LODA ESMF

Part II: Environmental and Social Management Framework (ESMF)

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Abbreviations

Abbreviation	Description
BMZ	Bundesministerium für Wirtschaftliche Zusammenarbeit und Entwicklung (Federal Ministry for Economic Cooperation and Development)
CESB	Capacity Development and Employment Services Board
DDS	District Development Strategy
DEO	District Environmental Officer
E&S	Environmental and Social
E&S	Environmental and Social - For the sake of simplicity, the acronym E&S is used throughout this document but addresses all aspects of "sustainability" including environmental, social, health and safety
EHS	Environment, Health, and Safety
EIA	Environmental Impact Assessment (synonymous for Environmental and Social Impact Assessment)
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment (synonymous for Environmental Impact Assessment)
ESMF	Environmental and Social Management Framework
FAO	Food and Agriculture Organisation
FC	Financial Cooperation
FONERWA	Rwanda Green Fund / Rwanda National Fund for Environment
GIIP	Good International Industry Practice
IDP	Integrated Development Program
IFC	International Finance Corporation
ILO	International Labour Organisation
KfW	Kreditanstalt für Wiederaufbau
LACRPF	Land Acquisition, Compensation and Resettlement Policy Framework
LAR	Land Acquisition and Resettlement
LED	Local Economic Development
LGCD	Local Government Capacity Development Strategy 2019 - 2024

Abbreviation	Description
LGPAC	Local Authorities Project Advisory Committee
LODA	Local Administrative Entities Development Agency
M&E	Monitoring and Evaluation
MEIS	Monitoring and Evaluation Information System
MIFOTRA	Ministry of Public Service and Labour
MINAGRI	Ministry of Agriculture
MINALOC	Ministry of Local Government
MINECOFIN	Ministry of Finance and Economic Planning
MININFRA	Ministry of Infrastructure
MOE	Ministry of Environment
NDP	National Decentralisation Policy
NST1	National Strategy for Transformation No 1
PAP	Project Affected Person(s)
PPD	Project Profile Document
RAP	Resettlement Action Plan
RDB	Rwanda Development Board
REMA	Rwanda Environmental Management Authority
RHA	Rwanda Housing Authority
RTDA	Rwanda Transport Development Agency
RUDP	Rwanda Urban Development Project
SPIU	Single Project Implementation Unit
ToR	Terms of Reference
VGGT	FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests
VUP	Vision 2020 Umurenge Programme
WB	The World Bank

1 INTRODUCTION

1.1 Background

This document is **Part II: ESMF** and describes the expected social and environmental impacts associated with the projects and activities channelled through LODA and will include adequate safeguard measures to minimize, mitigate and manage these expected impacts.

Overall, this ESMF is a methodological document developed to establish procedures for the range of LODA projects. These projects can have potential negative impacts upon the environment and people during the construction and operational phases. The ESMF sets out the procedures and mechanisms as well as practical approaches to be used to ensure the compliance of the project activities with national laws and international requirements of the World Bank and other key donors, such as KfW etc.

LODA's ESMF has been prepared as a guide for the screening of LODA's proposed activities for any negative environmental and social impacts, which would require attention prior to project implementation. Primarily, the ESMF conforms to Rwandan requirements aligned to principally the Environmental Law (No. 48/2018 of 13/08/2018) determining the modalities for protecting, conserving and promoting the environment in Rwanda, the Ministerial Order N° 001/2018 of 24/04/2018 relating to the requirements and procedure for Environmental Impact Assessment (EIA) in Rwanda, and the Ministerial Order No 001/ 2019 of 15/04/2019 establishing the list of projects that must undergo EIAs, as well as, the instructions, requirements and procedures to follow to produce an EIA.

This ESMF covers the range of LODA development projects and was prepared as a framework compatible with World Bank's 10 Environmental and Social Standards (ESSs) and other donor guidelines. However, the key ESSs which may be triggered by the LODA projects include ESS1 (Environmental and Social Risks Assessment and Management), ESS2 (Labour and Working Conditions), ESS3 (Resource efficiency and pollution prevention and management), and ESS4 Community Health and Safety.

It is important to clarify that the WB's ESS5 (Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement) and ESS10 (Stakeholder Engagement and Information Disclosure) may also be triggered in relation to the compensatory processes aligned to the Land Acquisition, Compensation and Resettlement Policy Framework (LACRPF) being the "associate framework" of this ESMF.

1.2 Objectives

The specific objectives of this ESMF are:

a. To establish clear procedures and methodologies for E&S planning, review, approval, implementation, and M&E of projects to be financed by KfW (or other governmental entities or donors) through LODA in line with the National Regulations, KfW Sustainability Guideline and World Bank Environmental and Social Standards (ESSs);
b. To prescribe project-specific requirements for development and implementation of project specific Environmental and Social Impact Assessments (ESIA), Environmental and Social Management Plans (ESMPs) and further management plans to adequately minimize, mitigate and compensate identified E&S risks and impacts;
c. To outline provisions for stakeholder engagement, consultation, and complaint management;
d. To specify appropriate roles and responsibilities between the Districts, LODA, and other stakeholders, and outline the necessary reporting procedures, for planning, managing, and monitoring E&S risks; and
e. To overall improve the Districts' and LODA's performance in E&S risk management and therewith attract further donors.

Please note:

Part II ESMF is primarily used by the District authorities and by LODA to monitor and check that the defined requirements are fulfilled.

2 E&S BASELINE CONDITIONS FOR LODA FUNDED PROJECTS

2.1 Introduction to baselines

The purpose of an EIA is to assess and predict potential adverse social and environmental impacts and to develop suitable mitigation measures, which are documented in an Environmental and Social Management Plan (ESMP) of the EIA. To assess any possible changes that may occur, it is necessary to first establish an understanding of the existing socio-environmental baselines at a site before any developments proceed.

Baseline investigation is required to establish the state of the socio-environment before any changes occur resulting from preparatory, construction, and operation phases to potential closure of a development. To assist the development of the baseline study, it is important to firstly have a good understanding of the potential positive and negative impacts that may occur as a result of a proposed project.

The baseline appraisal should consider all aspects of the socio-environment that may be altered by the proposed project. These can be categorised as physical, biological, socioeconomic, and visual impacts, as summarised in **Table 2-1**. The baseline should also be based upon the findings of the screening process undertaken and Terms of Reference (ToR) developed formally by Rwanda Development Board (RDB). In addition, this process should refer to guidelines in the LODA Feasibility Study Guidelines (updated version of 2019).

Table 2-1: Baseline considerations

Dimension	Possible impacts on
Physical	Climate, topography, hydrology (surface water & groundwater), air quality, noise, soils, and land-use
Biological	Biodiversity (flora & fauna), habitats & Protected Areas
Social	Socio-economy, socio-cultural aspects & heritage, social services, and land/resources issues to be address in detail in a potential Resettlement Action Plan (RAP) (see Part III - LACRPF)
Visual	Visual impacts and integration into landscape (rural and urban)

The scope of the baseline study including topics to be appraised, and the geographical extent of the analysis, are typically agreed with the relevant decision-makers during the development of the ToR. It is important to re-emphasise that the scope and detail of the baseline study should be commensurate with the size and scale of the project and hence the potential changes that the project may have upon

all socio-environmental aspects. The baseline study will typically be developed in three stages as follows:

- *Desktop study*: during which readily available existing information is used to describe the existing socio-environmental context. This is collected and analysed to ensure its appropriateness for use within the EIA. An important source of information in this regard is the feasibility study that should be available for proposed new LG projects,
- *Fieldwork*: additional data is collected in the field, with the intent of addressing any gaps and important issues that may have been identified,
- *Report writing*: collation and analysis of information into baseline section of the EIA.

Please note: The baseline is a part of the feasibility study. As defined in LODA's feasibility study guidelines in the updated version of 2020, the environmental and social dimension has to be analysed and considered in the planning phase.[1]

2.2 Baseline categories, characterisation, and phases

The analysis needs to focus on all the potential categories for projects, their characterisations, and the phases in which impacts and risks occur during the lifecycles of projects as summarised below.

2.2.1 Categories of impact and risks

The analysis of environmental and social impacts and risks focuses upon the proposed project and its feasible alternatives. Relevant impacts and risks could include:

- Local impacts,
- National impacts (usually not expected with LG projects),
- Transboundary and global impacts (usually not expected with LG projects),
- Indirect and cumulative impacts,
- Impacts or risks which are unlikely to arise or be insignificant should be discounted through a process of reasoned argument.

2.2.2 Characterisation of impacts and issues

Identify and characterise the positive and negative environmental and social impacts or risks of the project in terms of:

- Magnitude,
- Significance,
- Reversibility/potential for mitigation,

[1] For more information, please refer to LODA's Feasibility Study Guidelines of September 2020, Chapter 5.4, and Chapter 6.

- Extent,
- Duration.

The possibility for cumulative impacts should also be considered, while quantitative data should be employed to the extent where it is possible. In addition, this stage of analysis should also identify any key uncertainties and data gaps.

2.2.3 Phases

Environmental and social impacts and risks should be explicitly linked to relevant stages of the project cycle, as presented below:

- Preparation phase
- Construction phase
- Operation and maintenance (O&M) phase
- Closure phase e.g., quarries (materials used for infrastructures).

Please note: The infrastructure lifecycle the basis for LODA's infrastructure management.[1]

2.3 Baseline studies and Climate Change in Rwanda

Baselines need to incorporate the local risks associated with climate change and the proposed project. Recent events and meteorological data have provided evidence that climate change is happening in Rwanda and that it will have significantly disastrous effects on the population and the environment[2]. The most dominant manifestations of the changing climate include extreme and sometimes unpredictable rainfall events and droughts. Economic impacts of these weather-related extremes and their costs to the growth and development in Rwanda are already significant. Some of the projected development-related risks due to climate change in Rwanda include reduced long-term economic growth due to diversion of funds to cater for related catastrophes and emergencies, detrimental impacts on agricultural production, health status, water availability, energy use, infrastructure, biodiversity, and ecosystem services (including forestry and tourism) and disproportionately strong effects on the poor with limited resources to adapt to climate change.

Climate change impacts may affect the projects at District level and their maintenance costs. Therefore, it is imperative to integrate climate change data, issues, and sub-sections with both the social and environmental baselines for eventual analysis in the EIA. LODA's guidelines on the consideration of climate resilient designs for selected infrastructure types provides technical

[1] The most important are LODA's PRACTICAL TOOL FOR LOCAL GOVERNMENT INFRASTRUCTURE PROJECTS MANAGEMENT of September 2018, LODA PLANNING GUIDELINES From Gaps to Services – The LODA Planning Guidelines for District Planners of July 2021 and LODA Feasibility Study Guidelines of September 2020.

[2] See https://climateknowledgeportal.worldbank.org/sites/default/files/2021-09/15970-WB_Rwanda%20Country%20Profile-WEB.pdf

recommendations on how to consider climate change impacts in the design of the main district infrastructure types.[1]

Please note: Additional information on consideration of climate resilient design components for different infrastructure types is provided in LODA's Technical Guidelines: "Made in Rwanda" & Climate Resilience" of February 2021.

3 E&S IMPACT IDENTIFICATION, ANALYSIS AND MANAGEMENT

3.1 General environmental and social impacts

The infrastructure projects financed through LODA and covered by this ESMF are associated with project specific "Environmental and Social, and Health, Safety and Environment[2]" (E&S) risks. To identify these, high-level impact identification for different project types was conducted using two key steps discussed below:

-
- Table 3-1 provides the list of project sectors (Column 1) and project types (Column 2) based upon the LODA's most common infrastructure types funded. Only key infrastructure types are listed which may cause negative or positive E&S impacts. The third column includes a reference to the impact types and best practice mitigation measures.
- Table 3-2 to Table 3-4: includes impact types and best practice mitigation measures.

The colour code in right hand column of the table below is reflected in the various impact tables.

[1] LODA : Technical Guidelines: "Made in Rwanda" & Climate Resilience; February 2021

[2] For simplicity, the acronym E&S is used throughout this document but addresses all aspects of "sustainability" including environmental, social, health and safety issues.

Table 3-1: Sectors and infrastructure types

Sector	Infrastructure type	Reference to Tables 3-2 to 3-4
Education	Schools and education infrastructure	Table 3-2: Planning Table 3-3: Construction
Health	Heath Care Centres/ Hospitals	Table 3-2 :Planning Table 3-3: Construction
Water and Sanitation	Water Supply System	Table 3-2 :Planning Table 3-3: Construction
	Water treatment plants	
	Sewerage systems and wastewater treatment	Table 3-2: Planning Table 3-3: Construction Table 3-4: Operation
	Solid waste / garbage collection and landfill	
Decentralisation	Office Buildings	Table 3-2 :Planning Table 3-3: Construction
	Sports/ Cultural Infrastructure	
Urbanisation & Rural Settlements	Housing	Table 3-2 :Planning Table 3-3: Construction
	Integrated Development Approach Model Village -IDP model Villages	
Environment and Natural Resources	Afforestation and related activities	Table 3-2 :Planning Table 3-5: Environmental Protection/ Agriculture
	Progressive Terraces (non-agriculture)	
	Erosion Control Ditches	
	Flood prevention / standalone drainage	
Transport	Roads Construction (Class I, Class II)	Table 3-2 :Planning Table 3-3: Construction
	Bridges	
	Bus Terminal	
	Road Maintenance[1]	
Energy	Grid Electricity[2]	Table 3-2 :Planning Table 3-3: Construction
	Mini Hydro Power Plants	Table 3-2: Planning Table 3-3: Construction Table 3-4: Operation
Agriculture	Terraces	

1 Maintenance/ rehabilitation is to put the road in exactly the same state as it was after construction (that means no extension, upgrading of layers or similar)

2 Connections to public buildings like primary schools etc. The length of power lines varies but is usually below 10 km.

Sector	Infrastructure type	Reference to Tables 3-2 to 3-4
	Irrigation System	Table 3-2: Planning Table 3-5: Environmental Protection/ Agriculture
	Marshland Drainage	
	Livestock production infrastructure (cattle markets, feeder lots, etc.)	
	Reallocation of agricultural land / Land Consolidation Plans / Plot Realignment Plan	
	Cold storage facilities (including Milk Collection Centres)/ Drying floors and storage facilities/ Greenhouses	
	Feeder Roads	
Private Sector Development	Modern markets/ Slaughterhouses	Table 3-2 :Planning Table 3-3: Construction
	Guesthouses and hotels/ Recreation centres / parks / touristic sites	
	Development of Industrial Zones	

Please note :

Typical Social Protection classic and extended public works concern the construction or rehabilitation and maintenance of terraces, small district murrum roads, greening and beautification and similar activities. These are covered by the above listed infrastructure types.

