

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

RWANDA HOUSING FINANCE PROJECT

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ACRONYMS

BRD	Development Bank of Rwanda
COVID	Corona Virus Disease
EA	Environmental Assessment
EDPRS	Economic Development and Poverty Reduction Strategies
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EO	Environmental Officer
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental Management Plan
ESMS	Environmental and Social Management System
FI	Financial Intermediary
GoR	Government of Rwanda
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
MINALOC	Ministry of Local Government
MINECOFIN	Ministry of Finance and Economic Planning
MININFRA	Ministry of Infrastructure
MoE	Ministry of Environment
NPL	Non-Performing Loan
NST	National Strategy for Transformation
NUP	National Urbanization Policy
OM	Operations Manual
PAD	Project Appraisal Document
PAP	Project Affected Person
PDO	Project Development Objective
PIU	Project Implementation Unit
PMI	Prime Minister's Instructions
PPE	Personal Protective Equipment
PPP	Public-Private Partnership
PSF	Private Sector Federation
RAP	Resettlement Action Plan
REMA	Rwanda Environment Management Authority
RHFP	Rwanda Housing Finance Project
RLMUA	Rwanda Land Management and Use Authority
RMRC	Rwanda Mortgage Refinancing Company
RPF	Resettlement Policy Framework
RURA	Rwanda Utilities Regulatory Authority
RURA	Rwanda Utility and Regulatory Authority
SEMS	Social and Environmental Management System SEMS
ToRs	Terms of References
WBG	World Bank Group

EXECUTIVE SUMMARY

Rwanda Housing Finance Project is a US\$150million five-year project, which aims to expand access to housing finance to households and to support capital market development in Rwanda. To address structural challenges in the Rwandan housing finance market, the project helps develop the financial system's institutional framework and build capacity to facilitate financial intermediation beyond the banking sector. In this regard, the project was designed with two components: (1): Provision of Long-term Finance to Expand Housing Finance (US\$147 million equivalent), and (2): Technical Assistance and Implementation Support (US\$3 million equivalent). Part of component one proceeds will be allocated to finance a potential Government of Rwanda (GoR) investment into the Rwanda Mortgage Refinance Company (RMRC) in the form of equity and/or debt alongside commitments from other institutional investors.

To bolster the supply side, a restructuring to re-allocate US\$30 million from component one to provide infrastructure support to eligible affordable housing development projects was approved on November 6th, 2020 by the World Bank. The restructuring aims to increase the availability of affordable housing by addressing issues affecting the supply of affordable housing, originating from current government constraints to provide infrastructure support for affordable housing. In addition, measures introduced through the restructuring aim at streamlining the infrastructure support program by, among others, enhancing the program's eligibility criteria and shortening the time to receiving government support by developers; as well as crowding-in private sector resources to support affordable housing delivery through preparation and publication of public-private partnership guidelines and enabling regulations.

The addition of the new component brings about new environment and social risks and potential impacts such as health and safety issues linked to improper techniques during construction of mortgaged properties, Construction-related risks such as air and noise pollution, Occupational health and safety (OHS) issues, Gender-based violence (GBV) issues, Sexual Exploitation and Abuse, Workers and community grievances, community health and safety, etc. Therefore, the purpose of this Environmental and Social Management Framework (ESMF) is to seek the establishment of a process for environmental and social management screening which will permit the institution in charge of the implementation of the sub projects to identify, assess and mitigate the environmental and social impacts of project/sub project activities. The ESMF also determines the institutional arrangements in terms of segregation of duties and responsibilities amongst BRD and other key stakeholders in the implementation of the project. It is paramount to state that, while RHA will play a critical role in the project's new component for the provision of infrastructure and will be coordinating project activities with BRD, BRD will be custodian of the ESMF and will retain primary responsibility for Environmental and Social risk management.

1. INTRODUCTION

1.1 PURPOSE OF THE ESMF

The purpose of the ESMF is to seek the establishment of a process for environmental and social management screening which will permit the institution in charge of the implementation of the sub projects to identify, assess and mitigate the environmental and social impacts of project/sub project activities . The ESMF also determines the institutional measures to be taken during the program implementation, including those relating to capacity building.

1.2 RATIONALE FOR THE ESMF

The ESMF provides guidance, procedure and implementation arrangement of the provision of infrastructure for affordable housing development projects which was not previously planned in the earlier project design, in order to anticipately address adverse environmental and social impacts. Specific information on country-wide project locations, land requirements, bio- physical features etc will trigger the preparation of Environmental and Social Impact Assessment (ESIA). However, the proposed locations for sub projects activities to be implemented under the Rwanda Housing Finance Project (RHFP) include locations identified by Rwanda Housing Authority for selected housing developments and also other unknown locations that may be identified in the course of the project implementation .

1.3 PROJECT DESCRIPTION

1.3.1 COUNTRY CONTEXT

Rwanda is one of the most densely inhabited countries in Africa and one of its least urbanized, with just over 17 percent of its 12 million people living in urban areas.¹ The Government of Rwanda (GoR) views the relatively low rate of urbanization as an opportunity to create a more efficient urban system. Accordingly, in its vision to become a middle-income country by 2020,² off-farm job creation and urbanization have been identified as a key driver for economic growth, and urbanization and rural (human) settlement has been established as a ‘stand-alone’ sector by the Economic Development and Poverty Reduction Strategy (EDPRS) II for 2013–2018.

¹ NISR (National Institute of Statistics of Rwanda), Projection for 2018.

² Rwanda’s income target is to attain upper-middle-income country status by 2035 - NST I.

Both urbanization and housing continue to be a high priority in Rwanda’s development strategies, Vision 2050, and the National Strategy for Transformation I (NST) I for 2017–2024.³

1.3.2 SECTORAL AND INSTITUTIONAL CONTEXT

The Government’s ambition to promote urbanization and access to affordable housing in Rwanda is reflected in numerous strategies and policies that have been adopted in recent years. The National Urbanization Policy (NUP) (2015) provides an overarching guidance on spatial planning at the national, district, and city levels and discusses housing solutions for different income groups.⁴ The National Informal Urban Settlement Upgrading Strategy (2017) broadened the scope of affordable housing policies to include self-construction and home improvement as a solution for low-income residents who are unable to afford even the least-expensive units in new housing developments.⁵ The Prime Minister’s instruction on support for affordable housing, adopted in 2015 and amended in 2017, was designed as a set of fiscal and financial incentives targeted at developers to encourage them to scale up the supply of affordable housing units.

However, efforts to promote housing development and urbanization have not been able to bridge the large and widening gap between formal housing supply and demand. It is estimated that at least 60 percent of houses in Kigali are in unplanned settlements,⁶ where access to road and transport infrastructure, adequate tap water, electricity, and sanitation is limited, and that almost 147,000 houses need to be replaced⁷ (according to current regulatory standards) due to challenges such as build quality,

³ Sustainable urbanization is Priority Area 2 under the Economic Transformation Pillar of the NST I, with key strategic interventions, including the promotion of local construction materials to support the growth of the construction industry and the affordable and low-cost housing program. Housing also appears under the Social Transformation Pillar of the NST I, with plans to operationalize the affordable housing fund (AHF), the establishment of which was announced in July 2017.

⁴ The National Housing Policy offers housing solutions for different segments of the market, with key mechanisms for those with low and irregular incomes, including (a) direct Government support in low-cost real estate development for low-income families; (b) incremental self-build housing; and (c) cooperative approaches which can include pooled land or pooled finances.

⁵ The World Bank is supporting the urban upgrading pilot in the City of Kigali (CoK), under the Rwanda Urban Development Project (P150844).

⁶ A remote sensing exercise on the 2009 and 2015 building supply has revealed that unplanned peripheral neighborhoods are quickly filling with new, rudimentary housing, in response to rapid population growth and the comparatively small scope of grid planning/enforcement and sites and services provision.

⁷ All data from a forthcoming Housing Market Study by the International Growth Centre.

overcrowding, and high-risk/ecologically sensitive locations. This backlog affects all households but is more pronounced for lower-income groups. Based on the household formation rate it can be estimated that the annual housing need is currently around 67,000 units. Of these, 53,000 are required in rural areas and 14,000 in urban areas.

1.3.3 PROJECT DEVELOPMENT OBJECTIVES (PDO)

To expand access to housing finance to households and support capital market development in Rwanda.

The achievement of the Project objectives will be measured through the following PDO results indicators:

- Number of housing loans financed by this project (Number)
- Number of housing loans financed by financial institutions (Percentage)
- Number of bonds issued by the Rwanda Mortgage Refinancing Company (RMRC)
- Volume of bonds issued by the Rwanda Mortgage Refinancing Company (RMRC)

The project will also track the share of housing loans extended to female borrowers or co-borrowers over the lifetime of the project.

1.3.4 PROJECT COMPONENTS

To achieve the stipulated objectives, initially the project has been designed into two components: **Component 1- Provision of Long-Term Finance to Expand Housing Finance**, and **Component 2- Technical Assistance and Implementation Support**. However, the project has been restructured in response to a request from the GoR to re-allocate **US\$30 million** to **support provision of infrastructure for affordable housing development projects as component 3**. The restructuring of RHFP will help address critical supply constraints which pose a major risk to the project.

1.3.4.1 COMPONENT 1: PROVISION OF LONG-TERM FINANCE TO EXPAND HOUSING FINANCE

This component includes a LoC to support the provision of housing loans by Rwandan financial institutions. The LoC will be implemented by the BRD as the main implementing agency which will administer this component on behalf of the Government and possibly later on by the proposed Rwanda Mortgage Refinancing Company (RMRC). A large share of the proceeds of this component is expected to be used primarily in the form of long-term loans to financial institutions to support the issuance of housing loans to targeted beneficiaries.

1.3.4.2 COMPONENT 2. TECHNICAL ASSISTANCE AND IMPLEMENTATION SUPPORT (US\$3 MILLION)

The objective of this component is to strengthen the enabling environment for affordable housing and financing through technical assistance (TA) and capacity building. The component will focus on analytical

work and capacity building to support for housing demand-side capacity building and supply-side reform agenda, in close coordination with relevant Government departments and agencies, in view of fostering the enabling environment to support the supply of affordable housing.

Key activities envisaged under this component include review of the existing incentive framework (land, infrastructure, tax, and other financial incentives), including a rapid assessment of the affordable housing pilots; rental market study; establishing of a PPP framework for housing development; capacity building for financial institutions and intermediaries to enable them to access long-term finance for housing under the project; and review and update of legal and regulatory frameworks (Condominium Law and BNR: Regulatory and Supervisory Framework for a future RMRC and Review of the Regulatory Framework for Mortgage Lending) and any other study or capacity building that may be required during the course of the project.

1.3.4.3 . COMPONENT 3: PROVISION OF INFRASTRUCTURE FOR AFFORDABLE HOUSING DEVELOPMENT PROJECTS (US\$ 30 MILLION)

This component will support the GoR housing agenda through provision of infrastructure for affordable housing development projects. The objective of the component is to ensure maximum value from government infrastructure support in terms of affordable housing delivery. This will be achieved by having clear and measurable eligibility criteria for receiving infrastructure support; a strong operational process for delivering them and monitoring ongoing compliance, as well as crowding-in private sector resources to support medium- to long-term interventions to address housing issues across the income pyramid through PPPs models (PAD and PIM of RHFP).

1.3.5 PROJECT BENEFICIARIES

The primary beneficiaries of this project are Rwandan households which are unable to access long-term housing finance. The project expects to focus primarily on loans for homes in **the 10–35 million** price segment,⁸ a price range considered affordable to households with monthly incomes ranging between RWF 200,000 and RWF 700,000, the primary target segment which may qualify for mortgage loans under the GoR’s strategy on affordable housing finance (2018). This ‘middle-income’ segment, which corresponds to the 50th–80th percentiles in the income distribution for Kigali, is considered to be the ‘missing middle’, a growing segment of urban workers whose income would enable them to access mortgages if long-term

⁸ Subject to market conditions and economic considerations during implementation, if demand for such sized loans is lower than expected, the project also envisages flexibility to allow a small portion of the funding under the World Bank loan (up to 30 percent of the LoC) to finance housing loans above the RWF 35 million target range at market-based pricing for end borrowers. This would enable a blended yield for financial institutions and incentivize them to expand their mortgage lending in the RWF 10–35 million segment, if deemed necessary, to ensure or accelerate project implementation and incentivize the market to cover the main mortgage segment.

funding was more available. The setting of the income bracket eligible for affordable housing finance was triggered by the survey done by Rwanda Housing Authority in 2018, the survey is conducted within every two years and the bracket may be revised to for a wider scope in case the expected survey recommends the expansion of the scope.

Households with incomes above 700,000 are considered to have sufficient access to mortgage financing under current market conditions. Given the nascent stage of the mortgage market, it is necessary to jumpstart the urban middle-class market and progressively look to go downstream to reach the lower-income segments. The target segments may be adjusted over the implementation period as agreed by the GoR and World Bank.

