

**THE REPUBLIC OF RWANDA**



**MINISTRY OF INFRASTRUCTURE**

**P.O.BOX 24 KIGALI**

**RWANDA ENERGY GROUP (REG)**

**RWANDA TRANSMISSION SYSTEM REINFORCEMENT AND LAST MILE  
CONNECTIVITY**

**EXECUTIVE SUMMARY**

**ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)**

**Kigali, June 2020**

## **1. Brief project description**

The Government of Rwanda (GoR) through the Ministry of Infrastructure (MININFRA), with the funding from the African Development Bank (AfDB), is developing a project titled “Rwanda Transmission System Reinforcement and Last Mile Connectivity” to be financed by AfDB and by EIB under parallel financing. This financing project will support the Government of Rwanda’s energy transmission and access objectives during this period of the National Strategy for Transformation (NST1; 2017-2024). The multi-donor program would have a total volume of an estimated US\$ 276 million, spread across four components of grid electrification, improving grid reliability and efficiency, advancing off-grid energy and clean cooking, and providing technical assistance, capacity building and implementation support. The program will also receive the funds from other development partners where EIB investment financing would be EUR 100 million,

**The Project Development Objective** is to improve access to energy and efficiency of energy service delivery to households, businesses and public institutions in Rwanda.

### **Study objectives**

The main objective of this assignment is to develop an environmental and social management framework (ESMF), including the collection of all required data, information and materials. This shall provide clear, comprehensive and practical guidance to REG through its subsidiary of EDCL to integrate environmental and social considerations into the program.

### **The specific objectives of the study are to:**

- (i) Identify all relevant potential environmental risks and social concerns that may arise as a result of the project and the subprojects that it will support;
- (ii) Specify appropriate roles and responsibilities of involved stakeholders in the implementation of the ESMF;
- (iii) Develop subproject review procedures as well forms, guidance and checklists to apply technical input for the subprojects;
- (iv) Develop a screening procedure to identify the environmental and social issues associated with the subprojects;

- (v) Prepare generic ESMP that can be applied to manage the identified environmental and social risks and set out the monitoring plan that will be undertaken to confirm correct ESMP delivery;
- (vi) Develop the Term of Reference (ToR) for appropriate safeguards instruments (such as ESIAAs) as appropriate and required;
- (vii) Review and make an assessment of the capacity of the national project implementation entities, to screen subprojects and monitor the implementation of the project ESMP; and make proposals for capacity enhancement as appropriate;
- (viii) Provide estimates for the budget required for project ESMP implementation;
- (ix) Develop a public consultation and stakeholder engagement strategy;
- (x) Define appropriate environmental and social standards performance indicators; and
- (xi) Provide practical information resources for implementing the ESMF

**The Project has four main components:**

**Component 1: Increasing access to grid electricity** which will increase access to Households within 6 administrative districts of southern province of Rwanda.

**Component 2: Improving grid reliability and operational efficiency** which will include the following subcomponents: 1) Substation upgrades, connections of feeders to substations, and rehabilitation (Nyamata, Rutongo, Gikomero and Kanombe, Shango); 2) Upgrade of Karisimbi 6.6kV line to 30kV; 3) Upgrade and extension of different MV lines for improved supply; 4) Improving Quality Of Power Supply In Distribution System; 5) Upgrade of single to three phase lines countrywide; 6) Demand stimulation; 7) Transmission lines and associated substations; 8) Upgrade of substations; 9) Transformer upgrades and 10) Kigali Distribution Rehabilitation.

**Component 3 of Catalyzing private investment in off-grid electricity access and clean cooking** with the following subcomponents: 1) Results-based financing for off-grid solar solutions and clean cooking solutions; 2) RETF grant from Clean Cooking Fund; 3) Carbon Financing; and 4) Results-based financing and potential credit facility for clean cooking

**Component 4 of Technical assistance, institutional capacity building, and implementation support which includes as subcomponents:** 1) Technical Assistance.; 2) Capacity building.; 3) Implementation Support; 4) Project Operations and Consultancy Services and 5) Technical Assistance.

