

**REPUBLIC OF RWANDA**



**RWANDA AGRICULTURE AND ANIMAL RESOURCES  
DEVELOPMENT BOARD (RAB)**

**AND**

**DEVELOPMENT BANK OF RWANDA (BRD)**

---

**COMMERCIALIZATION AND DE-RISKING FOR AGRICULTURAL  
TRANSFORMATION (CDAT) PROJECT (P171462)**

**ENVIRONMENTAL AND SOCIAL COMMITMENT  
PLAN (ESCP)**

**October 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The Government of Rwanda (**the Borrower**) through the Rwanda Agriculture and Animal Resources Development Board (RAB) of the Ministry of Agriculture and Animal Resources (MINAGRI) and Development Bank of Rwanda (BRB, *Banque Rwandaise de Development*) is planning to implement the Commercialization and De-risking for Agricultural Transformation (CDAT) (**the Project**). The World Bank has agreed to provide financing for the Project.
2. The RAB will be responsible for the overall project implementation and set up a Project Implementation Unit (PIU) which will be responsible for overall project oversight and coordination (Component 4), as well as Component 3. The RAB will also be responsible for the management of Value Chain and Infrastructure Development (Subcomponent 1.1, Irrigation rehabilitation and development, Subcomponent 1.2: Land husbandry, Subcomponent 1.3: Innovation and services for agri-business development) and Agricultural Insurance (Subcomponent 2.2: Strengthening agricultural insurance) under Component 1 and 2 respectively. The BRD will be responsible of the implementation of the Agricultural Finance under the component 2 (Subcomponent 2.1: Scaling up agricultural finance).
3. The Government of Rwanda will implement material measures and actions so that the Project is implemented in accordance with the World Bank Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out the material measures and actions, any specific documents or plans, as well as the timing for each of them.
4. Where it refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other environmental and social (E&S) documents under ESF and referred to in this ESCP, including without limitation the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Labour Management Plan (LMP), Stakeholder Engagement Plan (SEP) and Environmental and Social Management System (ESMS). The table below summarizes the material measures and actions that are required, their implementation timeframe as well as the implementing entity of the material measures and actions.
5. The implementation of the material measures and actions put in place in this ESCP will be monitored and reported to the World Bank by RAB as required by the ESCP and the conditions of the legal agreement, and the World Bank will monitor and assess the progress and completion of the material measures and actions throughout the implementation of the Project.
6. As agreed by the World Bank (WB) and the Borrower, this ESCP may be revised from time to time during Project implementation to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Borrower will agree to the changes with the World Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the World Bank and the GoR. The ESCP may also specify the funding necessary for completion of a measure or action depending on the project. The latter will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances or Project performance result in changes to the risks and impacts during Project implementation, the World Bank and GoR shall agree on sources of additional

funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health and safety risks, labour influx, gender-based violence to the construction workers.



	<p>workers. The project coordination team shall provide reports on each incident / accident. A report of the incident shall be submitted, detailing summary findings of the Root Cause Analysis (RCA). An incident register shall be maintained at all work sites, throughout the duration of the project.</p> <p>Subsequently, as per the World Bank's request, a detailed report on the incident with adequate measures to prevent its recurrence shall be prepared and submitted within two (2) weeks.</p>		
<b>B</b>	<p><b>World Bank technical support</b></p> <p>The World Bank will provide implementation support and monitor on ongoing basis the environmental and social performance of the project which will include reviewing the Recipient's monitoring reports on compliance of the project with the requirements of the legal agreement and will review any revision of the ESCP including changes resulting from changes in the design of a project or project circumstances and other environmental and social risk management tools.</p>	Every six months period or as needed	World Bank
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
<b>1.1</b>	<p><b>Organizational Structure</b></p> <p>The CDAT shall be implemented by RAB and BRD through a Project Implementation Unit (PIU) that shall be established with the responsibility for overall coordination and management of the project. Qualified ten (10) environmental and social risk management staff and resources shall be availed to support the management of environmental and social risks and impacts of the Project. The permanent staff shall include one Environmental and one Social Specialist at the RAB/SPIU level. The project shall also recruit eight (8) Environment and Social Specialists to be based in the field to support specific subprojects in different Districts across the Country.</p>	RAB shall hire 10 Environmental and Social Risk Management Officers. Two (2) environmental and social risk management specialists shall be retained at RAB/SPIU level and eight shall be recruited at District level (the recruited 8 staff at District level each shall cover both environment and	RAB through PIU