Table 3-2 provides a list of expected impacts and best practice mitigation for the "Planning Phase". This is relevant for basically all project types associated with land use or interventions in a community.

Table 3-3 provides general expected impacts and mitigation for the "Construction Phase" or works execution, relevant for project types involving extended construction activities with heavy equipment and significant Health and Safety Risks for workers and communities. The Operation Phase impacts are only relevant for specific project types i.e., hydropower plant, waste management facility, water treatment and plants, and are provided in

Table 3-4. Specific impacts and mitigation for those project types that are not expected to be related to heavy construction activities but focus on "Environmental Protection or Agriculture" activities are provided in Table 3-5.

3.2 Planning phase impacts

Table 3-2 below outlines the general planning phase impacts and related management measures. This phase shall be based on a screening process and ToR development to be able to anticipate the main E&S risks.

Table 3-2: Planning phase impacts and mitigation

Potential negative impacts	General best practice mitigation measures
Land take from communities and resulting threats to livelihoods (see also Part III – LACRPF)	Analyse possibility to avoid any land take and use Government owned sites for new construction in the feasibility study. Where lands take is unavoidable, engage with all stakeholders (e.g., village elders, landowners, land users – formal/informal) through proper stakeholder engagement prior to any land take. This may be done on the occasion of Umuganda[1] by District representatives or other meetings as needed. See further guidance in Chapter O
	Assess likely impacts on resource users on site, upstream and downstream of project activity sites and potential impacts on their livelihoods
	Prepare a Resettlement Action Plan (in alignment with the Land Acquisition, Compensation and Resettlement Policy Framework - LACRPF) to: • Initiate livelihood restoration activities (e.g., relocations, compensations, trainings) to support people in their access to community resources • Offer appropriate compensation and feasible resettlement options for communities affected with special provisions for vulnerable groups • Ensure adequate consultation and complaint management.
Lack of communication and resulting disturbance of communities	Be informed about all communities present in the area
	Engage with communities and community-based organizations through proper Stakeholder Engagement process
	Plan sufficient time for community participation
	Initiate an efficient complaint mechanism to allow potentially affected individuals to voice their concerns without fear of retribution
	Plan facilities (e.g., landfills, wastewater treatment plant, industrial park) in sufficient distance to communities and sensitive receptors to prevent nuisance due to e.g., odour and littering
Water resources competitions and conflict	Assess users of existing resources and usage by the host communities, and design and locate project infrastructure in less sensitive areas to prevent conflicts and tensions in the communities

[1] Modern day Umuganda can be described as community work. On the last Saturday of each month, communities come together to do a variety of public works. This often includes infrastructure development and environmental protection. Rwandans between 18 and 65 are obliged to participate in Umuganda. Part of this activity is usually a community meeting.

Potential negative impacts	General best practice mitigation measures
Damage to water resources and community health due to landfill[1]	Residential development should be typically further than 250 meters from the perimeter of the proposed landfill cell development to minimise the potential for migration of underground gaseous emissions. This has to be considered in the identification of the possible construction sites
	Visual impacts should be minimized by evaluating locational alternatives, e.g., locate project as far away from villages as possible or consider natural landscape for visual screening
	Consider perennial streams and groundwater resources in planning of the landfill considering international best practice [2].
	There should be no underlying limestone, carbonate, fissured or other porous rock formations which would be incompetent as barriers to leachate and gas migration, where the formations are more than 1.5 meter in thickness and present as the uppermost geologic unit above sensitive groundwater
	Appropriate leachate and gas emissions mitigation should be applied
Damage to downstream users Planning of hydropower plant	Conduct hydrological assessments at planning stage to determine the ecological flow of the water resource and prevent damage to downstream user
	Conduct cumulative impact assessment of other hydropower plants along the river.
	Plan the hydropower plant in accordance with international best practice design
Change of drainage patterns in the area and risk for flooding/ soil erosion	Carefully plan the projects and take note of rivers, channels, and drainage patterns into account. Consider location and risks for surrounding communities
	Consider sufficient drainage channels and sufficient drainage capacity in the design
Disturbance or damage of cultural heritage (including both tangible and non-tangible heritage)	Avoid disturbance of known cultural heritage sites by looking for alternative sites
	Engage with communities through proper stakeholder engagement to identify sites with valuable cultural heritage.
	Document any chance finds and coordinate with the local authorities responsible for cultural heritage

[1] Landfills are not one of the most common infrastructure types for Local Government and landfill infrastructure projects are rather an exception.

[2] WHO Guidelines for Drinking-Water Quality
EU Landfill Directive (Council Directive 1999/31/EC of 26 April 1999)

Potential negative impacts	General best practice mitigation measures
	For any chance find, do not disturb the site until an assessment by a competent professional is made
Wastes to the nearby environment	During equipment mobilization, all contractor staff should be sensitized on waste management
	The contractor should provide adequate waste disposal facilities, especially for keeping solid wastes generated during mobilisation, contractor's site setting and material borrow site exploration
Floral and faunal habitat disturbance and loss	Plan contractor's site location away from natural habitats
	Minimise equipment and camp siting footprint as much as possible by consolidating them to one site to avoid adverse damage to the natural habitats
	Avoid waste disposal into the adjacent environment to reduce risks to the health of the habitats
Cumulative Impacts	For all activities planned at District level cumulative impacts need to be considered at planning stage. Engage with other project developers and authorities to identify other projects in the area that could impact same receptors. Define and implement suitable mitigation measures

3.3 Construction phase impacts

The matrix below outlines the construction phase general impacts and related management measures for projects in specific sectors as classified by LODA. Most of the activities during the construction phase are the responsibility of the construction contractor overseen by the District's Social & Environmental Officer with support from the District Engineer and Works Inspector (Ministry of Public Service and Labour) at the District office.

Table 3-3: Construction phase impacts and mitigation

Potential Negative Impacts	General Best Practice Mitigation Measures
Dust emissions – increased community health & safety risks, reduced agricultural productivity,	Do not over-load vehicles/trucks. Cover vehicles loaded with loose materials with tarps/nets to avoid dust blowout
	Cover vehicles loaded with loose materials with tarps/nets to avoid dust blowout
	Use water suppression on loose loads to increase moisture and reduce dust blowout. Also considering watering of dirt roads where appropriate near living areas, schools, etc.

Potential Negative Impacts	General Best Practice Mitigation Measures
ecosystem degradation	Use state-of-the-art vehicles with particle filters to adsorb dust. And pollutants before being emitted to the environment
	Prepare and implement traffic management plan for construction activities
	Limit material haulage distances as much as possible to reduce dust emission potential
	Keep within the speed limit and use paved roads rather than dirt roads
	Provide adequate dust protection devices to all workers exposed to dust, especially operators of heavy equipment and masons
Air emissions - increased community health & safety risks, accelerated climate change	Use state-of-the-art vehicles with low fuel consumption
	Have in place effective vehicle/equipment maintenance schedule for each piece of construction equipment. Document maintenance activities for reference
	Turn off engines when vehicles are not used
	Provide appropriate PPE to equipment operators to safeguard them against vehicular emissions
	Minimize transport distances (e.g., by using local products and materials)
Contamination of land	Establishing a waste management hierarchy that considers prevention, reduction, reuse, recovery, recycling, removal and finally disposal of wastes
	Dispose waste in an environmentally sound manner (e.g., disposal at permitted facilities specially designed to receive the waste) and recycle where possible.
	Designate equipment repair and maintenance areas and safeguard them by providing secondary containment to avoid soil contamination.
	Develop spill management procedures to address cases of accidental release/discharges.
	Control the release of hazardous materials, hazardous wastes, or oil to the environment and provide proper treatment.

Potential Negative Impacts	General Best Practice Mitigation Measures
Contamination of natural water resources	Dispose waste in safe distance from water resources.
	Set up wastewater treatment prior to discharge in surface waters or sewers.
	Prevent wastewater pollution through recycle/reuse, input substitution, or process modification (e.g., change of technology or operating conditions/modes).
	Designate equipment repair and maintenance areas, and safeguard them by providing secondary containment to avoid ground water contamination
	Set up a continuous water monitoring and management program
	Consider natural drainage patterns when siting and carrying out earthworks to minimise the risk of unplanned flows into private properties
	Use mulch to stabilize exposed areas
	Design channels and ditches for post-construction flows.
	Limit vegetation clearance during construction to as minimal as possible, mostly strictly on project footprints.
	Line steep channel and slopes (e.g., use jute matting)
Health risks to workers (Occupational Health & Safety) – construction sites, driving, equipment and machinery	Develop and implement Occupational Health and Safety (OHS) Plans
	Identify, control, and monitor health and safety risks in construction areas
	Provide adequate resources and expertise to manage health and safety performance
	Where significant health and safety risks are identified related to supply chain workers, the contractor should introduce specific procedures and mitigation measures to address these risks over a specified time period. Significant risks could be work at height or work with high voltage electricity
	Provide appropriate "Personal Protective Equipment" (PPE) for construction work, driving and field work activities

Potential Negative Impacts	General Best Practice Mitigation Measures
	Set up appropriate fire and emergency precautions (e.g., hydrants, water tanks)
	Distribute first aid kits to all working areas as required by the law
	Use state-of-the-art technologies and machinery for construction activities and transportation
	Implement clear traffic routes on construction sites (including warning signs) and key driving rules (e.g., speed limits)
	Use competent, experienced, and local drivers
	Limit driving hours and distances to avoid fatigue
	Use regularly maintained vehicles
	Use public and paved roads whenever possible
	Avoid work under severe weather conditions (e.g., thunderstorm, hail, heat)
	Ensure sufficient light supply when using machinery
	Provide OHS training for workers prior to construction commencement
	Install ergonomic precautions (e.g., use leverage instead of heavy lifting)
	Ensure safety of machinery used (e.g., fall preventions when working at heights)
	Set up a continuous monitoring scheme for workers health & safety.
Human rights violation	Manage workforce in alignment with international best practice i.e., the national labour law, related Ministerial Orders and finally the ILO Core Labour Standards[1]
	Ensure that worker accommodation is designed and managed appropriately including sanitary facilities, water access and private space
	Ensure that no forced or child labour takes place as stipulated in the national legislation

[1] Please refer to Introduction to ESMF and LACRPF and http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm

Potential Negative Impacts	General Best Practice Mitigation Measures
	Employment relationship shall be based on principles of equal opportunity, fair treatment, and non-discrimination (e.g., due to gender, age, or origin)
	No retention of workers' identity documents, including passports
	Workers have freedom to association and assembly
	Ensure fair payment
Disturbance of species and loss of habitats / species	Conduct habitat assessments/ecological studies before working on sensitive or natural habitats if RDB environmental clearance require this as pre-conditions for RDB certificate
	Avoid disturbance (direct construction, transit traffic) of legally protected and/or ecological valuable areas
	Create biodiversity offsets if habitat or biodiversity is negatively impacted or lost. Detailed mitigation and offset measures will be outlined in the project ESMP as a result of the ESIA
	Avoid constructions in/through wildlife corridor
	Use state-of-the-art technologies for construction activities and transportation to minimize noise and vibrations
	Keep to the speed limits
	Conduct awareness programmes for all project workers around ESMP commitments
	Obtain soil materials from nearby areas to control potential for alien and invasive plants being introduced into the project areas
	Restore/re-vegetate land surface sections used by the project before moving on to others
Degradation of natural or critical habitats	Limit procurement to those suppliers that based on available information do not contribute to significant conversion of natural and/or critical habitats
	Conduct habitat assessments/ecological studies before working on critical or natural habitats
	Avoid using timber/wood from ecological sensitive areas to reduce deforestation of valuable (primary) forest

Potential Negative Impacts	General Best Practice Mitigation Measures
Decline of ecosystem services provision	Identify the most important ecosystem services[1] in the area, avoid negative impacts and if negative impacts are created, provide alternatives for communities to restore their value
Supply chain – human rights violation	Limit procurement to those suppliers who are not engaged in child or forced labour and to suppliers outside of regions that are known for child or forced labour
Accidents due to traffic	Implement a Traffic Management Plan
	Implement safety awareness campaigns to improve community knowledge of the dangers of industrial road traffic and safe behaviour
	Project vehicles should be clearly marked to ensure communities understand, especially where possible disruption is caused by other companies / organisations
	Mechanically limit heavy goods vehicles speeds
Labour and working conditions	Develop Human Resources policies as per international best practice and local laws and procedures to ensure workers' rights are adhered to
	Ensure that the complaint mechanism (guided by the process outlined in this Document, Chapter 5) is adequately communicated to workers at the time of recruitment
	Prioritise the employment from the project areas in the first instance. In the event that the positions cannot be filled from within these areas, it should be advertised further afield (in the District, then nationally)
	All permanent workers should have formal contracts, in line with the National labour laws

[1] Ecosystem services are the benefits that people, including businesses, derive from ecosystems. Ecosystem services are organized into four types of services: (i) provisioning services, which are the products people obtain from ecosystems; (ii) regulating services, which are the benefits people obtain from the regulation of ecosystem processes; (iii) cultural services, which are the nonmaterial benefits people obtain from ecosystems; and (iv) supporting services, which are the natural processes that maintain the other services source: IFC Guidance Note 6Biodiversity Conservation and Sustainable Management of Living Natural Resources - https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards/ps6

Potential Negative Impacts	General Best Practice Mitigation Measures
Supply chain management – Human Rights violation, OHS income and opportunities for local producers	Limit procurement to those suppliers who are not engaged in child or forced labour, as defined by Rwandan Laws, and to suppliers outside of regions that are known for child or forced labour
	Limit procurement to those suppliers that provide sufficient occupational health and safety for their workers
	Conduct regular monitoring visits to the construction sites and audit performance of all contractors and suppliers on site according to ESMP requirements.
	Purchase local manufactured materials before accessing global markets

3.4 Operation and maintenance phase impacts

Operation and maintenance impacts are expected to be more relevant for waste treatment facilities, wastewater treatment plants and small-scale hydropower plants as shown in the Table 3-4. There may be also further impacts related to operations for other project types. These will be identified during the EIA.