Other direct beneficiaries of this project will be key stakeholders associated with the affordable housing value chain. This includes public entities such as the BRD, qualified participating financial intermediaries, the RMRC, and other relevant GoR institutions who will benefit from advisory and capacity building on affordable housing under Component 2 of this project.

Indirect beneficiaries of this project will be all other stakeholders in the housing and housing finance value chain, including the workforce. Greater access to long-term housing finance will have a catalytic impact on the purchasing power of a growing urban population in search of housing, which, alongside rising incomes, is expected to stimulate housing development. The resulting impact of housing construction and housing rental activity is estimated to account for about 10 percent of GDP and generate, on average, five jobs per new housing unit based on international experience. This ratio is likely to be higher in Rwanda as construction is more labor-intensive in a global comparison.

1.4 METHODOLOGY AND CONSULTATION

The preparation of the ESMF was undertaken by the consultant using the following approach and methodology.

1.4.1 DETAILED AND IN-DEPTH LITERATURE REVIEW

A review on the existing baseline information and literature materials was undertaken and helped in gaining a further and deeper understanding of the project. The consultant undertook detailed review and analysis of the national relevant legislations, policies and guidelines including the World Bank Safeguards Policies that should be considered during project implementation. Among the documents that were consulted in order to familiarize and further understand the project included:

World Bank Related Documents

- World Bank Safeguards Policies
- Project Appraisal document
- BRD's ESMS document

- Project Implementation Manual (PIM)
- RHFP restructuring paper

Rwanda's Legislative Documents

- Constitution of Rwanda
- Organic Law
- Labor Code
- Expropriation law

1.4.2 STAKEHOLDER CONSULTATIONS

Various discussions/consultations have been held with the Rwanda Housing Finance Project focal person, the BRD - SPIU management, different other relevant staff of key implementing partners of the project (MININFRA, RHA, REMA, PSF, RLMUA, Financial Institutions working with BRD, etc.).

Objective of consultation

The main objective of the discussion/consultations with different stakeholders for the Rwanda Housing Finance Project was to better understand their views and ideas with regard to their roles and responsibilities in the project so that they can be captured in the ESMF which is the important document that guides the implementation of the project.

Summary of outcomes from the consultations:

Consultations were made with key stakeholders of Rwanda Housing Finance Project including BRD-implementing agency, Rwanda Housing Authority, Ministry of Infrastructure, Rwanda Development Board (RDB), Rwanda Environmental and Management Authority (REMA), Rwanda Land Management and Use Authority (RLMUA). It was clear that these institutions have got vital roles to play in Environmental and Social Risk Management of Rwanda Housing Finance Project and Housing Projects in general in Rwanda. BRD understands its prime responsibility as the custodian of the E&S risk management of the project which has the fiduciary responsibility to implement the project on behalf of the government of Rwanda. Rwanda Housing Authority understands its responsibility in regards to E&S risk management of the housing projects in Rwanda, to this effect RHA introduced the position of the Environmental and Social Safeguards position on its new structure which is in response to the needs of ensuring the Environmental and Social Risks are controlled and effectively managed in its housing portfolios. Rwanda Housing Authority is committed to support BRD in the implementation of E&S risk management of the project and the roles these two entities (BRD and RHA) has been institutionalized through the signing an implementation agreement with roles of each party. The Rwanda Housing Authority which has a mandate at the national level to promote housing development will play a critical role by helping in the land acquisition transactions in collaboration with Rwanda Land Management and Use Authority (RLMUA), ground supervision of infrastructure works done which shall play this role working hand in hand with the

supervising company(s) that will be hired by the project to supervise the construction of infrastructure. RHA will be the custodian of the infrastructure support standard operating procedures which relates to the support or any Government of Rwanda support operational procedures, responsibilities, assessment criteria and methods for assessment and/or adjudication that will guide the award of the support.

The follow up of the implementation of this ESMF and reporting on safeguards policies are jointly done by both: It is important to note that BRD will take lead responsibility implementation of the Environmental & Social Management aspects with close collaboration with RHA. RHA will review and approve reports from the supervising company on the progress of construction works of infrastructure, E&S management aspects and other incidences that may take place on the respective sites . BRD's Project Implementation Unit shall review the provided reports for non-objection and reporting to WB. Reporting to the World Bank will be done on quarterly basis alongside the normal project implementation progress report that is submitted to WB on quarterly basis. Rwanda Housing Authority will be reporting to BRD on E&S matters on a monthly basis.

Other institutions like RDB and REMA that were consulted expressed commitment to support Rwanda Housing Finance Project implementation and will intervene in the project implementation as usual according to their mandates – review and approve ESIA and ESMPs for RDB - regular inspection from REMA to verify how the ESMF and ESMP are implemented (roles and responsibilities are developed in section 5).

In a nut shell, the all the key stakeholders consulted understood their roles and responsibilities in the implementation of the project especially in regard to the E&S risk management which gives the project implementing entity that the ESMF shall be adhered to for effective management and mitigation of E&S risks that might arise from the day to day implementation of the project.

1.4.3 PREPARATION OF ESMF

The preparation of the ESMF involved:

- a) Collation of baseline data on the environmental conditions of the project areas.
- b) Identification of positive and negative environmental and social impacts.
- c) Identification of environmental and social mitigation measures.
- d) Preparation of screening procedures to be used while screening subproject proposals; and
- e) Formulation of environmental and social monitoring plan.

2. POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK FOR RWANDA

2.1 INTRODUCTION

The Environmental and Social Management Framework (ESMF) aims to identify the range of required environmental and social management measures that need to be taken during the planning, design, implementation and operation phases of Infrastructure including roads, water and sanitation facilities, electricity, sewerage, social amenities, etc. in order to ensure compliance with the national and WB requirements.

ESMF provides general policies, guidelines, codes of practice and procedures to be integrated into the implementation of the Project. It defines the steps, processes, and procedures for screening, alternative analysis, assessment, monitoring and management of the environmentally/Socially related issues.

In addition, ESMF presents overview of environmental policies and legal regime of Rwanda and WB safeguard policies; includes institutional and capacity assessment related to environmental and social management; and describes the principles, objectives, and approach to be followed while designing the site-specific environmental and social mitigation measures.

The ESMF is intended to be used as a practical tool during program formulation, design, implementation, and monitoring of infrastructure development related activities. The project will include a number of infrastructure activities, such as construction of houses, roads, sewer, medium to small scale water supply and sanitation facilities, small scale solid waste management interventions, street lighting, etc. which will potentially trigger WB OP 4.01 – Environmental Assessment, OP 4.11 – Physical Cultural Resources and OP 4.04 – Natural Habitats. As part of the World Bank requirement for safeguards to ensure that the project either completely avoids or minimize such negative impacts, the BRD will have to prepare an Environmental and Social Management Framework (ESMF) to describe the potential environmental and social impacts, develop a screening mechanism and inform preparation of EIAs and EMPs for RHFP subprojects, once final subproject design becomes available.

2.2 LEGAL AND INSTITUTIONAL FRAMEWORK

The Republic of Rwanda has developed policy and strategies, legal instruments and institutional framework for environmental protection and conservation. The implementation instrument for the remainder of Vision 2020 and for the first four years of the journey under Vision 2050 will be the National Strategy for Transformation (NST1). NST1 integrates far-sighted, long-range global and regional commitments by embracing: the Sustainable Development Goals (SDGs) priorities that are consisting of 17 Goals with associated targets and indicators, across a range of economic, social and environmental aspects.

2.2.1 CONSTITUTIONAL PROVISIONS

The constitution states that all citizens have the right of equal access to public service in accordance with their competence and abilities. In the Constitution of the Republic of Rwanda of June 4th, 2003 as

amended to date, article 49 states that every citizen is entitled to a healthy and satisfying environment. The law determines the modalities for protecting, safeguarding, and promoting the environment.

Different policies and laws from the constitution, the Vision 2050, the NST1 and the National Decentralization Policy (the “Decentralization”) take into account environmental aspects.

2.2.2 VISION 2050

Vision 2050 takes into account the aspiration of Rwandans to leave to our children a better world to live in. As such, growth and development will follow a sustainable path in terms of use and management of natural resources while building resilience to cope with climate change impacts. Rwandans aspiration for high quality of life will be further appreciated through the quality of the environment, both natural and built.

In the NST1, infrastructure plays a crucial role. Although national development is desired, any such development should be done in a sustainable manner as provided for in Rwanda’s Environmental Policy. The Strategy highlights the environment priorities as major issues and has made efforts to focus on the environment and all key sectors that have at least one environmental indicator among their key performance indicators.

2.2.3 ENVIRONMENTAL ORGANIC LAW

The law sets out the general legal framework for environment protection and management in Rwanda. The law determines the modalities of protecting, conserving, and promoting the environment. Chapter V of the Organic Law Article 30 clearly calls for the need to subject projects to mandatory Environmental Impact Assessment (EIA). The list of projects that must undergo an environmental impact assessment before they obtain authorization for their implementation is established by an Order of the Minister. An Order of the Minister also issues instructions and procedures for conducting environmental impact assessment. .

2.2.4 LABOR CODE

In accordance with the Labour Code, an employer is responsible to maintain health and safety of the workers at workplace. Employer is required to keep the workplace in a common state of cleanliness and presentation of hygiene and safety necessary for the health and safety of workers.

The employer may also create a committee on health and safety at workplace and devise modalities for its functioning. Workers must also be provided with a first aid box, needed in case of emergency. In case of work accident, the employer must evacuate the injured and take them to the nearest health center.

An employer is required to ensure the health, safety and welfare of all persons working in his/her workplace. Employer is required to: provide workers with work premises and tools appropriate for the work; assure workers of the reliable and timely renewal of collective and individual means of protection; conduct a risk and hazard analysis and take effective protective measures; inform employees about any risks likely to result from the use of technologies and any other imminent danger; ensure that safety

information is displayed in readable language in all premises; make no deductions from an employee's remuneration or charge an employee in respect of anything done or provided in pursuance of the order on OSH; and notify the labour inspectors of any dangerous occurrence or occupational accident within four days of such incident.

[2.2.5 LAW N°10/2012 OF 02/05/2012 GOVERNING URBAN PLANNING AND BUILDING IN RWANDA](#)

The law establishes the basis applicable to urban planning and building in Rwanda. It gives institutional roles and responsibilities in all stages.

[2.2.6 LAW N°20/2011 OF 21/06/2011 GOVERNING HUMAN HABITATION IN RWANDA](#)

The law governs land occupation and construction on land reserved for human habitation. It defines the human settlements and criteria of an area reserved for human settlement.

[2.2.7 ORGANIC LAW \(LAND\)](#)

Article 3 of this law stipulates that land is part of the public domain of all Rwandans, ancestors, present and future generations. With exceptions of the rights given to people, the state has supreme powers to manage all the national land. This is done in the public interest aimed at sustainable, economic development and social welfare, in accordance with procedures provided for by law. In that regard, it is the state that guarantees the right to own and use the land.

The state also has rights to expropriation due to public interest, settlement and general land management through procedures provided by law and after appropriate compensation.

[2.2.8 EXPROPRIATION LAW](#)

The law determines the modalities and the procedures relating to expropriation in the public interest. It states that only the Government shall carry out expropriation. Expropriation as provided for in this law shall be carried out only in the public interest and with prior and just compensation. Every project, at any level, which intends to carry out acts of expropriation in the public interest, shall provide funds for inventory of assets of the person to be expropriated and for just compensation on its budget.

Article 3 stipulates that expropriation can only be carried out by Government and only in the public interest and with prior fair and just compensation. Underground or surface activity may be carried out with a public interest aim, on land belonging to a person. No landowner is permitted to oppose such activity. In the event that the activity causes any loss to the landowner, he shall receive fair and just compensation for it.

[2.2.9 RELEVANT POLICIES, STRATEGIES AND GUIDELINES FOR THE GOVERNMENT OF RWANDA RELEVANT TO ESMF](#)

[2.2.9.1 RWANDA ENVIRONMENTAL POLICY](#)

The overall objective of the Environmental Policy is the improvement of man’s well-being, 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 programmes at all levels.

2.2.9.2 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. While the water policy calls for improvement of water resources including marshlands, the agricultural policy calls for development of these ecosystems for agricultural production.

2.2.9.3 NATIONAL BIODIVERSITY STRATEGY AND ACTION PLAN.

The strategy focuses on five major areas i.e. improved conservation of protected areas and wetlands; sustainable use of biodiversity in natural ecosystems and agro-ecosystems; rational use of biotechnology; development and strengthening of policy, institutional, legal and human resources frameworks; and equitable sharing of benefits derived from the use of biological resources.

2.3 INSTITUTIONAL FRAMEWORK FOR ESMF

2.3.1 RELEVANT INSTITUTIONS

2.3.1.1 MINISTRY OF ENVIRONMENT (MOE)

Ministry of Environment (MINIRENA) is responsible for addressing issues of policy, in particular through Ministerial orders and/or orders that set out laws and procedures for the administration, planning and allocation of land. It governs the implementation and application of organic law and land use master plan. It puts in place mechanism for the sustainable management of natural resources in conformity with the national priorities set by the national development pillars (Vision 2050, NST1, MDGs)

Role in Rwanda Housing Finance Project (RHFP): - MoE’s role in this project is not significant and will only be necessary in the event there is need to draft or amend policies which may affect the project positively or negatively.