## **2. Overview of the major environmental and social risks and stakes**

According to the AfDB ISS ( Integrated Safeguards System) the program's environmental and social risk rating is cat 1 considering the anticipated risks and impacts associated with construction of Transmission lines in component 2 of Improving grid reliability and enhancing operational efficiency which will require land acquisition for tower location and physical relocation for households which will be located in the Right of Way. The project will include also the power distributions lines (component 1), distribution of solar system and clean cooking solutions (component 3). It also considers technical assistance that involves sector performance improvements and forward-looking options for sector development; capacity building in planning, skills development, audit and compliance; and policy and regulatory improvement and entrepreneurship development, including targeted training for women entrepreneurs under clean cooking solutions (part of component 4), among others. According to the law regulating Environmental Impacts Assessment in Rwanda the project involving the construction of HV (High Voltage) lines, MV (Medium Voltage) lines and Hydro dams is subject to full Environmental Impact Assessment. The project activities will involve construction of MV and LV lines within 6 administrative districts distributed in Southern Province under component 1, Kigali Distribution Rehabilitation with focus on Upgrade and Extension of Medium Voltage lines with transformers and renovation of existing MV/LV cabins. Further the project will involve the construction of Transmission lines, upgrades of substations/transformers and upgrade from single phase to three phases countrywide.

The project will be subject to Environmental and Social Impact Assessment according to Ministerial Order No 001/2019 of 15/04/2019 establishing the list of projects that must undergo environmental impact assessment, instructions, requirements and procedures to conduct environmental impact assessment which stipulates that all projects involving the construction of MV and HV lines must undergo a full Environmental and Social Impacts Assessment. For each of

these project components, the assessment should be done to analyze the project impacts on natural environment (air, water, soil, fauna, flora) and socioeconomic and cultural environment. Especially for component 2, ESIA and RAP is being prepared for transmission lines due to their particular adverse environmental and social impacts. For all project components the mitigation measures will be developed in Environmental and Social Management Plan (ESMP) in compliance with AfDB Operational Safeguard (OS) 1 of Environmental and social assessment and National Environmental law 48/2018 of 13/08/2018.

### **3. Institutional framework, Laws & regulations/procedures**

The following laws, policies and frameworks were reviewed and discussed in the details for their relevancy to the program:

- Ordinary Law N° 43/2013 of 16/06/2013 Governing Land in Rwanda, Repealing Organic Law N° 08/2005 of 14/07/2005 Determining the Use and Management of Land in Rwanda;
- National Strategy for Transformation one (2017-2024) \_NST1;
- Law N° 66/2018 du 30/08/2018 Regulating Labour in Rwanda;
- The Law (No. 48/2018 of 13/08/2018) on Environment determining the modalities for protecting, conserving and promoting the environment;
- Ministerial Order N° 001/ 2019 of 15/04/2019 establishing the list of projects that must undergo environmental impact assessment, instructions, requirements and procedures to conduct environmental impact assessment.
- Law No 32/2015 of the 11/06/2015 relating to Expropriation in the public interest
- AfDB Operational Safeguards (OS);
- The constitution of the Republic of Rwanda of 2003 revised in 2015;
- Law no 32/2015 of 11/06/2015 relating to expropriation in the public interests;
- Ministerial order No2 of 17/05/2012 determining conditions for occupational and health safety;

- Regulations No 002 of 26/04/2018 governing e-waste management in Rwanda;
- Guidelines on the management of waste disposal site/dumpsites (landfill) ;
- National wetland conservation program;
- RURA Guidelines for Right of Way in Rwanda;
- MININFRA, Biomass energy Strategy, A sustainable path to clean cooking solution 2019-2030

#### **4. Risks and generic potential impacts**

##### **Positive Impacts**

In the construction phase there will be temporary employment opportunities for local contractors and those who will be employed or supply services and provisions for workers and to contractors. Within the respective project areas there will be opportunities for petty trading and small business service provision along the construction of power electrical line in component 1, construction of transmission lines, Substation upgrades, connections of feeders to substations, and rehabilitation (Nyamata, Rutongo, Gikomero and Kanombe, Shango); Upgrade of Karisimbi 6.6kV line to 30kV; Upgrade and extension of different MV lines for improved supply, Improving quality of power supply in distribution system; upgrade of single to three phase lines countrywide and demand stimulation, transmission lines and associated substations, upgrade of Bugesera industrial park substation (3\*30 MVA); Transformer upgrades and Kigali Distribution Rehabilitation in component 2; Furthermore the component three of Catalysing private investment in off-grid energy and clean cooking will create many employment opportunities for private sector companies, local people who will be hired and especially targeted women entrepreneurs who will receive the capacity building to be motivated to take part in the business of clean cooking solutions. Some of social benefits includes the enhancement of electricity supply services in the trading centres and small industries like sawmills and joineries, grain mills and other agricultural processing businesses which need electricity for efficient production. The long-term direct positive impact is therefore the access to reliable electricity supplies, which will lead to better provision and easier management of goods and services and enable new facilities for processing and storage. Social and environmental costs, not least in noise and air pollution, associated with existing generator usage and kerosene lamp will be reduced and there will be a more limited requirement for firewood cutting and collection which will reduce indoor air pollution and contribute to the

long- term environmental pollution control through the reduction of CO<sub>2</sub> emissions and fossil fuel use.