Table 3-4: Operation phase impacts and mitigation

Potential Negative Impacts	General Best Practice Mitigation Measures
Water quality degradation	Conduct regular surface and groundwater quality monitoring, to ensure projects (e.g., waste management centres and irrigation projects) do not lead to contamination of domestic water sources
	Remedy any potential sources of water quality contamination by obtaining expert views and applying recommended measures
Soil erosion	Conduct regular monitoring of soil erosion and sedimentation on adjacent rivers or other water bodies from the project operational activities
	Remedy potential erosion by obtaining expert views on any significant challenges faced during operations
	Apply related recommendations in the ESMP

Potential Negative Impacts	General Best Practice Mitigation Measures
Livelihoods	Conduct RAP implementation audits to establish the effectiveness of the process
	Implement livelihood restoration measures for operation phase and conduct regular audits to gauge effectiveness
Disturbance of communities (general)	Conduct regular information and engagement activities with the affected communities throughout operation phase to inform about potential project changes/ extensions and status of complaint
	Apply the formal complaint mechanism during operation to allow for feedback and remediation
Disturbance of communities (landfill)	Select vehicles and containers that minimize air emissions during waste loading and unloading
	Install catch fences and netting to trap windblown litter
	Design drop-off points to minimize queuing of vehicles
	Sweep waste management areas and roads frequently and use water spray for dust control where needed
	Pre-treat wastes as needed (e.g., solidification, encapsulation, or wetting sufficient to reduce dust but without forming leachate)
	Use enclosed waste handling and storage areas for malodorous wastes or wastes that generate hazardous dust (e.g., asbestos). Enclosed waste storage and handling areas are preferred for all wastes
	Use extraction system to remove dust from working areas, buildings, and storage vessels, and treat as needed to control particulate emissions (e.g., bag filter)
	Remove, treat, or dispose of all biological/malodorous wastes in an expeditious manner
	Provide adequate storage for waste not immediately treated or disposed of
	Implement good housekeeping procedures

3.5 Impacts specific to environmental protection and agricultural projects

The table below outlines the generic impacts related to environmental protection and conservation projects (agricultural and non-agricultural use)/ marshland drainage. These impacts are listed separately as they are considered to be of lower E&S risks than the other infrastructure types presented in previous sections.

Table 3-5: Impact of irrigation systems, terraces, and mitigation

Potential Negative Impacts	General Best Practice Mitigation Measures
Disturbance of terrestrial species and loss of habitats / species	Conduct biodiversity baseline surveys if required by RDB during environmental clearance
	Avoid disturbance of legally protected and/or ecological valuable areas if required by RDB during environmental clearance
	Create biodiversity offsets if habitat or biodiversity is negatively impacted or lost if required by RDB during environmental clearance
Loss of habitats and species in rivers and creeks	Maintain ecological flow in rivers and creeks necessary to sustain habitats
Pollution of the natural environment and health risks to communities	Avoid pesticide use where possible, prefer biological agriculture (see also WHO Pesticide Evaluation Scheme[1])
Salinization of irrigated lands	Plan for and implement water drainage measures
Worker H&S[2]	Develop and implement Environment , Health, and Safety (EHS) plans as appropriate
	Identify, control, and monitor health and safety risks in work areas
	Provide adequate resources and expertise to manage health and safety risks
	Ensure the use of Personal Protective Equipment (PPE) for workers, e.g., shoes, sun protection, gloves etc.
	Maintain high standard in housekeeping on site, e.g., keep construction sites clean, ensure that work material is stored away properly when not used, do not leave sharp items on ground
	Avoid work under severe weather conditions (e.g., thunderstorm, hail, heat)

1 WHO Pesticide Evaluation Scheme (WHOPES)
2 Worker H&S for implementation of Irrigation Systems, Marshland Drainage or Terraces is considered to be slightly less critical than for full Construction Activities and are described for different project types.

Potential Negative Impacts	General Best Practice Mitigation Measures
	Provide Occupational H&S training for workers prior to work commencement

Further guidance on impact assessment and best practice mitigation is provided in ESMF Applicable Standards, as follows:

- World Bank Operational Policies[1], and EHS guidelines[2]
- IFC Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, 2007[3]
- IFC Good Practice Note Addressing Complaint from Project-Affected Communities, 2009[4]

Please note:

The high-level impact assessment tables serve as guidance for general impacts to expect from key project activities. To generate a project-specific impact assessment and appropriate mitigations, an EIA needs to be conducted. The outcomes would include project-specific ESMPs related to construction impacts, and where relevant to operational impacts, as well as mitigation and monitoring measures. See also the next chapter of this framework for intervention tools with guidance documents.

1 The World Bank Operational Policies can be found under the following Link. https://policies.worldbank.org/sites/PPF3/Pages/Manuals/Operational%20Manual.aspx For Labour and Working conditions IFC Performance Standard 2 is applied. http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards/ps2

2 http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

3 http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_stakeholderengagement__wci__1319577185063

4 IFC (2009): Good Practice Note Addressing Grievances from Project-Affected Communities

4 E&S INTERVENTION TOOLS IN LODA'S E&S Risk MANAGEMENT PROCESS

To improve the E&S performance in LODA's project funding and management process, and to meet the general international E&S safeguard requirements, measures have been proposed at various stages of the LODA project management process. These are described below and are illustrated in the Table 4-1.

4.1 LODA E&S intervention tools

Table 4-1 below defines the tools aimed at improving E&S risk identification, management, and monitoring in the LODA project management process. These tools are partly stand-alone as guidance for the Districts, Contractors, and supervising consultants and partially in LODA's Monitoring and Evaluation Information System (MEIS).

Table 4-1 E&S Intervention Tools

Reference	E&S Tool	Relevance	Timing of use	User
Appendix 1	E&S Preliminary risk assessment checklist	Shall support with the screening of E&S risks and subsequent upgrade of the ToR issued by RDB for the EIA/ RAP (if applicable)	At start of project planning	DEO
Appendix 2	Guide on EIA/ RAP Review	Shall support with the review and commenting on EIAs (and RAPs)	Once EIA (and RAP) are prepared	DEO and LODA E&S support within Local Economic Development Unit and aligned to other Units and Divisions within LODA
Appendix 3	ESMP Template and Guidance	Shall guide the elaboration of a detailed ESMP to be implemented and monitored during works implementation and possibly O+M	Once as integral part if the EIA	RAPEP Consultant elaborating EIA

Reference	E&S Tool	Relevance	Timing of use	User
Appendix 4	ESMP Monitoring Template	Shall be used to monitor the implementation of the ESMP during works implementation and possibly O+M	To be used during technical monitoring visits and later outcome monitoring	DEO, District engineers, LODA LED Unit during technical monitoring visits
Appendix 5	Incident Reporting Template	Shall be used for the reporting of incidents	During Construction	Contractor/ DEO
Appendix 6	Complaint Form	Shall serve for the documentation of complaints	During all phases of project planning and implementation	Districts/ Contractors/ Employees and Workers/ Community Members
Appendix 7	Chance Finds Procedure	Shall serve for the management of archaeological finds/ cultural sites	During planning and construction	DEO and Contractor

Figure 4-1 shows the E&S relevant steps and related intervention tools in relation to the process of project planning and implementation between LODA and the Districts

Steps		Key E&S interventions
Project Selecti	• Consider Citizen priorities • DDS, Need assessment, Presidential pledges	
Project Brief	• District to conduct preliminary risk assessment • District-through-consultant to submit PB and ToRs • RDB to decide whether the EIA is needed	District to conduct E& S pre-analysis of E&S risks
FS, ESIA &	• District to tender FS and EIA (in the event RDB approved it and based on the screening and scoping process	In the event of expropriation, a RAP in line with LACRPF will be done
PPD to LODA	• District submits PPD to LODA via MEIS • District submits FS by LODA's request • LODA to review and PPD and planning documents	Draft of ESIA report to be shared to District and LODA
Consul tation	• Consultations with Provinces, MINALOC, MINECOFIN, LGAC • LODA to inform Districts the approved projects	
Budget ina	• Budgeting to begin • Result: agreed project list that is approved by parliament	Budget to cater the E&S consideration including resettlement
LODA Suppo	• Project Implementation : LODA to offer technical support to District through capacity building to be provided by LODA staff, SPIU and consultants	LODA E&S expert to provide technical assistance to Districts
Contra ctina	• Each project is guided by a contractor and supervisor Environmentalist and social safeguard experts should be among the personnel	Districts should keep the E&S personnel as they were in bidding
Monito rina	• Supervising firm to conduct regular monitoring of contractor's activities • LODA and its consulting team visits projects on	Open an MEIS –ESMF window and encourage Districts to use it in Monitoring
Report ina	• Monthly reports are submitted from supervisor to District to LODA technical staff • LODA prepares monthly reports and upload to	E&S Monthly and quarterly report, including expropriation status to be

Figure 4-1: E&S relevant steps and related intervention tools

4.2 E&S impact identification methodology

4.2.1 Preliminary risk assessment

The first step in the identification of E&S risks is the preliminary risk assessment (PRA) process. It shall be conducted at an early project stage before the EIA is started. The outcome of the PRA process feeds into the Project Brief to be submitted to RDB and finally in the draft ToR for the EIA with any additional documents, e.g., RAP. The process and responsibilities are as follows:

1. Initial E&S risks are assessed by LODA and Districts using PRA approach
2. Results of PRA within Project Brief including draft ToR are submitted to RDB to orientate the final ToR for EIA
3. RDB compiles the final ToR for EIA.

Some central questions to consider during the PRA process are listed below. These questions indicate which areas of E&S risks need to be considered. More questions with "No" would mean that more E&S risks are expected. The key initial questions for a project should include:

- Can you exclude that the planned project will have a high demand upon natural resources (e.g., timber, water, land, etc.)?
- Can you exclude that land acquisition will require or not expropriation and/or resettlement of people for the duration of the project (preparation, construction, or operation phases)?
- Can you exclude any impacts upon protected areas (such as Nature Reserves, National Parks etc.), natural habitats (such as forests, wetlands) or species of concern (e.g., Red Data List species, endemic species, and species of spiritual or economic value for local communities)?
- Can you exclude any impact upon cultural heritage (e.g., places of worship, temples, graves etc.)?
- Can you exclude negative long-term impacts on the human environment e.g., air pollution, water pollution, noise generation, odours, etc.?

The "E&S Preliminary Risk Assessment Checklist" is attached in Appendix 1. It contains recommendations around additional studies and management plans, e.g., prepare a detailed biodiversity assessment if project is located in a protected area or prepare a RAP if there are any impacts upon PAPs involving land acquisition. The Checklist results are intended to be integrated into the MEIS in the future.

4.2.2 Risk and impact assessments

The key process for identification of E&S risks and impacts is the EIA. During the impact assessment phase, the ways in which the project will impact with the physical, biological, cultural, and social, and visual aspects of the socio-environment will be assessed. For preparation of an EIA, it is important to apply a logical methodology and justify the impact ratings. The impact assessment shall be based upon the outcomes of the screening process. The final ToR for EIA are issued by RDB

, while LODA supports this process for LG projects by providing a template that is used by RAPEP Consultants to be adopted for a specific project and be submitted with the project brief to RDB(see template in Appendix 2 of this framework). These tools will guide the impact assessment conducted by an experienced independent consultancy affiliated to the Rwanda Association of Professional Environmental Practitioner (RAPEP) with the capacity to provide experts for both social/RAP and biophysical issues, and any other specialists, as required for each project.

4.2.3 Prediction of magnitude

The magnitude, i.e., the way to combine various impact characteristics and conclude a magnitude designation, of each impact is predicted as falling into one of the following designations: negligible, small, medium, or large. The '*magnitude* 'encompasses various possible dimensions of the predicted impact, such as:

- Extent (i.e., local, regional, or international);
- Duration (i.e., temporary, short-term, long-term, or permanent);
- Scale or size (no fixed designations);
- Frequency (no fixed designations); and
- Likelihood, for unplanned events only (i.e., unlikely, possible, likely).

Each EIA topic area, e.g., noise, biodiversity, social, etc. should adopt a different methodology for defining the magnitude of change as appropriate. For example, for readily quantifiable impacts, such as noise numerical values shall be used to define its magnitude, whilst for other topics, e.g., social impacts, a more qualitative classification may be necessary, e.g., high, medium, and low impacts of school development for local children.

4.2.4 Sensitivity of resources and receptors

The sensitivity (or vulnerability / importance) of the impacted resources or receptors shall be defined using one of the following designations: low, medium, or high. As per the magnitude rating, the definition for each designation varies on a resource/receptor basis. Where the resource is physical (for example, a water body) its quality, sensitivity to change and importance (on a local, national, and international scale) are considered.

- Where the resource/receptor is biological or cultural e.g., protected area, its importance may be local, regional, national, or international, where its sensitivity to the specific types of impact is considered.
- Where the receptor is human, the vulnerability of the individual, community or wider societal group is considered.

Figure 4-2: Exemplary Impact Significance Matrix

	Sensitivity / vulnerability / Importance of resource			
Magnitude of impact		*Low*	*Medium*	*High*
	Negligible	Negligible	Negligible	Negligible
	Small	Negligible	Minor	Moderate
	Medium	Minor	Moderate	Major
	Large	Moderate	Major	Major

Source: Own figure after ERM, 2017

The impacts will be rated as negligible, minor, moderate, or major.

Please note:

It is crucial throughout the whole process to justify each assessment and each rating, so that the outcome is transparent and comprehensible. **Table 3-3** provides the context for how the various impact significance ratings are defined.

Table 4-1: Exemplary Context of impact significance

Significance Designation	Significance Context
Negligible	A resource/receptor (including people) will not be affected in any way by a particular activity or the predicted effect is deemed to be 'imperceptible' or is indistinguishable from natural background variations.
Minor	A resource/receptor will experience a noticeable effect, but the impact magnitude is sufficiently small (with or without mitigation) and/or the resource/receptor is of low sensitivity/ vulnerability/ importance. In either case, the magnitude should be well within applicable standards.
Moderate	Has an impact magnitude that is within applicable standards but falls somewhere in the range from a threshold below which the impact is minor, up to a level that might be just short of breaching a legal limit.
Major	An accepted limit or standard may be exceeded, or large magnitude impacts occur to highly valued/sensitive resource/receptors.