	<p>The project shall hire consultants on need basis, to develop required environmental and social safeguards tools and environmental, social, health and safety auditing. National laws and World Bank ESF requirements shall be met for the clearance of prepared documents and compliance with safeguards. BDF shall be engaged by RAB as a service provider through a Memorandum of Understanding (MoU) to administer the CDAT matching grant facility. BDF (Business Development Fund) was established in 2011 as a wholly owned subsidiary of the Development Bank of Rwanda (BRD).</p>	<p>social issues) and assign them to defined project sites before the commencement of the works at each site (it is understood that the same officers may be responsible for several subproject sites in the course of project implementation) and one Climate Change Specialist at head office to manage de-risking aspects</p> <p>BRD shall assign one Environmental and one Social Specialist to the project.</p> <p>BDF shall assign one Environmental and one Social Specialist to the project (subcomponent 1.3)</p>	<p>BRD through PIU</p> <p>BDF through RAB</p>
<p><b>1.2</b></p>	<p><b>Environmental and Social Assessment/ Management Plans and Instruments</b></p> <ul style="list-style-type: none"> <li>✓ The Recipient will carry out an environmental and social assessment of the project to determine the environmental and social risks and impacts of the project throughout the project life cycle and come up with adequate management plans and implement them. The environmental and social assessment will apply a mitigation hierarchy approach.</li> </ul>	<p>At the start of development works and studies/consultancies in every project site and throughout the subproject implementation period</p>	<p>RAB and BRD through PIUs</p>

	<ul style="list-style-type: none"> <li>✓ High risk subprojects, as per the considerations defined in World Bank's ESF risk classification guidance, will be excluded from financing with the World Bank funds under the Project.</li> <li>✓ The Recipient shall prepare tools/ instruments for the implementation of agreed measures and actions. These management tools will include environmental and social management frameworks (Environmental and Social Management Framework, ESMF; Resettlement Policy Framework (RPF), Stakeholder Engagement Plan (SEP) and Labour Management Plan (LMP). All management tools will incorporate appropriate measures for the project to meet the requirements of Rwandan applicable law and regulations and the ESSs.</li> <li>✓ Once subprojects and activities – either physical works or studies/ consultancies (similar in concept to project works) - are confirmed, including but not limited to the proposed irrigation schemes, the Recipient will prepare the subproject-specific environmental and social impact assessment (ESIA), environmental and social management plans (ESMP) or other appropriate environmental and social risk management instruments (environmental and social audit, occupational health and safety, hazard or risk assessment, etc.) where required, in accordance with triggered ESSs, ESMF, the EHSGs and other relevant Good International Industry Practice (GIIP). The Resettlement plans will be prepared where applicable</li> <li>✓ The Environmental and Social Management Plans (ESMPs) for subprojects be implemented in compliance with the</li> </ul>	<p>ESMF, RPF, SEP, LMP and will be prepared before the Project appraisal</p> <p>Before appraisal</p> <p>Prior to the commencement of any subproject activities at each site, and, in case of tenders, before the tendering process can commence</p> <p>Bi-annual monitoring reports on the ESMPs implementation</p>	<p>RAB through PIU</p> <p>RAB and BRD through PIUs</p> <p>RAB and BRD through PIUs</p> <p>RAB and BRD through PIUs</p>
--	--	---	--

	<p>requirements of Environmental and Social Standards (ESSs) triggered by CDAT and Rwanda regulations.</p> <ul style="list-style-type: none"> <li>✓ ESMPs will include, as relevant, thematic management plans, such as Emergency Response Plan (ERP). With regard to ERP, a master ERP will be prepared that shall be adapted for each subproject, as relevant, as stated under ESS4. Additionally, with regard to dam safety, a master Emergency Preparedness Plan (EPP) will be prepared by RAB and adapted for each subproject involving dams, as stated under ESS4 in the ESCP</li> <li>✓ Cumulative Impact Assessment (CIA) will be prepared with regard to the cumulative impacts of the project (with a specific emphasis on irrigation schemes); a Biodiversity Impact Assessment will be prepared as part of the Cumulative Impacts Assessment, and Biodiversity Management Plans prepared for each subproject involving adverse impacts on biodiversity. The Recipient will ensure that subprojects involving destruction of Critical Habitats (defined in line with ESS6) are not supported under CDAT</li> <li>✓ Pesticide Management Plan (PMP) will be prepared to ensure that all agrochemicals are handled, stored, disposed of, and applied according to relevant international standards and codes of conduct, as well as the EHSGs. RAB will prepare a framework PMP that will inform the subproject level plans</li> <li>✓ Update environmental and social risk management instruments (ESMF, SEP, ESIA/ESMP, etc.) whenever the project changes or unforeseen circumstances occur.</li> </ul>	<p>Master ERP and Master EPP Before project effectiveness and subproject ERPs and EPPS thereafter throughout project implementation prior to start of the bidding process for each respective subproject</p> <p>Within first 6 months of project effectiveness</p> <p>Framework PMP within first 8 months of project effectiveness and subproject PMPs thereafter throughout project implementation prior to start of the bidding process for each respective subproject</p> <p>Whenever deemed necessary</p>	<p>RAB through PIU</p> <p>RAB through PIU (with support from BRD)</p> <p>RAB through PIU (with support from BRD)</p> <p>RAB through PIU</p>
--	---	---	---