2.3.1.2 MINISTRY OF INFRASTRUCTURE (MININFRA)

Ministry of infrastructure oversees affordable housing related activities. In March 2015, the National Housing Policy was adopted, with its vision being: “Everyone independent of income, base of subsistence, and location shall be able to access adequate housing in sustainably planned and developed areas reserved for habitation in Rwanda”.

The National Housing Policy strategizes in a holistic approach the way toward a positive impact on increasing employment rates, skills transfer, and quality enhancement in the local construction industry – all seen as factors contributing to a vision of increasing wealth for all. A wide approach to make housing affordable is needed.

2.3.1.3 RWANDA ENVIRONMENT MANAGEMENT AUTHORITY

REMA is non-sectorial institution mandated to facilitate coordination and oversight of the implementation of national environmental policy and the subsequent legislation. REMA has a key role to play towards the achievement of the national goal of sustainable development as set in out in the National Development Vision 2050. The alarming rate of environmental destruction as a result of population pressure, serious erosion, pressure on natural resources, massive deforestation, pollution in its various forms etc. necessitated the Government, to form REMA to coordinate, supervise and regulate environmental management for sustainable development in Rwanda. With regards to the management of the bio-physical environment throughout Rwanda, the overall responsibility now lies with the Rwanda Environment Management Authority.

REMA is also tasked to coordinate different environmental protection activities undertaken by environmental promotion agencies; to promote the integration of environmental issues and climate change in development policies, projects, plans and programmes; to coordinate implementation of Government policies 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.

Role in Project: -REMA will play a significant role in ensuring that the activities related to this project have no adverse impact on the environment. This is as a result of their key mandate of ensuring environmental protection. They will monitor project activities based on the ESIA/ESMP prepared and ensure that the mitigation measures in the ESMPs are followed.

2.3.1.4. RWANDA DEVELOPMENT BOARD

Rwanda Development Board (RDB) is a one stop institution bringing together several government bodies focused at promoting investment in Rwanda. The authority is charged with administering the ESIA process and works with other institutions in the process. RDB has created a department of EIA responsible for reviewing all projects EIA/ESIA before approval; a duty that was previously undertaken by REMA. With regard to environmental safeguards, RDB plays the following roles:

1. Review Project Briefs so as to advise on Terms of Reference,
2. Provide information or advice to developers and EIA/ESIA Experts when consulted during EIA process,

3. Review EIA reports and provide comments to the developers
4. Organizing public hearings,
5. Issue certificate of approval

Role in Project: -The role of RDB in this project include the points 1-5 highlighted above.

2.3.1.5 *MINISTRY OF LOCAL GOVERNMENT*

Under the framework of decentralization, MINALOC oversees the implementation of the decentralization process as well as relevant community and social protection programmes. This Ministry is also responsible for environment governance and therefore for mobilizing the public to participate in the management and protection of natural resources. The National Decentralization Policy adopted in May 2000 holds local populations responsible for managing resources, including natural resources.

Districts are responsible for protection of public infrastructures and the environment. Similarly, cities, towns, and villages are responsible for land and environmental management, urban planning, road maintenance and energy and water resources management. MINALOC is over-seeing various community development related Programme in the districts. MINALOC is engaged in ensuring the development of rural areas through the implementation of settlement policies and ensuring their access on basic infrastructures through advocacy and collaboration with various stakeholders in different sectors.

Role in Project: -The role of MINALOC in this project will be to ensure that as per its mandate, activities of the project at the district level do not adversely affect the environment. Under Rwanda’s decentralized system of governance, local governments are responsible for among others environmental protection at district level and have environmental officers who ensure this mandate.

2.3.1.6 *RWANDA HOUSING AUTHORITY (RHA)*

Rwanda Housing Authority is under the ministry of infrastructure and was legally established in order to organize the construction industry as a whole and by doing so to spur Economic Development and Poverty Reduction which guide Rwanda’s medium-term development. Rwanda Housing Authority has to ensure the implementation the National Housing, Urbanization, construction and Government Assets management policies through coordination, conception, development, monitoring and evaluation of actions and programs set out in its mission.

Its specific objective is to ensure adequate institutional, legal and regulatory framework (including capacity building), increase the volume of infrastructure and equipment, ensure quality of services, minimize and stabilize costs, increase accessibility, ensure continuity/durability, and ensure safety in housing infrastructure for its user/beneficiaries.

Majors of its functions which are regulate the housing, legislation, construction, urban development industries and management of government assets both fixed and non-fixed assets and also to develop a

reliable database that encompass land use/management, housing, and construction.

The Rwanda Housing Authority developed Urban Planning Code and Rwanda Building that provides urban planning principles that include criteria of defining urban centers, basic public infrastructures, objectives and requirements of site development and land subdivision, plot restructuring and re-plotting, plot development parameters based on zoning principles, categorization of urban land use, neighborhood design principles, traffic circulation principles, etc. These guide the setting of electricity networks in order to ensure the effective use of energy resources available in Rwanda and sustainably use available resources urban and rural areas electrification.

Roles of Rwanda Housing Authority in the Project and E&S in particular

- The RHA will play a big role in designing, monitoring, evaluating all technical activities including developing of Terms of References for government contracted infrastructure provision, evaluation of bids related the construction of infrastructures and validation of activity reports for reimbursement of infrastructure support payment modality.
- Rwanda Housing Authority will facilitate all technical aspects of the procurement processes for infrastructure support component.
- RHA will be the custodian of the infrastructure support standard operating procedures that related to assessment, evaluation, award, monitoring, reporting on the affordable housing projects that have benefited from the support.
- RHA will work hand in hand with the respective project supervising firms to generate monthly reports covering progress on works done, Environmental & Social management aspects related to the project incidences on the site and other E&S risks that may happen to the project and the reports shall be submitted to BRD for non-objection, which will be submitted to WB for consideration on a quarterly basis.
- RHA Environmental & Social safeguards specialist shall work with the BRD's Environmental & Social safeguards specialist to undertake screening of the affordable housing project to receive the infrastructure support from RHFP. In this case BRD will take the lead and the due diligence shall be submitted to WB for non-objection before the first set tranche of infrastructure support is paid to developer/contractor of an affordable housing project.

3. THE WORLD BANK AND BRD ENVIRONMENTAL AND SOCIAL SAFEGUARD POLICIES

The World Bank requires that an ESMF be prepared whenever the Bank's OP 4.01 is likely to be triggered for any proposed subproject where the exact dimensions and location of the subprojects is not yet

defined so as to clarify the ESIA development guidelines. In this regard, this ESMF has been prepared to guide the ESIA development for the proposed infrastructure subprojects and investments under the RHFP in line with the relevant laws of Rwanda and the Environmental and Social Safeguard Policies of the World Bank.

3.1 WORLD BANK'S SAFEGUARDS TRIGGERED BY PROJECT

3.1.1 ENVIRONMENTAL ASSESSMENT (OP/BP 4.01)

This policy requires Environmental Assessment (EA) of projects proposed for the Bank financing so as to help ensure that the investments made are environmentally sound and sustainable. The EA is seen as tool to improve decision making, and as a process whose breadth, depth, and type of analysis depend on the nature, scale, and potential environmental and social impacts of the proposed investments under the specific project activities (RHFP in this case). The EA process takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, vulnerable peoples, and cultural and archaeological property) and transboundary and global environmental aspects.

The Bank Operational Policy 4.01 requires that the ESMF report must be disclosed as a separate and standalone document by the GoR and the Bank as a condition for bank appraisal. The disclosure should be both in Rwanda where it can be accessed by the general public and local communities and at the Info-shop of the World Bank. It is also a requirement of this policy that the date for disclosure must precede the date for appraisal of the program. The policy also calls for the RHFP to be environmentally screened to determine the extent and type of the EA process required. In this regard, the World Bank allows that this process can be performed using the BRD screening system as it presented in section 3.2 of this ESMF.

The RHFP then has been screened and assigned an EA Medium risk (Category B). This category of projects is defined as follows: Medium risk (Category B) projects are likely to have potential adverse environmental impacts on human populations or environmentally important areas – including wetlands, forests, grasslands, and other natural habitats – and are less adverse than those of High risk (category A) projects. These impacts are site specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for High risk (category A) projects. The EA process for medium risk (category B) projects examines the potential negative and positive environmental impacts and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance.

Therefore, this ESMF sets out to establish the EA process to be undertaken for implementation of project activities in the proposed RHFP when they are being identified and implemented.

3.1.2 NATURAL HABITATS (OP 4.04)

This Bank Operational Policy recognizes that conservation of natural habitats, like other measures that protect and enhance the environment, is essential for long term sustainable development. The Bank therefore supports the protection, maintenance, and rehabilitation of natural habitats. Natural habitats

are land and water areas where (i) the ecosystems biological communities are formed largely by native plant and animal species, and (ii) human activity has not essentially modified the areas primary ecological functions. All-natural habitats have important biological, social, economic, and existence value.

Therefore, the Bank natural habitats operational policy (OP 4.04) is triggered in all cases where the proposed investments are likely to have potential adverse impacts on Rwanda's natural habitats including wetlands, underground water sources, open water bodies, and forests. The Bank natural habitats operational policy requires that any activities funded under the RHFP that adversely impacts these ecosystems, must have a successfully mitigation plan so as to maintain the overall balance and integrity of the ecosystems impacted.

3.1.3 PHYSICAL CULTURAL RESOURCES - OP/BP 4.11

Physical cultural resources are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Their cultural interest may be at the local, provincial or national level, or within the international community. Physical cultural resources are important as sources of valuable scientific and historical information, as assets for economic and social development, and as integral parts of a people's cultural identity and practices. The Bank assists countries to avoid or mitigate adverse impacts on physical cultural resources from development projects that it finances. The borrower addresses impact on physical cultural resources in projects proposed for Bank financing, as an integral part of the environmental assessment (EA) process.

When the project is likely to have adverse impacts on physical cultural resources, the borrower identifies appropriate measures for avoiding or mitigating these impacts as part of the EA process. These measures may range from full site protection to selective mitigation, including salvage and documentation, in cases where a portion or all of the physical cultural resources may be lost.

3.1.4 INVOLUNTARY RESETTLEMENT (OP 4.12)

The objective of the Involuntary Resettlement Operational Policy (OP 4.12) is to avoid, where feasible, or minimize, while exploring all viable alternative project designs, displacement and having to resettle people. This policy is triggered in situations involving involuntary taking of land and involuntary restrictions of access to legally designated parks and protected areas and or socioeconomic places. The policy aims to avoid involuntary resettlement to the extent feasible, or to minimize and mitigate its adverse social and economic impacts. Involuntary Operational Policy (OP 4.12) covers direct economic and social impacts that both result from Bank-assisted investment projects and related activities, and are caused by (a) the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets or access to assets, or (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or (b) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons.

For project activities that impact people and livelihoods in this way, RHFP will have to comply with the requirements of the disclosed RPF and RAPs to comply with this policy. The Involuntary Resettlement Operational Policy prescribes compensation and other resettlement measures to achieve its objectives and requires that borrowers prepare adequate resettlement planning instruments prior to project appraisal of proposed projects.

OP 4.12 requires the displaced persons and their communities, and any host communities receiving them, are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement. Appropriate and accessible grievance mechanisms are established for these groups. In new resettlement sites or host communities, infrastructure and public services are provided as necessary to improve, restore, or maintain accessibility and levels of service for the displaced persons and host communities.

3.2 BRD’S ENVIRONMENTAL AND SOCIAL SAFEGUARDS POLICIES

BRD’s environmental and social objectives are to preserve, protect and improve the quality of the environment; protect human health, in relation to the environment; ensure the prudent and rational utilization of natural resources and to conserve nature; and, promote measures to deal with regional or worldwide environmental problems, notably climate change and access to potable water and sanitation.

BRD is implementing a robust environmental and social policy prepared in 2013 and an Environmental and Social Management System, which is compliant with Rwandan regulatory framework that pertains to the environment, land use, labor health and safety issues, vulnerable and marginalized groups and cultural artifacts. BRD is well equipped with professionals who over the years have received training in environmental and social risk management and therefore should be up to the task under the proposed Project. In addition, BRD is in the process of hiring an environmental and social safeguards specialist who will be responsible for the day to day environmental and social management activities carried out throughout the implementation of the Project . The BRD’s Environmental and Social Safeguard specialist to be hired by the Project will be responsible for supervising the implementation of safeguards instruments and ensure that Bank’s (BRD) and Project specific activities comply with ESMF/RPF and, if necessary, an Environmental Management Plan/Resettlement Action Plan are developed as appropriate.

In order to implement the terms of this environmental and social policy, BRD has developed a Environmental and Social Management System (ESMS). The purpose of the ESMS is to proactively identify and evaluate the social and environmental risks of projects before a decision is made to finance them and to monitor ongoing social and environmental performance after disbursement.