### **Adverse impact**

The program is expected to have some adverse environmental impacts, but all of them will be mitigated to the extent possible to avoid any harm that this may cause to the environment. The component 1 is expected to have different environmental impacts on vegetation resulting on bush clearing, soil and water contamination resulting on the use of machinery fuel and lubricants, contamination due to the unsafe waste disposal, landscape deformation and land degradation from different excavation works, noise pollution resulting from the use of heavy vehicles and machines and air pollution from the burning of fossil fuel among others. The component 2 of Improving grid stability and operational efficiency with construction of transmission lines, substations/transformers will have negative environmental impacts such as noise pollution, generation of hazardous and non-hazardous wastes, land cover loss from bush clearing and excavation works, disturbance on biodiversity, change on landscape, land use restriction, permanent land acquisition for tower location and possible physical displacement. The component 3 and 4 will have environmental impacts related to waste generation from used solar panel, batteries and accessories, TA which will develop policy and regulatory including the review of tax tariff may have impacts of increasing CO<sub>2</sub> emissions due to the promoted fuel type, increasing the pressure on the forest through increasing population depending on the firewood due to the increased and unaffordable prices, loss of employment for people who were working previously in the charcoal sector due to the increment in taxation on the charcoal, unemployment due to the taxation increase on charcoal and decrease on the clean cooking stove due the promotion of environmental protection through energy efficiency. All of these will be mitigated efficiently.

The program is also expected to have social and cultural impacts resulting from the temporally loss of access to land or property due to the construction works within the right of way, crop destruction in the Right of Way, aesthetics and visual related impacts, damage and loss of physical cultural properties, workers health and safety related impacts due to potential construction, operations and maintenance and camp installation. The impacts are limited to the specific project areas, minimal and minor in scale and in terms of magnitude and should be adequately mitigated through the preparation of appropriate ESMPs, EHSPs and RAPs whenever required. The ESIA

and RAP is being prepared for the subcomponent of transmission which may present adverse social impacts and need to be discussed and approved before the launch of that specific component.

## **5. Public consultation during the preparation of the ESMF**

The public consultation for this ESMF was carried out in 6 administrative districts namely Gisagara, Huye, Nyamagabe, Nyanza, Nyaruguru, Ruhango administrative Districts of Southern province of Rwanda and different relevant institutions from 20<sup>th</sup> January 2020 to 26 February 2020 and the result of public consultation showed that this program is urgently needed by the population but also some issues were raised concerning the delay in compensation payment. All stakeholders consulted promised to support the program as public consultation outcomes.

Public participation and community consultation will continue to be an integral part of social and environmental assessment process of the program. Further consultation is planned during the preparation and implementation of Resettlement Action Plans and, Environmental and social impacts assessment. The objectives of those consultations are to minimize probable adverse impacts of the program and to achieve speedy implementation of the program through bringing in awareness among the community on the benefits of the project.

## **6. Framework Environmental and Social Management Plan (ESMP)**

Framework ESMP provides guidance on procedures to be followed and standards to be met in implementing the project which should agree with national and AfDB safeguard provisions. Institutional arrangements with clearly defined roles and responsibilities as well as monitoring protocols to be followed are presented to ensure that the required provisions are adhered to. The ESMP in this ESMF was prepared considering the activities of the proposed subprojects and activities and their impact mitigation measures were subdivided into four phases including activities in Planning Phase, Construction Phase, Operation Phase and decommissioning phase.

### **6.1. Program generic environmental and social measures**

The program has been ranked by the AfDB as category 1 project due to its environmental and social impacts associated with the construction of transmission lines. ESIA and RAP specific to this subproject of transmission lines is being prepared to fully mitigate all adverse impacts. The power line routes for distribution lines will be designed to avoid sensitive ecosystems and the data from the draft ESIA confirm that there is no protected area to be affected by the transmission lines. The project has the chance find procedure in case there might be any culture heritage property found alongside the construction works. The compensation will be fully done before the

construction works and PAPs to be physically relocated will be given 120 days to relocate to the new locations, the RAP contains the Livelihood restoration program for all PAPs who will be adversely affected by the project especially those to be physically relocated to restore their physical capital, human capital, natural capital, financial capital and social capital. The project will be implemented by the Project implementation unit (PIU) in EDCL with the experience of managing different similar projects. The PIU has the safeguards team and the team will be strengthened by the additional of three new safeguards staff. The project will also fund the capacity building of PIU staffs in its component 4 of technical assistance and capacity building and the safeguards will be trained in AfDB Integrated Safeguards System/Operation Policies implementation, Gender mainstreaming program and, Health and safety management system.

