specific, few or none of them are irreversible, and most of them are mitigated more readily than impacts from category A sub-projects. This category is equivalent to Impact Level 2 (IL2) in Rwanda's General Guidelines for ESIA (2006). They require environmental impact assessments to be carried out but these may not require detailed analysis. The activities under this category include construction of towers and antennas, constructions of buildings with less than 500 people capacity, micro hydropower plants, etc.
- c) Projects which are likely to have minimal or no adverse environmental and social impacts. Beyond screening, no further EA action is required. This category is equivalent to Impact Level 1 (IL1) in Rwanda's General Guidelines for ESIA (2006). The Environmental and Social Assessment is not required.

In line with the World Bank ESS1 requirements and Rwanda Ministerial Order No 001/2019 of 15/04/2019 establishing the lists of projects, activities and works that must undergo environmental and social assessment, instructions, requirements and procedures to conduct environmental and social assessment, the ACEP sub-projects falling under Component 2 are likely to be assigned moderate risk based on their small size and the fact that activities will not be carried out in environmentally sensitive areas. Therefore, simplified environmental and social assessment (e.g. Environmental and Social Management Plan) may be required prior to project implementation. In cases of difference in the screening outcome (between Rwandan laws and the World Bank ESF) the more stringent requirement will apply.

However, the screening process will be required for all project activities to confirm the environmental and social risk category of villages' sub-projects and relevant follow up action. It will be conducted district-wise by the developer and the screening report will be shared with the World Bank and RDB for approval. The environmental and social screening checklist form is presented in Annex 1.

### **6.2.2. Further Environmental and Social Assessment and Exclusion List**

Based on the screening findings by the developer and depending on the extent/magnitude of the impacts, it may be evidenced that the financed activities or sub-projects have a negative and irreversible impact on the environment which is similar in nature to the work, activity or project listed in Impact Level 3 or Impact Level 2 under the Rwandan regulation (or high or substantial risk under World Bank ESF). Further environmental and social assessment (An Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plan (ESMP)) will be needed and carried out by Spark Microgrants. RDB may therefore request Spark to undertake the required assessments.



**All ACEP sub-projects, activities or works that will require a full ESIA study will be screened out for funding.** All projects carried out in environmentally sensitive areas (like projects in areas of critical habitats or which result in the conversion or degradation of such habitats; projects related to production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans (such as pesticides/herbicides, ozone depleting substances, etc); activities involving child labour; or activities requiring land acquisition, restrictions on land use or involuntary resettlement will also not be implemented by ACEP.

Villages' sub-projects that do not exceed Moderate risk rating need a simplified ESMP will be eligible for funding by Spark Microgrants. The guideline for the preparation of ESMP is illustrated in Annex 2. This ESMF provides guidance on the procedures and requirements for the preparation of the simplified ESMP.

### **6.2.3. Procedures and Requirements for ESMP Preparation**

If an ESMP is deemed necessary, the main issues to be assessed and described in the ESMP for ACEP sub-projects include community health and safety risks, greenhouse gas emission and air pollution, noise pollution, water pollution and loss of biodiversity. For moto businesses, the impacts will include maintenance requirements for motorcycles, safe driving practices, including PPE and potential social risks, such as GBV. The type of expertise needed in the ESMP will vary with the location and magnitude of the sub-projects within the district but should in any case include:

- Environmental Specialist, with extensive experience in agricultural development activities;
- Animal Production Specialist, with vast experience in animal production and ecosystem management;
- *Socio-economy Specialist* in rural economy/development or related fields.

To prepare an ESMP, a consultant should be hired to prepare a scoping report specifying the sub-project's area of influence, the thematic scope and depth of assessments required, the composition of the required ESMP team, and the probable budget required to mount the ESMP study. The public consultation meetings will also be held and findings from the consultation will be included in the report.

Upon review and approval of the Scoping Report, the consultant will start the ESMP study. The Study will entail a systematic investigation of all impact areas as identified in the scoping report, taking care to document the current baseline environment, resource exploitation patterns and ecological pressure points. It is mandatory for the ESMP study to undertake public consultation with all stakeholders in the project's area of influence. The ESMP team should note and understand all stakeholder interests so as to cater for them in the ESMP.

In addition to policies and legal framework, environmental baseline and public consultation findings, the report will also include the environmental management plans and environmental monitoring plans as well as estimated cost.

- ***Review of the ESMP report***

The ESMP report will be submitted to both RDB and World Bank for approval and clearance. The project shall obtain clearance and completion Certificate from World Bank and RDB respectively. The Spark Management will be responsible for ensuring that the final ESMPs reports are approved by RDB and World Bank before implementation.

- ***Decision-Making***

During the decision-making and authorization phase, ESMP documents submitted shall be reviewed by RDB for their approval. If the project is approved, the developer will be issued with an ESMP Certificate of Approval, which permits implementation of the sub-project in accordance with the mitigation measures in the ESMP report and any additional approval conditions.

#### **6.2.4. Environmental Monitoring**

The monitoring should be done during both construction and operation phases of a project. This is the responsibility of SPARK, Districts and REMA. Monitoring is not only to ensure that approval conditions and proposed ESMPs are complied with but also to observe whether the predictions made in the ESMP reports are correct or not or what review is required. Monitoring will include GRMs and management of any grievances within the project.

#### **6.2.5 Labor Management Procedure.**

Spark Microgrants will prepare a standalone Labour Management Procedure (LMP) applicable to project implementation. The LMP will include the number and characteristics of project workers employed by Spark (directly employed and contract staff), an assessment of the key potential labor risks, an overview of the labor legislation and other applicable policies and procedures, and a GRM for project staff. The LMP will be submitted to the Bank for review and clearance.

### **6.3. Mitigation and Management plan**

Mitigation measures will be considered starting with the Environmental Assessment process. Impacts identified as severe will be further analyzed to identify additional mitigation measures that are potentially available to eliminate or reduce the predicted level of impact. Potential mitigation measures will include vegetation restoration plan, engineering design solutions, stakeholder's participation in finalizing mitigation measures, technical assistance from the relevant government agencies (to identify solutions for waste management, efficient fodder production and water use, in case of moto businesses – road safety aspects, etc.) and capacity building of the project beneficiaries, etc. The ESMP should be developed so as to counter the impacts assessed and also the likely impacts during the implementation of the works and operational phase.

#### **6.3.1. Guidelines for mitigation measures**

All significant adverse impacts are considered for avoidance through modifications to project design or mitigation. The mitigation options considered include project modification, provision of alternatives, and impact control. In case where the effectiveness of the mitigation is uncertain, monitoring programmes will be introduced.

The mitigation measures are applied to significant impacts arising from construction and operation phase of the villages sub-projects. As all activities will be done by households, these should be informed of possible adverse impacts both during the project construction and operation phase and appropriate mitigation measures to be implemented. This is the responsibility of Spark Microgrants in partnership with participating districts.

#### **6.3.2. Compliance with ESMP Implementation**

Monitoring the compliance of sub-project implementation with the mitigation measures set out in its ESMP will be required. At District level, the ACEP District Coordinator (DC), Spark trainers and District Environmental Officer (DEO) will have the responsibility for implementing E&S and RIM measures, reporting on any issues, and pursuing the following corrective measures as required.

- (i) If a violation of the ESMP is detected during a site visit, the Community leaders and workers will be notified of the violation, and the means of rectification, verbally and a realistic deadline for rectifying the violation.
- (ii) If a violation is reported to the DC and DEO by some other entity, they will conduct a site visit and, similarly, issue the verbal warning and deadline for rectification.
- (iii) The DC and DEO will return to the site on the deadline, and if the violation is still occurring, they will notify the community leaders in writing of the continuing violation, informing them of actions/measures to be taken by the Project.