This ESMF will follow the procedures of the ESMS that are integrated within BRD’s existing financial risk management procedure, and as a result, the Risk Management Division will ensure that all activities considered for financing will be subject to:

- Screening against a list of excluded activities (see annex 8) which BRD will not finance.
- Evaluation of Social and Environmental Risks :

- Since the infrastructure support to be given to developers is not treated as debt and will not go through BRD’s normal underwriting processes. The Environmental Social Safeguards Specialists in collaboration with his or her counterpart in RHA will prepare a due diligence screening report of the project before infrastructure support is dispatched. The screening checklist/report will be reviewed by the SPIU Coordinator and the Risk Department of the BRD and then submitted to WB for non-objection. The responsibility to submit the screening report to WB for non-objection will rest on the PIU Social Safeguards Specialists.
- Additional information or clarification may be requested from the safeguards specialist, to determine if the environmental risk category, social and environmental risk assessment or proposed corrective actions are satisfactory or need to be revised. The risk Management Division categorizes Social and Environmental Risks as High risk (category A) , Medium Risk (category B) and Low Risk (category C).
- Environmental and Social due diligence (ESDD):
Compliance with applicable national laws on environment, health, and safety is verified. The project proponent will be asked to provide copies of all necessary permits and required documents or to obtain these before the application is further evaluated.

If other areas of noncompliance are identified, the project proponent will be asked to develop a plan for corrective action within a reasonable time frame to be included as a condition before receipt of the infrastructure support.

Additional social and environmental due diligence is conducted for certain complex Medium Risk (Category B) and High Risk (Category A) projects. This should include a review to ensure that the following information has been provided by the project proponent as part of the application process and also that it meets, as applicable, the requirements set forth in international best practice guidelines.

The project proponent is expected to assess the potential social and environmental risks and impacts of the project, which will include:

- Environmental Impact Assessment: The preparation of an acceptable Environmental Impact Assessment (prepared with the help of consultants with appropriate expertise and experience) is required under Rwandan law and applies to all High Risk (Category A).
- Additional Social and Health Impact Assessment: A Social and Health Impact Assessment (prepared with the help of consultants with appropriate expertise and experience) is also required for all High Risk (Category A)

4. PROJECT ENVIRONMENTAL AND SOCIAL RISKS AND MITIGATION MEASURES

4.1 ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

The Rwanda Housing Finance project will include a number of activities with potential environmental and social impacts and will cover selected sites where affordable Housing units will be constructed in Rwanda.

This ESMF mainly addresses activities under Component 3 which relates to provision of infrastructure for construction of affordable housing units.

What is clear at this point however is that some of the houses under construction may be located in areas with high population density. This has potential implications for involuntary resettlement as more land would be required. These implications will create potential environmental and social risks or impacts that will occur during different phases of the project.

The environmental impacts include:

- ✓ Sanitation and waste management problems
- ✓ Increase in soil water erosion
- ✓ Increase in suspended solid and sediments delivery in surface water
- ✓ Increase in brick making and sand mining
- ✓ Impacts related to health risks and safety of workers/ students and teachers
- ✓ Generation of noise pollution
- ✓ Generation of dust emission
- ✓ Use of lead based –based products

Social Economic Impacts include :

- Displacement of people
- Increase in the spread of STDs and HIV/ AIDS
- Increase in the spread of COVID - 19
- Disruption of traffic and public utilities deliveries
- Land ownership conflicts

According to **Covid-19 Policy Responses and Integrated Policy Framework** elaborated by World Bank, A “whole of society” approach is needed for immediate response and medium-term recovery. In the emergency phase, governments can provide incentives or use mandates to coordinate with businesses and communities in combating the disease, maintaining social distancing, and supporting people affected by the pandemic’s health and economic impacts. This approach has been used by the Government of Rwanda where it pulled on board all institutions (public and private) to put together efforts to support all affected people.

Success in containing the pandemic depends on government policy, but also on people's behavior. Government of Rwanda took leadership in working with the private sector, communities, and the media to support responsible collective action and maintain social cohesion – vital for stability and successful recovery.

The pandemic's social and economic consequences disproportionately affect the vulnerable. The risk of transmission is particularly high among those less able to practice social distancing, including urban slum dwellers and institutionalized populations, as well as groups such as market traders who cannot afford to attempt it. The economic response will need to address the exacerbation of pre-existing vulnerabilities and support those whose livelihoods are threatened. Negative impacts will be stronger for those without access to social protection. Welfare losses, disruption in education and childcare services, and increased stress and violence can have irreversible consequences for women, adolescent girls, and children.

This ESMF will need to accommodate a strong implementation of mitigation measures that will be recommended for all negative impacts especially those related to welfare losses, health and economic challenges in order to try to contain the pandemic's propagation. Positively, RHFP will economically contribute to COVID – 19 containment where workers will earn money so that they will be able to afford testing campaigns, pay for medical insurance, etc.

The table 1 summarizes the project environmental and social impacts and their mitigation measures

Table 1: Potential negative environmental and social impacts and mitigation measures

Potential impacts	Proposed Mitigation measures	Monitoring indicators	Responsibility
Soil			
Land preparation	Reduced excavation to necessary areas only	Excavated areas	Contractor
Increased runoff	Roof catchment Minimize paved surface Landscape the open areas	Runoff (m3) Rainwater harvested (m3/period of time) Landscaped area (m2), Paved surface (m2)	Contractor, Project manager and site supervisor.
Soil erosion	Installation of soil traps on lower edges Installation of traps for stored loose demolition and construction materials such as sand.	Installed soil traps. Securing of construction materials.	Contractor
Water			
Water pollution (surface water and groundwater resources)	Wastewater treatment Construction of adequate and up to-standard sewage conveyance. Regular maintenance checks on treatment plant.	Wastewater/sewage treatment plant. Routine maintenance Checks of wastewater/sewage treatment plant.	Project manager, Contractor, REMA, District (where the project is being implemented)
Solid and liquid waste	Refuse pits distributed within the premises where all solid waste will be deposited. Segregate paper wrappings, plastic, metal cans and other waste such as timber off-cuts. Clean up exercises will be regularly undertaken every end of business day Workers clearly briefed on proper disposal of solid waste. The management will also ensure that a refuse handling company is	Number of refuse pits on site. Segregated solid waste Site cleaned (kgs of solid waste on site)	Project manager and Contractor and Supervising company

	appropriately appointed to regularly collect refuse for disposal. The monitoring of efficient operations of the treatment plant.		
Water quantity	Treatment and recycling of used water. Installation of water meters to monitor amount used.	Amounts of water recovered. Installed water meters.	Project manager and Contractor
Air			
Air pollution Emissions	Installation of dust screens. Regular watering of access routes to reduce dust. Provision of dust masks to workers. Use of mufflers on heavy equipment and vehicles. Reduction in use of machinery to necessary requirement only.	Installed dust screens. Watering of access ways. Dust masks provided. Mufflers installed. Reduced machinery use.	Project manager, Contractor, REMA, and District (where the project is being implemented)
Biodiversity			
Microclimate modification	Maintaining mature trees all through development of all facilities. The whole project area should not be paved. Landscaping of the area will reduce the effect of heat reflection thus reducing microclimate modification. On the onset of the project, ideal zones where will be little movement should be identified and trees planted in these zones. The project proponent should ensure as many indigenous species are planted as possible. Fencing where applied should as much as possible retained to chain-link and live fencing so as to reduce the surface	Number of mature trees kept on site. Area paved versus area not paved. Landscaped area versus non landscaped one.	Project manager Contractor.

	area of built environment and to improve on the general aesthetics of the area.		
Noise			
Noise (vibration from vehicles, machinery, plants and equipment)	Use of mufflers. Regular repair of silencers. Operation during daylight hours. Only Provision of ear muffs to site workers.	Mufflers installed. Maintenance logs. Operation logs. Ear muffs provision and numbers.	Project manager, Contractor supervising company and District.
Social Concerns			
Security	Fencing off the project site during construction and limiting movement and attraction unwanted characters.	Fence and restricted entry. Strict monitoring on movement of personnel and materials to and from site.	Contractor and Project Manager
Fire hazards	Ensure speedy evacuation in the eventuality of a fire. Provide firefighting equipment such as fire horses, fire extinguishers and exit signs. Display procedures along corridors and in public ways to ensure safe and speedy evacuation of personnel, students and guests.	Speed of evacuation in the eventuality of a fire. Quantity of firefighting equipment such as fire horses, fire extinguishers, exit signs, provided within the building. Number of fire safety signs and devices existing at the building.	Project Manager, supervising company, REMA, and District
Electric installations	General precautions should be taken in the installation of the electric network within the buildings.	(100%) conductors and wires in copper. (100%) fire pump feeder cables and service feeder cables fireproofed. (100%) electrical conductors protected from high temperatures.	Project manager and Contractor and supervising company
Hazards and accidents	Installation of appropriate safety signs. Training of site and staff Provision of PPE	Safety signs installed, Training undertaken,	Project manager Contractor and

		PPE Provided to site staff	supervising company
Traffic around the site	<p>Consider constructing enough parking lots to avoid stops and parking in the surroundings of the site.</p> <p>Traffic signs limiting the speed installed in the surroundings of the site.</p> <p>Exit and entrance well indicated to mitigate jams and traffic accidents around the site.</p>	<p>Number of underground parking lots versus the number of guests</p> <p>Number of traffic signs warning the drivers on speed limit.</p> <p>Flow of traffic (km/h) around the site</p>	<p>Project manager, traffic police and Contractor</p>
Contamination by HIV/AIDS and other STDs	<p>Sensitization campaign to the staff on HIV/AIDS and other STDs;</p> <p>Voluntary testing to determine HIV status; counselling at existing medical facilities;</p> <p>Sensitization on disease control;</p>	<p>Campaigns against HIV/AIDS and other STDs;</p>	<p>Contractor, supervising company and Project Manager</p>
Contamination by COVID -19	<p>Sensitization campaign to the staff on COVID – 19 especially on how is it transmitted.</p> <p>Voluntary testing to determine COVID -19 status; counselling at existing medical facilities;</p> <p>Sensitization on disease control;</p>	<p>Campaigns against COVID-19 and other.</p>	<p>Contractor, supervising company and Project Manager.</p>

4.2 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

The implementation of this project should follow the mechanism of development and execution of environmental documents according to correlative list throughout all development stages in line with the requirements of National environmental legislation and the World Bank safeguard policies. Depending on the scope of activities for each subproject and its categorization (Category high risk, medium risk, low risk or FI), an individual (site-specific) Environmental and Social Management Plan (ESMP) may be produced.

4.3 ENVIRONMENTAL AND SOCIAL MONITORING PLAN

To keep track of the requirements, responsibilities and costs for monitoring the implementation of environmental mitigation identified in the analysis included in an environmental review or assessment for Category A and B projects, a monitoring plan should be prepared too. Like the ESMP the project cycle is broken down into three phases (design, construction, and operation). The format also includes a row for baseline information that is needed to achieve reliable and credible monitoring. The key elements of the matrix are:

- What is being monitored?
- Where is monitoring done?
- How monitoring will be carried out?/type of equipment for monitoring
- When or how frequently is monitoring necessary or most effective?
- Why is the parameter being monitored (what does it tell us about environmental impact)?

In addition to these questions, it is useful to identify the costs associated with monitoring (both investment and recurrent) and the institutional responsibilities. When a monitoring plan is developed and put in place in the context of project implementation, the SPIU should request reports from RHA. RHA will also be collecting the monthly report from the contractors/supervising company. These reports shall at minimum include; status of works done, E&S activities carried out, grievances recorded and sold, E&S incidences occurred on the site, their implication and measures in place. All these reports shall be provided to the WB on quarterly basis and may also be available to WB during the supervision mission.

5. RHFP - ESMF IMPLEMENTATION ARRANGEMENTS

5.1 PROJECT INSTITUTIONAL AND IMPLEMENTATION ARRANGEMENTS

The BRD as **the lead project** implementing agency, will be responsible for the implementation of all the Project components in close collaboration with Rwanda Housing Authority. BRD has established a Special Project Implementation Unit (SPIU) which is responsible for overall project coordination and oversight, which includes, among other things:

BRD shall be responsible for the E&S management of the project with the following roles

- ✓ BRD shall be responsible for the overall project coordination, and day to day management and implementation of the project including financial management, procurement, supervision and environmental and social safeguards Management.
- ✓ regularly collect and submit to WB, project reports, information on the status of compliance of environmental and social management requirements agreed with World Bank in the project agreements and informing the WB on the measures taken to address the envisaged Environmental and social management risks. Reporting shall be done on quarterly basis and annually for the entire year.
- ✓ BRD shall provide quarterly Environmental & Social Safeguard reports within 45 days of every end of the quarter.
- ✓ BRD shall also furnish to WB the annual environmental and social management performance report within ninety (90) days after the end of each calendar year as stipulated in the amended financing agreement signed with the Bank.
- ✓ BRD shall also be in charge of submitting screening and due diligence checklists to the World Bank before the infrastructure support for affordable housing development projects is approved
- ✓ BRD shall be responsible to review and approve ESMP and RAP endorsed by RHA. This shall only apply to project activities for which the EMSF and RPF provides for the same ESMP and RAP. The reviewed and approved ESMP and RAP shall be submitted to WB for non-objection.
- ✓ BRD shall be responsible for ensuring that ESIA's, ESMP's, and RAP's are prepared in compliance with both the national legislation and the WB Safeguards policies. However, the ESIA's preparation and its costs for subprojects shall be the responsibility of the developer while its review and approval/clearance shall be handled by RDB (refer to the table 2 below). It is important to note that where government clearances are needed, the developer shall be responsible for obtaining such clearances where deemed necessary BRD and RHA may facilitate the developer to speed-up the process of obtaining such clearances by following up with RDB or any other responsible organ from time to time.
- ✓ BRD shall review and approve Environmental Social Management Plans (ESMP's) and Resettlement Actions Plans (RAP's) endorsed by RHA. This shall only be applicable to project activities for which the EMSF and Resettlement Plan Framework provides for the ESMP's and RAP's. The reviewed and approved ESMP and RAP shall be submitted to World Bank for non-objection.