<p><b>1.3</b></p>	<p><b>Consultation and Participation</b></p> <p>The Project will organize consultations with stakeholders, including communities, groups, or individuals affected by the proposed subprojects and with other interested parties to disclose project information and understand the concerns of affected people, and how such concerns will be addressed as per SEP, ESMF and ESMS.</p> <p>The World bank has the right to attend such meetings and will monitor, as part of its due diligence, the implementation of consultation and stakeholder engagement by the Recipient.</p>	<p>Before project appraisal, at the start of project activities at subproject level and throughout the project implementation period</p>	<p>RAB and BRD through PIUs</p>
<p><b>1.4</b></p>	<p><b>Management of Contractor and Supervising entity</b></p> <p>Incorporate the relevant aspects, including ESMPs or other environmental and social risk management instruments and any other required ESHS measures (including GBV Code of Conduct), into the ESHS specifications of the bidding documents and contracts with contractors and supervising firms. The bidding documents will provide the requirements of the contractor to manage ESHS risks and impacts of the construction activities, such as recruitment of ESHS Specialist as key site staff, preparation of Contractor’s Environmental and Social Management Plans (C-ESMP), Code of conduct for contractor’s employees and reporting on ESHS performance and incidents and accidents notification.</p> <p>Thereafter, ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p>	<p>Before launching the procurement process for the relevant activities</p> <p>During the project construction phase</p>	<p>RAB and BRD through PIUs</p> <p>RAB and BRD through PIUs</p>
<p><b>1.5</b></p>	<p><b>Notification of riparian countries</b></p> <p>As the project involves the use of water through irrigation, the environmental and social assessment will consider the requirements</p>	<p>Before project appraisal</p>	<p>RAB and MINAGRI</p>

	of OP 7.50 for projects on international waterways		
<b>ESS 2: LABOUR AND WORKING CONDITIONS</b>			
<b>2.1</b>	<p><b>Working Conditions and Management of worker relationships</b></p> <p>RAB has prepared a Labor Management Procedures/plans (LMP) applicable to the project in accordance with the requirements of the national labour law and ESS2.</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS2 and local regulations acceptable to the Bank, including working conditions and management of workers relationships, implementing workforce protection requirements, implementing adequate occupational health and safety measures, setting out appropriate grievance mechanisms for Project and contractor's workers, and incorporating labor requirements into the ESHS specifications of the bidding documents and contracts with contractors and supervising firms.</p>	<p>Before the CDAT appraisal</p> <p>Throughout the project life cycle</p>	<p>RAB through PIU</p> <p>RAB and BRD through PIUs</p>
<b>2.2</b>	<p><b>Occupational Health and Safety (OHS)</b></p> <p>The Project will implement occupational health and safety (OHS) measures as described in ESS2 and the ESIA/ESMP, ESHS guidelines relevant to each subproject, including but not limited to the GEHSGs and all 13, as relevant, agriculture-related EHSGs (since it is impossible to determine which will be relevant because there will be hundreds of small subprojects in all areas of the agri sector), and other GIIP. In addition, the Contractors who will be engaged in physical works will develop (prior to the start of construction works) and implement a site-specific OHS management plans that would be part of C-ESMP.</p>	<p>Throughout the project implementation period</p>	<p>Contractors, RAB and BRD through PIUs</p>

2.3	<p><b>Grievance Redress Mechanism (GRM)</b></p> <p>The project shall adopt, maintain and operate a grievance redress mechanism (GRM) consistent with ESS10 and ESS2 and in a manner acceptable to the Bank as early as possible to address specific concerns associated with its implementation in a timely manner.</p> <p>The Project shall inform the Workers or affected communities of the grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use.</p>	Throughout the project implementation period	RAB and BRD through PIUs
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>Resource use efficiency</b></p> <p>The Project will apply the resource efficiency requirements of this ESS, and after assessing environmental and social risks and impacts of the proposed activities, will identify and implement technically and financially feasible measures that avoid or minimize resource misuse.</p> <p>Being an irrigation project, the water balance and quality assessment in CDAT subprojects will be maintained, monitored and reported periodically</p>	<p>Throughout the implementation period of the project</p> <p>Regularly during irrigation period</p>	<p>RAB and BRD through PIUs</p> <p>RAB and BRD through PIUs</p>
3.2	<p><b>Pollution prevention and management and management of wastes</b></p> <p>The Project will seek to mitigate d the release of pollutants to air, water and land due to routine, non-routine, and accidental circumstances, and with the potential for local, regional, and transboundary impacts;</p>	Throughout the implementation period of the project	<p>RAB and BRD through PIUs</p> <p>RAB and BRD through PIUs</p>