## **7. IMPLEMENTATION AND MONITORING PLAN OF THE ESMF**

### **7.1 Monitoring Objectives**

The objective of monitoring is twofold:

- (a) to alert project authorities by providing timely information about the success or otherwise of the environmental management process outlined in this ESMF in such a manner that changes can be made as required to ensure continuous improvement to ACEP environmental management process (even beyond the project's life);
- (b) to make a final evaluation in order to determine whether the mitigation measures incorporated in the technical designs and the ESMP have been successful in such a way that the pre-project environmental and social condition has been restored, improved upon or is worse than before and to determine what further mitigation measures may be required.

This section sets out requirements for the monitoring of the environmental and social impacts of the ACEP sub-projects. The monitoring of environmental and social indicators will be mainstreamed into the overall monitoring and evaluation system for the project. The monitoring of this ESMF implementation will be conducted by Spark Microgrants and the key implementing institutions of this project.

### **7.2 Monitoring and Reporting of Environmental and Social Indicators**

Two opportunities will be taken to build a simple system for the monitoring and evaluation of environmental and social impacts:

- a) The District Coordinator (DC) will also act as the Environmental and Social Safeguards Specialist and will coordinate Spark Trainers in a district and should consider the environmental and social criteria that require measurement (i.e. registered incidents/ accidents, levels of income etc); a list of initial proposals is given below;
- b) Using that list of criteria, a set of indicators can be integrated into the screening forms used in the project approval process in each district. This will ensure flexibility at the sub-project design stage, integration of monitoring considerations throughout the sub-project cycle, as well as a participatory approach to environmental and social monitoring.

#### **7.2.1 Initial proposals**

The key parameters to be considered under ACEP sub-projects include monitoring of community health and safety risks, noise pollution, greenhouse gases emission and air pollution, income generation, water and soil degradation, gender-based violence and other social tensions, and risks to cultural heritage, etc. The goals of monitoring are to measure the success rate of the project, determine whether interventions have resulted in dealing with negative impacts, whether further interventions are required or monitoring is to be extended in some areas. Monitoring indicators will be very much dependent on specific project contexts.

Monitoring and surveillance of sub-projects will take place on a "spot check" basis as it would be impossible to monitor all the sub-projects to be financed under the project. The spot checks consist of controlling the establishment of mitigation measures, and will be planned to include representation of all sub-project types, and all target districts and sectors. It is not recommended to collect large amounts of data, but rather to base monitoring on observations by project technicians and stakeholders to determine the trends in indicators.

#### **7.2.2 Monitoring of Participation Process**

The following are indicators for monitoring of the participation process involved in the project activities.

- ✓ Number and percentage of beneficiary households consulted during the planning stage,
- ✓ Level of decision making of affected people;

- ✓ Level of understanding of project impacts and mitigation;
- ✓ Effectiveness of local authorities to make decisions;
- ✓ Frequency and quality of public meetings;
- ✓ Degree of involvement of women, youth or disadvantaged groups in discussions.

The main components of the monitoring plan include: environmental or social issue to be monitored and the means of verification; specific areas and locations; parameters to be monitored; frequency; and institutional responsibilities for monitoring and supervision. Sites specific monitoring checklists will be prepared by the designers for each sub-project, and be included as an integral part of sub-project approval in each village. Monitoring checklist should be prepared using the generic monitoring plan presented within this ESMF document and respecting significant site-specific impacts and proposed mitigation measures elaborated in site specific ESMP document.

The Project will have a dedicated public liaison officer (or District Coordinator), who will establish communication with the local residents that may be affected by the project and be responsible to inform them about all of the project related activities, especially those related to environmental and social impacts of the project and planned mitigation measures; They will also be responsible for handling raised E&S and RIM issues or communicate them to the Project management for further measures.

Spark Microgrants will have the authority for immediate suspension of works if its performance is found to be in serious contravention with the environmental and social standards and regulations. Monitoring and compliance in accordance with ESMF and ESCP, including monitoring of implementation of sub-project screening and approval process, during the project implementation will be undertaken by the designated E&S staff and reported in writing to Spark Microgrant and the Bank.

### **7.2.3 Reporting Process**

The project staff in collaboration with District environmental officer (DEO) will prepare their compliance reports in respect to ESCP, which document the implementation of environmental mitigation and protection measures (together with prescribed monitoring activities carried out during the reporting period) on monthly basis and submit them to Spark Country Director who will, in turn, share the report with the Bank and REMA. However, in case of any kind of accident or endangerment of protected environments, reporting to Project Management, participating District and World Bank will be immediate.

Annual Environmental Health and Safety (AEHS) reports, including monitoring indicators and reporting on the implementation of the requirements set forth in the ESCP will be prepared by Spark and submitted for the Bank's review. In case of fatalities or major incidents on sites, Spark will immediately report to WB.

In addition to the Project reports required by the World Bank, ESMF implementation, and any other E&S instruments prepared under ACEP, will be reviewed as part of the Project Mid Term Review and at the project end as part of the Project Completion Report. Findings related to environment and social management will be shared with REMA (in addition to the World Bank). The table below indicates project indicators to be monitored and reported against.

**Table 4: Monitoring indicators for ACEP**

Monitoring parameter	Monitoring Activity/Indicators	Target	Responsibility for monitoring
<b>Environmental and Social Safeguards Instruments</b>			
Screening	% of sub-projects with completed screening reports	100% of sub-projects screened	Spark Program Director
Approvals and implementation	% of ESMP, including chance finds procedure, completed and cleared (if required)	100% ESMP approved	Spark Program Director
E&S and RIM Training	Number of ACEP and District staff trained	Project management team, District staff (Environmental Officer, veterinary officer, Sector Agronomist and Cell executive secretary and SEDO)	Spark Country Director
	Number communities' members trained	Village members	Spark Program Director
Reporting	No. of quarterly reports received	12 quarterly reports received	Spark RELM Director
	No. of annual reports received	1 annual report received	Spark RELM Director
OHS/Labour Management	Labour management procedures prepared # offices meeting OHS quality standards	1 LMP prepared 4 offices meeting OHS standards	Spark Operations Director
<b>Intervention level Monitoring</b>			
Biodiversity conservation	Number of trees, grasses and shrubs planted for ecological rehabilitation	At least 80% of planted trees survived and are in good condition	Community, Spark and District
	Types of generated wastes at the site	All solid wastes (100%) generated at the site are collected	Community, Spark and District
	Introduction/ proliferation of Invasive species in the project area	No invasive species in the project area	Community, Spark and District
Community Health and Safety risks	Recorded cases of human- animals diseases transmission	No significant increase of diseases versus Baseline data	Community, District, local health centers (Ministry of Health) and Spark
	Recorded cases of accidents/ injuries and fatalities by livestock, moto- taxi or other project related causes	No significant increase of cases versus Baseline data	Community, District, local health centers (Ministry of Health) and Spark
	Recorded cases of crimes like theft of animals, motos, clients, etc	No significant increase of cases versus Baseline data	Community, District, National Police, RIB and Spark
	Recorded number of gender-based violence (GBV) cases among project beneficiaries or with neighbours.	No significant increase of cases versus Baseline data	Community, District, National Police, RIB and Spark
	Employment opportunity (animals' keepers, moto operators), origin (within or outside the project area) and age (records on workers above 18 years old)	No significant increase of cases versus Baseline data	Community, District and Spark
Noise pollution	Good operational techniques and management practice adopted (ie feed bins located where delivery movements and handling on sites are reduced, Staff/ contractors and visitors instructed not to raise voices, use phones or play radios unnecessarily at night, etc)	Noise pollution minimized as possible (No complaints recorded)	Community, District and Spark
Households incomes	Number of households beneficiaries who acquired new items as a result of ACEP funding	Increase in hh assets of project beneficiaries (target TBD based on ACEP Results Framework)	Community, District and Spark
GRM	Active site specific Grievance Redress Committees (GRCs)	All grievances received are timely resolved	Community, District

### **7.3 Monitoring of ESMF Implementation**

In addition to the project reports required, an audit on ESMF implementation will be prepared at the project end and delivered to REMA and World Bank.