- ✓ For the smooth implementation of this role, BRD will hire an Environmental and Social Safeguards Specialist for the Special Project Implementation Unit (SPIU) and will be responsible for developing, coordinating and overseeing environmental and social policies and procedures, as well as reviewing and appraising proposed investments/project activities for compliance with the national environmental and social requirements as well as the World Bank's environmental and social safeguards policies and reporting to the WB as he or she may be delegated by the SPIU coordinator.

S/he will work with SPIU project teams and clients on the implementation of the Project . S/he will formulate recommendations and requirements for client action and will also monitor the environmental and social performance of operations in the both the Project's and the entire SPIU funded portfolio and will be reporting to RHFP Coordinator and Chief Risk officer.

Her/his roles and responsibilities should include but not limited to:

- ✓ Work with other departments within BRD to ensure that appropriate resources and capacity are deployed to effectively cover the safeguards policies of projects in preparation and implementation of the projects under the SPIU portfolio;
- ✓ Support the design and implementation of operations, ensuring that the financed projects and other activities are socially and environmentally sustainable, and comply with BRD and the World Bank's social and environmental safeguards policies and good international industry practices (GIIP);
- ✓ Undertake screening and due diligence of all projects proposed for financing under the SPIU portfolio to determine scope and severity of risks and impacts as well as the level of environmental and social analysis, including mitigation measures needed;
- ✓ During all phases of the sub-project continuously identify significant potential social and environmental impacts and risks of a subproject or investment ;
- ✓ Design a simple but robust safeguard monitoring system, including easily measurable indicators, at BRD and lead on the monitoring of implementation of the relevant safeguards instruments during all phases of the subprojects or investments;
- ✓ Design and incorporate safeguards management/remediation plans and feasible and cost-effective measures to avoid, minimize, and mitigate potential adverse environmental and social impacts likely to be associated with any investments under SPIU portfolio.
- ✓ Supervise and support projects technically to ensure full compliance with implementation of mitigation measures by the proponents/recipients of the investments;
- ✓ Review and approve corrective action plans (CAP) for sub-projects found to be non-compliant with the environmental and social safeguards policies and mitigation measures;
- ✓ Identify and report on environmental and social safeguards implementation performance of sub-projects/investments, particularly those with high safeguards sensitivity;
- ✓ Develop safeguards capacity building programs and administer safeguard training to staff, and continuously provide technical assistance (TA) and capacity building to existing and potential customers;

- ✓ Ensure that the client understands the national environmental and social regulations, BRD and World Bank's safeguards policies, guidelines and project-specific safeguards requirements, and has the necessary commitment and capacity to manage social and environmental impacts and/or risks adequately;
- ✓ Identify and advise on areas of work beyond safeguards where safeguards and environmental sustainability may be catalyzers for new lending products;
- ✓ Contribute significantly to advocacy, dissemination and knowledge building, with regard to the World Bank's environmental and social safeguards policies, including the World Bank policy on information disclosure;
- ✓ Prepare periodic reports (quarterly and annually) on the status of environmental and social compliance of investment projects funded under the SPIU;
- ✓ Work with (provide support to) local authorities and projects developers in establishing appropriate sub-project level grievance redress mechanisms/systems for managing (collecting, registering, responding to, feedbacking, etc.) grievances, conflicts and disputes;
- ✓ Work on any other assignment from either BRD's Management or immediate supervisor regarding the E&S safeguards of the Bank.

Rwanda housing Authority (RHA) shall closely work with the Development Bank of Rwanda in the implementation of the project and particularly the E&S requirements. E&S roles of RHA shall include the following :

- ✓ Assessment of applications or expression of interest of developers to provide infrastructure facilities in the affordable housing development sites
- ✓ To supervise infrastructure execution works in affordable and high-density projects for contractors delivering infrastructure on reimbursement modality and those through public procurement
- ✓ Provide an environmental and social management performance report to BRD fifteen (15) days after the end of each calendar month.
- ✓ Work with the supervising companies and contractors to prepare the sub projects Environmental and Social Management Plan (ESMP) and Resettlement Action Plan (RAP) for which the Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) provides for . These plans shall be submitted to BRD for review & approval and onward submission to The World Bank (WB) for non-objection. RHA commits to carrying out activities which involve displacement and affected persons shall be compensated at full replacement costs, resettled and provided with assistance in accordance with the approved resettlement action plans.
- ✓ Work with BRD's Environmental Social Management Specialist to prepare screening reports for projects to get the infrastructure support from the project. BRD will have the sole responsibility of sharing the screening report to the World Bank for non-objection before the infrastructure support is granted to developers.
- ✓ RHA shall furnish annual environmental and social management performance report of the infrastructure support component of the project within sixty days (60) days after the end of each

calendar year which will later be reviewed by BRD and submitted to WB within ninety (90) days after the end of each calendar year as stipulated in the amended financing agreement signed with the Bank.

- ✓ Ensuring Environmental and social safeguards are adhered to, handling the resettlement and expropriation actions that may be triggered by infrastructure construction and related grievance redress mechanisms. Report all incidences related to E&S to BRD for filing and to WB disclosure.
- ✓ For smooth implementation of EMSF, RHA shall be required to have adequate capacity to implement E&S requirements and it shall be required to always have an E&S Safeguard specialist/staff to facilitate the required roles in the in E&S implementation arrangements of the project. RHA shall closely monitor the WB safeguards implementation through supervising company(see table 2)

Table 2: Institutional roles and responsibilities for ESMF implementation.

Type of activity	Description of activity (Step by Step)	Responsible institution	Remarks
Design phase			
Land acquisition	<p>Land acquisition shall take the following steps;</p> <ul style="list-style-type: none"> The developer needs land for construction of affordable houses and therefore he applies for it. The RHA will facilitate developer considering that his/her project falls in the public interest projects. The RLMUA intervenes in (1) land registration from the owner to government (2) land registration from government to developer (3) facilitate RHA to expropriate using reference prices that are annually published by the cabinet. At this stage, the developer prepares all E&S required documents like ESIA, EIA and submit them to RDB for review and issuing certificates. RAP/ARAP is endorsed by RHA, reviewed and approved by BRD. RHA will prepare a report to BRD detailing how land was acquired and other details related to land acquisition which shall be reviewed and documented by BRD for reporting purposes to the WB. 	RHA, RMLUA and RDB	The land acquisition procedure needs those different government institutions, however RHA will be the lead and primary responsible of this exercise.
Application for infrastructure	<p>After the land acquisition</p> <ul style="list-style-type: none"> The developer will apply for infrastructure support (roads, water supply connection, electricity connection, sewerage facilities, social amenities, land scoping, etc. In addition, RLMUA provide some recommendation to RHA about the land optimization principals. For this project, the affordable housing units have to be apartments and buildings. 	RHA, and RLMUA and relevant approval authorities/committees	RHA will lead the process

	<ul style="list-style-type: none"> RHA will make assessment of applications in line with the standard operating procedures related to the operationalization of the infrastructure support satisfactory to WB. The decision shall be disclosed to BRD and outcome of applications shall be reported to the WB alongside BRD's RHFP quarterly implementation progress reports. 		
Pre – construction phase			
Procurement/Delivery of infrastructure support	<ul style="list-style-type: none"> Once the application is officially approved by relevant committees (NAP) and other relevant organs Procurement/delivery of the infrastructure support shall be commenced in line with RHA standard operating procedures. 	RHA and BRD	RHA will lead the Implementation of all the procurement processes of the infrastructure support component. In the event there is need to Fastrack the project, BRD may lead the procurement processes and in this case RHA will delegate a technical team to work with BRD.
E&S Due Diligence	<ul style="list-style-type: none"> Before provision of infrastructure support to developers, the E&S Safeguard screening and due Diligence report shall be done. BRD's Environmental & Social safeguards specialist will take lead responsibility in the preparation of screening report with the inputs or technical help from his or her counterpart at RHA. The due diligence checklist will be reviewed by SPIU coordinator and Risk Department of the BRD before onward submission to WB for non-objection. 	BRD ,RHA and WB	BRD/ E&S safeguards specialist will be responsible for the preparation of the E&S Due Diligence with the technical help from his or her counterpart from RHA.
Construction and operation phase			

Civil works monitoring and evaluation	<ul style="list-style-type: none"> • After getting funds, developer starts construction of infrastructure works • RHA will be fully responsible for civil works monitoring and evaluation them. • RHA shall spearhead the process of hiring the the supervising Company to do ground supervision of day to day works and will report to RHA for approval. • Reports from these monitoring and evaluation will be shared to BRD for review and to make appropriate payments. • The supervising firm shall report to RHA status of works done, E&S activities and compliance. The report from the supervising company shall also incorporate E&S monthly performance report. 	RHA, BRD and supervising company	RHA will take the lead of this activity. RHA will be furnishing report to BRD every fifteen (15) days after the end of each calendar month whilst BRD will make E&S performance report alongside the quarterly report that will be submitted to WB within 45 days at end of every quarter.
E&S Safeguards compliance	<ul style="list-style-type: none"> • The E&S safeguard specialists on the contractor/developer side will prepare reports against approved ESMPs by RHA to Supervising company. • The supervising company will then verify and review those reports and will submit them to RHA for approval. • Once they are approved, RHA (E&S safeguard specialist) will report to SPIU - BRD. • Then, the E&S Safeguard Specialist who will be hired by RHFP in BRD, will be responsible of E&S Safeguards compliance on ground (all sites of the project) and will prepare quarterly and annually reports which will be submitted to World Bank for a non – objection. • District where the project will be being implemented shall come in when the non-compliance of E&S safeguards is visible and can 	WB, BRD, RHA , District and supervising company.	BRD specialist will take the lead and will be responsible for submission of reports to WB on quarterly and annually basis as RHA will be providing E&S Safeguards compliance reports on monthly basis in line with the timeline specified in the monitoring identified above.

	<p>cause problems, for example, when there will be an accident on site.</p> <ul style="list-style-type: none"> RHA will have the responsibility to immediately report to District, Police and BRD and then BRD will report to WB with all necessary information. 		
Complaints resolution	<p>It is mandatory to establish Grievance Redress Mechanism Committee at project level and at site specific level (see section 6.3 of ESMF). These committees at site level will meet when there are some complaints from project affected people and will resolve them. If they fail to get solutions, they will submit unresolved ones to the project GRM committee (RHFP – BRD level). Records/reports will be submitted to BRD/SPIU. However, if there is a complaint that is not resolved by GRM committee at RHFP – BRD level, it shall be submitted to WB for further action.</p>	GRM committees at Project and site levels	<p>Reports shall be prepared by BRD as it will play a secretariat role and belief report shall be prepared and incorporated in the quarterly progress reports submitted to the WB on quarterly basis.</p> <p>This exercise will be led by SPIU – BRD. The E&S safeguards specialist will keep folders containing files of minutes of resolved complaints from sites meetings of GRM committees and minutes of meetings which will be held by GRM committees at RHFP – BRD level.</p>
E&S safeguards inspection	<p>During the construction and operation phase, REMA might carry out an inspection on ground (all sites of the project) and provides some recommendations or seeks for an Environmental Audit of the project. If it is done, the reports should be shared with BRD for further actions.</p>	REMA, BRD	<p>It is REMA's mandate to inspect ongoing projects in Rwanda and see how the ESMPs are implemented and to inform the lead implementing agency</p>

		<p>(BRD). Hence REMA will take the lead of the activity.</p> <p>BRD/SPIU shall share REMA audit recommendations to RHA as and when needed.</p>
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5.2 IMPLEMENTATION SUPPORT FROM SUPERVISING COMPANY ON PROJECT SITE

In respect to environmental and social requirements, the supervising company will play a key role for the implementation of ESMPs in all sites of the project . The following are areas of intervention:

- Supervise the implementation of the ESMPs by the Contractors and ensure that contractors will comply with WB Safeguard policies;
- Monitor and review the screening and categorization process for each sub-project;
- Review and approve site specific environmental enhancement/mitigation designs worked out by the Contractor;
- Hold regular meetings with the RHA
- Review the Contractors Environmental Implementation Plans to ensure compliance with the Environmental Management Plan (ESMP);
- Develop good practice construction guidelines to assist the contractors in implementing ESMPs;
- Prepare and submit regular environmental monitoring and implementation progress reports (monthly)
- Ensure that proper environmental safeguards are being maintained at all ancillary sites such as brick fields, borrow areas, brick crushing area, materials storage yards, worker's camps etc. from which the contractor procures material for construction works;
- Supervise the proper construction and maintenance of the facilities for the labour camps, including the provisions for the safety and health of workers and their families;
- Ensure that proper facilities are available for the monitoring of water quality and vehicular emissions as provided for in the environmental monitoring plan during the construction period.
- Report incidences related to E&S risks to RHA for onward submission to BRD and World Bank for consideration and action.