## **6.2. Environmental and Social management procedures for screening.**

Subprojects and activities will need to be reviewed for potential environmental and social impacts. The project is expected to produce net benefits; however, certain sub project activities may have environmental and social impacts that will require mitigation. For this reason, this project has been rated as category 1 risk under the AfDB ISS. The screening will further ensure that subprojects that may have potential adverse impacts are studied in greater detail including need for subproject specific ESIA, the due diligence will be also critical to assess the social and environmental impact of the sub-project.

As part of the identification of sub-projects, the project proponent will prepare a sample screening checklist. The screening checklist will lead to the preparation of an ESIA or ESMP Report for review by Rwanda Development Board (RDB). Project reports will be prepared by independent consultants registered under RAPEP (Rwanda Association of Professional Environmental Practitioners), who will be paid by the project implementing agency or when possible, the study may be done by existing EARP social and environmental safeguards team. The EARP's environmental and social Safeguards specialists will offer guidance in the preparation of the screening forms and project reports. However, this ESMF has developed the sample checklist which will be used by the subproject for screening and this checklist can be modified/ improved by the specific subproject depending on particular adverse impacts foreseen.

### **6.3. Public communication and consultation mechanism**

The ESMF, ESIA, RAP and ESMP are to be disclosed to public stakeholders. If new information arises out of public hearings (may occur in parallel) for the ESMP to be updated, such update shall be made for contracted companies on a mandatory basis. The ESMP may be adjusted/updated by the successful contractor with due account of the contractor's equipment, technology, status of the facility, baseline conditions, etc. These updates shall be communicated to the PIU and be subject to approval from the PIU and the Bank prior to the implementation. The PIU/the Bank would decide whether these updates are substantial enough to trigger additional public hearings. The draft Environmental and Social Management Framework will be disseminated to different key stakeholders (Ministries, Districts and surrounding communities) for the purpose of disclosure and holding of public hearings. The public consultation for this ESMF was carried out in 6 administrative districts composing the project lots namely Gisagara, Huye, Nyamagabe, Nyanza, Nyaruguru, Ruhango administrative Districts of Southern province of Rwanda and different relevant institutions from 20<sup>th</sup> January 2020 to 26 February 2020 and the result of public consultation showed that this program is urgently needed by the population but also some issues were raised concerning the delay in compensation payment. All stakeholders consulted promised to support the program as results of the public consultation outcomes.

### **6.4. Specific and target capacity building.**

Effective implementation of Environment and Social Management Framework requires technical capacity in the human resource base of implementing institutions as well as logistical facilitation. Implementers (Project PIU and Districts Liaison Officers) 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). EDCL PIU staff, District Environmentalist, Districts Liaison Officers and Electricity Engineer will get the appropriate trainings to Bank operational safeguards policies including, National environmental law and policy, which will help them ensuring that the project complies with Rwandese and Bank environmental and social Policies, and that the project adheres to this ESMF. They will also be trained in the gender mainstreaming program and Health and safety management systems. This will be important to support the teams appreciate their role in providing supervision, monitoring and evaluation including environmental reporting on the project activities. The program will recruit 3 more safeguards specialists' staff additional to the 5 existing in the PIU.

## **6.5. Grievance redress mechanism (GRM)**

A grievance mechanism has been developed for potential use by all interested stakeholders. The aim of the grievance mechanism is to achieve mutually agreed resolution of grievances raised by such stakeholders. This grievance mechanism ensures that complaints and grievances are addressed in good faith and through a transparent and impartial process, but one which is culturally acceptable. Grievances raised by stakeholders need to be managed through a transparent process, readily acceptable to all segments of affected communities and other stakeholders, at no cost and without retribution. The grievance mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for both a proponent/operator and stakeholders, especially PAPs.

The types of grievances stakeholders may raise include, but are not limited to:

- i. Negative impacts on communities, which may include, but not be limited to financial loss, physical harm and nuisance from construction or operational activities;
- ii. Health and safety risks;
- iii. Negative impacts on the environment such as pollution of water ways, soil, and air;
- iv. Relocation of utilities, and
- v. Unacceptable behavior by staff or employees.

It is critical that stakeholders understand that all grievances lodged, regardless of the project phase or activity being implemented, will follow one single mechanism. The mechanism must not impede access to other judicial or administrative remedies.