### **7.4 Evaluation of Results**

The evaluation of results of environmental and social mitigation can be carried out by comparing baseline data collected in the planning phases with targets and post-project situations. A number of indicators would be used in order to determine the status of affected people and their environment. In order to assess whether these goals are met, the Spark RELM Director will indicate parameters to be monitored, institute monitoring milestones and provide resources necessary to carry out the monitoring activities. The following are some pertinent parameters and verifiable indicators/questions to be used to measure the ESMF process, mitigation plans and performance;

- ✓ Were field staff and stakeholders (District staff mostly) been trained in E&S and RIM compliance?
- ✓ How many villages' projects were screened and which environmental and social risk categories assigned?
- ✓ How many consultation meetings with project beneficiaries and stakeholders organized in each District; who attended, what was discussed and what were the participants' concerns on the sub-project? Were all concerns addressed, what is their current implementation status, if any.
- ✓ How many recorded grievance cases have been settled within one year?
- ✓ How many projects were screened?

### **7.5 Quarterly and Annual Reviews**

Quarterly and annual reviews will be undertaken by Spark compliance staff and are necessary to:

- ✓ Ensure that sub-projects are complying with the processes established in the ESMF;
- ✓ Ensure that sub-projects are compliant with the conditions and requirements stipulated in the ESCP,
- ✓ Identify challenges and opportunities in order to improve programme performance; and
- ✓ Be able to determine the cumulative impacts of the Programme to establish attainment of the Programme Development Objectives.

The review session will produce a quarterly and annual review reports for every District. It is wise to conduct these workshops every year to make timely improvement in the Programme performance. The quarterly and annual Review reports will be presented to ACEP steering committee on a quarterly and annual basis in order to ensure that the project activities are implemented in an environmentally and socially sound manner.

### **7.6 Environmental and Social Due Diligence**

The purpose of environmental and social safeguards internal due diligence is to establish the level of compliance with World Bank environmental and social framework as well as national policy and regulatory requirements. The Spark Management Team will be responsible for ensuring that environmental and social due diligence is carried out at mid-term review and project end, in compliance with ESF tools. Specifically, the Program Director and Country Director, who will receive training on E&S and RIM, are responsible for compliance and reporting. The due diligence reports will be shared with World Bank, REMA and participating Districts.

### **7.7 Monitoring Roles and Responsibilities**

#### **a) Spark Microgrants**

Spark Microgrant is the implementing agency of the ACEP. It will provide overall coordination and management of the project, and will work under a Project Steering Committee comprising the Ministries in charge of finance and local government. The project will run for three years, from 2020-2024. With regard to monitoring, the Project will provide overall coordination in monitoring including coordinating

training in collection and analysis of monitoring data for data collectors. The Project Monitoring and Evaluation staff, jointly with the Managing Director will be primarily responsible for ensuring compliance to the monitoring framework. The Managing Director will lead the team of Spark trainers (Sector level trainers) in a district. They will undertake review of the monitoring reports emanating from fields during works implementation and will then submit these monitoring reports upon approval to REMA and the World Bank.

Critical role of Spark will include data analysis as well as maintenance of management information systems and all baseline data. Lately other than preparation of periodic reports, Spark Microgrants will implement all the necessary modifications in the monitoring framework. Spark is also responsible for the Grievance Redress Mechanism.

#### **b) Comic Relief**

As stated above, the implementation of this project will be undertaken by Spark Microgrants. Comic Relief will be the grant recipient. It will pass on the JSDF funds to Spark Microgrants, together with complementary financing from its own resources. Comic Relief will retain a small amount of the complementary financing (US\$77,000) to support monitoring and evaluation (including of the ESMF) and communications for the project.

#### **c) World Bank and Japan Social Development Fund (JSDF)**

The World Bank/JSDF are the co-financier of this project and their role will include monitoring and evaluation of the implementation of the ESMF within the budget of Spark Microgrants and to ensure that compliance is achieved as per the requirements of the ESMF.

#### **d) Village Leadership Committee**

The Village Leadership Committee (VLC), established in each village in the early stages of the project, will be responsible for management of the microgrants sub-project. It will facilitate proposal development including coordinating with other villages and local government officials to ensure technical feasibility. Local communities will be useful agents in collection of data that will be vital in monitoring and as such they will play a role in the monitoring framework.

Local communities in the project intervention areas will receive training and capacity building skills in data collection to be done by the implementing agencies so as to equip them with the ability to collect data.

#### **d) Community GRM Committee**

The Community GRM Committee will i) support village-level grievance handling and problem-solving; ii) escalate any issues that cannot be resolved at the village-level to Spark through the other Project GRM platforms; iii) advise on the use of project resources in accordance with agreed village plans and budgets; iv) report back to the community on resource use and problem resolutions; v) support inclusive decision-making.

#### **f) Rwanda Environment Management Authority (REMA)**

REMA will inspect the compliance with environmental safeguards by the Project. REMA should monitor the reports on a quarterly basis. It will rely on a bottom up feedback system from the ground by going through the monitoring reports and making regular site visits to inspect and verify for themselves the nature and extent of the impacts and the success or lack off, of the mitigation measures.

#### **f) Implementing Partner Institutions of ACEP**

All the implementing institutions identified under this project, will monitor the specific components of project that they are targeted to execute. They include Ministry of Local Administration (MINALOC) and its agency (LODA), and participating Districts.

The Ministry of Local Administration (MINALOC) through participating Districts will assist in mobilization of local communities in the project intervention areas for the adoption and ownership of the project activities. Through the district environmental officer, the district will monitor on daily basis the implementation of safeguards measures reflected in the safeguards documents.

### **7.8 Grievance Redress Mechanism**

The Grievances Redress Mechanisms (GRM) will be required to ensure that project affected people are able to lodge complaints or concerns, without cost, and with the assurance of a timely and satisfactory resolution of the issue. The procedures also ensure that the entitlements are effectively transferred to the intended beneficiaries.

The purpose of the GRM is to record and address any complaints that may arise during the implementation phase of the project and/or any future operational issues that have the potential to be designed out during the implementation phase. The GRM works within the existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are to:

- ✓ Give people affected by the project and other stakeholders safe, transparent and accessible ways of reporting any issues that are putting participants/beneficiaries at risk, and/or impacting the quality of the project;
- ✓ Record, categorize and prioritize the grievances;
- ✓ Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions);
- ✓ Forward any unresolved cases to the relevant authority.

#### **7.8.1 Established procedures and time frame for Grievance redress mechanism**

Grievance redress mechanisms are increasingly important for development projects, where ongoing risks or adverse impacts are anticipated. They serve as a way to prevent and address community concerns, reduce risk, and assist larger processes that create positive social change.

The creation of a community advisory committee will be given priority in each sub-project to resolve any grievance arisen from the village. This village advisory committee, composed of committee head, deputy head, and secretary, will be elected by the entire village to represent them and support them in decision making, supervision of the village sub-projects and support village-level grievance redress. The committee meetings are held at least once two weeks from the date of receiving complaints. Advisory Committees will provide space to raise and address issues in the project, and allow community members to address problems within their control internally.

#### **7.8.2 Grievance resolution approach**

The channels of receiving complaints include presentation of complaints via face-to-face meetings, written complaints, telephones (call/ sms line, whatsapp), email communication, and community-based GRM focal points. Spark's will designate a GRM/Safeguards Officer as part of the Research, Evaluation Learning and Monitoring (RELM) Team, who will be responsible for phone line and SMS, and logging all issues. Spark Trainers are responsible for collecting issues directly from villagers during in-person visits.

If the aggrieved person does not receive a response or is not satisfied with the outcome within the agreed time, s/he may lodge his/her grievance to the relevant Municipal Administration such as the Cell or Sector Executive Secretary or District Mayor, also mandated to help resolve such matters. If requested, or



deemed necessary by the village Advisory Committee, the Spark GRM/Safeguards Officer will assist the aggrieved person in this matter.