	<p>The Project will avoid the use of chemicals and hazardous materials subject to local and international bans, restrictions or phase-out. Where subprojects involve recourse to pest management measures, preference will be given to integrated pest management (IPM) or integrated vector management (IVM) approaches using combined or multiple tactics. The pesticides use shall comply with relevant ESHS guidelines<sup>1</sup> and the project will ensure that all agrochemicals are handled, stored, disposed of, and applied according to relevant international standards and codes of conduct, as well as the EHSGs.</p> <p>The Pesticide Management Plan (PMP) will be required given that the project will involve pest management issues , where subprojects involve recourse to pest management measures. RAB will prepare a framework PMP that will inform the subproject level plans.</p> <p>The construction wastes will be collected and disposed of in the district waste disposal site or any other site approved by competent authority. The selection of adequate site for materials storages and provision of sufficient waste bins (separate bins for food waste, recyclables and garbage) at the worksite for the collection of waste generated from the worksites and carrying these wastes in the covered trucks for the safe disposal at approved site will be performed.</p> <p>x Operational phase pollution management, for example, related to waste generation and disposal, waste water discharges, air emissions shall be integrated into the risk assessment and management instruments as appropriate for subprojects and other types of investment activities (i.e. ESIA/ ESMPs, ESRM screening tools and corrective action plans for small and micro businesses etc.).</p>	<p>Throughout the implementation period of the project</p> <p>Before project effectiveness</p> <p>Throughout the implementation period of the project</p> <p>Throughout the implementation period of the project</p>	<p>RAB through PIU</p> <p>RAB and BRD through PIUs</p> <p>RAB and BRD through PIUs</p>
--	--	--	--

<sup>1</sup> General EHS Guidelines as well as the Agri-sector EHS Guidelines covering primary production, as relevant to each subproject

<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
<b>4.1</b>	<p><b>Community Sensitization</b></p> <p>The project shall consult the community to raise public awareness of the Project, the risks involved, especially on agrochemicals' waste collection, transport, and disposal and recycling, transport of agriculture supplies and products, potential dam failures or flooding associated with irrigation projects, health impacts/risks due to water-borne diseases, as well as risk management through stakeholder engagement, public hearings, radio talk shows and community meetings in accordance with ESS4 and ESS10.</p>	Throughout the project life cycle	RAB and BRD through PIUs
<b>4.2</b>	<p><b>Community Health and Safety</b></p> <p>The community health and safety risks are expected to be present, and in some cases can be significant (e.g. irrigation schemes with presence of dams), and will be considered under the project by:</p> <ol style="list-style-type: none"> <li>1. Designing, constructing, operating and decommissioning infrastructures and equipment in accordance with national legal requirements, the relevant EHSGs covering agricultural sector (impossible to specify which ones at this stage) as well as other GIIP, taking into consideration safety risks to third parties and affected communities;</li> <li>2. Fencing or guarding to prevent entry of unauthorized people into construction areas and posting warning signposts;</li> <li>3. All visitors to the work area shall wear basic PPEs such as safety shoes, mask, hard hats and vest, etc.</li> <li>4. Putting in place a program to promote awareness to the construction workers and local community on the risk of</li> </ol>	Throughout the design and construction phase of each subproject under the project	RAB and BRD through PIUs