### **6.5.1 Grievance Redress process**

#### **6.5.1.1 Project Level Grievance Redress Mechanism: Grievance Redress Committee (GRC)**

As the GRM works within existing legal and cultural frameworks, it is organized in such a way that the Grievance Redress Committee (GRC) will comprise of local community representative, PAPs representative, local authority representative at village and cell levels, Contractor and Supervising firm representative. Many project related grievances are site-specific. Often, they are related to impacts generated during construction such as noise, dust, vibration, contamination, workers dispute etc. Most of the time, they can be resolved easily on site with the contractor commitment to implement the ESMP and proper supervision by the implementing agencies and

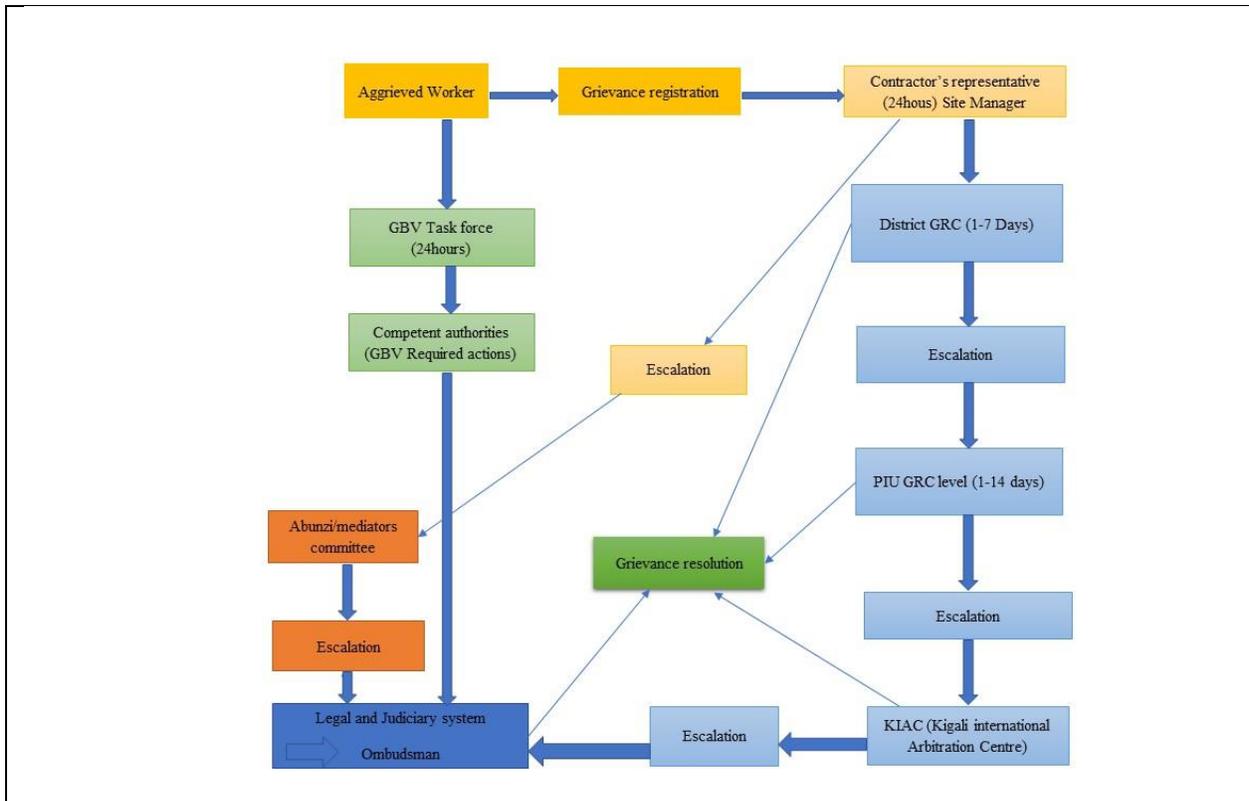
administrative District officials. Other grievances are more sensitive especially when they are about land boundaries, or misunderstandings between affected households and the Contractor regarding access arrangements, properties accidentally damaged by construction activities, accidents on sites among others. All these grievances and claims must be resolved as soon as they are received.

The grievance procedure at project level will be simple and administered at the extent possible at the local levels to facilitate access, flexibility and ensure transparency. All the grievances will be channelled via the Grievance Resolution Committees specifically established for the project at Cell, Sector and District level. All measures will be undertaken to ensure that the grievance is solved amicably between the concerned parties. If the grievance is not solved at Cell level, Sector or District level, the courts of law will be the last resort. Efficiency in solving of the grievances will be of paramount importance. The selection of members for the sub-project grievance committee will be at the discretion of the PAPs to decide basing on information provided by the PIUs.