The relevant Local Administration will then attempt to resolve the problem (through dialogue and negotiation) within 15 days of the complaint being lodged. If no agreement is reached at this stage, then the complaint is dealt with through the local courts where possible. Where matters cannot be resolved through local routes, the grievance will be referred to higher authorities at the national level. Spark will provide assistance at all stages to the aggrieved person to facilitate resolution of their complaint and ensure that the matter is addressed in the optimal way possible.

### 7.8.3 Grievance Log

Spark's GRM/Safeguards Officer (part of the M&E team) will ensure that each complaint is appropriately tracked and recorded. The log will contain record of the persons responsible for an individual complaint, and records of dates for the following events:

- ✓ Date when the complaint was reported;
- ✓ Date the Grievance Log was added onto the project database;
- ✓ Date when information on proposed corrective action sent to complainant (if appropriate);
- ✓ The date when the complaint was closed out; and
- ✓ Date when the response was sent to complainant.

### 7.8.4 Monitoring Complaints

Spark Microgrants will keep record of the number and the type of complaints received and addressed. The GRM/Safeguards Officer will be responsible for producing regular reports (quarterly) for the Project Director which include;

- Number of complaints received
- Compliance with standards & policies (addressing within a certain time etc.)
- The issues raised and trends in these issues over time
- Causes of grievance/feedback
- Whether remedial actions were warranted
- Redress actions actually provided
- Recommendations to improve /prevent/limit recurrences.

Spark will keep records of all issues brought to their attention verbally or in writing by people affected by the project (communities or individuals). It will categorise all issues and prioritise complaints and whistleblowing for priority redress. The project GRM/Safeguards Officer is responsible for collecting, logging and categorizing all issues submitted.

All non-anonymous and/or non-confidential issues submitted will be acknowledged by Spark, and all complainants will be kept informed of status updates within the stipulated time frame.

**Table 5: Follow up of site complaints by Spark staff**

Issue collection method:	Responsible for acknowledgement and follow-up:	Process overview
Phone/SMS	GRM/Safeguards Officer	Inform complainant at the time the complaint is received that their issues will be followed up within a specified time period. Ask if they would like to be kept updated and update issue log accordingly with contact details and any other specifications.

Website	GRM/Safeguards Officer	Email response forwarding the issues to the relevant GRM Committee member, or informing the complainant of when to expect feedback/resolution.
Focus Group	Trainer	Inform complainant at the time the complaint is received that their issues will be followed up within a specified time period. Ask if they would like to be kept updated and update issue log accordingly with contact details and any other specifications.
Community GRM Committee	Trainer	Inform the Committee at the time the complaint is received that their issues will be followed up within a specified time period. Report back to the Committee once a resolution is reached both verbally and in a written letter.

## **8. INSTITUTIONAL ASSESSMENT, CAPACITY BUILDING AND TECHNICAL ASSISTANCE**

### **8.1. Introduction**

The effective implementation of this ESMF will require technical capacity in the human resource base of implementing institutions as well as logistical facilitation. The implementers need to understand inherent social and environmental issues and values to be able to clearly identify their indicators. While preparing this ESMF, an institutional assessment was inbuilt to identify strengthening needs on social and environmental evaluation, screening, mitigation and monitoring.

### **8.2. Institutional Assessment and Capacity Building**

The overall ACEP management will be the responsibility of Spark Microgrants. At site level, the project will be implemented by the Provincial Programme Manager, District Coordinator and Spark trainers in partnership with participating District Governments.

Spark Microgrants has sufficient staff capacity to manage all E&S and RIM responsibilities, considering the planned hiring under the project to accommodate the increased scope of work for the organisation. Overall responsibility for environmental and social risk compliance within Spark is borne by the Project Director, while responsibility for implementation of E&S RIM implementation systems sits with the Country Director and a dedicated M&E specialist. All will receive intensive safeguards training. It will be the first time for the staff to participate in the implementation of E&S RIM under a WB funded project. In light of the limited E&S RIM experience, a comprehensive training needs assessment and development of a training strategy plan for the whole project team should be carried out as an initial implementation activity of this ESMF, and included in the ESCP. A minimum of 25 staff will be trained, including all program staff (who are critical to implementation of the SEP and GRM), and key management, M&E and operations staff, who are responsible of elements of E&S RIM implementation, including supporting sub-project proposal screening, GRM systems, stakeholder engagement, and risk mitigation and management. In addition, the RELM Team will appoint/hire a dedicated GRM/Safeguards specialist responsible for picking up the additional workload associated with and expanded GRM mechanism and increased compliance responsibilities required to implement the E&S and RIM approach outlined. It is recommended that training sessions incorporate aspects proposed in this framework focusing on skills in E&S RIM preparation and implementation.

The District Government has an environmental officer (DEO) who is not familiar with ESF and overloaded with district duties, He/she may not have enough time to follow up project activities. Building the capacity of District Coordinator and Spark trainers on E&S and RIM matters will therefore be of great assistance.

SPARK will also recruit a short-term consultant to train and assist Spark team and communities on environmental and social management during project identification, environmental screening and preparation of E&S RIM instruments as required.

### **8.3. Human Resource Capacity Requirements**

The Spark Microgrants does have unexperienced safeguards staff to oversee the overall E&S and RIM issues during ACEP implementation. Their capacities need to be strengthened. For the purpose of this ESMF, capacity building should be targeted at the key users of the systems to be established, particularly the sub-project screening tool and GRM. This includes (but is not limited to) District-level Trainers (who support the planning and implementation of village sub-project and FCAP facilitation), the Proposal Review Committee (which includes Finance officers, Technical advisers, M&E Officer, and District Coordinator, who support review and approval of village sub-projects, including through the use of the

ESIA screening tool), and the users of the GRM, including the Country Director, M&E staff, and District Trainers. Training will be designed to enhance the skills on environmental and social impacts so that they are able to implement the proposed ESIA screening process, developing ESMPs, managing GRM, and implementing and monitoring mitigation measures appropriately.

The proposed trainings should cover:

- ✓ Overview on ACE project, WB Environmental and Social Framework and Rwanda safeguards regulations;
- ✓ Overview of the screening process and requirements;
- ✓ Rationale for using screening form and Environmental and Social Checklists;
- ✓ Identification of environmental and social impacts and significance levels according to World Bank and the Government of Rwanda;
- ✓ GRM operations and reporting.

The objective of the E&S and RIM trainings is to equip these technical staff with the necessary skills to implement the E&S instruments in line with this ESMF and ensure that the project activities are socially and environmentally sustainable. Spark management staff will conduct these trainings, in consultation with World Bank E&S and RIM Specialists.