4.2.5 Identification of mitigation measures

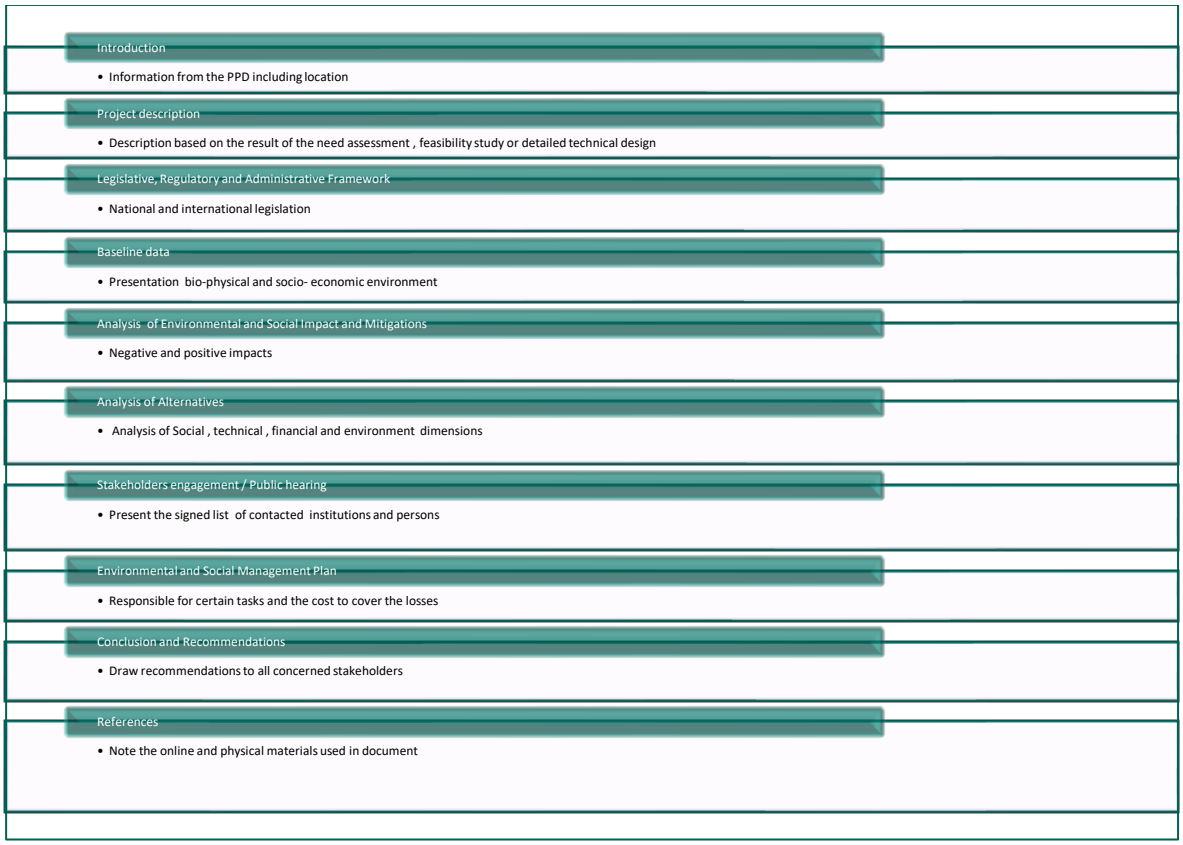
To mitigate the identified impacts a hierarchy of mitigation options shall be defined, with avoidance at the source of the impact as a priority and compensatory measures or offsets to reduce the impact significance as a last resort (1. Avoid, 2. Abate, 3. Remedy, 4. Compensate).

Mitigation measures shall be defined for significant impacts (i.e., those with a minor, moderate or major rating).

The mitigation measures including responsibilities and monitoring requirements shall be summarised in the project specific ESMP (see Template in Appendix 6).

The proposed content and structure of an EIA is shown in **Figure 4-3**.

Figure 4-3: EIA Structure guidelines



4.3 Environmental and Social Management Plan

The Environmental and Social Management Plan (ESMP) is finally the main tool to define, implement and monitor mitigation measures for risks identified in the EIA.

The mitigation measures must be classified according to the responsible units implementing them. The ones for the works contractor must be included in the technical specification of the contract and must be considered in the works contract

value as soon as their implementation requires financial resources. The same holds true for the supervision on site.

Appendix 3 of this framework provides a proposal on the structure of the ESMP according to LODA's requirements. Meanwhile Appendix 4 provides a checklist that should be used to quality assure the ESMPs submitted jointly with the EIA.

The following "Dos" and "Don'ts" can be used as general guidelines during the works construction and - if possible - should be basic requirements which project could apply.

Table 4-2: Dos and Don'ts during project implementation phase

Topics	Dos	Don'ts
Land use	• Prefer previously disturbed areas for worker housing, storage, workshop, and site. • Clearly mark "no entry zones" (cropland or fruit trees, wetlands, burial sites or any sensitive environment or social site/area) • Avoid proximity to schools, health posts and households of vulnerable families • Clean up the site and restore it to its original condition • Restore all temporary access roads, haul roads and any other disturbed areas outside of the approved work areas	• Do not enter any construction site or area without authorization • Do not damage households and associated structures, cultivated land, fruit trees or any other potential source of income • Do not undertake any activities or park your vehicles outside the boundaries of the work area
Noise	• Limit the hours of operation for noisy activities near schools, hospitals, residents, religious buildings, etc. • Turn off vehicle engines if not needed • Keep the noise level within acceptable limits	• Do not engage in any noisy activity at night
Dust and air	• Minimize traffic as much as possible and drive slowly • Spray unpaved roads with water if you are working near schools, hospitals, residential areas, etc. • Re-vegetate disturbed areas as soon as the activity is completed • Drive slowly to avoid generating dust	• Do not store cement, sand, or excavated materials without covers or shelters • Do not clean the canopy if it is not necessary
Water	• Refuel vehicles at least 30 metres from waterways • Fence off the construction site adjacent to sensitive areas such as natural waterways, ponds, drains • Divert runoff / construction sites or disturbed areas with ditches	• Do not use natural water resources for your water supply (e.g., springs, streams, lakes) without the approval of the relevant authorities, local leaders • Do not discharge hazardous substances, chemicals, construction materials and waste into waterways, ponds, drainage systems • Do not block the water flow

Topics	Dos	Don'ts
Waste	• Keep the workplace clean and tidy. • Store hazardous waste using secondary containment and restrict access to the hazardous waste storage area to prevent harm to construction personnel, the environment, and the public • Perform on-site sorting to separate liquid, organic, demolition, hazardous and recyclable waste streams and identify the disposal route for each • Use undamaged and leak-free waste containers • Reuse excavated soil as much as possible for backfill, landscaping and other areas of the project where excavation material is required • Work with local authorities to transport and dispose of waste according to legal requirements	• Do not burn any type of waste. • Do not dispose of any waste in an unauthorized area, especially near waterways • Do not leave any sharp or dangerous objects (knives, box cutters, scissors, broken glass, etc.) that could attract the attention of children living near the work site
Labour and employment law	• Implement a fair and transparent employment process • Provide workers with clear and understandable information about rights through contractual documents in the local language	• Not to discriminate against any worker or job applicant on the basis of gender, marital status, nationality, ethnic origin, age, religion, or sexual orientation • Do not recruit children (under 18) or use forced labour
Code of Conduct	• Establish a code of conduct for worker-community interaction and behaviour on site. Require workers to comply with the code of conduct	
Grievances	• Establish and maintain a grievance mechanism accessible to workers	

Topics	Dos	Don'ts
Community Safety	• Establish and maintain a grievance mechanism for local communities adjacent to construction sites • Secure work sites (temporary bridges, traffic control, barricades, signs, and warning lights) • Delineate open trenches with visible temporary fencing, undertake monitoring after rains and prevent flooding of trenches. • Immediately inform the appropriate authorities in case of damage to utilities such as underground and overhead power lines, water pipes, gas pipes, pipelines, etc. • Establish appropriate site demarcation and access controls near settlements to prevent unauthorized entry to construction or activity sites, especially by children (e.g., fencing off the construction section near settlements or communities)	• Do not leave any holes or openings without a clearly marked safety guard • Do not exceed the speed limit
Traffic management	• Establish speed limits for all vehicles in the project • Equip vehicles with reversing signals. Ensure that truck drivers are accompanied by a flagger or lookout when reversing, unloading, and loading • Train all drivers in safety provisions • Avoid roads with blind curves, low visibility intersections and very narrow roads along steep grades • Avoid roads frequently used by local residents • Use local road signs and work with local authorities and responsible communities • Keep access roads in good condition and free of deposits, waste, and construction materials • Use flaggers where appropriate and provide clear and visible signage • Avoid vehicle traffic during the hours when children are going to and from school	• Do not drive without a valid driver's license • Do not use a mobile phone while driving

Topics	Dos	Don'ts
Health and safety in the workplace	• Provide health and safety training to all project employees and familiarize workers with the risks associated with their activities • Conduct a risk assessment and identify mitigation measures for each activity • Record and report any workplace hazards, incidents, or injuries • Provide the correct PPE and ensure that all employees use it • Keep PPE in good condition and change it if it is damaged • Prohibit the use of alcohol or illegal drugs. • Use the right tool for the job • Use a ladder in good condition for climbing • Implement good housekeeping to prevent trips, slips and falls. • Conduct daily briefings / information sessions on health and safety issues prior to commencing work • Conduct a medical examination of all staff prior to the start of activities • Provide sufficient drinking water for staff • Provide and maintain toilets for the workforce with separate facilities for women and men • Provide one qualified first aid attendant for employees and an adequate supply of first aid kits on site	• Do not attempt to repair broken equipment and machinery if you are not authorized to do so. • Do not use metal ladders near overhead power lines • Do not work without PPE • Do not work alone or in isolation
Housekeeping	• Keep the workplace clean and tidy • Secure loose material that may fall • Keep walkways, stairs, passages, ladders, etc. free of obstructions, materials, cables, chords, pipes, etc. • Keep material away from the edge of excavations, trenches, roofs, etc. • Cover and secure open trenches, holes, and other openings • Avoid stagnant pools of water in work areas • To carry out the daily cleaning of the activity area	

Topics	Dos	Don'ts
Hazardous Materials Management	• Store fuels, oils, chemicals, and other hazardous materials on an appropriately sized, leak-proof spill containment base • Clearly label containers with contents, handling, storage, expiration and health and safety information • Use drip trays when refuelling and servicing (e.g., oil change) equipment • Install appropriate warning signs in hazardous material storage yards, lock doors and restrict access to authorized personnel • Store hazardous waste using secondary containment and restrict access to the hazardous waste storage area to prevent harm to construction personnel, the environment, and the public	• Do not smoke near hazardous materials
Fire prevention and control	• Take all reasonable and precautionary measures to ensure that fires do not start as a result of project activities on the site • Provide basic firefighting equipment available on site (including but not limited to rubber beaters when working in grass / bush areas, at least one fire extinguisher of the appropriate type when welding or other "hot" activities) • Store flammable materials under conditions that will limit ignition potential and fire spread • Train all employees on fire hazards and how to deal with any fire should it occur.	• Do not light a fire for any purpose, including incineration of waste • Do not throw your cigarette butts on the ground

5 STAKEHOLDER ENGAGEMENT AND COMPLAINT MANAGEMENT

5.1 Introduction

As laid out in the latest decentralisation policy issued by MINALOC, decentralisation is a multi-sectoral policy that most people in Rwanda now associate with efficiency, effectiveness, and stakeholder ownership across all service delivery domains. Stakeholder coordination, however, remains a challenge even though many stakeholders acknowledge the need for coordinated efforts, and notwithstanding the many platforms established for coordination at national and local levels. In decentralisation, coordination is particularly challenging because of the multiple stakeholders and the fact that sector delineation is still somewhat fuzzy."

The commitment made is the will of the Government of Rwanda to work with stakeholders to put in place effective functional coordination and partnership development mechanisms for all actors working to promote or strengthen local governance, decentralized service delivery and/ or participatory community development. This is in line with the importance given by international standards in stakeholder engagement.

The purpose of stakeholder consultation and information disclosure mechanism is to:

- *Inform:* by promoting stakeholder understanding of issues, problems, alternatives, opportunities, and solutions through balanced and objective information sharing;
- *Consult:* by obtaining feedback and acknowledging concerns and aspirations of stakeholders on analysis, alternatives, and decisions with regard to development projects;
- *Engage:* by working directly with stakeholders to ensure that their concerns and aspirations are understood and considered and to assure them that their concerns / aspirations would be directly reflected in the developed alternatives; and that feedback will be provided on how their input influenced the final decisions;
- *Empower:* by making stakeholders partners in each aspect of the decisions, including development of alternatives and identification of preferred solutions.

LODA funded projects policy is, affect a wide range of stakeholders in various ways due. As such, there is need for effective identification, mapping, and engagements with different cadres of stakeholders to ensure that all significant E&S concerns are understood and requisite management measures put in place. The ESMF and LACRPF processes also provide for adequate stakeholder engagement as a pivot for their effective implementation.

5.2 Stakeholder engagement at project level

In order to clearly develop a systematic and effective means of engagement, stakeholders should be identified in relation to the projects to be undertaken and mapped out to understand their interests in these development activities. Stakeholders identified and mapped for inclusion in engagement activities under the LODA-funded decentralisation programme will meet one or more of the following criteria:

- Have an interest in the various project categories;
- Would potentially be impacted by or have an influence on the various project categories (negatively or positively);
- Could provide commentary on issues and concerns related to various project categories.

Stakeholders were categorised based on their various needs, interests, and potential influence on the project, as outlined in the table below.

Table 5-1: Stakeholder map

Stakeholder Group	Project Interaction	Stakeholders
Central Government	Permitting and licensing Funds transfer and management Compliance enforcement	Key Stakeholders: • Ministry of Local Government (MINALOC) • Ministry of Infrastructure (MININFRA) • Ministry of Economic Planning and Finance (MINECOFIN) • Ministry of Agriculture and animal resources (MINAGRI) • Ministry of Environment (MINEDUC) • Ministry of land and forestry (MINILAF) • Ministry of Environment and Natural Resources (MINERENA) • Ministry of Education (MINEDUC) Regulatory Bodies/Lead Agencies in these ministries including • Rwanda Environment Management Authority (REMA) • Rwanda Development Board (RDB) • Rwanda Energy Group (REG) • Water and Sanitation Corporation (WASAC) • Rwanda Water and Forestry Authority (RWFA) • Rwanda Land Management and Use Authority (RLMUA)

Stakeholder Group	Project Interaction	Stakeholders
Local Government (Province)	Oversight of Projects	Governors of the Provinces Provincial M&E staff
Local Government (District)	Project selection Project Implementers District-level permitting and compliance enforcement Complaint Management	Mayors and Vice mayors District Executives Sector leaders Cell leaders
Directly affected communities/ Project affected persons	Loss or damage of property Physical and/or economic displacement Affected by project impacts Affected by resettled communities	Landowners. Land users Communities living close to construction sites Communities living along access roads Communities hosting resettled households
Vulnerable persons/ groups	Interaction with project impacts Inadequate ability to cope with negative project impacts Inadequate ability to enjoy project benefits unaided Special needs different that the rest	The poor, as identified by UBUDEHE, the elderly, sick, disabled etc
National and Local NGOs and CSOs; Faith Based Organisations	Support to the affected persons/communities May have useful data and information from experience in the communities Project may hinder or enhance their project works with the communities May supplement project benefits	Community Based Organizations, National-category NGOs, International NGOs, and Pressure Groups i.e., Human Rights Watch, Transparency International Rwanda, World Vision, IUCN, OXFAM, CARE, WWF, etc.