	<p>spreading of communicable diseases. Contractor's monthly training program will cover topics on the workers Code of Conduct.</p> <ol style="list-style-type: none"> <li>5. Adopting and applying the principles of universal access, where technically and financially feasible;</li> <li>6. Incorporate technically and financially feasible road safety measures into the project design to prevent and mitigate potential road safety risks to road users and affected communities including (i) preparing a site-specific traffic management plan (as part of the C-ESMP) with details on traffic volume, routes and time of travel will be developed and implemented and shared with the local traffic authorities, (ii) conducting awareness campaigns to drivers/ bicyclists/ motorcyclists and pedestrians for pedestrians safety; (iii) enforcing road safety regulations (speed limits, etc.); (iv) displaying signage on road indicating the problem.</li> </ol> <p>ESMPs for subprojects shall include provisions for road safety during the subprojects operational phase.</p> <p>In case of emergency event arising from both natural and man-made hazards such as in the form of fire, leaks or spills, floods, explosions likely to occur due to various reasons, the project will put in place measures to address the emergency event including preparation of emergency response plan (ERP) - apart from with regards to possible irrigation dams which are to be assessed later "in preparation" - in coordination with the relevant local authorities and the affected community, and will take into account ESS4, the master ERP, and the emergency prevention, preparedness and response arrangements put into place with project workers under ESS2.</p>	<p>Throughout the operation phase of each subproject under the project</p> <p>Before the start of construction phase of each subproject under the project that poses risks to community health and safety</p>	<p>RAB and BRD through PIUs</p> <p>RAB through PIU</p>
--	--	---	--

	RAB will be responsible for preparation of a master ERP, as stated under ESS1, which will be adapted for subprojects accordingly.	Before project effectiveness	RAB through PIU
<b>4.3</b>	<p><b>Emergency preparedness and response and dam safety</b></p> <p>The project will comply with dam safety requirements as it envisages constructing new irrigation facilities, dam inclusive, and rehabilitating existing marshland infrastructures. In this regard, the existing Rwanda guidelines for small dams will apply to small dams – both new and existing - and where relevant, the project will prepare appropriate dam safety plans for both large and small dams in accordance with the requirements of the ESSs, and specifically ESS4. The required safety plans include (and will be incorporated in the C-ESMP, where relevant):</p> <ul style="list-style-type: none"> <li>✓ Plan for construction supervision and quality assurance</li> <li>✓ Instrumentation plan</li> <li>✓ Operation and maintenance (O&amp;M) plan</li> <li>✓ Emergency preparedness plan (EPP), developed based on a master Emergency preparedness plan (EPP) will be prepared and adapted for each subproject involving dams as stated under ESS1 in this ESCP</li> </ul> <p>During dam construction and operation, the Recipient will engage experienced and competent professionals for the supervision of the design and construction works and will require the owner and users of the dam to adopt and implement safety measures right from the design phase to the operation and maintenance phase.</p>	<p>Prior to the commencement of subproject activities and, in case of a tender, prior to the commencement of the tender</p> <p>Ongoing during implementation</p>	<p>RAB through PIU</p> <p>RAB through PIU</p>
<b>4.4</b>	<p><b>Security personnel</b></p> <p>The construction works shall require the Project to provide security for safeguarding workers and property. The project shall engage security</p>		RAB through PIU

	personnel for the safety of workers and worksites (materials, storages sites, etc). These workers like others shall sign the Code of Conduct, which will act as a security management plan, and undergo regular training programs in line with the requirements of ESS4.	Throughout the construction and operation period of each subproject	
--	--	---	--



<p><b>4.5</b></p>	<p><b>Gender based violence (GBV), prostitutions and use of child labour</b></p> <p>During the project implementation, the project does not expect labor influx across project sites in search for employment and businesses. However, the project shall recruit a sizeable number of local labors which could potentially contribute to gender-based violence and sexual exploitation and abuse (SEA), and Sexual Harassment (SH).</p> <p>The RAB shall ensure that all project workers sign the Code of Conduct (CoC). The Code of Conduct for all the construction workers with measures to prevent SEA/SH, and gender-based violence shall be developed and implemented as part of the C-ESMP. All construction workers should abide by the Code of Conduct through contractual obligation.</p> <p>Monthly training program will also cover topics related to Code of Conduct, such as sexual Exploitation and Abuse, Sexual Harassment particularly towards women, and gender-based violence and respectful attitude, while interacting with the local community.</p> <p>The labor law and national policies on child labour, sexual harassment/ prostitutions and gender equity shall be enforced. In addition, awareness meetings on GBV, child labour, prostitutions preventions shall be organized.</p>	<p>Throughout the project implementation</p>	<p>RAB, BRD through PIUs and participating Districts</p>
<p><b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b></p>			
<p><b>5.1</b></p>	<p><b>Land acquisition and resettlement</b></p> <p>The CDAT activities will involve moderate land acquisition, restrictions on land use and resettlement. The construction of irrigation and post-harvest infrastructures across various project sites will lead to small scale land loss and resettlement while land husbandry works will result</p>	<p>Throughout the Project implementation</p>	<p>RAB through PIUs</p>