#### **8.4. Technical Capacity Enhancement**

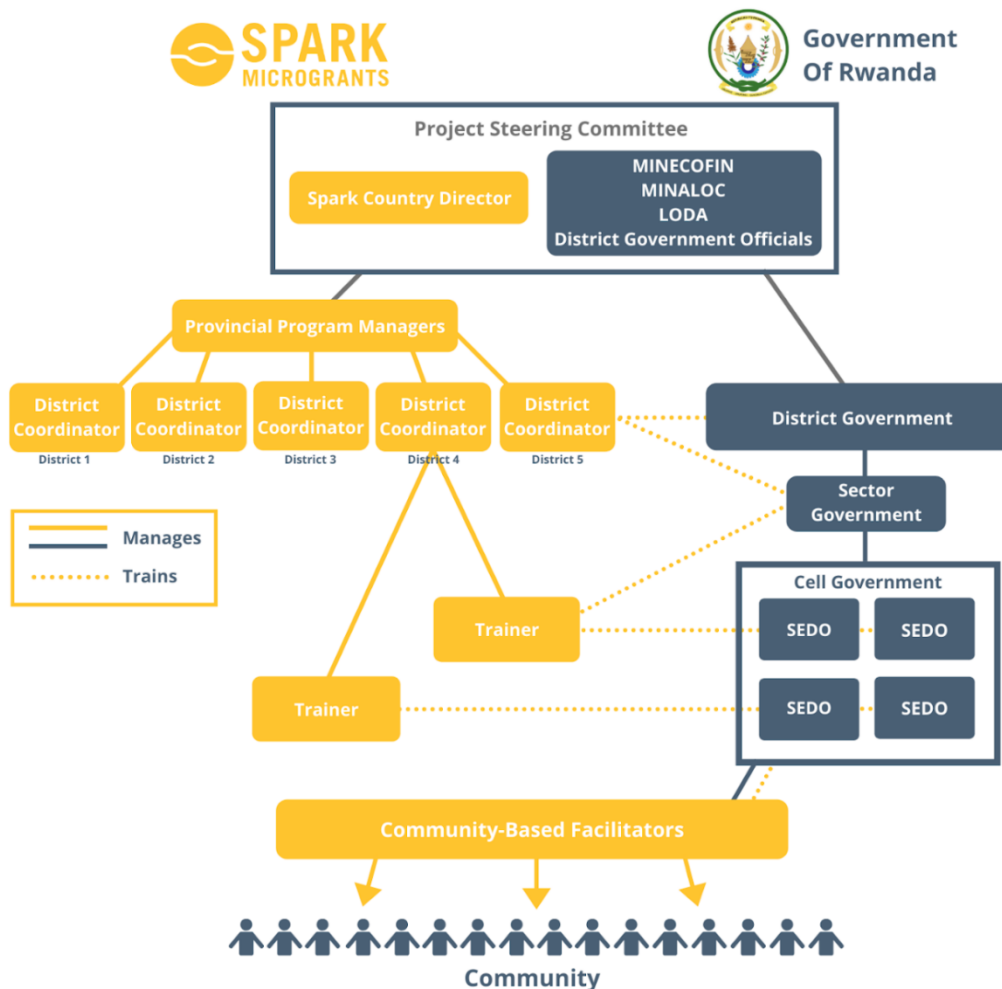
- Mobilization meetings, awareness campaigns and trainings on E&S and RIM will be required for the following institutions and personnel:
- Spark Microgrants staff (Provincial Programme Manager, District Coordinator and Spark Trainers);
- Local Government Authorities (District environment officer, Director of Agriculture and Natural Resources, JADF officer, District Social protection officer, Sector Social affairs, Veterinary, Business and Cooperative affairs, Executive Secretary of Cells and SEDO) in Districts covered by ACE project;
- Community based facilitators (CBF)
- Site specific Grievance Redress Committees (GRCs)/ Village advisory committee
- Village members;

## 9. ESMF IMPLEMENTATION ARRANGEMENTS AND BUDGET

The Environmental and Social Management framework implementation and budgeting process presented under this section considers institutional arrangements required to implement the environmental actions and an estimated cost for its implementation.

### 9.1. ESMF Implementation

The Project will be implemented by Spark Microgrants in partnership with the Government of Rwanda. Spark Microgrants will be responsible for the environmental and social management of the project and the application and compliance with the ESF documents prepared for the project (ESMF, SEP, LMP and the ESCP). Comic Relief, the grant recipient, will disburse funds to Spark and are ultimately responsible for ESMF compliance. The proposed coordination among government institutions and non-government institutions is illustrated in Figure 2 below.



**Figure 2: Implementation Arrangements of ACE project**

As per the organizational structure above, the ACE project will be implemented as follows:

#### 9.1.1. Project Steering Committee

The project will be supervised by a Project Steering Committee (PSC), composed of LODA, MINALOC, MINECOFIN, District Government Officials and Spark Microgrants, which will review overall project progress and outcomes on an annual basis. Village members will also be invited to attend select PSC meetings. The PSC will meet on a semi-annual basis to review and approve project progress once per year to review and approve annual work plans and budgets prepared by Spark Microgrants. They will be responsible for reviewing management reports related to E&S and RIM and implementation of the ESF instruments.

### 9.1.2. Spark MicroGrants and Government of Rwanda implementation coordination

#### - **National Level: Spark + LODA.**

At the central level, LODA is an implementing agency of the Ministry of Local Administration that supports Districts' policy implementation. LODA's Social protection department will collaborate with Spark Microgrants on the project, governed by an MoU signed in February 2020, and the Project Grant Agreement.

#### - **Provincial Level:**

Spark has one Provincial Manager in each of the two target Provinces, who are the focal point of contact for the Director of District Development and Planning, who will be the contact person to engage province officials and support in coordinating a task force at the provincial level.

#### - **District level:**

Spark Microgrants and the District Governments of the target District will work together under the direction of an MoU before commencing project activities. District Taskforce in each District will oversee the implementation of project activities. The Taskforce will be led by the District Executive Committee and Social Protection Direction. Taskforce meetings will be conducted on quarterly basis. Taskforce meetings present the opportunity to address grievances and seek resolution, as well as identify and consult on any unintended project impacts being experienced at the Sector and District levels.

Spark Microgrants allocates one District Coordinator to each District office to lead capacity building and coordination activities.

#### - **Sector Level:**

Sector executive will lead a team of Social affairs, Veterinary and Business and Cooperative Affairs, who work in cooperation with Spark Trainers.

#### - **Cell level:**

Social and Economic Development Officers (SEDO) will be trained by Spark to train Community-based Facilitators (CBFs), and to lead stronger citizen engagement processes. The training manuals will reflect the ESF instruments prepared, including the application of sub-project ESIA screening tools, and facilitation techniques designed to foster inclusion of marginalised groups identified in the environmental and social baseline.

#### - **Village Level:**

Two CBFs will be trained to facilitate the FCAP through weekly village meetings. The FCAP guide provided to CBFs to guide their facilitation of village meetings will include instructions on the application of sub-project ESIA screening tools, and facilitation techniques designed to foster inclusion of marginalized groups identified in the environmental and social baseline. Within villages, an Executive Committee (President, vice president, secretary, and treasurer) will be elected by the entire village to represent them and support them in decision making. This Committee will support the supervision of the village sub-projects, support the implementation of the SEP, including support village-level grievance redress.

### 9.1.3. Project Component Implementation

The *Component 1* will be implemented at the District, Sector, Cell and village level. Spark Trainers, District Coordinators and Provincial Managers will train and support District, Sector, and Cell Government officials to engage citizens in rural development, utilizing existing local government staff and village institutions. District-level Trainers will be responsible for in person collection of grievance as part of the broader GRM system, and oversee implementation of the ESIS screening tools for MG sub-projects.

The *Component 2* will be implemented primarily by Spark Microgrants, utilizing the financial infrastructure of Umurenge SACCOs to deposit village grants into village bank accounts, with financial contributions from District Government.

*Component 3* will be implemented primarily by Spark, LODA, MINALOC and MINECOFIN at the Central level, with Spark and LODA offices in Kigali supporting policy coordination.

The *Component 4* will be implemented by Spark and Comic Relief. Spark management staff based in Kigali will coordinate project management, M&E, and Knowledge dissemination and communication, with the support of Comic Relief staff in London, and in close coordination with the Project Steering Committee.