5.3 SCREENING AND CHECKLIST

Screening of investments will commence right at the project inception phase as soon as the specific sub project details are known including nature and scope, proposed location and area among other parameters. Screening is expected to happen concurrently with the project specific feasibility studies so that any potential impacts identified through screening are immediately incorporated into the feasibility study hence ensuring that environmental sound design of the sub projects occurs right at the project design phase. To be able to properly conduct this screening exercise, an environmental and social checklist (annex 9) will be completed by the E&S safeguard Specialist of BRD/SPIU with the help from his or her counterpart from BRD

The screening process could result in any of the following determination; -

1. Full ESIA
2. RAP if 200 people or more are affected
3. ARAP if less than 200 people, but not physically displaced and/or less than 10% of their productive assets are lost.
4. A stand-alone ESMP or
5. No further environmental study

The checklist that has been proposed is presented below:

Table 3.:Environmental and Social screening checklist (Filled and prepared by BRD’s environmental and social experts)

RHFP Project:	Select relevant project
Project Investment name	[type here]
Location	[type here]
Estimated cost (RwF)	[type here]

TYPE OF PROJECT OR ACTIVITY:

Project Type

- Construction/ preparation of infrastructure
- Construction of houses
- Completion of the construction of houses

Sub-project Component

- Access road (Mention the type of the road, length).
- Drainage (Mention the type and construction materials and length).
- Any other utility.

Please provide more details:

What are the activities that have been commenced:

Land acquisition Process

Has the Project already acquired the Land before applying for financing from RHFP?

If Yes,

- *Was public consultation conducted?* Yes No
- *Is there any grievance received so far* Yes No

If Yes, what was the complaint and how was it solved? (Provide proof if any)

- *How was the Land Acquisition Process carried out?*

Land Acquisition Audit

Briefly describe this process of stakeholder engagement and key stakeholders and the results of the engagement exercise.

.....
.....
.....

Feedback from the Land Acquisition Process Audit

.....
.....

Include if willing buyer and willing seller approach was applied.

.....

Attach supporting Documents (Land valuation report, land purchase agreement and proof transfer)

Likely project impact	Yes/No	Comments on extent or quantity of impact and proposed mitigation measures
○ <i>Is the Project site affecting a gazetted forest? If yes, to what extent.</i>		
○ <i>Will this project affect vulnerable and marginalized groups? If yes, a Livelihood Restoration Plan will be required</i>		
○ <i>Are there surface water recourses or natural springs at the Project site? If yes, what type of resources and what are they used for?</i>		
○ <i>Do wetlands (lakes, rivers, swamp, seasonally inundated areas) exist at the Project site? If yes, what type of resources and what are they used for?</i>		
○ <i>Is there any habitat of endangered/vulnerable/ threatened species for which protection is required under Rwanda national law/local law and/or international agreements at the Project site?</i>		

<p>○ <i>Is there any protected area, nationally or internationally (national park, national reserve, world heritage site etc.) at the Project site or in its immediate surrounding? If yes, give more explanation.</i></p>		
<p>○ <i>Would the proposed project pose a risk of introducing invasive alien species? If yes, how?</i></p>		
<p>○ <i>Does the project involve extraction, diversion or containment of surface or ground water that could cause depletion of water sources? If yes, what volumes will be extracted and what is the estimated reserve that exists?</i></p>		
<p>○ <i>Does the project pose a risk of degrading soils? If yes, in what manner?</i></p>		
<p>○ <i>Would the proposed project result in the release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and transboundary impacts? If yes, how?</i></p>		
<p>○ <i>Is there a potential for the release to the environment of hazardous materials resulting from their production, transportation, handling, storage and use for project activities? If yes, how?</i></p>		
<p>○ <i>Will the proposed project involve the application of pesticides and fertilizers that have a known negative effect on the environment or human health? If yes, in what quantities and for what purpose?</i></p>		
<p>○ <i>Would the proposed project be susceptible to or lead to increased vulnerability to earthquakes, subsidence, landslides, and erosion, flooding or extreme climatic conditions? If yes, explain?</i></p>		
<p>○ <i>Is there a possibility that the project will adversely affect the aesthetic attractiveness of the local landscape? If yes, explain how</i></p>		
<p>○ <i>Based on available sources, consultation with local authorities, local knowledge and/or observations, could the project alter any</i></p>		

<i>historical, archaeological, cultural heritage traditional (sacred, ritual area) site or require excavation near same? If yes, which ones?</i>		
<i>○ Is the project likely to significantly affect the cultural traditions of affected communities, including gender-based roles? If yes, explain how?</i>		
<i>○ Would the proposed project produce a physical “splintering or break up into small fragments” of a community? If yes, explain how?</i>		
<i>○ Indicate here if the project will require expropriations. If yes specify how many Households (HH) are concerned as well as the type of property (business, residence, land, crops and trees, etc), the number of the properties, area of land taken by the project (i.e. percentage % of each affected person) and that land left per affected person (percentage %). In case of expropriation specify what, the mitigation measures are (e.g. financial compensation, relocation etc.)</i>		
<i>○ Is the project likely to result in influx of people into the affected community(ies)? If yes, explain how?</i>		
<i>○ Is there any other project or potential project nearby likely to be affected or to affect this project? If yes, which one and explain how?</i>		

CONCLUSION

Which course of action do you recommend?

ENVIRONMENTAL AND SOCIAL AUDIT **UPDATED ESMP** **FULL LAND ACQUISITION AUDIT**

ESIA **A/ RAP** **ANY OTHER DOCUMENT (Specify:)**

Completed by: [type here]

Name: [type here]

Position: [type here]

Date: [type here]

6. PUBLIC / CITIZEN ENGAGEMENT AND DISCLOSURE PROCESS PROCEDURES

Citizen engagement is both an essential criteria and important strategy for an integrated environmental and social analysis process, the project design and its implementation. Views of the project affected Implementing persons have been fully taken into account during the project preparation and continue to form a basis for further design and implementation of the sub-projects throughout the RHFP implementation period. The purpose of the stakeholder consultation is to identify the views of local communities, major institutional and other stakeholders, and to assess any mitigation measures which may be undertaken to minimize any adverse impacts of the proposals under consideration.

6.1 DISCLOSURE OF THE ESMF

The ESMF serves as the Project's umbrella for the environmental and social management document, setting out the strategy to screening process that will ensure capturing all the project's environmental and social issues. Disclosure of ESMF should conform to the Public Communications Policy of the WB: Disclosure and Exchange of Information which requires that the ESMF document for WB projects be accessible to the interested parties and the general public. As soon as the client (BRD) receives the ESMF, should initiate the process of public hearings which includes the disclosure of the ESMF document, arrangement of communication interaction with stakeholders and conduct public hearings.

At the same time, the bidding commission shall include draft check list for ESMPs in the bidding packages and add a provision specifying that if new information arises out of (may occur in parallel) public hearings for the ESMPs to be updated, without effect on the budget of contracted companies (it is extremely rare occasion when changes in ESMPs/ESMP checklists on the basis of public hearings require a significant budget increase which can put bidders at risk). After the successful contractor is selected, the contractor prepares site specific ESMPs/ESMP checklists with due account of the contractor's equipment, technology, status of the facility etc. This document shall be included in the first monitoring report on the sub-project.

6.2 PUBLIC HEARINGS

Pursuant to WB Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure, the borrower should hold public hearings on the projects that must undergo environment assessment (Category A and B) to discuss the project's environmental aspects at the earliest stages; the conduct of public hearings implies access to information and broad public participation at all project consideration stages.

To ensure meaningful consultations, the borrower provides relevant material in a timely manner prior to consultation. It is important for the project developer (BRD) to construct and build good working relationships with different stakeholders in order to avoid conflicts that may arise, assess the level of stakeholder interests, support and concerns, take stakeholders views, concerns into account during project implementation. An ESMP shall not be limited to the period of construction works and shall also cover the operational phase under each sub-project. It means that districts and developers should commit to adhere to WB safeguards provisions including stakeholder interaction standards.

This document (ESMF), and ESMPs to be prepared will be disclosed to public prior to any civil works commencement. Besides ensuring participation of stakeholders, public hearings on these documents, will help identify possible impact types and environmental and social issues that neither were earlier reflected in the ESMPs. This will allow updating ESMPs checklists and including its final version in the bidding documents for procurements.

During the preparation of ESMP, it is important to undertake public consultations for groups that may be impacted by subproject. These groups are usually represented by those who live near construction site, as well as by representatives of local NGOs, and other stakeholders. Public consultations should take place at any subproject to inform stakeholders on planned socioeconomic safety measures and to research public opinion. During public consultations, stakeholders will be given an opportunity to express their views on any environment and social-related issues that may arise in the course of project implementation. All PAPs will be informed and meaningfully consulted on the project using accessible communication methods and language. Any reasonable issue raised at public consultation, will be

included in ESMF. Views of the stakeholders will be taken into account during subproject implementation. Public consultations usually take the form of meetings which enable the best information exchange: subproject initiators inform local communities on their activities and local communities are able to raise issues that are topical for them. Household visits will be used to inform vulnerable and marginalized categories of people (people with disabilities, landless persons, elderly).

During public consultations, the project beneficiaries will be informed about the grievance redress mechanism that they can utilize during various stages of the project. There are also other acceptable methods that can be used for public opinion research such as questionnaires, round tables, etc. Minutes of public consultations shall be taken and results of public consultations should be recorded in final version of ESMP. ESMP should be developed for each subproject taking into account its specificity. ESMP, design estimates for activities and results of public consultations should be submitted to the district and RDB office in charge of environmental impact assessment. Construction activities under subproject should not be started until the approval by the RDB is obtained.

6.3 GRIEVANCES REDRESS MECHANISM (GRM)

A Grievance Redress Mechanism will be implemented to ensure that all complaints from local communities are dealt with appropriately, with corrective actions being implemented, and the complainant being informed of the outcome.

It will be applied to all complaints from affected parties. Lead Implementing agency will maintain a Complaints Database, which will contain all the information on complaints or grievances received from the communities or other stakeholders. This would include: the type of complaint, location, time, actions to address these complaints, and final outcome. The contractor, in coordination with supervising company in collaboration with local leaders, shall set-up a grievance redress committee that will address any complaints during project implementation. Grievances should be resolved within 15 working days.

In addition, for resettlement related complaints, the sub project RAP team (comprised of Sociologist, a Land Surveyor and Valuation Experts) will facilitate the establishing of the grievance redress mechanisms in accordance to the guidelines outlined in the RPF under the District Executive Secretary on behalf of the District Council. The following levels of grievance resolution are provided for by Law, however, the RHFP - RPF provides details of the process and institutions involved:

- a) Resettlement and Compensation Committee
- b) Role of District Executive Committee, CoK and or MININFRA (RHA) in resolution of contestations to the expropriation list and valuation for compensation and resettlement
- c) Approval and timeframe for payment of compensation
- d) Retraction of expropriation
- e) Cell Adjudication Committee (CAC)
- f) High Court

A grievance form is presented below and hard copies will be made available at community centres.

Table 4: Grievance form for RHFP

PROJECT:	District	Sector	Cell	Village
Grievance number:			
Name of the recorder:.....			Title:.....	
Date: / /				
Complainant Names:		Signature of Complainant..... Date: / /		
Province	District	Sector	Cell	Village
Details of Complaint:				
.....				
.....				
.....				

Grievance Clouse Out

Grievance number: :.....

Define immediate action required:

.....

Define Long term action required (If necessary):

.....

Corrective action plan taken	Due date

Responsible party (Filled in and signed by the complainant when she/he receives compensation or file closed):.....
.....

Complainant Name:Date: .../.../..... Signature.....

Responsible Grievance Redress Committee

TitleName.....Date../...../.....Signature.....

6.3.1 GRIEVANCE REDRESS COMMITTEE (GRC) AT PROJECT LEVEL

In the IFC performance standard 5 land acquisition and Involuntary Resettlement (paragraph 11) states that the client will establish a grievance mechanism as early as possible in the project development phase. According to RHFP - RPF, a Grievance Redress Mechanism (GRM) is elaborated in following chapters and recommends a Grievance Redress Committee (GRC) at the project level with.