#### **6.5.1.2. Workers Grievance Redress mechanism**

Provisions in law N° 66/2018 of 30/08/2018 regulating labor in Rwanda will be applied for Grievance Redress Mechanism for workers. Grievance redress mechanism shall be established under REG-PIU to address complaints arising during the program implementation. Program direct workers will be informed about the grievance redress mechanism during meetings at the time of the induction and where training will be provided where required, this will follow the same procedure as described in the approved REG manual of procedure for grievance management. Contracted workers will be informed about grievance redress mechanism through meetings at workplaces as well as notices to be made available at the workplace. The Grievance Redress Committees (GRCs) to be established as mentioned earlier will also handle the arising grievances. The process pertaining to how to go about grievances handling are documented for further reference. The worker's GRCs will be established based on below structure and will be followed by all contractors throughout the project implementation.

**Figure 1: Structure of the Workers Grievance Redress Mechanism**



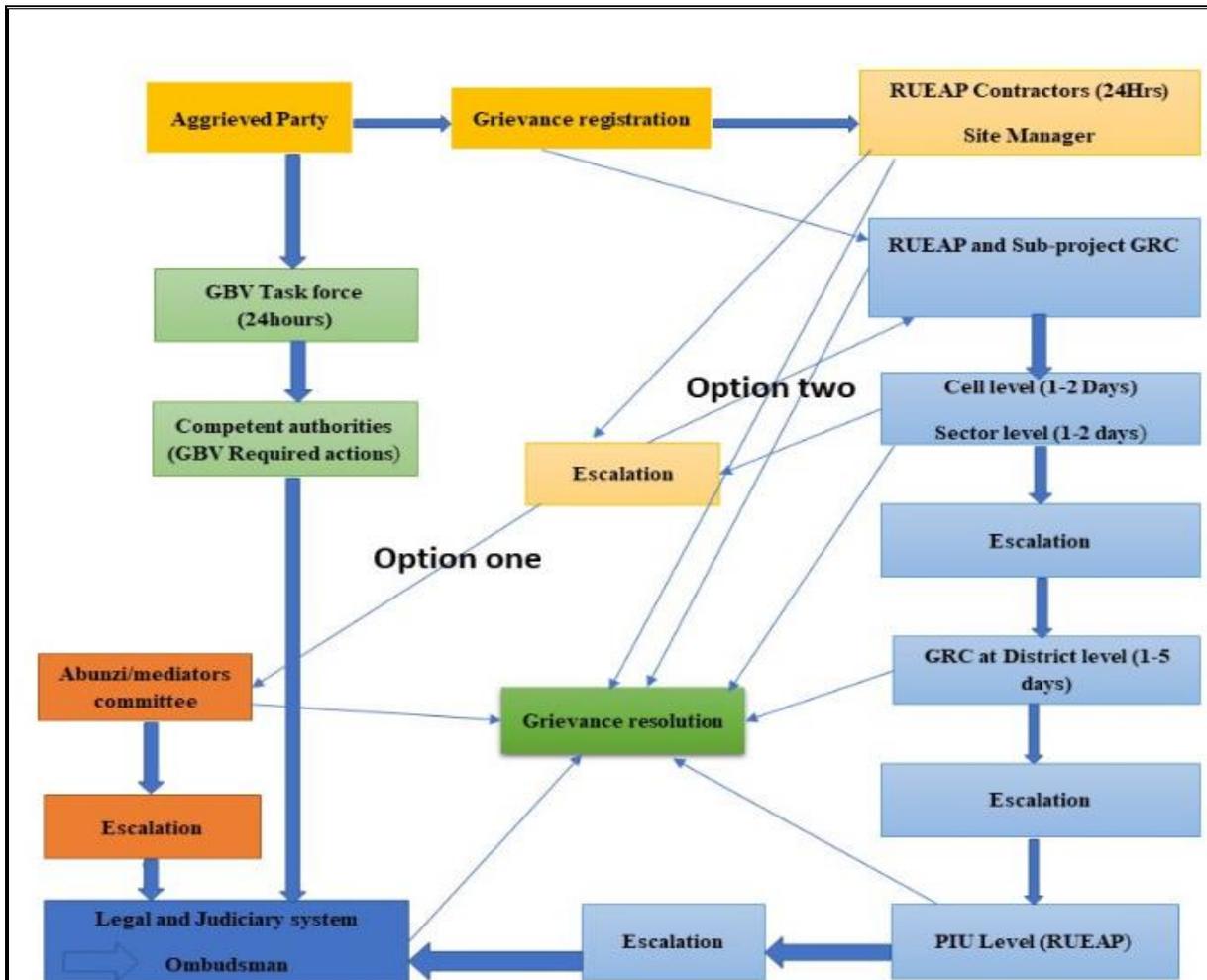
**6.5.1.3. Grievance channel for Gender-Based Violence**

As Gender -Based Violence, Sexual Exploitation and Abuse or Sexual Harassment requires timely access to quality, multi-sectoral services and involves confidentiality and informed consent of the GBV victim. To this end, MININFRA will develop a GBV Action plan that will include an Accountability and Response Framework, and this will form part of project C-ESMP. The GBV Action Plan will identify service providers in the project areas with minimum package of services (health, psychosocial, legal/security, safe house/shelter, and livelihood). The GBV Action Plan will also provide enough details to allow for the development of a localized referral pathways, will establish procedures of handling cases as part of the service providers mapping. The bidding documents will clearly define GBV requirements. During implementation phase, separate facilities for women and men will be recommended to all contractors with indication signage.