**Table 6: Role and responsibilities in the ESMF implementation**

No	Activity	Responsible institutions
1	Sub-project brief preparation and ToRs for ESMPs (if required)	Spark Microgrant through its hired consultant
2	Sub-project Screening and screening Checklist	Spark Microgrant and participating Districts
3	Preparation of terms of reference	Spark Microgrant, World Bank and RDB
4	Approval of terms of Reference	RDB and the World Bank
5	ESMP study (if relevant)	Consultant hired by Spark Microgrant
6	Review of ESMP report	- Spark Microgrants, - Participating Districts - Rwanda Development Board (RDB) - World Bank
7	Approval of ESMP and Issuing completion Certificate	- World Bank - Rwanda Development Board
8	Implementation of the ESMF	- Spark Microgrants and participating Districts
9	Implementation of ESMPs	- Village Leadership Committee - Spark Microgrants, - Participating Districts - REMA
10	Monitoring of environmental risks and impacts management implementation	- Village Leadership Committee - Spark Microgrants, - Participating Districts - REMA - World Bank

## 9.2. Disclosure of ESMF

Following its preparation by the Spark Microgrant and clearance by the World Bank, the ACEP ESMF will be disclosed by making copies available at the MINALOC head office, Project website and to the local government agencies and other stakeholders. The site specific ESIA or ESMP reports will also be disclosed by making copies available at MINALOC head office, Project website, District headquarters, District websites and local government's agencies, REMA and other stakeholders of the ACEP. The Government of Rwanda will also authorize the World Bank to disclose this ESMF electronically through its external website.

## 9.3. ESMF Implementation budget

The Budget for the implementation of this ESMF will be provided by the donor and will mainly consist of the preparation of E&S and RIM tools. The cost for mitigation measures will be included in the ESIA's or ESMPs. The table below show the estimated cost for the implementation of the ESMF for the proposed project.

**Table 7: Estimated budget for the implementation of ESMF**

Item	Unit	Quantity	Unit Cost (US \$)	Total Cost (US \$)
<b>Preparation of E&amp;S and RIM instruments</b>				
ESMPs (where relevant)	Study	4	5,000	20,000

Item	Unit	Quantity	Unit Cost (US \$)	Total Cost (US \$)
<b>Subtotal 1</b>				<b>20,000</b>
<b>Capacity building</b>				
Training of project beneficiaries and stakeholders	Training sessions	6	500	3,000
<b>Subtotal 2</b>				<b>3,000</b>
<b>Project Monitoring</b>				
Spark Microgrants*	Persons	2	N/A	N/A
Districts (village committees, GRM committees etc)	persons	LS		2,000
<b>Subtotal 3</b>				<b>2,000</b>
<b>Environmental and Social due diligence</b>				
Consultants	report	2	5,000	10,000
<b>Subtotal 4</b>				<b>10,000</b>
<b>Total</b>				<b>35,000</b>
<b>Contingency (5%)</b>				<b>1,750</b>
<b>Grand Total</b>				<b>36,750</b>

\*: Staff will be given mission allowances

The estimated total cost for ESMF implementation, including E&S and RIM documents preparation if required, monitoring of ESMPs, capacity building, auditing and workshops for unit performance review is estimated at US \$ 36,750. It assumed that all sub-projects environmental studies in a district can be compiled into one report.



## 10. CONCLUSION AND RECOMMENDATIONS

Spark Microgrants prepared this ESMF to guide the implementation of Rwanda: Advancing Citizen Engagement Project to ensure effective implementation and full compliance with Rwandan environmental regulations and meet World Bank environmental and social safeguards Requirements. The policy, legal and institutional frameworks for the implementation of the ESMF has been scoped and all the applicable environmental and social standards have also been identified. Public consultation and participation process were also organized with major government implementing agencies and will continue during project implementation.

This ESMF provides potential environmental and social impacts associated with the sub-project activities as well as guidelines for their mitigation. It also provides the program's environmental and social management process right from the identification stage through to completion. The ESMF also includes requirements for capacity building for the project implementing team, implementing partners at local level and community to ensure effective implementation and monitoring during sub-project implementation.

After gathering environmental and social baseline data in the project sites and based on findings from the consultation meetings with local authorities, the activities to be implemented across various sites were found to have minor adverse impacts. These include greenhouse gases emission and air pollution, health and safety risks, noise pollution, loss of biodiversity, soil and water deterioration, gender-based violence risks, etc.

Guidelines for mitigation of predicted adverse environmental and social impacts were developed. The present study report also provides the ACEP environmental and social management process as well as the implementation and monitoring procedures. It also provides an institutional capacity assessment and required capacity and ESMF implementation arrangements,

This ESMF has an inbuilt grievance procedure that will be used to address grievances that are likely to arise during the ESMF implementation. The estimated budget for the ESMF is US \$ 36,750. Given the nature of the project, the potential adverse impacts are minimal and can be controlled through proposed mitigation measures. The sub-project screening process will assess environmental and social impacts and risks, and propose community-owned measures to reduce risks and mitigate adverse impacts.

Successful implementation of this ESMF will depend to a large extent on the involvement and participation of local communities and local leaders. Specifically, it is recommended that:

- Environmental and Social safeguards awareness and education for the key stakeholders and affected communities must be an integral part of the ESMF implementation.
- District and local community structures should fully be involved in all steps of the project implementation and adequately trained to implement the screening process as well as appropriate sub-project E&S screening tools.
- This framework will apply to all ACE project activities. It should be regularly updated to respond to changing local conditions. It should be reviewed and approved through the national approval process and by the World Bank prior to project negotiations. It should also incorporate lessons learned from implementing various Components of the project activities.

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## ANNEXES

### Annex 1: Environmental and Social Screening Checklist Form (Sample Template)

The sample Environmental and Social Screening Checklist Form is intended as an example. Spark is required to develop a project specific version for use in conjunction with the sub-project approval criteria, and appropriate for use during Project implementation. It will be included in the Project Implementation Manual (PIM). The World Bank will approve the ACEP Environmental and Social Screening Checklist as part of the PIM.

**Note:** The Environmental and Social Screening Checklist (ESSC) is designed to avail information to the decision makers during project implementation. It identifies impacts and mitigation measures and recommends further environmental analysis if required. This form will be filled for each sub-project. Spark will prepare a summarized screening report of all projects together by district. The report will be shared with both World Bank and RDB for approval.

**ACE Sub-project Activity:** .....  
**District:** .....  
**Sector:** .....  
**Cell:** .....  
**Village:** .....  
**Date of Screening:** .....

#### Environmental and Social screening guiding questions

##### 1. Natural Resource Use (Yes or No)

1.1 Will there be additional demands on natural resources (including but not limited to water, forests, grazing areas, soil, and wetlands) as a result of the sub-project?

If no, move to next question

If yes, do these additional demands present sustainability risks immediately or over time?

If yes, **ESMP is required**

If no, does the sub-project include measures to govern the additional resource use?

If yes, move to next question

If no, **sub-project is ineligible in its current form, and requires revision to include sufficient resource management planning**

1.2 Will the sub-project restrict people's access to natural resources at any time before, during, or after implementation? .....

If no, move to next question.

If yes, are plans in place to provide additional resources to meet increased permanent and temporary needs of local populations?

If yes, move to next question

**If no, project is ineligible for funding.**

1.3 Will the sub-project affect downstream users of resources, especially water resources?

If no, move to next question.

If yes, does the sub-project include plans for protecting those resources?

If yes, move to next question

If no, **sub-project is ineligible in its current form, and requires revision to include sufficient resource management planning**

1.4 Are any future natural resource use opportunities being cut off as a result of the sub-project?

If yes, **ESMP is required**

If no, move to next question

##### 2. Socio Economic Impacts (Yes or No)

2.1 Will the sub-project affect land use, or require leases, or changes in tenure?

If yes, **project is ineligible for funding**

If no, move to next question.

2.2 Will the sub-project require resettlement of any residents?

If yes, **project is ineligible for funding**

If no, move to next question.

2.3 Will the sub-project result in construction workers or other people moving into or having access to the area?

If yes, will this negatively affect the availability of local resources for residences (such as by limiting supplies of fuel, services, or access to public areas)?

If yes, **ESMP is required**

If no, move to next question

2.4 Will the sub-project create short or long-term jobs in the village or neighboring villages (including daily wage labour)?

If no, move to next question.

If yes (a), will this include a percentage (%) of work for local women, youth, and marginalized groups?

If yes, confirm just arrangements to favour jobs for marginalized groups are included in the sub-project proposal, and are designed not to interfere with other livelihoods opportunities (e.g. not during harvest season).