The GRC at the project level shall be responsible for:

- Coordinating GRC activities at different sites;
- Redressing all complaints which at the level of the project;
- Redressing all complaints which are not resolved at site specific GRC;
- Carrying out field and complainants visits whenever necessary;
- Coordinate GRM activities at different sites;

The proposed GRC at the project level will be chaired by elected chairperson from representative institutions except BRD which will play role of secretariat. It would be composed by:

- BRD SPIU Coordinator
- MININFRA representative
- RHA representative
- PSF representative
- Environmental and Social safeguard specialist from BRD

6.3.2 GRIEVANCE REDRESS COMMITTEE (GRC) AT SITE SPECIFIC LEVEL

In accordance with the IFC Involuntary Resettlement and the Grievance Redress Mechanism (GRM), a Grievance Redress Committee (GRC) is recommended at site specific level.

The GRC at the site specific level shall be responsible for:

- Receiving immediate grievances, complaints and concerns presented to them at site;
- Solving all grievances received at site or neighboring environment;
- Forwarding unresolved grievances to the GRC at Project level;
- Maintaining the grievance log and all records;
- Carrying out field and complainants visits whenever necessary;

The proposed GRC at the site specific level will be chaired by village representative and will be composed by of representative from Site Developer, Workers representative, village representatives.

- Site developer representative
- Workers representative (subproject)
- Village representative
- Women representative
- Youth representative

7. CAPACITY BUILDING AND TRAINING ON SAFEGUARDS FRAMEWORK IMPLEMENTATION

7.1 CAPACITY DEVELOPMENT

Effective implementation of Environment and Social Management Framework (ESMF) requires technical capacity in the human resource base of implementing institutions as well as logistical facilitation. Implementers (Project BRD - SPIU, RHA and Districts) need to understand inherent social and environmental issues and values and be able to clearly identify indicators of these.

Even with existence of policies and laws such as the Environment new Law (2018), evidence on the ground still indicates that there is significant shortcoming in the abilities of local and district level stakeholders to correctly monitor, mitigate and manage environmental performance of development projects.

It is important for BRD - SPIU staff, RHA' E&S safeguard Specialist, District Environmentalist and District Engineer to get the appropriate trainings that help them ensuring that the project complies with Rwandese environmental and social laws, and that the project adheres to this ESMF. Sufficient understanding of the mechanisms for implementing the ESMF will need to be provided to the various stakeholders implementing the sub-projects (infrastructure construction). This will be important to support the teams appreciate their role in providing supervision, monitoring and evaluation including environmental reporting on the project's activities. The BRD project SPIU should carefully analyze the project scope, their availability to the project activities and their capacity for the successful implementation of the project and its ESMF.

7.2 HUMAN RESOURCE CAPACITY REQUIREMENTS

Human capacity requirements for stakeholders of this ESMF are related to "low technical capacity", and "Inadequate staffing" in the area of environment . This means the implementation of this ESMF requires the right number of trained and dedicated staff for environmental and social management purposes at all levels (BRD, RHA, Districts and Local community). It is very important to build the capacity of staff that will be assigned duties related to environmental and social management.

The implementation of ESMF and related ESMPs requires dedicated staff with sufficient knowledge on environmental and social management principles, project screening, impact mitigation, monitoring and follow-up action. Training and awareness creation should be undertaken at different levels of ESMF implementation. These levels will entail the central Government (MININFRA - RHA), BRD -SPIU, Districts, local authorities, private sector, NGOs, and GRM committees . The exercise will be customized according to each level's needs to ensure adequacy in implementation of the ESMF. The table below shows specific planned training interventions under RHFP, their target audience, timeline and budget.

Table 5: Planned Training intervention under RHFP

Planned trainings	Target audience	Timeline (phases of the implementation)			Estimated budget (USD)
		Design	Pre-construction	Construction	
Content of ESMF, ESMF requirements (roles& responsibilities and actions to be taken), ESMF checklist documents	SPIU – BRD, RHA (affordable housing department staff), District representatives	X		X	2,000
National and WB E&S safeguards required to implement ESMF	SPIU – BRD, RHA (affordable housing department), District representatives		X		1,000
Need for ESMPs, Content of the ESMPs/ ESMP Checklists; National and World Bank requirements for the content and quality of ESMPs;	E&S Specialist of SPIU, E&S specialist of RHA, District representatives, Supervising company, Contractor representative (E&S specialists).		X	X	1,000
Wastes (Solid waste and wastewater) minimization and management	E&S Specialist of SPIU, E&S specialist of RHA, District representatives, Supervising company, Contractor representative (E&S specialists).			X	1,000
Occupational health and safety;	E&S Specialist of SPIU, E&S specialist of RHA, District representatives, Supervising company, Contractor			X	1,500

	representative (E&S specialists) and Local communities.				
Induction training for GRM: Roles & responsibilities	GRM Committees (Project and site level)		X	X	2,000

8. CONCLUSIONS AND RECOMMENDATIONS

This Environmental and Social Management Framework (ESMF) has been prepared in order to guide project planners, implementers and other stakeholders to identify and mitigate environmental and social impacts in the Context of the Rwanda Housing Finance Project. The ESMF provides project implementers with an environmental and social screening process that will enable them to identify, assess and mitigate potential environmental and social sub-projects' impacts, in accordance with the Government of Rwanda and World Bank Environmental and Social Safeguard Policies.

The implementation of the project will have the environmental and social impacts that should be mitigated following the ESMF guidelines. Successful implementation of this ESMF will depend to a large extent on the active participation of different key stakeholders (Project SPIU, RHA (affordable housing Department), Districts, and local communities). To be successful it is recommended that:

- Environmental and Social awareness and education for the key stakeholders and affected communities must be an integral part of the ESMF implementation.
- RHFP Project SPIU, RHA, District Environmentalist, District Engineer, E&S Specialists of supervising company and contractors be adequately trained to implement the screening process, and where required to help develop and implement appropriate Environmental and Social Management and Monitoring Plans. They should be empowered to adequately administer the ESMF and should be given the necessary support and resources to ensure effective implementation.
- This ESMF should be regularly updated to respond to changing local conditions and should go through the national approval processes, reviewed and approved. It should also incorporate lessons learned from implementation of the project activities.

ANNEXES

ANNEX 1: SUMMARY OF ENVIRONMENTAL AND SOCIAL REGULATORY FRAMEWORK FOR RWANDA

Environmental management laws	Organic Law No. 4 of 2005 defines projects to undergo mandatory EIA
Water management laws	Water Law No. 62/2008, embraces modern principles of sustainable water resources.
Wetlands management laws	Organic law on environmental protection and management –2018, ORTPN – 1972 amended 2003 Wetland protection, Land law – 2005 and Wildlife Act
Forest management laws	National Forest Law 2010 provides for establishment, development and sustainable management, including conservation and rational utilization of forest for socioeconomic Development
Wildlife management laws	The Wildlife Policy still under review by the parliament
Land management and Involuntary Resettlement laws	The organic law determines the use and management of land in Rwanda. It also institutes the principles that are respected on land legal rights accepted on any land in the country as well as all other appendages whether natural or artificial. <i>The Law Relating to Expropriation in the Public Interest, Law No. 18/2007 of 19/04/2007.</i> The Law determines the procedures relating to expropriation in the public interest. Expropriation is the taking of private property in the public interest aimed at development, social welfare, security and/or territorial integrity.
Gender Legal framework related to access to natural resources	The Constitution of Burundi 2005 National Policy on Gender Family code
International Conventions	
Convention of Biological Diversity	Ratified
Wetlands Convention	Ratified
UN Framework on Climate Change	Ratified
Convention to combat Desertification	Ratified
Convention on Migratory species	Ratified
World Heritage Convention	Ratified

ANNEX 2: CONTENT OF AN EIA REPORT

An EIA report has the following objectives:

- a) To enable the developer to plan, design and implement mitigation measures for significant adverse environmental impacts and to maximise social benefits from a proposed project.
- b) For the decision-makers to objectively evaluate the proposed project.
- c) To provide information on environmental impacts and mitigation measures for local communities and any other stakeholders to be able to contribute their opinions.

The EIA report should entail;

- i) **Executive summary** of the EIA report which should be brief and focus on following matters:
 - ☒ Name and location of the project;
 - ☒ Name of the developer
 - ☒ Name of the agency preparing EIA report;
 - ☒ Main impacts identified;
 - ☒ Mitigation recommendations;
 - ☒ Environmental monitoring plan.
- ii) **Objectives of the project**, including ideas, intentions and particular objectives.
- iii) **Description of the proposal and its alternatives.** In this part, it is necessary to describe in detail the proposed project and its alternatives including those not subjected to pre-feasibility study or feasibility study. Attention should be concentrated to the comparison of different alternatives. Following are the required contents of the section "*Description of the proposal and its alternatives*":
 - ☒ The stage of the project cycle where the project is being implemented (pre-feasibility study, feasibility study or design);
 - ☒ Outlines of the plan for impact prediction and mitigation measures;
 - ☒ Raw materials, supplies, energy, water and equipment to be used for implementing the project and its alternatives;
 - ☒ Operational parameters such as capacity and product output;
 - ☒ Tables, photographs, diagrams and maps;
 - ☒ Comparison of characteristics of alternatives (extent, location, technology, products, energy and raw materials demands) in the present socio-economic, technical and environmental situation;
 - ☒ A summary of project technical, economic and environmental characteristics.
- iv) **Discussion on the proposal and its relation to relevant policies, laws and programmes** (sectoral and regional). In this section, the proposal must be shown to be in line with policies, laws, institutional framework and development strategy of Rwanda.

v) **Description of present (baseline) environmental state (analysis of initial state).** In this section, the environment in the project area should be appropriately described. The following aspects should be presented:

- ☒ Environmental baseline conditions (natural and socio-economic);
- ☒ Sensitivity and values (cultural, aesthetic) of environment in the project area.

v) **Impact assessment.** In this section, the spatial and temporal scope of the impacts and characteristics of different impacts (whether positive or negative, direct or indirect, their intensity, extent and significance) should be presented for the project and also for all alternatives considered. The following aspects should be presented:

- ☒ Assessment of all impacts to the local population;
- ☒ Environmental data base, study methods and assumptions;
- ☒ Limitations and reliability of the data and study results;
- ☒ Compliance with the environmental standards and license issuing procedures;
- ☒ Significance of impacts, criteria and standards used for assessment of impact significance;
- ☒ Measures to avoid and mitigate impacts.

In this section, methods of data collection, methods and criteria used for assessing degree of danger and significance of impacts must be indicated. Cumulative impacts must be emphasized. A summary table of impacts for each alternative should be provided.

vi) **Evaluation and comparison of alternatives** and selection of one that is environmentally suitable. The main content of this section is the comparison of the main positive and negative impacts, impact mitigation and monitoring measures of alternatives. The environmentally suitable alternative is determined based on the following aspects:

- ☒ Impacts with largest effects, measures for avoiding, mitigating and managing them;
- ☒ Impacts for which the developer has committed to take prevention measures and unavoidable impacts;
- ☒ Allocation of cost and benefit between the levels, partners and population of the project area;
- ☒ Information on protection measures or resettlement, acquiring opinions of the public;
- ☒ Environmental improvement opportunities.

vii) **Impact management and environmental monitoring plan (EMP).** In this section, tasks to ensure the implementation of mitigation measures and monitoring of impacts should be presented. This is a plan for monitoring and management of impacts during the implementation and operation of the project, where the responsibilities between the state and investor are differentiated. This plan includes the following contents:

- ☒ Description of mitigation measures;
- ☒ Implementation schedule including indicators, costs, etc.;
- ☒ Assignment of responsibility for implementation;
- ☒ Monitoring of implementation;
- ☒ Report on evaluation of implementing such the plan.

Annex where tables, drawings, maps, documents and information used as reference should be presented

ANNEX 3: PUBLIC PARTICIPATION AND STAKEHOLDER INVOLVEMENT

It is a requirement that appropriate mechanisms for ensuring full involvement and participation of the public is accorded priority and should be a continuous process from screening, scoping, during EIA/EA Study report preparation, draft EIA/EA report, and during EIA/EA finalization and review.

Purpose and objectives of public consultation

The purpose of public consultation is to promote a two way communication process, and helps to:

- i. Identify public concerns and values and inform the public about proposed actions and consequences;
- ii. Collect relevant social, economic and environmental information that will help improve the understanding of a proposed development, clarify issues and improve project design;
- iii. Allow the participation of affected people in decision making process and foster a sense of local ownership;
- iv. Develop and maintain transparent procedures for project implementation.

The specific objectives of people's participation are to:

- i. Ensure that local people participate fully and have a recognized role in decision-making during project planning;
- ii. Raise environmental awareness among the local stakeholders and the implementing agencies involved with management of energy and the associated resources;
- iii. Enable a dialogue between project planners and local people on all project-relevant topics, such as social conditions, land values, resources usage, informal and customary rights, environmental concerns etc. - so that local knowledge and ideas inform the technical design and development of the project;
- iv. Ensure early detection of possible social conflicts arising from the proposed interventions, and explore ways to minimize them - e.g. through negotiation and education;
- v. Ensure the establishment of organizations and procedures to enable local people to participate in the construction, operation, and maintenance – as well as non-structural elements – of energy related projects.