	<p>in temporary restrictions on land use during terracing construction phase. The project will therefore offer affected persons compensation at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods as pre the requirement of ESS 5 and the 2005 national expropriation law.</p>		
<b>5.2</b>	<p><b>Resettlement Plans</b></p> <p>At project preparation stage, the detailed resettlement implications of the project are not yet known since the project sites and activity per site are not yet confirmed. The following plans will be required:</p> <p>The project has prepared the Resettlement Policy Framework (RPF) consistent with ESS5 acceptable to the Bank. The RPF is under review by the Bank and shall be cleared and disclosed prior to appraisal.</p> <p>The Resettlement Action Plan (RAP) is another instrument that will be developed at site level once the subproject or individual project components, including but not limited to the proposed irrigation schemes, are defined during implementation, and the necessary information becomes available to assess and mitigate the negative resettlement impacts and identify development opportunities for affected families. The Project Affected Households (PAHs) shall be fully compensated as per the RAP and the entitlement matrix prior to the commencement of any subproject civil works or, in case of a tender, before tendering can begin.</p>	<p>RPF to be cleared and disclosed prior to the project appraisal</p> <p>Prior to works commencement or, in case of a tender, before tendering can begin</p>	<p>RAB and BRD through PIUs</p> <p>RAB and BRD through PIUs</p>
<b>5.3</b>	<p><b>Grievance mechanism</b></p> <p>The implementation of CDAT activities will result in grievances that need to be addressed. The project shall put in place appropriate</p>	<p>Throughout the project implementation period</p>	<p>RAB and BRD through PIUs</p>

	<p>grievance redress mechanism (GRM) as early as possible to address specific concerns about compensation, relocation or livelihood restoration measures raised by displaced persons (or others), various types of project related conflicts in a timely manner as per the requirement of ESS 10, 5 and 2.</p> <p>Affected communities will be informed of the grievance mechanism at the time of preparation of the site specific RAPs and the PIU shall collaboratively work with the local authority establish, operationalize and ensure continues monitoring and reporting of the GRCs and the community members who raise grievances shall be protected against any form of reprisal for its use.</p>		
<b>5.4</b>	<p><b>Monitoring and Reporting</b></p> <p>The Recipient (RAB) shall monitor the implementation of resettlement and compensation activities and livelihood restoration measures across project sites in line with the ESCP and the requirements of ESS5. He will also prepare monitoring reports and submit to the bank on bi-annually basis as set out in the ESCP.</p>	Throughout the project implementation period	RAB through PIU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
<b>6.1</b>	<p><b>Conservation of biodiversity and habitats</b></p> <p>The project may involve conversion of natural habitat. It will not be clear until subproject ESIA's are conducted whether this may include any critical habitats or protected areas of high biodiversity value as defined in ESS6. ESIA's will assess the potential presence of critical habitats and any projects where those are present will be excluded from financing.</p> <p>Though water and land will be needed during the implementation of its planned activities, the project will take appropriate actions to avoid or</p>	Throughout the project implementation period	RAB and BRD through PIUs

	<p>minimize adverse impacts on biodiversity and natural habitats in accordance with the requirement of this ESS6. The Recipient will ensure that activities involving conversion of critical habitats or legally protected areas are not supported under CDAT project.</p> <p>Particular attention will be paid to introduction of invasive species. The Project will be required to ensure that subproject activities do not intentionally introduce any new alien species unless this is carried out in accordance with the existing regulatory framework for such introduction. Deliberate introduction of any alien species with a high risk of invasive behavior will be avoided regardless of whether such introductions are legally permitted or not.</p> <p>The project will identify the potential subproject-related risks and impacts on habitats and biodiversity. A Biodiversity Impact Assessment will be prepared as part of the Cumulative Impacts Assessment of the project. Where significant risks and adverse impacts on biodiversity have been identified in the process of subproject ESIA preparation, a Biodiversity Management Plan (BMP) will be developed and implemented in line with ESS6 and in a manner acceptable to the Bank. The Biodiversity Management Plan may be a standalone document or it may be included as part of the ESIA prepared under ESS1.</p>	<p>Within first 6 months of project effectiveness and thereafter ongoing through project implementation</p>	<p>RAB and BRD through PIUs</p>
<p><b>6.2</b></p>	<p><b>Sustainable management of living natural resources</b></p> <p>The infrastructures put in place by the project will be valorized with various commodities including rice, maize, bean, etc. Aquaculture and apiculture will be promoted in the water reservoirs and their buffer zones respectively. The project will manage planned living natural resources in a sustainable manner, through the application of good management practices, available technologies for increased and sustainable production, and sustainability standards (where available).</p>	<p>Ongoing throughout project implementation</p>	<p>RAB and BRD through PIUs</p>