If no such arrangements are included in the sub-project proposal, **sub-project is ineligible in its current form, and requires revision to include specific plans for inclusive work opportunities.**

If plans for distribution of work opportunities to marginalised groups are included in the sub-project proposal, move to next question.

If yes (b), will the sub-project provide a safe working environment, limiting the risks of gender-based violence, workplace accidents, and the spread of COVID-19?

If yes, move to next question

If no, **sub-project is ineligible in its current form, and requires revision to include sufficient safe working conditions**

2.5 Will the sub-project outputs be targeted to meet the needs of vulnerable groups in the community (e.g., women, youths, elderly, or PWDs)?

If yes, move to next question

If no, **sub-project is ineligible in its current form, and required revision to include inclusive distribution of sub-project benefits to all groups.**

2.6 Will the sub-project result in destruction of assets (building, crops, vehicles, etc.)?

If no, move to next question

If yes, **ESMP is required**

2.7 Will the sub-project result in the loss of primary residential structures and consequently involuntary resettlement?

If yes, **sub-project is ineligible for funding.**

If no, move to next question

2.8 Is the land identified for sub-project activities, including livestock rearing/fattening, crop planting, etc. government, private or church land?

If yes, **ESMP is required**

If no, move to next question

### **3. Cultural Heritage**

3.1 Is the sub-project site culturally or archaeologically sensitive? Answer yes if there are;

- rock-shelters

- caves
- places of worship
- areas of cultural value for the community
- located in or nearby a cemetery or memorial area
- Any other culturally contested or archaeologically significant features about the site.

If no, move to next question

If yes, ***sub-project is ineligible in its current form, and requires relocation to non-sensitive location.***

#### **4. Biophysical/ Landscape impacts (Yes or No)**

4.1 Will the immediate or downstream effects of the sub-project change the vegetation cover?

If yes, ***ESMP is required***

If no, move to next question

4.2 Will the sub-project affect important species, habitats, or ecosystems in the area?

If yes, ***ESMP is required***

If no, move to next question

4.3 Is the sub-project site environmentally classified as sensitive area? (Check the list of environmentally sensitive environments for Rwanda.)

If yes, ***ESMP is required***

If no, move to next question

4.4 Is the sub-project site located on a steep slope or sloping land?

If yes, ***ESMP is required***

If no, move to next question

4.5 Are there areas of limestone karst or wetlands?

If yes, have special consideration been given to their management in the sub-project proposal?

If yes, move to next question

If no, ***sub-project is ineligible in its current form, and requires revision to include management of sensitive karst/wetland areas.***

4.5 Will the sub-project activities result in vegetation being removed or any surface left bare?

If no, move to next question.

If yes, have the impacts of the land clearance been considered and risks mitigated in the sub-project proposal?

If yes, move to next question

If no, ***sub-project is ineligible in its current form, and requires revision to include mitigation of the risks of land clearance/vegetation removal.***

4.6 Will slope or soil stability be affected by the sub-project (e.g., by using heavy machinery)?

If no, move to next question

If yes, are there any site-specific-erosion plans and sediment-control plans for the sub-project site?

If yes, move to next question

If no, ***sub-project is ineligible for funding***

4.7 Will the present landscape be altered (e.g., by rock or soil removal, spoil dumping, or timber removal)?

If yes, ***sub-project is ineligible for funding***

If no, move to next question

4.8 Will the sub-project be implemented near or in vegetated areas?

If no, move to next question

If yes, are there important species, habitats, or ecosystems in the sub-project site (in the immediate area or off site) or is the area environmentally sensitive or fragile? For e.g. birds, bats, bees, etc.

If yes, **ESMP is required**

If no, move to next question

## **5. Impacts on water and air quality (Yes or No)**

5.1 Will the sub-project generate waste products (including increased sewage or solid wastes)?

If no, move to next question

If yes, does the sub-project proposal include provisions to safely dispose of waste outputs?

If yes, move to next question

If no, **sub-project is ineligible for funding in its current form, and requires revision to adequately safely and sustainably manage waste products.**

5.2 Will the sub-project or its waste disposal affect the quality of local streams or the groundwater?

If yes, **ESMP is required**

If no, move to next question

5.3 Will toxic chemicals (e.g., herbicides, tar, oils spills, paints, and other hazardous chemicals) be used or disposed of along the route of sub-project?

If no, move to next question

If yes, **sub-project is ineligible for funding.**

5.4 Will the sub-project create dust or noise problems?

If yes, **ESMP is required**

If no, move to next question

5.5 Will the sub-project reduce safety for pedestrians, including children and old people?

If no, move to next question

If yes, are plans in place to minimize these impacts?

If no, **sub-project is ineligible for funding in its current form, and requires revision to adequately mitigate safety risks.**

If yes, move to next question

## **6. Environmental health, natural hazards, and construction hazards (Yes or No)**

6.1 Will there be any water logging or standing water at the sub-project site?

If no, move to next question

If yes, is there a plan in place to control disease vectors, especially mosquitoes?

If yes, move to next question

If no, **sub-project is ineligible for funding in its current form, and requires revision to adequately mitigate safety risks.**

6.2 Is the environment at the sub-project site naturally unstable (i.e., in an area prone to erosion, in an area of known earthquake or landslip activity, in an area prone to severe storms, floods, or droughts, thunderstorms)?

If no, move to next question

If yes, are plans in place to protect the development against these natural hazards?

If yes, move to next question

If no, **sub-project is ineligible for funding in its current form, and requires revision to adequately mitigate natural hazards and instability**

6.3 Does the sub-project require workers for construction, maintenance, or other tasks, who will undertake work in close proximity, and/or undertake dangerous work?

If no, move to next question.

If yes, are safety measures in place to protect the workforce, including provision of necessary Personal Protective Equipment for all workers, and training on the use of safety equipment?

If yes, move to next question

If no, **sub-project is ineligible for funding in its current form, and requires revision to adequately mitigate safety risks for sub-project workers.**

6.4 Will hazardous substances (e.g., large quantities of fuels) be used or stored in the sub-project area?

If no, move to next question

If yes, are plans there to contain these substances, and contingency plans to deal with spills of hazardous chemicals (including oil products) in the sub-project area? (Plans should indicate how fuel, oil, or other hazardous chemicals are delivered, transferred, and stored to prevent leaks from contaminating the soil, streams or beaches, and how any spills will be contained and managed).

If no, **sub-project is ineligible for funding.**

If yes, are fire-fighting and spill-clean-up materials / chemicals available for use at the sub-project site, and or in the sub-project budget (e.g., water, sand, detergent, acid, or alkali)?

If no, **sub-project is ineligible for funding in its current form, and requires revision to adequately mitigate the risks of hazardous substances**

If yes, move to next question.

## 7. Other

7.1 Is the sub-project found in the list of projects that require ESIA or partial ESIA as per the Ministerial Order N°001/2019 of 15/04/2019 establishing the lists of projects that must undergo environmental impact assessment, instructions, requirements and procedures to conduct environmental impact assessment? (list should be attached)

If yes, sub-project is ineligible for funding

If no, move to next question

### DECISION MAKING:

#### Refer to Annex E.2

- o Sub-project categorization: .....

#### Refer to Ministerial Order N°001/2019 of 15/04/2019

- o ESIA required :.....( ✓Yes)..... (✓No)
- o ESMP required: ..... (✓Yes)..... (✓No)

### CERTIFICATION

We certify that we have thoroughly examined all the potential adverse impacts of this sub-project as described in the sub-project brief. To the best of our knowledge, the associated safeguard instruments (ESMPs) if any, will be adequate to avoid or minimize all adverse environmental and social impacts.