How to involve the public in ESIA process

There are several techniques and methods for consulting the public. Public meetings are often the principal form of consultation used in environmental assessment. However, there are other more interactive consultation and participation methods that may be applicable to water development projects. These include open houses, focus group meetings, persuasion, education, information feedback, and delegation of authority to an affected community. The public may also be appropriately involved in the ESIA process through:

- i. Informing the public about the proposed project,
- ii. Participation in scoping exercises,

- iii. Open public meetings/hearings on the projects,
- iv. Inviting written comments on proposed projects from those who can put their comments in writing
- v. Use of community representatives,
- vi. Review of Draft Environment Impact Statements,
- vii. Making relevant documents available to any interested members of the public.

Figure below outlines the general systematic process of engaging the stakeholders, which should be adopted in assessments of the water resources related projects.

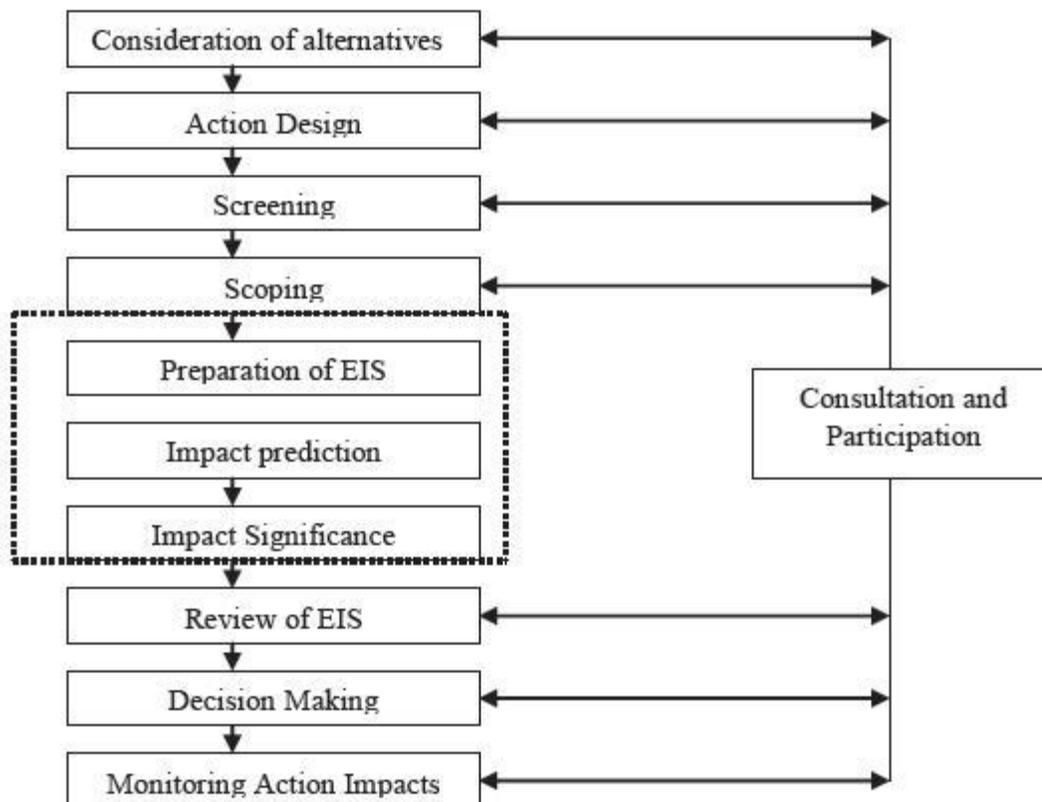
Responsibility for Ensuring Public Participation and Involvement

One of the responsibilities of the lead agency is to ensure that the public is fully involved in the ESIA process for energy development projects through overseeing the ESIA process and reviewing the EIS. In turn, developers or project proponents are also obliged to effectively consult and involve the public throughout the ESIA process. In case the Water lead agency is the project proponent, REMA takes over the responsibility for overseeing and ensuring public participation and involvement by the said lead agency.

Planning for Consultation and Public Participation

Planning for consultation and public involvement requires skilled professional advice, usually provided by a social scientist who is usually a member of the ESIA consultancy team. The planning ought to start with informal consultations very early in the ESIA process. The three key tasks here are to identify **WHO** will be affected, **HOW** and **WHEN** they are to be involved in the consultation process. Such planning will involve:

- i. Clearly define objectives regarding the issues to be addressed, and the key decisions involved;



- ii. Integration of consultation and participation within the ESIA and project design process. The information and internal communication requirements of the ESIA team and project designers should be taken into account;
- iii. Allowing flexibility to adapt and change as new information comes up;
- iv. Allocating adequate resources and scheduling work.

It is notable that consultation and participation is continuous throughout the ESIA process. The iterative and continuous nature of the ESIA process is set out in Figure 5.

Stages for public involvement in the ESIA Process

In its broadest sense, public involvement and participation is an on-going activity which takes place throughout the entire ESIA process. The relevant stakeholders in the ESIA process are:

- i. Beneficiaries of the project - target groups making use of the water resources;
- ii. Affected people – i.e. those people that experience, as a result of the project, intended or unintended changes in water resources that they value;
- iii. General stakeholders – i.e. formal or informal institutions and groups representing either affected people or biodiversity itself.
- iv. Future generations - ‘absent stakeholders’, i.e. those stakeholders of future generations, who may rely on water resources around which decisions are presently taken.

Public Consultation before EI Study is Done.

If after receiving and screening/reviewing the developer’s project, REMA, in consultation with the Lead Agency, decides that it is necessary to consult and seek public comment, it shall, within 4 weeks from submission of the project brief and/or notice of intent to develop, publish the developers notification and other supporting documents in a public notice. When the notification is accompanied by voluminous documentation, it is permissible to publish a summary of it in a public notice, indicating the nature and location of the project, characteristics of site and specifying the places where the documents of the developer can be consulted. Objections and comments from the public and other stakeholders shall be submitted to the REMA and to the Lead Agency with 21 days from the publication of the notice.

Public Consultation during the EI Study

The team conducting the EI Study shall consult and seek public opinion/views on environmental aspects of the project. Such public involvement shall be during scoping and any other appropriate stages during the conduct of the study.

Public consultation after EI Study is done (EIS Review)

The Environment Impact Statement (EIS) shall be a public document and may be inspected at any reasonable hour by any person. Considering the scale and level of influences likely to result from the operation of the proposed energy project, the Lead Agency, in consultation with REMA, shall decide whether a public hearing shall be held and shall decide locations where it is necessary to make the contents of the draft EIS known to the public (EIA Manual 2002). Within 2 weeks from the date of receiving the developers’ EIS, REMA shall, if it finds it necessary, publicize receipt of the EIS, identify the

concerned region and concerned stakeholders, the places for inspection of the draft, and shall also make copies or summaries of the statement available for public inspection.

The public notice shall include a summary of assessment data indicating nature of the water resources related project, location, characteristics of site and the results of the assessment. It shall also specify the places where the draft EIS may be consulted, and a notification to copy /send any comments to the Authority and to Lead Agency. REMA shall also send copies of the developer's draft EIS within 14 days from the date on which it was received, to other relevant agencies and experts for comments on those aspects of the project impacts that fall under their jurisdiction. Public comments and/or objections shall be submitted to Lead Agency and to the REMA.

Presenting Opinions on the EIS

Those members of the public who may have opinions from points of view for environmental conservation on the draft EIS may present their written opinions to Lead Agency and to REMA within 21 days from the day of publicity as required under the EIA Regulation for Uganda. The Lead Agency, in cases where it is presented written opinions provided for in the preceding paragraph shall send copies of them to the developer soon after expiry of the 21 days. The developer shall take all necessary steps to address the issues raised.

Holding public hearings

Where the Lead Agency is of the opinion that it is necessary to hear views of the public in concerned areas regarding specific a specific energy project, shall hold public hearings on the days contained in a notice for public hearings. The public in the concerned areas may present their opinions at the public hearings from points of view for environmental conservation and socio-economic considerations. The developer may explain or present his (her) opinions at the public hearings. The developer, in case where public hearings are held, shall make a record of the opinions presented at the hearings, and shall take all necessary steps to address the issues raised.

Notification on Public Hearings

Where it is necessary to hold public hearings on a proposed water resources related project, a notice for the public hearings must be made at least 10 days to the meeting. Such a notice may be:

- i. posted in or near the affected community,
- ii. Published in a daily newspaper in an official language;
- iii. Published in a local newspaper in an appropriate local language,
- iv. Notified to the public through any other suitable media.

The notice shall contain full information about the location, time of the proposed meeting, and the items to be considered by the meeting; and shall also announce that no decisions are to be made on matters not so noticed.

Where to hold public hearings

- v. Project site.
- vi. Meeting place within Lead Agency/boardroom.
- vii. Any other facility with adequate capacity, and available for this purpose.

- viii. Social centers.
- ix. Any other convenient place identified for this purpose.

ANNEX 4 : ENVIRONMENTAL PARAMETERS FOR MONITORING PURPOSES (DURING THE IMPLEMENTATION)

Environmental parameter	Management measures	/implemented	Remarks
Soil			
Construction debris and other solid wastes			
Hazardous waste (explosives, chemicals, bitumous waste, etc)			
Excavated soils			
Erosion			
Borrow pits and quarry sites			
Contamination of Soil by Fuel and Lubricant			
Water and sanitation			
-Potable water at construction sites and camp (including water quality parameters)			
-Water (water sources, River, stream, lake) pollution			
-Sanitation facilities (sewer) and waste water disposal at construction sites/camps			
Air Pollution			
Generation of dust			
Concrete mix plants and batching plants			
Odour from construction camps			
Pollution from crusher			
Noise pollution			
Noise/vibration from vehicles, machinery, plants and equipment			
Flora and Fauna			
Loss or damage of vegetation			
Loss, damage or disruption to fauna			
Disruption to Users			
Loss of access			
Traffic jams and congestion in road crossing areas			
Traffic control and safety			
workers' accident risks			
Risk from operations			
Risk from electrical equipment			
Risk at hazardous activity			
First aid			
Rehabilitation of construction camp			
Damage and loss of cultural properties			

Conservation of religious structures		
Chance found archaeological property		
environmental enhancement		
RHFP sites landscape/rehabilitation		

Note: When it comes to reporting on above mentioned parameters, illustrative photos/pictures are necessary wherever it's applicable.

ANNEX 5: SOCIAL PARAMETERS FOR MONITORING PURPOSES

no:	Issues	Milestone	Situation at site	Remarks	Way forward
1	Number of affected Persons on site				
2	Compensation paid				
3	Number of Properties Affected				
4	Public Consultation				
5	Grievance redress Mechanism				
6	Gender Issues				
7	Compensation Eligibility and Entitlements				
8	Vulnerable groups				
9	Employment				
10	Recording Keeping				
11	HIV / AIDS Mitigation Measure				
12	COVID -19 Mitigation measure				
13	Any other incidence on site				

ANNEX 7 : LIST OF CONSULTATED INSTITUTION AND CONTACT PERSONS

S/N	NAMES	INSTITUTION	POSITION
1.	KAMPETA Sayinzoga	BRD	CEO
2.	TENGERA Gloria	BRD	Company Secretary and General Counsel
3.	IGIHOZO Uwera Liliane	BRD	Head of SPIU
4.	MANDERA Nelson	BRD	Ag. RHFP Coordinator
5.	UWIMANA Leopold	RHA	Director of Affordable Housing Planning and Development Department
6.	IRAGENA Philbert	REMA	PEA – Project Officer
7.	KYAZZE Edward	MININFRA	Division Manager - UHHD

8.	RUTAGENGWA Alexis	RLMUA	Head of Department - SLUPM
9.	KARARA Jean De Dieu	RDB	EIA Analyst

ANNEX 7: LIST OF EXCLUDED ACTIVITIES

BRD will not finance the following types of projects (BRD – ESMS):

- 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 pharmaceuticals, pesticides/herbicides, ozone depleting substances, PCBs, wildlife or products regulated under CITES.
- Production or trade in weapons and munitions.
- Production or trade in alcoholic beverages (excluding beer and wine),
- Production or trade in tobacco.
- Gambling, casinos and equivalent enterprises.
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the radioactive source is considered to be trivial and/or adequately shielded.
- Production or trade in unbonded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
- Drift net fishing in the marine environment using nets in excess of 2.5 km in length.
- A reasonableness test will be applied when the activities of the project company would have a significant development impact but circumstances in Rwanda require adjustment to the Exclusion List.
- BRD will not use RHFP funds to finance activities highlighted in the project implementation manual under the excluded activities section.
- In addition, BRD will not use funds from the World Bank to finance any activity involving the following:
 - Armaments (any investment associated with weapons and munitions, including sporting firearms, defense systems, military installations, military equipment including uniforms, and the training and physical support of military personnel).
 - Toxic waste (any investment associated with the handling or treatment of toxic waste).
 - Pornography.