#### 6.5.1.4. Judiciary Level Grievance Redress Mechanism

The project level process will not impede PAPs access to the legal system. Local communities have existing traditional and cultural grievance redress mechanisms (Abunzi committees) established and regulated by law no 37/2016 of 08/09/2016 determining organization, jurisdiction, and competence and functioning of Abunzi committee. These are established at cell and Sector level to solve community-based conflicts and grievances their regulatory body being the Ministry of Justice. This mechanism cannot be overlooked by the project. The population can choose to use this channel instead of the project GRC. The escalation at this level leads to the court process. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per Rwanda National Legal procedure.

**Figure 2: Grievance Redress Process for the implementation of the project**



## **6.6. Performance indicators for the monitoring of the implementation of the Framework ESMP (F-ESMP)**

- All compensation processes implemented and all PAPs with damaged assets paid;
- Warning signs available on sites and Protection equipment provided;
- Public informed about upcoming construction;
- Percentage of local people employed;
- Percentage of grievances adequately treated.

## **6.7. Institutional arrangement**

The project will be implemented by EDCL and BRD. The existing EARP-PIU has the necessary capacity for the project coordination, fiduciary, and safeguards management aspects and has been rated satisfactory for the ongoing Bank-supported portfolio under its mandate. The social and environmental specialists existing in EARP will ensure compliance with environmental and social safeguards related issues during the implementation of subproject activities, public awareness, particularly among construction contractors and their works about the importance of undertaking development work while safeguarding the environment both biophysical and social environment. The project will fund the capacity building of PIU staffs.

The implementation arrangement will involve the following main actors:

- EDCL Project Implementation Unit (PIU) to coordinate all the program activities;
- Energy Project liaison Officers to regularly monitor and report on environmental and social issues at districts level;
- The district land valuer from one stop centre will assist, the project valuer in the identification and demarcation of the properties of project affected people;
- The Community who will be employed as manpower and get paid;
- The community will be member of grievance redress committee at Cell and Sector level

Key stakeholders identified during public consultation include but not limited to the following:

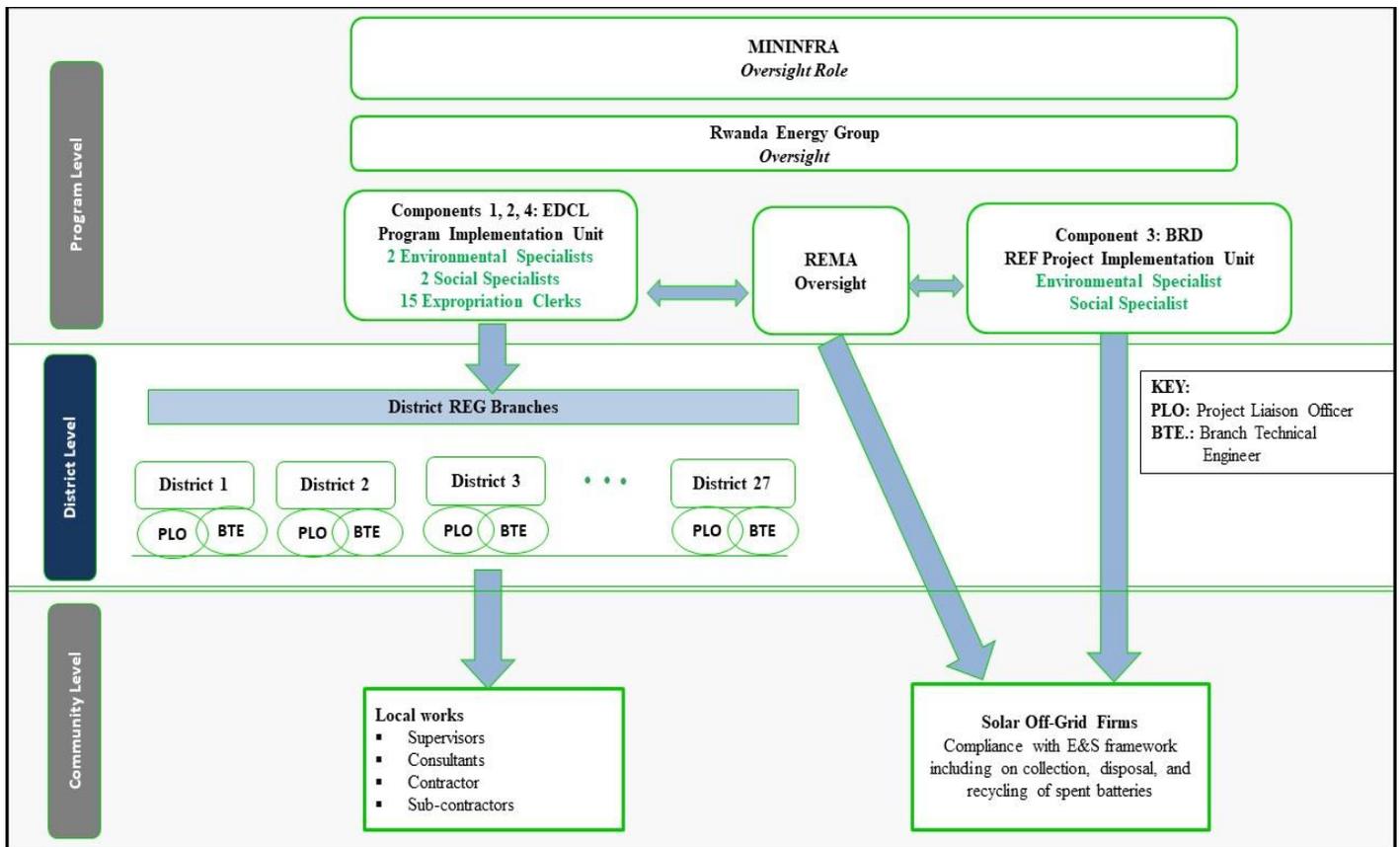
**At national level:**

- Ministry of Environment (MoE);
- Ministry of Infrastructure (MININFRA);
- Rwanda Environment Management Authority (REMA);
- Rwanda Development Board (RDB);
- Rwanda Land Use and Management Authority (RLUMA).

**At local level:**

- Local Government Officials (Districts and Sectors);
- REG District Branch managers and
- Potential Project Affected People (PAPs).

**Figure 3: Safeguards Institutional Arrangement under the project**



## 6.8. Cost estimates

The total budget for the implementation of this ESMF is estimated at 100,000 USD. The key indicative aspects include (1) Training and capacity building for the project PIU; (2) Training and capacity building for District Environment Officers and project liaison officers, contractor staff and supervisor staff training, including the supporting staff; (3) Meetings and consultation with PAPs and local communities; (4) Personal protective equipment; (5) Preparation of ESIA for grid extension; (6) Preparation of site specific ESMPs; and (7) Implementation of Environmental and Social Management Plan (ESMPs), Monitoring and evaluation of ESMPs, and grievance redress mechanism. More about the budget may be found in the table 1 of this ESMF summary.

**Table 1: Indicative Budget for the ESMF implementation**

No	Activity to be undertaken	Number (Districts)	Unit cost (USD\$)	Unit cost (USD\$)
1	Training and capacity building for the project PIU	6	185	1500
2	Training and capacity building for District Environment Officers, District Electricity Engineers, contractor staff and supervisor staff, including the supporting staff	6	556	3500
3	Tranings of contractor staffs, consultation meetings with PAPs and local communities	6	741	4500
4	Preparation of ESIA for the projects	6	LS	20,000
5	Preparation of ESMP for different subprojects	6	LS	22,500
6	Implementation of Environmental and Social Management Plan (ESMP)	6	LS	40,000
7	Monitoring and evaluation of ESMPs	6	LS	4,000
8	Implementation of grievance redress mechanism	6	LS	4,000
	<b>Total</b>			<b>100,000</b>

LS: Lump Sum

## **7. Project safeguards documents that supplement the ESMF.**

The ESMF sets out clear procedures and mechanisms as well as practical approaches to ensure the compliance of the subprojects/project activities with National laws and requirements of the Development Partners. This ESMF was prepared as a framework compatible with AfDB Integrated Safeguards System. The ESMF is also in line with requirements of the Environmental Law (No. 48/2018 of 13/08/2018) determining the modalities for protecting, conserving and promoting the environment in Rwanda, and the Ministerial Order No 001/ 2019 of 15/04/2019 establishing the list of projects that must undergo environmental impact assessment, instructions, requirements and procedures to conduct environmental impact assessment. Other Project safeguards documents that supplement this ESMF include AfDB Operational Safeguards, project RPF, sub projects ESIA, RAP, ESMP, and EHSP (Environmental Health and Safety Plan).