#### SEDO (Local Government Official)

Name:

Position:

Telephone:

Signature:

#### ACEP District Coordinator

Name:

Position:

Telephone:

Signature:

## Annex 2: Consulted Stakeholders, From September 14th to September 18th, 2020

SNo	Names	Position	Institution
1	YANKURIJE Thacien	Director of Social Affairs Unit	MINALOC
2	HABAMENSHI Didace	Environmental Specialist	Rwanda Agriculture and Animal Resources Board /SPIU World Bank Projects
3	KARARA Jean de Dieu	Environmental Expert	RDB
4	NSENGIYUMVA Jacques	Ag Director of Environmental Regulation and Pollution Control Unit	REMA
5	IMFURAYABO Fabrice	Director of Planning, Monitoring and Evaluation Unit	Gicumbi District
6	NYAKUBYARA Devothe	JADF Officer	Gicumbi District
7	NKURUNZIZA Safari Eliphaz	District Environmental Officer	Gicumbi District
8	KARANGWA Charles	Director of Planning, Monitoring and Evaluation Unit	Huye District
9	KAYITARE Leon Pierre	JADF Officer	Huye District
10	BUTERA Martin	District Environmental Officer	Huye District
11	DUNCAN Hannah	Strategy Director	Spark Microgrants
12	NSABIMANA Gilbert	Country Director	Spark Microgrants



### Annex 3. Chance finds procedure under Rwanda ACEP

Institute of National Museums of Rwanda (INMR) is responsible for recovering these items. Chance find procedures under ACEP will be used as follows:

- Immediately stop the CDD sub-project activities in the area of the chance find.;
- Delineate the discovered site or area.;
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the equivalent takeover. The Institute of National Museum of Rwanda shall be responsible for significant movable and immovable cultural property. The address of Institute of National Museum of Rwanda is: *Rwanda, Huye; Address: SH 1RD 2; P.O.BOX 6397, Kigali; +250730741093; +250783379597; E-mail: [info@museum.gov.rw](mailto:info@museum.gov.rw)*
- Notify the Community-based Facilitators (CBFs) and Social and Economic Development Officers (SEDO) who in turn will notify the responsible local authorities and the Institute of National Museum of Rwanda Cultural Properties Division immediately (within 24 hours or less);
- The local authorities would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the Institute of National Museums of Rwanda (INMR) within 72hours.;
- The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values;
- Decisions on how to handle the finding shall be taken by the responsible authorities and the Institute of National Museum of Rwanda Cultural Properties Division. This could include changes in the layout (such as when the finding is an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage.;
- Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Institute of National Museum of Rwanda Cultural Properties Division.;
- CDD sub-project activities will resume only after permission/authorization is issued by the responsible local authorities and the Institute of National Museum of Rwanda, Cultural Properties Division concerning the safeguard of the heritage.;
- The procedures described above must be reflected in the ESMPs for CDD sub-projects, when applicable, and monitored during project supervision.;
- Relevant findings will be reported in monitoring and evaluation report on a quarterly basis to the World Bank, and recorded in Implementation Supervision Mission Aide Memoire, and Implementation Status & Results Report (ISR). Also, the Implementation Completion and Results Report (ICR) in its environmental and social part will assess the overall effectiveness of the project's cultural property mitigation, management, and activities when the chance find encountered during the implementation.

## **Annex 4: Guidelines for the preparation of Environmental and Social Management Plans (ESMPs)**

The EA process involves the identification and development of measures aimed at eliminating, offsetting and/or reducing environmental and social impacts to levels that are acceptable during implementation and operation of the projects. As an integral part of EA, ESMP provides an essential link between the impacts predicted and mitigation measures specified within the EA and implementation and operation activities.

These guidelines are for the use of Spark Microgrants when developing sub-project specific ESMPs for village sub-projects, if and when required in accordance with this ESMF. If an ESMP is deemed necessary, the main issues to be assessed and described in the ESMP for ACEP sub-projects may include (depending on sub-project type) community health and safety risks, greenhouse gas emission and air pollution, noise pollution, water pollution, loss of biodiversity, safe driving practices, PPE, and potential social risks, such as GBV. The specific risks to be addressed will be identified by the sub-project screening tool (see guidelines in Annex 1). The type of expertise needed in the ESMP will vary with the location and magnitude of the sub-projects within the district but should in any case include:

- Environmental Specialist, with extensive experience in agricultural development activities;
- Animal Production Specialist, with vast experience in animal production and ecosystem management;
- *Socio-economy Specialist* in rural economy/development or related fields.

To prepare an ESMP, a scoping report should be prepared specifying the sub-project's area of influence, the thematic scope and depth of assessments required, the composition of the required ESMP team, and the probable budget required to mount the ESMP study. The public consultation meetings will also be held and findings from the consultation will be included in the report.

Upon review and approval of the Scoping Report, an ESMP study can start. The Study will entail a systematic investigation of all impact areas as identified in the scoping report, taking care to document the current baseline environment, resource exploitation patterns and ecological pressure points. It is mandatory for the ESMP study to undertake public consultation with all stakeholders in the project's area of influence. The ESMP team should note and understand all stakeholder interests so as to cater for them in the ESMP. The report will also include the environmental management plans and environmental monitoring plans as well as estimated cost. Guidance on these areas is offered below.

The ESMP report will be submitted to both RDB and World Bank for approval and clearance. The project shall obtain clearance and completion Certificate from World Bank and RDB respectively. Spark Management will be responsible for ensuring that the final ESMPs reports are approved by RDB and World Bank before implementation.

The following are the minimum requirements for an ESMP:

### **a. Description of Mitigation Measure**

2. Feasible and cost-effective measures to minimize adverse impacts to acceptable levels should be specified with reference to each impact identified. Further, the ESMP should provide details on the conditions under which the mitigation measure should be implemented. The ESMP should also distinguish between the type of solution proposed (structural and non-structural) and the phase in which it should become operable (design, construction and/or operation). Efforts should also be made to mainstream environmental and social aspects wherever possible.

## **b. Monitoring program**

3. In order to ensure that the proposed mitigation measures have the intended results and comply with national standards and World Bank requirements, an environmental performance monitoring program should be included in the ESMP. The monitoring program should give details of the following:

- Monitoring indicators to be measured for evaluating the performance of each mitigation measure (for example: national standards, engineering structures, extent of area replanted, etc).
- Monitoring mechanisms and methodologies
- Monitoring frequency
- Monitoring locations

## **c. Institutional arrangements**

4. Institutions/parties responsible for implementing mitigation measures and for monitoring their performance should be clearly identified. Where necessary, mechanisms for institutional coordination should be identified, as often, monitoring tends to involve more than one institution.

## **d. Capacity Development and Training**

5. To support timely and effective implementation of environmental project components and mitigation measures, the ESMP draws on the EA's assessment of the existence, role, and capability of environmental units on site or at the agency and ministry level. If necessary, the ESMP recommends the establishment or expansion of such units, and the training of staff, to allow implementation of EA recommendations.

Specifically, the ESMP provides a specific description of institutional arrangements--who is responsible for carrying out the mitigatory and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training). To strengthen environmental management capability in the agencies responsible for implementation, most ESMPs cover one or more of the following additional topics: (a) technical assistance programs, (b) procurement of equipment and supplies, and (c) organizational changes.

## **e. Implementation Schedule and Cost Estimate**

6. Timing, frequency and duration of mitigation measures with links to the overall implementation schedule of the project should be specified.

7. Implementation of mitigation measures mentioned in the EMP will involve an initial investment cost as well as recurrent costs. The EMP should include cost estimates into the sub-project design, bidding and contract documents to ensure that the contractors will comply with the mitigation measures. The costs for implementing the EMP will be included in the sub-project design, as well as in the bidding and contract documents.

## **f. Integration of ESMP with Project**

8. The Borrower's decision to proceed with a project, and the Bank's decision to support it, are predicated in part on the expectation that the ESMP (either stand alone or as incorporated into the ESCP) will be executed effectively. Consequently, each of the measures and actions to be implemented will be clearly specified, including the individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.