Stakeholder Group	Project Interaction	Stakeholders
Media Political Parties/groups, Religious Organisations	Cascading project information to the public Influence on public views and opinions on the projects	Independent and National Media (newspapers, television, and radio stations) Local schools Local health institutions Religious denominations
Businesspersons and companies	Supply of Project inputs and management of outputs Professional and technical services to the projects Financial management	Contractors Suppliers and service providers Other businesses operating within project communities Local and international banks
Law enforcement agencies	Security	Rwanda Police

The table above provides a general stakeholder map, but due to the varying nature and type of projects funded by LODA, the implementing District, as well as LODA, will identify the relevant stakeholders through stakeholder mapping based upon consultation processes. The consultations shall be carried out through all four phases of project implementation: (i) Planning, (ii) Construction, (iv) Operation & Maintenance and (iv) potential Decommissioning, e.g., quarry.

5.3 Stakeholder engagement plan outline

The outline for the Stakeholder Engagement Plan (SEP) provides the principal types of engagements required with the main stakeholders during project implementation. This plan shall be adapted and populated to specific project needs, as part of the EIA process.

Table 5-2: Stakeholder Engagement Plan (SEP)

Stakeholder Group	Objective of Engagements	Project Phase	Required Actions	Responsibility
Central Government (Ministries and Agencies)	• Obtain support regarding licensing and permitting processes • Ensure compliance with set Environmental Regulations and Guidelines • Conduct quarterly updates to build and maintain a positive and on-going relationship	All Phases	• Apply for all required licenses and permits (RDB) • Apply for any requisite extension, renewal or variation of licenses or permits • Conduct and submit reports of annual environmental audits to REMA • Submit regular E&S monitoring reports to LODA as scheduled (every 3 months at the latest) • Consult REMA on any emerging environmental issues that may require their guidance	District
Local Governments (Province)	• Build and maintain a positive and on-going relationship	All Phases	• Schedule monthly update meetings on planned and on-going projects.	District
Local Governments (District)	• Obtain information, approvals, and guidance during the land acquisition process • Comply with set Environmental Regulations and Guidelines	Planning and Construction Phase	• Apply for all required licenses and permits • Apply for any requisite extension, renewal or variation of licenses or permits • Submit monthly project monitoring reports to the Districts as scheduled • Conduct and submit reports of annual environmental audits to REMA of existing projects	Contractors Supervisors

Stakeholder Group	Objective of Engagements	Project Phase	Required Actions	Responsibility
Directly affected communities	• Regular meetings to foster understanding of the Projects • Obtain and maintain support of local communities • Timely compensation • Livelihood restoration	All Phases	• Conduct one public hearing/ consultation at early planning stage to inform the population and the site selection (sensitive areas, cultural heritage, land availability) • Conduct at least one public hearing/ consultation, during EIA (and RAP) stage • Provide monthly updates to the communities on existing projects, e.g., as part of Umuganda • Make the EIA documentation available to the public, e.g., District One-Stop-Centre Projects involving Land Acquisition • Disclose compensation approach to affected landowners • Achieve consent and sign-off on land ownership transfer agreements • Ensure receipt and acknowledgement of compensations (financial and technical) • Conduct monitoring as defined in the RAP presented in Part III - LACRPF	District

Stakeholder Group	Objective of Engagements	Project Phase	Required Actions	Responsibility
Vulnerable persons/groups (e.g., disabled, the elderly, women headed households)	• Special assistance to ensure these groups are informed via appropriate channels and means of engagement	All phases	• Identification of vulnerable groups before and resulting from project activities as part of the EIA process • Integrate special provisions for vulnerable groups into project processes, including EIA and RAP and the overall stakeholder engagement approach • Conduct quarterly meetings to understand how they cope with the project impacts	District
National and Local NGOs, FBOs	• Build and maintain a trusted relationship; • Collaborate on relevant activities for the benefit of the communities.	Construction and O&M phases	• Hold regular conversations with representatives from relevant NGO groups to ensure they are well-informed during the Project's life.	District
Media	• Improve public/ civil society/political perceptions about the Project • Have opportunities for public outreach/advertisements • Seek to ensure that stakeholders develop a sound understanding of the Project	Construction and O&M phases	• Conduct quarterly dedicated media briefings to provide project updates, details of the Project's E&S performance etc. • Invite the media to important events organised or promoted by Project to show case success project stories	• Implementing Districts • LODA

Stakeholder Group	Objective of Engagements	Project Phase	Required Actions	Responsibility
Businesspersons and companies	• Build and maintain mutually beneficial relationships • Improve perceptions about the Project	Construction and O&M phases	• Conduct bi-annual contractor and supplier briefings on E&S risk management process (within this Part II- ESMF) • Obtain views and comments from Contractors regarding the process and address these	District with contractors, suppliers, and Supervisors
Law enforcement agencies	• Build and maintain a positive and on-going relationship with the regular and traffic police	All phases	• Interactions with the Joint Operation Committee as needed	District

5.4 Complaint management

LODA's complaint management is based upon IFC's Guide for grievance management[1] which describes a grievance as a concern or complaint which can be raised by an individual or a group within communities affected by a project. Both concerns and complaints can result from either real or perceived impacts of a company's operations and may be filed in the same manner and handled with the same procedures.

The guide also describes a project-level complaint mechanism for affected communities as 'a process for receiving, evaluating, and addressing project-related complaints from affected communities at the level of the company, or project.'

5.4.1 Purpose

The purpose of the "Complaint Management Procedure" is to implement a formalised process (identification, tracking and redressing) to manage project related complaint/complaint from communities and other local or national stakeholders in a systematic and transparent manner and define corrective measures to address the complaint.

5.4.2 Existing complaint management at Local Government level

A form of public complaint management already exists at the District level. Complaints are raised within the existing local complaint structure which comprises of

- Village committees,
- Cell committees,
- Sector committees, and
- District committees.

At each stage there is an opportunity for the complainants to appeal the decisions made and raise them with the next higher levels. If all above local hierarchy fails, then the affected person can seek legal redress.

Complaints are recorded at different units in the District, depending on the topic they relate to, e.g., in the District Social and Environmental Development Unit, the District Agriculture and Natural Resource Unit, the Governance Unit or the Labour/Works Inspector. Citizens can also complain via MINALOC's outreach programme and the E-citizen system operated by MINALOC.

There are weekly meetings for the resolving of complaints at District level. On these occasions, representatives from the District Executive Committees are available to discuss complaints with the Persons Affected by Project (PAPs) and to identify solutions.

[1] IFC (2009): Good Practice Note Addressing Grievances from Project-Affected Communities

5.5 Worker complaints

The labour law No. 13/2009, dated 27/05/2009 outlines the procedure to handle complaints. Central positions for complaint management are the workers' delegate and the labour inspector. For any firm employing more than 10 workers, a worker's representative is elected and will act as the worker's delegate. The Labour Inspectorate is an organ which is dependent on the Labour Directorate at national level. Each District is supposed to have the position of a Labour / Works Inspector (attached to Ministry of Public Service and Labour):

- *For Individual worker's complaints*: complaints or disputes between individuals and employers shall be settled amicably by the worker's delegate. If this fails, then the complaint is raised with the labour inspector. If this also fails, then the dispute is taken to competent courts at national or district level. It is tasked with monitoring compliance with the labour code and the provisions of collective conventions as well as social security laws. The Labour Inspector shall draft a report on all such activities that are contrary to the provisions of the labour code and the social security. He /she has the mission to inform and advise in matters relating to the Labour Law and any related disputes.
- *For collective labour disputes*: Disputes will go immediately to the Labour Inspector in the given area. Within seven days, disputing parties are invited for conciliation. If the dispute is settled at this stage, the minutes of conciliation are submitted to clerks of a court and are thereby enforceable. In cases where there is no conciliation, then the minutes of non-conciliation are forwarded to the National Labour Council to set up an arbitration committee to resolve the disputes. Decisions from this committee are enforceable by the clerk of court within 30 days of the decision notification unless there is an appeal. Appeals are taken up with legal courts.

5.6 Additional tools for complaint management

A complaint form is attached to this document in Appendix 7 for use in the Districts. Furthermore, the hotline of LODA (telephone 5029) can be used as complaint hotline by informing citizens they can complain directly at LODA. The same holds true for LODA's general email (info@loda.gov.rw) publicly available on the LODA website.

6 PROJECT MONITORING AND REPORTING

6.1 Introduction and objective

The overall objective of E&S monitoring is to ensure that the proposed mitigation measures defined in the EIA and the corresponding ESMP are implemented and that they are effective. E&S monitoring also enables timely and adequate response to new and developing issues of concern.

Monitoring of the E&S impacts of projects shall be based on the monitoring activities determined in the ESMP. The ESMP may refer to further sub-plans, e.g., for dust, traffic, or wastewater. Monitoring shall be risk driven, with higher risk projects subject to more intensive monitoring. The risk evaluation shall be subject to on-going review and amendment according to the project's E&S performance during implementation.

Overall, monitoring and reporting of key indicators is incorporated into LODA's MEIS system in collaboration inputs from District Planners.

6.2 Monitoring at district level

The implementing Districts shall conduct regular monitoring to evaluate whether projects are being implemented and operated in line with the requirements set out in the project ESMP. This shall be conducted through:

- Review of the project's monthly supervising contractor's status supervision reports including a chapter on ESMP Implementation.
- [20]
- *Regular monitoring visits*: Regular technical site visits should be conducted and during the visit time should be taken for interviews with Project Affected Persons (PAPs). The number and/or frequency of site visits are based upon the needs, risks, and circumstances of each project, and shall be based on the timeframes provided in the ESMP. If the ESMP does not provide specific timelines, the monitoring visits shall take place at least on a semi-annual basis. The monitoring visit and subsequent reporting shall include:
  - An assessment of the project's performance against the ESMP;
  - A summary of the project's compliance with regulatory E&S requirements;
  - Details of any significant incidents or material non-compliances;
  - Stakeholder engagement activities and implementation of the complaint mechanism during the reporting period;

[20] This implies that the Terms of Reference and Supervision Contract provide dedicated instructions for the monitoring of the ESMP.

- Future plans and opportunities for continuous E&S performance improvement.

- Findings of monitoring visits shall be documented via the MEIS.

Where reporting indicates significant E&S risks, LODA may increase the requirement for monitoring activities. Conversely, where reporting demonstrates satisfactory E&S performance, the monitoring activities may be reduced.

Responsibility: District Social & Environmental Officer with support from the persons responsible for Stakeholder Engagement and Health & Safety

6.3 Monitoring at LODA level

LODA will review and oversee the monitoring information from the Districts through the MEIS at least on a quarterly basis. LODA E&S support is provided by the Local Economic Development Unit (LEDU) and linked with other Units and Divisions, and shall schedule calls, conduct site visits, and report reviews to ensure in-depth supervision of any high-risk projects.

There shall be weekly project reviews between the Local Development Planning Division, LGSP Division and the E&S support within the LEDU based on the MEIS information to define critical findings and corrective actions.

7 IMPLEMENTATION ROLES AND RESPONSIBILITY

The responsibility matrix below outlines the responsibility for different activities within the ESMF for LODA and Districts and respective persons to achieve LODA's E&S performance goals.

Table 7-1: Responsibility matrix

Level	Activities	Responsibilities
LODA	Review the Environmental and Social Screening Checklists from the Districts and PPD and support with the identification of requisite specialist studies	LODA E&S support within the Local Economic Development Unit and aligned to other LODA Units And Divisions E&S specialists.
	Prepare, in liaison with Districts, EIA and RAP ToRs for Consultants and assist them in bid evaluation	
	Review the ESIA (and ARAP) reports, in liaison with Districts, and advise them with recommendations	
	Review the E&S elements of the District Project submissions in the Project Profile Documents	
	Evaluate adequacy of proposed project budgets to cover for the E&S management components during implementation	
	Ensure that Districts are informed about ESMP requirements, reporting requirements and responsibilities as per ESMF/ LACRPF	
	Conduct occasional site visits to high-risk projects as necessary and advise the supervising consultants and Districts on identified issues.	
	Review the MEIS information on E&S management for the projects at District level and ensure timely close-out of identified non-compliances	
	Conduct final audit of E&S management after final hand-over of the infrastructure	
District	Conduct Environment and Social pre-screening once project list is agreed	DEO and other responsible persons[21]
	Work closely with ESIA Consultant and submit project brief and draft of ToR to RDB	

[21] Additional responsibilities need to be allocated for: (i) Stakeholder engagement during Project planning stage and ESIA disclosure; (ii) Documentation of grievances from different units (Districts' Labour Inspectors, District's Social & Environmental Development Unit/ Agric. And Nat. Res Unit, Governance Unit) and report via the MEIS; and (iii) Overview of preparation of Resettlement Action Plans (by external consultants) or preparation of these and implementation thereof; (iv) Monitoring of Health and Safety performance at the construction sites.

Level	Activities	Responsibilities
	Ensure that stakeholder engagement activities are conducted at planning and EIA stage as proposed in this ESMF	
	Prepare, in liaison with LODA, EIA and RAP ToRs for consultants	
	Conduct Consultants ESIA and RAP bid evaluation	
	Provide Draft EIA (and RAP) to LODA	
	Review the EIA (and RAP) in liaison with LODA	
	Ensure the E&S Considerations are included in project budget	
	Ensure that the assigned contractors and supervising consultants have competent Environmental and Social Staff and are informed about ESMF/ LACRPF requirements.	
	Review consultant's reports on project ESMPs contained in the Regular Work Progress Reports submitted by the supervising consultant.	
	Conduct site visits as agreed with LODA and advise the contractors and supervising consultants on identified issues.	
	Ensure that identified non-compliances and incidents are adequately communicated to LODA and Corrective Action Plans developed.	
	Conduct Annual Environmental Audits of the Projects and submit the reports to REMA.	
	Feed all E&S information and monitoring results in MEIS as requested by LODA on a quarterly basis.	
	Inform LODA about incoming major complaints and resolution.	
	Conduct RAP Audits as stipulated in the RAP (if any).	
Works contractor (to be included in Contract)	Assign, as part of the project team, a competent Environmental and Social Staff to oversee implementation of the ESMP and RAP	Contractor's Project Manager
	Ensure implementation of mitigation measures as entailed in the ESMP (and ARAP) throughout the works	

Level	Activities	Responsibilities
	Regularly update the supervising consultant on ESMP implementation, challenges and any additional support required as and when there is a potential risk	
	Produce status reports against the ESMP and RAP as part of the E&S Chapter of the monthly Progress Reports.	
	Address all non-compliance as advised by the supervising consultant and report on the status of each, within agreed timeframes with the District	
	Report E&S incidents and accidents to LODA	
Supervision (to be included in Contract)	Assign, as part of the project team, a competent Environmental and Social Staff to oversee contractor's implementation of the ESMP and RAP	DEO , Labour inspector and other responsible persons[22]
	Conduct daily supervision of the contractor's implementation of mitigation measures as entailed in the ESMP and RAP	
	Regularly update the District on ESMP implementation, challenges and any additional support required as and when there is a potential risk	
	Produce status reports against the ESMP and RAP as part of the E&S Chapter of the Progress Reports submitted to the District	
	Address all non-compliance as advised by the District and report on the status of each, within agreed timeframes with the District	
	Report E&S incidents to the Contractor	

22 Additional responsibilities need to be allocated for: (i) Stakeholder engagement during Project planning stage and ESIA disclosure; (ii) Documentation of grievances from different units (Districts' Labour Inspectors, District's Social & Environmental Development Unit/ Agric. And Nat. Res Unit, Governance Unit) and report via the MEIS; and (iii) Overview of preparation of Resettlement Action Plans (by external consultants) or preparation of these and implementation thereof; (iv) Monitoring of Health and Safety performance at the construction sites.