<b>ESS 7: INDIGENOUS PEOPLES/ SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
<b>7.1</b>	All FI subprojects will be prepared and implemented in accordance with relevant national and local laws and regulations. BRD's ESMS excludes subprojects that have adverse risks or impacts on SSAHTLC and other disadvantaged or vulnerable groups. The overall project design has a strong gender and social inclusion lens, and the scope of Project activities and eligibility criteria are reflective of the relevant disadvantaged or vulnerable group needs.	Not applicable	Not applicable
<b>ESS 8: CULTURAL HERITAGE</b>			
<b>8.1</b>	<b>Chance Finds</b>  Chance finds procedure are included in ESMF and will be included in subproject construction works ESMPs and C-ESMPs for the Project and implemented in accordance with ESS8 and in a manner acceptable to Bank	Incorporate chance finds procedures in the ESMF and ESMSs, ESIA/ESMPs/SPRs (as required) prior to during the preparation of those tools	RAB and BRD through PIUs
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
<b>9.1</b>	<b>Environmental and Social Management System (ESMS)</b>  The Project includes Development Bank of Rwanda which us a Financial Intermediary (FI). In line with ESS1 and ESS9 requirements, BRD will maintain an Environmental and Social Management System (ESMS) for identifying, assessing, managing and monitoring environmental and social (E&S) risks and impacts of its investment activities as well as managing overall portfolio risk in a responsible manner on an ongoing basis.  However, as BRD has an existing ESMS, this will be reviewed and updated where necessary to make it consistent with ESS9 requirements. The ESMS shall also include specific agri-finance guidelines.	Before project effectiveness	BRD through PIU

<p>Furthermore, BRD will ensure that Participating Financial Intermediaries (PFIs) availing financing from BRD will be required to comply with the following requirements as a condition of eligibility to receive financing from BRD:</p> <ul style="list-style-type: none"> <li>- Develop – or strengthen if already existing - and implement an ESMS compliant with ESS9, and acceptable to BRD, RAB and World Bank and approved by the PFI’s senior management or Board of Directors, as appropriate, and will disclose relevant parts of their ESMS on their websites. However, benefiting SACCOs will be required to have a simplified ESMS consisting of a simple screening process of investments against the List of Excluded Activities while they gradually develop their ESMS via training and technical support to be provided by BRD</li> <li>- The ESMS for each PFI will include provisions to ensure that no financing is to be provided to activities on the List of Excluded Activities as included in the BRD ESMS as approved by the World Bank</li> <li>- The ESMS for each PFI must include clear provisions for subproject screening, risk categorization, due diligence and monitoring</li> <li>- In case of potential project support to insurance companies as a result of reforms to the National Agricultural Insurance Scheme (NAIS), the ESMS for those companies (that are also PFIs) will address key E&amp;S factors that affect financial viability of insurance products (most notably, climate change);</li> <li>- Each PFI will have adequate internal E&amp;S capacity to implement its ESMS.</li> </ul> <p>Each PFI will be required (via financing agreements) to report to BRD within a reasonable timeframe any material incidents and accidents related to sub-projects supported by the Project.</p>	<p>Before first disbursement from BRD to each PFI</p> <p>As needed throughout project implementation</p>	<p>BRD through PIU</p> <p>BRD through PIU</p>
---	--	---

	BRD will ensure that each PFI is required (via financing agreements) to prepare and submit to the BRD a bi-annual E&S Report on the implementation of its ESMS that will include information on E&S risk profile of its portfolio financed through the Project. BRD will also provide a bi-annual E&S report to the World Bank.	Bi-annually during project implementation	BRD through PIU
<b>9.2</b>	<p><b>Organizational capacity and competency</b></p> <p>The BRD will develop and maintain organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities. It will also designate a representative of its senior management to have overall accountability for environmental and social performance to the project;</p> <p>BRD will also retain at least one environmental and one social specialist throughout project implementation XX</p> <p>BRD will prepare a structured Environmental and Social Capacity Building Plan that will include activities throughout the project implementation to help ensure that both BRD and PFIs are able to meet the requirements outlined above. This plan will include adequate budget and resources for implementation.</p>	<p>Before first disbursement to BRD</p> <p>Throughout project implementation</p> <p>Before first disbursement to BRD</p>	<p>BRD through PIU</p> <p>BRD through PIU</p> <p>BRD through PIU</p>
<b>9.3</b>	<p><b>Labor Management for BRD's and PFIs' own workforce</b></p> <p>BRD will address labor management aspects in its existing ESMS and include an LMP section to ensure consistency with ESS2. Further, BRD will revise its existing Labor Management Procedures to ensure consistency with ESS2. BRD will disclose its institutional Labor Management Procedures on its website in accordance with ESS2 including grievance mechanisms for their own workforce.</p>	<p>Before project effectiveness</p>	<p>BRD through PIU</p> <p>BRD through PIU</p>