Appendix 1: Preliminary E&S Risk Assessment Checklist

Last updated on 16.09.2022

Instructions:

This checklist is used to assess the preliminary risks of the planned measures, to define their eligibility and to categorise them according to their risk level. If you are planning quite different groups of measures, you may choose to fill in one checklist per group of measures.

The questionnaire below lists the main indicators for the different categories of E&S risks. Please note that a simple reference to one of the categories does not mean that the measures necessarily fall into that category. Rather, the decisive factor here is a consideration of the measures as a whole. It is therefore important to justify the choice of category. The most important is to be able to identify the risk and know how to deal with it during the project. On this basis, the type of assessment and safeguarding instrument needed can be identified and specified.

This checklist is used in the very early planning phase and does not replace the screening process undertaken by RDB for most infrastructure projects. The EIA in Rwanda is to be conducted for nearly all infrastructure projects and therefore for the main infrastructure types the EIA is a legal requirement. For further information on the infrastructure types that have to undergo an EIA please refer to the Ministerial Order No 001/2019, 15/04/2019.

Overview

Project title	
Project implementation area	
District name	
Contact details of the DEO	
Type of measures/ areas proposed	
Brief description of the E&S characteristics of the proposed activities and sites (location, size e.g., hectares, length, beneficiaries)	
EIA and other E&S documents available for review	
Have you ensured that the proposed measures are not on the Facility's exclusion list?	☐ Yes ☐ No

Step 1 is only to be filled in case of funding or co-funding by development partners.

Step 1: General eligibility (exclusion list)	Yes	No
Does the measure include the following activities? *(If the answer is YES to any of the above questions, the measure is not eligible)*		
1. Production of or trade in any product or activity that **is subject to national or international disposal or banning regulations or an international ban**, for example a. certain pharmaceuticals, pesticides, herbicides, and other toxic substances (under the Rotterdam Convention, the Stockholm Convention, and the WHO "Pharmaceuticals: Restrictions on Use and Availability"), b. ozone-depleting substances (under the Montreal Protocol), c. protected wildlife species or products of protected wildlife species (according to CITES / Washington Convention) d. prohibited international trade in waste (according to the Basel Convention).		
2. Investments that could be associated with the **destruction or degradation of areas of special protection interest** (without compensation according to international standards).		
3. The production **of** or trade in **explosives, armaments, ammunition,** including controversial weapons or their critical components (nuclear weapons or radioactive munitions, biological weapons and chemical weapons of mass destruction, cluster bombs, anti-personnel mines, enriched uranium)		
4. The production of or trade in **radioactive material.** This does not apply to the supply of medical equipment, monitoring equipment or any other application where the source of radioactivity is insignificant or adequately protected.		
5. The production or trade **of free asbestos**. This does not apply to the purchase or use of cement boards with bound asbestos or with an asbestos content of less than 20%.		
6. **Destructive fishing methods and trawling** using nets longer than 2.5 km in a marine environment.		
7. **Nuclear power plants** (with the exception of environmental risk reduction measures for existing structures) and mines where uranium is a primary extraction product.		

Step 1: General eligibility (exclusion list)	Yes	No
8. **The prospecting, exploration, and mining of coal**; transport and associated infrastructure used primarily for coal; coal-fired power stations, heating stations and cogeneration plants and associated power lines.		
9. Unconventional prospecting, exploration and extraction **of oil shale**, tar sands or oil sands 1. Unconventional prospecting, exploration and extraction of oil shale, tar sands or oil sands 2. Activities involving deforestation and significant conversion of critical natural habitats;		
10. **Tobacco** production or trade.		
11. Production of or trade in **alcoholic beverages** (excluding beer and wine).		
12. **Gambling, casinos,** and equivalent businesses.		
13. Infrastructure for the **armed forces** such as military buildings, prisons, police stations, etc.		

- If the answer to any of the questions is YES, the measure should in principle be excluded from any LODA funding.
- If NO is answered to all the questions, please proceed.

<Justification

Step 2 (Exclusion of Category A measures - significant risks)	Yes	No
Does the measure include the following activities? If the answer to any of these questions is YES, the measure is not eligible. Please note, while measures in the exclusion list can never be financed for category A, there may be some cases where it is possible to minimise the risks by adapting the design of the measures, and thus making the project eligible. Category A measures have potentially high adverse effects and/or risks, which are multiple, irreversible, long-term and/or unprecedented. The impacts may affect a wider area than just the facility under construction, the site, or the project area.		
1. **Land and habitat conversion >20** ha There will be significant and large-scale changes in the use of natural resources (e.g., alternative land use: as arable land, as forest or pasture, for rural development, timber production, etc.) and large-scale land reclamation. An exception are agricultural, forest and environmental projects aiming to reduce soil erosion and to improve climate change mitigation		
2. **Exploitation methods in large-scale agriculture and fisheries.** Large-scale and significant changes in farming and fishing practices (e.g., introduction of new plants, large-scale mechanisation, introduction of new fish species) and large-scale slaughter.		
3. **Large-scale exploitation of water resources** (e.g., large dams and other impoundments, pumped storage/power plants, irrigation and drainage projects, deep wells, water management and watershed management, water supply, seawater desalination plants)		
4. **Water supply systems without safe sewage disposal mechanisms**		
5. **Major infrastructure projects** (e.g., roads, bridges, airports, ports, transmission lines, pipelines, rail networks, other rail transport, tourism).		
6. **Power generation** (e.g., large wind farms, large-scale solar farms, biomass plants, geothermal plants, thermal power plants).		
7. Industrial **activities** (e.g., metallurgical plants, wood processing plants, chemical plants, cement plants, refineries and petrochemical plants, agro-industries).		
8. **Exploitation of geological/mineral resources**, etc. (e.g., mining, quarrying, peat extraction, oil, and gas extraction).		

Step 2 (Exclusion of Category A measures - significant risks)	Yes	No
9. Waste/wastewater **management and disposal** (e.g., sewage systems, wastewater treatment plants, landfills, household, and hazardous waste reprocessing facilities).		
10. Direct impacts on protected areas Interventions in nationally or internationally protected areas.		
11. Cultural property to be protected Activities that would damage cultural property including archaeological, historical, or religious property. Examples of cultural properties to be protected are (i) archaeological (prehistoric), paleontological, historical, cultural, artistic and religious values; (ii) unique natural deposits/functions or tangible objects that represent cultural values, such as sacred caves, rocks, lakes and waterfalls; and (iii) certain types of intangible culture that may be used for commercial purposes, cultural knowledge, innovations and community practices that include traditional ways of life.		
12. High risks due to explosion and fire hazards		
13. Significant physical and economic displacement Measures that involve significant involuntary physical displacement and/or forced evictions (> 200 people and/or vulnerable people) as well as significant economic displacement.		
14. Controversial land rights Measures that would require the acquisition of disputed land		
15. High E&S risks expected for local residents The health, safety, livelihood, and social cohesion of the members of the local community is significantly affected, e.g., by significant pollution of residential areas by exhaust fumes, pesticides, noise - especially at night, vibrations, construction dust, road accidents etc.) In particular, pollution is considered to be too high when the national and international limit values for pollutants (according to the World Bank's EHS Guidelines) are exceeded.		

Step 2 (Exclusion of Category A measures - significant risks)	Yes	No
16. Exploitative or abusive work • Activities involving exploitative or abusive forms of work, forced labour or exploitation of children, where: • any work or service, not performed voluntarily, which is imposed on an individual under threat of force or punishment is considered forced labour; • employment of children which constitutes economic exploitation, or which is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development, shall be considered as harmful child labour.		

If the answer to any of these questions is YES, the measure is not eligible for LODA funding. In some cases, it is possible that adjustments in the design of the measure (size, location, etc.) allow for a reassessment of the risks resulting in a lower risk category, thus making the measure eligible. If you answered NO to all questions, go to the next step

<Justification

Step 3: Risk categorisation of eligible measures		
High risk	**Moderate and low risks**	**Minimal or no risks**
Potentially high negative environmental and social impacts and risks, which are • higher than 'moderate' in some areas • but not as numerous and unprecedented as those in category A and at the same time partially reversible and/or temporary. If an ESIA is required by national law/international standards, the project is automatically B+.	Potential negative environmental and social impacts and risks that are "manageable", predictable, temporary, reversible, and limited to the project site. They can be avoided or mitigated by state-of-the-art measures or standard solutions. All physical works fall into at least this category. An EIA is anyhow required by national legislation.	No or marginal negative environmental and social impacts and risks. No specific protection, assessment or monitoring measures or action plans are required. Physical work is never in this category and always at least category "moderate and low risks."
Environment" indicators		

Step 3: Risk categorisation of eligible measures

☐ Geographical expansion, new site in a non-sensitive area ☐ Location in nature (land without human use) ☐ Construction in an agricultural or residential zone ☐ Conversion of medium-sized land (10 to 20 ha)[23] ☐ Projects near valuable habitats ☐ Various medium risks for the health, safety, and social cohesion of local residents (air pollution, noise, risk of traffic accidents, significant increase in heavy traffic etc.)	☐ Little or no geographical expansion ☐ Modernisation of the existing building site ☐ Location in an industrial zone or business park ☐ Conversion of small-scale land (up to 10 ha)[24] ☐ No impact on nationally or internationally protected areas ☐ Various small risks for local residents (air pollution, noise, risk of traffic accidents, increased heavy traffic etc.) ☐ Transport of dangerous goods	☐ Not location specific (e.g., general advice/capacity building) ☐ No construction ☐ No additional land required ☐ No risk E&S expected for local residents	

[23] An exception are agricultural, forest and environmental projects aiming to reduce soil erosion and to improve climate change mitigation.

[24] An exception are agricultural, forest and environmental projects aiming to reduce soil erosion and to improve climate change mitigation

Step 3: Risk categorisation of eligible measures

Social" indicators			
☐ Physical relocation < 50 persons / 10 households ☐ Economic relocation : < 200 people ☐ Use of communal land ☐ Location near a cultural property (see definition above) ☐ Large influx of migrant workers ☐ Armed security personnel required	☐ Physical relocation < 5 persons / 1 household, ☐ Economic relocation : < 50 persons ☐ No impact on Indigenous people and cultural sites	No negative effects expected on the population	
Safety at work" indicators			
☐ Construction sites with camps ☐ Employment of youth, temporary/ seasonal workers, migrant workers, Indigenous people (non-Labour Force) ☐ Significant occupational hazards: Blasting operations, mine clearance	☐ <100 construction workers (excluding labour-based) ☐ No large-scale projects ☐ General exposure to risks in the workplace (e.g., welding, hazardous substances, etc.)	Few or no direct employees in the project (excluding labour-based)	

➔ High risks projects should be avoided if feasible	➔ Low risk projects must undergo the EIA process as defined in national legislation ➔ In case of expropriation ESMF Part III: LACRPF has to be applied	➔ No further action required on minimal risk projects	*<Justification*

Appendix 2: Guide on EIA/ RAP Review

Last updated on 16.09.2022

EIA Review Guidance

In an effort to ensure quality identification and assessment of environmental and social risks of projects and ensure that project affected persons are adequately consulted and compensated, LODA has developed these guidelines to aid in the evaluation of the EIA and RAP Consultant's output against LODA and RDB Requirements. The guidelines spell out the main factors to consider in the evaluation of the compliance of the consultants; outputs to the Terms of Reference for the specific studies.

While reviewing the ToR for the EIA/ RAP shall be considered.

General Review Criteria

The following elements will be used to check the quality of the EIA reports during review:

S. No	Review Criteria	Finding (Yes/No)	Recommendations
Report Format			
1	Includes all the content as stipulated in the Terms of Reference (baseline studies, impact assessment, mitigation planning);		
2	Includes a table of contents at the beginning of the document		
3	Reads as a single document with appropriate cross-referencing		
4	Uses consistent terminology with a glossary.		
5	References all information sources used.		
6	Has a clear explanation of complex issues		
Report Content			
7	Includes necessary information for each major project component;		
8	Describes stakeholder engagement activities and plan		
9	Considers and reflects stakeholders' views		
10	Provides clear, easy-to-understand information to decision makers and the public		
11	Provides relevant and sufficient information for the specific decision-making situation		
12	Has a clear structure with a logical sequence		

S. No	Review Criteria	Finding (Yes/No)	Recommendations
13	Is concise, comprehensive, and objective		
14	Is written in an impartial manner without bias		
15	Includes a full description of the project to be developed		
16	Makes effective use of diagrams, illustrations, photographs, and other graphics to support the text		
17	Contains a good description of the methods used for the studies of each environmental or social topic		
18	Includes a clear discussion of alternatives		
19	Makes a commitment to mitigation (with a Plan / Program) and to monitoring (Environmental and Social Management Plan and sub-plans)		
20	Resolves (proposing consistent mitigation solutions) all significant impacts		
21	Proposes mitigation solutions that are consistent with good international practices and in line with national legislation		
22	Has a non-technical summary that does not contain technical terminology		
23	Refers to the World Bank Operational Policies (and further international best practice) as required by the LODA ESMF		

Specific Review Criteria for EIA

S. No	Review Criteria	Finding (Yes/No)	Recommendations
Project Description			
1	The purposes and objectives of the development are adequately explained		
2	The design, size or scale of the project, and the nature, its implementation plan and maps are used effectively for this purpose		
3	Important design features, especially those for environmental planning and socio-economic management (e.g., pollution control, waste management, and erosion control, handling of toxic or hazardous materials, worker services) are highlighted		
4	The nature and quantities of material needed during both the construction and operational processes		
5	The numbers of workers involved with the project during both construction and operation are estimated		
6	The land area taken up by the development site is well defined and its location clearly shown on a map		
7	Where alternate plans, designs or sites are being considered each is adequately discussed		

S. No	Review Criteria	Finding (Yes/No)	Recommendations
8	The types and quantities of waste matter, energy and residual materials and the rate at which these will be produced, are adequately estimated. Uncertainties are acknowledged and ranges or confidence limits given where possible		
9	The Area of Interest expected to be affected by the development is delimited with the aid of suitable scale map(s).		
Baseline Environment			
10	The important components of the affected environments are adequately identified and described. The methods and investigation undertaken for this purpose are disclosed and are appropriate to the size and complexity of the assessment task. An appropriate amount of field work was done. Uncertainties are indicated		
11	Existing data sources were searched and, where relevant, used. These include local authority records and previous studies		
12	Local land use and development plans were consulted and other data collected as necessary to assist in the determination of the probable future state of the environment, in the absence of the project, taking into account natural fluctuations and human activities.		

S. No	Review Criteria	Finding (Yes/No)	Recommendations
Impact Identification and Assessment			
13	All important issues identified in the EIA/ESMP terms of reference are included in the report. Deviations and exclusions are adequately accounted for		
14	Direct and indirect impacts are identified using a systematic methodology (e.g., project specific checklists, matrices, impact networks expert judgment, and extensive consultations). A brief description of the impact identification methods is given along with the rationale for using them		
15	Due attention is paid to environmentally sensitive areas, to off-site, time delayed or recurring (e.g., seasonal) impacts and to cumulative or synergistic effects with existing and anticipated developments		
16	Impacts are analysed as the deviation from baseline conditions, i.e., the difference between environmental conditions expected if the development were not to proceed and those expected as a consequence of it		

S. No	Review Criteria	Finding (Yes/No)	Recommendations
17	The significance of impacts is assessed using appropriate national and international quality standards where available. Explicit account is taken of the values placed on affected environmental features locally, nationally and (where appropriate) internationally		
18	Individuals, groups, communities, and government agencies affected by the project are clearly identified		
19	Concerned stakeholders (e.g., individuals, groups, communities, Government agencies) have been adequately consulted and their views accounted for in the development of mitigation measures		
20	It is clear to what extent the mitigation methods will be effective. Where effectiveness is uncertain or depends on assumptions about operating procedures, climatic conditions, etc. Data is introduced to justify the acceptance of these assumptions		

S. No	Review Criteria	Finding (Yes/No)	Recommendations
ESMP			
21	An effective environmental monitoring and management plan (ESMP) is presented to deal with expected; possible but uncertain; and unforeseen impacts caused by the project. Training needs are identified. The costs of the program are estimated. Developer and government responsibilities are distinguished, reporting and review procedures are specified		
22	Structure and responsibility for environmental management (considering operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting and staff training). Description of existing capacity and projected organizational changes intended to ensure the effective implementation of the ESMP, including • approval and licensing requirements; • reports on the ESMP (legal and organizational requirements and commitments); • environmental training: description and schedule; including technical assistance programs, if applicable; • ESMP projected budget;		

Summary Review Recommendations:

Agency	Recommendations
District Environment Officer	
LODA Environment Support Officer	
LODA Social Support Officer	

Specific Review Criteria for RAP

The review criteria for the RAP will assist the fulfilment of requirements in Part III - LACRPF during the review of RAP reporting by both implementing Districts and LODA as follows.

S. No	Review Criteria	Finding (Yes/No)	Recommendations
1	Adequate identification of all people affected by the project and all adverse impacts on their livelihoods associated with the project's land acquisition		
2	Large-scale maps showing demarcated individual affected households, with registration numbers derived from the population census		
3	Detailed survey of all losses that will result for each household, enterprise, or community affected by the project		

S. No	Review Criteria	Finding (Yes/No)	Recommendations
4	Detailed analysis of the data collected in the census, assets inventory, and socioeconomic studies		
5	Adequate stakeholder identification, mapping, and engagement regarding the RAP strategy for livelihood restoration		
6	Adequate review and documentation of the legal and administrative procedures applicable to the project		
7	A comprehensive compensation framework that specifies all forms of asset ownership or use rights among the affected persons and the project's strategy for compensating them for the partial or complete loss of those assets		
8	Detailed and relevant livelihood restoration programme developed		
9	An implementation budget with all resettlement costs itemized by categories of impact, entitlement, and other resettlement expenditures including training, project management, and monitoring		
10	Details on the roles and responsibilities of all project players and related organizations clearly outlined		
11	Evidence of consultations with relevant identified and mapped stakeholders and affected persons		

S. No	Review Criteria	Finding (Yes/No)	Recommendations
12	Grievance Redress Procedures developed and clear		
13	Appropriate schedule to monitor and report on the effectiveness of RAP implementation		

Summary Review Recommendations:

Agency	Recommendations
District ES Officer	
LODA ES Support Officer	

Appendix 3: ESMP Template and Guidance

Environmental and Social Management Plan (ESMP)

for Construction Sites

<District>

<Project Name/Location

<Author>

<Date/ Version>

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Introduction

The District < *Name of District*> plans to build < *name of intervention* e.g., school, water system, etc. > ("*the project*"). The project will be built on a site in / at < *Name of place / village*>. The construction work will be carried out by the construction company (contractor) < *Name of contractor*> with the following subcontractors: < *Name of subcontractors if already known*>. The implementing consultant will supervise construction activities < *Name of consultant if already known*>.

The purpose of this Environmental and Social Management Plan (ESMP) report is to provide a consolidated summary of all environmental and social (E&S) commitments relevant to the construction phase of the project. The measures cover environmental aspects (such as air emissions, biodiversity, and environmental contamination) and social aspects (such as protection of human rights, communication with local stakeholders, workplace, and community safety). This ESMP also provides an overview of the E&S management system implemented to ensure systematic and effective implementation of these commitments, including the division of roles and responsibilities between the PMO and the contractor.

The ESMP may be updated at the design and construction level as the project is implemented, to reflect the results of discussions with stakeholders and to include details of any further E&S developments.

Description of the project

Add a description of the project here. This description should be based on available documentation (e.g., technical design, project description, maps, aerial photographs) and visits to the project site. Under the headings below you will find topics relevant to your project. Please complete with project-specific information.

Summary of Site Assessment

- Are these greenfield sites (undeveloped land) or brownfield sites (previously developed land)?
- What is the land ownership status? Who owns the land to be used for the project (including informal/traditional users and land ownership rights, if any, conflicting land claims),
- How is the land currently being used (farming, grazing, forestry, not in use, vacant)?
- Provide a brief description of the environmental and social baseline and known/potential sensitivities. Are there any protected areas or sites of cultural significance nearby? Are there any Indigenous people living in the area? How far away is the nearest house / dwelling?
- Are there any other construction activities nearby?

- What is the area of influence of the project, i.e., the area in which the project itself and any associated infrastructure (e.g., water pipes) are located? This should be presented on a map if possible.
- Provide any additional information relevant to the context of the project.

Project activities

- Describe the type of activities planned, e.g., construction (e.g., housing, school, health post, clinic), infrastructure (water pipe, well, water points for livestock), small irrigation dam, small irrigation infrastructure, etc.
- Describe the activities to be carried out during preparation and construction, e.g., site grading, excavation activities, demolition of existing buildings, use of heavy equipment, construction of access roads and electrification, etc.
- Provide a project design plan (technical drawings n s) if available.

Stakeholders

- Indicate the names of the statutory bodies/authorities/departments involved in the project.
- Describe other local stakeholders, e.g., current landowners/users, communities, local decision makers, opinion leaders (traditional or formal).

Roles and responsibilities

The roles and responsibilities of the different stakeholders are explained in the ESMS. Please provide further details in the sections below.

The implementation partner

Please provide additional details on the responsibilities within the implementation partner. Who is responsible for the implementation of this ESMP? Who is responsible for monitoring? Who is responsible for overseeing the performance of the contractor in relation to E&S management and implementation of this ESMP?

Include a flow chart if available.

The service providers

Please provide additional details on responsibilities within the providers. Who is responsible for implementing this ESMP? Who is responsible for monitoring? Who is

responsible for overseeing the provider's performance with respect to E&S management and implementation of this ESMP?

Include a flow chart if available.

Communities

Please provide details of cooperation with the communities responsible for the project.

Other entities

Public authorities involved in the project must be informed about the ESMP and involved in its implementation. The responsibilities of these authorities should also be mentioned.

Training

All personnel working on the project should receive training on E&S topics as specified in the ESMS. For this purpose, please insert here a detailed training plan, especially for construction workers.

Project standards (national and international)

The management and mitigation measures described in this document (in particular in chapter 6) are aligned with international best practice standards for E&S risk management as defined in the LODA's respective Parts of its framework.

Please also add information in case a project has additional E&S requirements such as Development Partner (DP) requirements laid out in the contractual arrangement between the DP and LODA and/or the District.

Stakeholder involvement and grievance mechanism

The stakeholder engagement plan and grievance mechanism are defined in Part III - LACRPF of LODA's framework and will be applied in the ESMP of each project.

Please also add information in case a project has additional E&S requirements such as DP requirements laid out in the contractual arrangement between the DP and LODA and/or the District.

Register of E&S aspects

The generic table in the ESMP template presents all the E&S commitments that must be met by the contractor - supported by the PMO - during the project activities.

Insert site-specific ESMP tables here.

Monitoring of the ESMP

The monitoring mechanisms and processed are defined in LODA's ESMF introduction and will be applied for this ESMP.

Please also add information in case a project has additional E&S requirements such as DP requirements laid out in the contractual arrangement between the DP and LODA and/or the District.

Example of an ESMP monitoring table

Themes /Subjects Potential impact	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Monitoring / control procedure	Date of ESMP inspection/ review/ monitoring DD/MM/DD	
Health and safety in the workplace					**Conclusions / Observations**	**Corrective action**
…	…					
Ambient air					**Conclusions/ Observations**	**Corrective action**
…						

Colour code for conclusions / observations
Major non-compliance with ESMP requirements. Urgent action is required to protect the ecological and human environment and avoid risks to the project schedule.
Minor non-compliance. Action required but no immediate threat to the ecological and human environment or to the project schedule.
In accordance with the ESMP commitment.

Appendix 4 ESMP Monitoring Template

Table 2: ESMP Tables

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
A. General requirements for ESHS management				
Responsibilities and obligations	Ensure that all workers, suppliers, and potential subcontractors are aware of and comply with the ESH&S requirements and specifications of this ESMP.	Induction training completed and recorded. Contracts with subcontractors and suppliers	Work Contractor / Supervisor / District	Review of training records Review of contracts to ensure that project requirements are included
	Adjust this ESMP to the specific project, define the frequency of the monitoring procedure and transmit it to the PMO and the Facility. Verify if additional management plans are required	Final project specific ESMP	Work Contractor / Supervisor / District	Review prior to finalization of the project-specific ESMP

25 Reminder: ESMP elements in bold and underlined type should always be considered, regardless of the outcome of the site assessment.

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
Resources allocated to ESHS management	Assign managers[26] ESHS and define requirements and responsibilities. Stakeholder Contact Officer (Relationship Officer or Community Liaison Officer)	Final project specific ESMP Inform the competent authorities of the ESHS manager	Work Contractor / Supervisor / District	Review prior to finalization of the project-specific ESMP
Reports	Reports on progress and incidents, accidents, sightings, near misses	Final project specific ESMP ESHS Incident Reporting Protocol	Work Contractor / Supervisor / District	Review prior to finalization of the project-specific ESMP
Code of Conduct	Establish a code of conduct taking into account legislation, safety regulations, substance abuse, environmental sensitivity, communicable diseases, gender issues (sexual harassment), respect for local beliefs and customs, community interactions, etc.	Code of conduct in place and rules shared with staff (see Appendix A)	Work Contractor / Supervisor / District	Review of Code of Conduct induction materials Review of reported punishable or objectionable behaviour Review of grievance files

26 Note: In many jurisdictions, an EHS manager is required at sites employing 50 or more workers

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
EHS training	Provide staff (including indirect workers) with health and safety orientation and training and make them aware of health and safety risks and mitigation measures appropriate to the scope of the project.	Training completed and recorded	Work Contractor / Supervisor / District	Review of training records
B. Protection of the environment				
Protection of adjacent areas	Restrict excavation activities during periods of heavy rainfall. Use temporary containment to reduce the risk of sediment, oil, or chemical spills to receiving waters.	No excavation during heavy rainfall	Work Contractor / Supervisor / District	Check weather forecasts and inspect site conditions prior to excavation
	Excavating in cut ditches to prevent water from entering the excavation.	Water does not enter the excavations	Work Contractor / Supervisor / District	Random site inspection

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Ensure that safeguards are in place to avoid or minimize adverse effects on vegetation, soils, ground and surface water, biodiversity, natural drainage, and water quality in the construction area Construction methods to minimize impacts as much as possible.	No impact identified in the adjacent environment	Work Contractor / Supervisor / District	Regular monitoring of adjacent natural resources
	Ensure that site approaches and boundaries are in accordance with pre-agreed plans. All construction activities should be carried out within boundaries.	Boundary marking and use of warning signs	Work Contractor / Supervisor / District	Inspection of the site before the start of activities.
	Take care to avoid the surrounding wetlands.	Pre-work survey to ensure that the site is not in a wetland	Work Contractor / Supervisor / District	During site selection
	Keep away from permanent watercourses and outside flood zones; sensitive urban services and buildings (health centre, school, water supply for the population); all housing;	Signage of work site boundaries and use of warning signs	Work Contractor / Supervisor / District	Inspection of the site before the start of activities.