	<p>The LMP section shall also be reflected in each PFI's ESMS to comply with both ESS2 and ESS9. BRD will disclose its institutional ESMS, including grievance mechanisms for their own workforce, on its website in accordance with ESS2 and ESS9. BRD will ensure that PFI's maintain labor management procedures in line with national laws and WB ESS2.</p>	<p>Before first disbursement from BRD to each PFI</p>	
--	---	---	--



<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
<b>10.1</b>	<b>Stakeholder Engagement Plan (SEP)</b>  The Project has prepared a Stakeholder Engagement Plan (SEP) consistent with the requirement under ESS 10. The SEP is under review and shall be cleared and disclosed prior to project appraisal .	RAB shall disclose the SEP prior to appraisal	RAB and BRD through PIUs
<b>10.2</b>	<b>Update of SEP</b>  The project will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. The SEP will be updated if significant changes are required during implementation and will be redisclosed.	The updated SEP during implementation shall be disclosed within 6 months after the project effectiveness	RAB and BRD through PIUs
<b>10.3</b>	<b>Implementation of SEP</b> This SEP has been prepared as a stand-alone document and shall be implemented throughout the project life cycle.	Throughout the project implementation period	RAB and BRD through PIUs
<b>10.4</b>	<b>Information Disclosure</b>  The Bank and RAB shall disclose documentation relating to the environmental and social risks and impacts of project prior to project appraisal or before the commencement of works at site level.  The Project shall disclose a summary of the project information in the project areas in local languages and in a manner that is accessible and culturally appropriate. The disclosure shall allow stakeholders to understand the risks and impacts of the project, and potential opportunities.	Whenever required  Before commencement of subproject activities	RAB through PIU  RAB/SPIU
<b>10.5</b>	<b>Meaningful Consultation with Stakeholders</b>		RAB and BRD through PIUs

	<p>The Project shall engage throughout the project cycle in meaningful consultations with all stakeholders (local communities, local authorities, etc) to provide them with opportunities to express their views on project risks, impacts and mitigation measures, and allows the project to consider and respond to them as per the requirement of ESS10.</p> <p>The CDAT project shall continue to conduct stakeholder engagement in accordance with the SEP and shall build upon or strengthen the channels of communication and engagement already established with stakeholders.</p> <p>The project shall particularly seek feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures.</p>	on an ongoing basis as the nature of issues, impacts and opportunities evolves	
<b>10.5</b>	<p><b>Organizational capacity and commitment</b></p> <p>The Project shall define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS.</p>	Prior to implementation of any subprojects	RAB and BRD through PIUs
<b>10.6</b>	<p><b>Grievance Redress Mechanism (GRM)</b></p> <p>The project shall adopt, maintain and operate a grievance redress mechanism (GRM) consistent with ESS10 and in a manner acceptable to the Bank as early as possible to address specific concerns associated with its implementation in a timely manner.</p> <p>All stakeholders, including affected communities will be informed of the GRM and various channels to submit and resolve grievances.</p>	On an ongoing basis	RAB and BRD through PIUs

**CAPACITY SUPPORT (TRAINING)**

	<p><b>Capacity building needs</b></p> <p>Training topics for project staff, contractors’ workers, service providers, project workers (labor force), PFIs, and other stakeholders involved in the project implementation will include among others:</p> <ul style="list-style-type: none"> <li>▪ Stakeholder mapping and engagement</li> <li>▪ World Bank Environmental and Social Framework and Rwanda safeguards regulations;</li> <li>▪ Specific aspects of environmental and social assessment and ESMP implementation and monitoring in line with the ESMF and ESMS</li> <li>▪ Emergency preparedness and response</li> <li>▪ Workers and community health and safety</li> <li>▪ Information on World Bank’s Safeguards Incidents Reporting requirements</li> <li>▪ Risk assessment and management;</li> <li>▪ Operation and maintenance and safety inspections of dams and dam safety measures;</li> <li>▪ Management of agrochemicals and sites wastes;</li> <li>▪ Compensation and livelihood restoration programme and Grievance redress mechanisms;</li> <li>▪ Gender-based Violence (GBV) and Sexual Exploitation and Abuse (SEA)</li> </ul> <p>The training will regularly be conducted based on needs assessment.</p>	<p>Regularly throughout the project life cycle</p>	<p>RAB and BRD through PIUs</p>
--	---	--	---------------------------------