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	After construction, form a reshaped site so that it is inherently stable, well drained, and suitable for the desired long-term use of the land and allows for natural regeneration of vegetation	Visual inspection and comparison with adjacent undisturbed areas	Work Contractor / Supervisor / District	Regular monitoring
	Minimize visual impacts	Visual inspection and comparison with adjacent undisturbed areas.	Work Contractor / Supervisor / District	Review of grievance files
Selection of Borrow Areas, Backfill Storage Sites and Access Road	Select borrow areas or areas to be excavated, backfill storage locations and access roads, if required, for the project.	Selected Designated Areas	Work Contractor / Supervisor / District	Once during site selection
	Locate storage areas in areas where trees can act as buffers to prevent dust pollution	Selected Designated Areas	Work Contractor / Supervisor / District	Once during site selection
	Dispose of excess material in areas approved by local authorities	Selected Designated Areas	Work Contractor / Supervisor / District	Once during site selection

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Locate the landfill site on low-value land	Selected Designated Areas	Work Contractor / Supervisor / District	Once during site selection
Pollution prevention	Ensure that all work carried out minimizes the risk of pollution (e.g., liquid effluents, air emissions, noise and vibration management, vehicle and equipment maintenance and selection, fuel, oil and chemical storage and handling), throughout the life of the project.	Ensure that potential pollutants are not stored and handled within 50 m of sensitive receptors (especially waterways).	Work Contractor / Supervisor / District	Regular site inspection Review of grievance files
Effluents	Ensure proper containment and storage of construction wastewater, including sanitary water. No untreated effluent is released.	No discharge of untreated wastewater	Work Contractor / Supervisor / District	Regular site inspection Review of grievance files
Emissions and dust	Use technically appropriate vehicles wherever possible. Provide emission control equipment (e.g., filters) where appropriate.	Data sheet	Work Contractor / Supervisor / District	Prior to the start of work and whenever new equipment/vehicles are used on site Review of grievance files Regular visual inspection

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Use low-sulphur fuels in accordance with the legal provisions in force and local availability.	Data sheet	Work Contractor / Supervisor / District	Regular inspection of documents
	Ensure that vehicles are stopped when not in use. Educate drivers	Engines off	Work Contractor / Supervisor / District	Site inspection
	Best practice to ensure minimization of dust emissions (e.g., proper storage, watering, etc.) in dry and windy conditions and during transport.	Watering carried out, no dust emissions observed, no complaints from workers	Work Contractor / Supervisor / District	Regular site inspection Review of grievance files
	Avoid night-time operations and vehicle movements	No work done between 10pm and 7am No grievances received	Work Contractor / Supervisor / District	Random site inspection Review of grievance files Review of accident/incident records Review of training records
Noise and vibration	Define traffic speed limits. Raise driver awareness.	Speed limit signs Driver training records for induction training	Work Contractor / Supervisor / District	Random site inspection Review of grievance files Review of accident/incident records Review of training records

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Locate stationary equipment (such as electrical generators) as far away as possible from nearby receptors (e.g., worker rest areas, populated areas, and environmentally sensitive areas). Ensure that noise levels do not exceed 120 dB when using equipment or vehicles.	Distances are maintained between the equipment and the receivers	Work Contractor / Supervisor / District	Once before the work begins Monitor noise levels when using equipment Review of grievance files
	Identify waste management facilities and waste management providers. Ensure waste disposal by waste management providers authorized to treat / dispose / recycle each type of waste	Waste management, if possible, by approved service providers Waste management contracts Waste transfer notes	Work Contractor / Supervisor / District	Inspecting waste management facilities Evidence of provider accreditation Review of waste transfer files
Waste Management	Ensure that all waste produced is properly collected, sorted, stored, transported, and treated	Existing waste collection areas Waste inventories Waste transfer notes	Work Contractor / Supervisor / District	Random site inspection Review of waste inventories Review of waste transfer files

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Minimize waste production wherever possible.	Records are kept on waste generation Waste management plan Training completed and recorded	Work Contractor / Supervisor / District	Monitor (e.g., monthly) the amount of waste produced Review of training records
	Document all waste-related operations (type of waste, quantities produced, etc.).	Storage, transport, and treatment of waste are documented Waste transfer notes Waste inventories	Work Contractor / Supervisor / District	Review of waste transfer files Review of waste inventories
	Proper and safe storage of fuels, construction materials, waste materials and any materials that may cause spills (e.g., batteries from power generators).	Safe storage of materials Spill Response Procedure Spill response and remediation equipment is in place	Work Contractor / Supervisor / District	Random site inspection
	Minimize waste production wherever possible.	Records are kept on waste generation Waste Management Plan Training completed and recorded	Work Contractor / Supervisor / District	Monitor (e.g., monthly) the amount of waste produced Review of training records

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
Clearing of vegetation	Limit vegetation clearing to areas within the site boundary to what is absolutely necessary	Minimal clearing of vegetation Boundary marking of construction sites	Work Contractor / Supervisor / District	Inspection of the site before the start of activities.
	Describe vegetation clearing methods. Ensure that no chemicals/pesticides are used, that burning of vegetation is limited, etc. Do not clear vegetation more than two months before operations	No use of fire or chemicals on site Marking the boundaries of work sites. Use of warning signs	Work Contractor / Supervisor / District	Inspection of the site before the start of activities. Site inspection during site clearance
	Avoid clearing mature trees and endangered species	No mature trees removed	Work Contractor / Supervisor / District	Inspection of the site before the start of activities.
Biodiversity	Avoid, as far as possible, areas of ecological value.	Areas of ecological value are avoided	Work Contractor / Supervisor / District	Site assessment prior to site selection. Ecological value assessment, if required.
	Avoid disturbing natural habitats.	No habitat disturbed	Work Contractor / Supervisor / District	Inspection of construction practices.

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
Erosion control measures	If construction takes place on sloping surfaces/slopes, ensure that preventive erosion control measures are applied (e.g., tree and other vegetation conservation plan, use of natural contours for roads and drainage systems, excavated drainage channels).	Temporary and permanent preventive erosion control measures in place Landscaping and bioremediation plan in place	Work Contractor / Supervisor / District	Random site inspection to verify that measures have been implemented
	Ensure that the topsoil is stripped and stored properly. This topsoil will be used to restore the area after construction. The topsoil should not be mixed with the subsoil and should be stored separately	Topsoil stored and reused for restoration.	Work Contractor / Supervisor / District	Monitor whether topsoil is properly stripped and stored
	Optimal stacking	Height of the pile / stacking limited	Work Contractor / Supervisor / District	Random site inspection
Site remediation	Where possible, re-vegetate and restore cleared areas with native species after construction	Revegetation completed	Work Contractor / Supervisor / District	Single inspection after construction

Element[25]	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Ensure that rehabilitated areas do not present health and safety hazards (such as holes, ponds).	Reintegration completed	Work Contractor / Supervisor / District	Post-construction inspection Inspection after heavy rain and snow
	Reintegration of the construction site as soon as possible after the end of construction activities	Reintegration completed	Work Contractor / Supervisor / District	Single inspection after construction Inspection after heavy rain and snow
	Reclaim borrow areas, backfill storage sites and access roads as required	Rehabilitation / refurbishment completed	Work Contractor / Supervisor / District	Single inspection after construction Inspection after heavy rain and snow

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
C. Hygiene / Health and Safety				
Health and Safety Plan	Develop a health and safety plan.	Health and safety plan in place	Work Contractor / Supervisor / District	Review of the H&S plan

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
Accident Report	Ensure that all health and safety incidents (e.g., observations, accidents) on site are properly recorded and tracked. (See Appendix C - Incident Report)	Incident reporting process in place	Work Contractor / Supervisor / District	Check accident/incident records
Personal protective equipment	Ensure the provision of personal protective equipment (PPE) for workers (helmets, masks, safety glasses, safety boots, etc. depending on the type of project)	PPE used by all on site Training completed and recorded	Work Contractor / Supervisor / District	Random site inspection Review of training records
Prevention of emergency scenarios	Ensure immediate clean-up of any spills and post-construction remediation of contaminated areas	Trained workers The Emergency Response Team (ERT) is in place[2].	Work Contractor / Supervisor / District	Random site inspection after a spill Single inspection after construction Review of training records Review of the EIA
	Provide the necessary equipment and prevention teams on site in accordance with applicable regulations to respond to emergency scenarios, e.g., fire, explosion, flooding, natural hazards, etc.	Equipment and prevention teams are in place Training completed and recorded	Work Contractor / Supervisor / District	Regular site inspection Review the equipment list Review of the EIA Review of training records

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Maintain high standards of on-site maintenance. Construction materials and light equipment must be stored properly.	Visual verification of proper maintenance on site	Work Contractor / Supervisor / District	Random site inspection
ENEX / Hazardous Materials Removal	Ensure that ENEX clearance / hazardous and noxious material clearance, as applicable, has been completed and approved prior to commencement of work. Where appropriate, clearance work should be accompanied by awareness raising/training of community members on emergency preparedness in the event of the discovery of other hazardous and noxious ENEX / materials. (See Annex D of the ENEX Removal Form)	Clearing documentation Training records	Work Contractor / Supervisor / District	Random site inspection Review documentation and training records
First Aid	Ensure minimum first aid supplies on site (properly stocked first aid kits; one person or a sufficient number of first aiders) and ensure that staff and workers are informed about the first aid organization)	Appropriate first aid/emergency kits on site Ensure first aiders are present for all work crews/shifts First aid certificate	Work Contractor / Supervisor / District	Regular check of first aid kits First Aid Certification Examination Review of the number of first aiders required by local legislation

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
Access to health care	Ensure that the workforce has access to primary health care on site by providing prescriptions and immunizations.	Health care available on site Medical follow-up files	Work Contractor / Supervisor / District	Random site inspection Review of grievance files Review of medical records (if not confidential)
	If there are more than 35 workers on site, ensure that a hospital, medical clinic, or health centre can be reached within 45 minutes	Medical centres near the site	Work Contractor / Supervisor / District	Medical centres in the vicinity of the site identified once before the start of the work
Hygiene, accommodation, and catering	Ensure the provision of health and safety (H&S) and sanitary facilities on site, including shaded wellness areas, bathrooms, changing rooms and drinking water. Ensure separate toilet and changing facilities for men and women.	Appropriate H&S and sanitary facilities provided on site	Work Contractor / Supervisor / District	Inspection of the camp prior to the accommodation of the workers Regular inspection Review of grievance files
	Ensure the provision of adequate space, water supply, adequate sewage and garbage disposal, adequate protection from heat, cold, damp, fire and disease-carrying animals, adequate sanitation and washroom facilities, adequate lighting, and basic medical services, in accordance with all applicable health and safety regulations and standards	Appropriate conditions for workers on site	Work Contractor / Supervisor / District	Inspection of the camp prior to the accommodation of the workers Regular inspection Review of grievance files

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Report the occurrence of any communicable diseases among the workforce (STDs, HIV/AIDS, tuberculosis, malaria and hepatitis B and C). Raise awareness among workers	Communicable Disease Registry Training completed and recorded	Service provider / PMO	Review of disease registry and disease prevention project, if available Review of training records
D. Work and relations with local communities				
Working conditions	Ensure compliance with minimum legal labour standards in accordance with ILO regulations (child/forced labour, sexual abuse, non-discrimination, equal opportunities, working hours, minimum wage).	Grievance Process Files Training completed and recorded	Work Contractor / Supervisor / District	Review of inspection reports (also from labour authorities) Review of grievance files Review of training records
	Ensure that all direct and indirect workers have access to the grievance mechanism and are aware that they can file workplace grievances anonymously (See Sub-Appendix B - Grievance Mechanism)	Grievance mechanism in place and grievances on record Training completed and recorded	Work Contractor / Supervisor / District	Review of the Grievance Register Review of training records

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Ensure that all workers have the same rights and are treated equally	Non-discrimination policy in place	Work Contractor / Supervisor / District	Random site inspection Review of the Grievance Register
Local recruitment	Ensure that local communities are prioritized for the provision of goods and services to the project and project staff, as appropriate	Local procurement and employment issues	Work Contractor / Supervisor / District	Review procurement and employment rules and records Review of the Grievance Register
Transport	Organize carpooling/buses for worker transportation as needed.	Carpool/bus used	Work Contractor / Supervisor / District	Review of the Grievance Register
Community Interaction	Involve/communicate with/inform communities. Ensure consultations with local authorities and communities regarding construction. Obtain local information regarding incidental findings and land acquisition issues.	Minutes of meetings Grievance mechanism	Work Contractor / Supervisor / District	Review of the Grievance Register Minutes of consultation meetings
	Establish an effective grievance mechanism to allow potentially affected individuals to raise their concerns	Grievance mechanism in place and grievances on record	Work Contractor / Supervisor / District	Review of the Grievance Register

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
	Ensure that local communities are prioritized for the provision of goods and services to the project and project staff, as appropriate	Local procurement and employment issues	Work Contractor / Supervisor / District	Review procurement and employment rules and records Review of the Grievance Register
Damage to persons and property	Ensure that all Contractors apply codes of conduct regarding employment and labour behaviour (including, but not limited to, safety rules, zero tolerance for substance abuse, environmental sensitivity of the area, dangers of sexually transmitted diseases and HIV/AIDS, gender equality and sexual harassment, respect for people's beliefs and customs, and community relations in general).	Code of Conduct (see Sub-Annex A of this Code) Grievance Process Files	Work Contractor / Supervisor / District	Interviews with workers, Review of the Grievance Register
	Ensure site areas are secure, have access restrictions, signage, and appropriate lighting. Use warnings/danger signs/safety barriers to protect children and other vulnerable people from harm and prevent access by non-workers.	H&S site planning done; elements installed	Work Contractor / Supervisor / District	Pre-activity inspection Random site inspection Review of the Grievance Register

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
Land acquisition and occupancy	Avoid occupation of formal and informal landowners' land to the extent possible. If land occupation is unavoidable, no forced evictions should take place. Owners should be compensated before they access the land. Reach out to the community to understand land ownership and use.	Grievance mechanism Management plan for land acquisition and compensation, if required (see Sub-Appendix F)	Work Contractor / Supervisor / District	Once during site selection Review of the Grievance Register Monitoring of the land acquisition/compensation process
Traffic management	Ensure that project staff adopt safe driving and behaviour on the road (e.g., through training/induction)	Driver training records for induction training	Work Contractor / Supervisor / District	Review of training records
	Target signage and outreach activities to increase public awareness of traffic changes and potential hazards to high-risk sections of public roads, particularly near the site and disposal areas.	Warning signs Minutes of meetings	Work Contractor / Supervisor / District	Inspection of traffic lanes Review of the Grievance Register

Element	Mitigation, management, and enhancement measures	Means of verification	Responsibility	Control / monitoring procedure
Fossils / Archaeological Incidental Finds	Establish specific procedures to manage the protection of archaeological and historical sites, chance finds and fossils. Ensure that all cultural heritage finds (e.g., graves, old ceramics, fragments of ancient buildings, etc.) are immediately reported to the competent authority and avoid excavation in the immediate vicinity of an incidental find, fence off the incidental find and await instructions from the competent authority	Records of notifications to the competent authority Training records, Incidental Finds Files	Work Contractor / Supervisor / District	Site inspection

Appendix 5: Incident Reporting Template

Incident Reporting Template	
General Information	
District	
Project Name	
Name of Contractor Company and subcontractors	
Name, position, and company of main person(s) involved with/ causing the Incident	
Details about Accident/ Incident	
Date and Time of Incident	
Location of Incident	
Type of Incident	*E.g., Fatality, Injury, major oil spill, social unrest, outbreak of violence, labour strikes etc.*
Detailed Description of Incident (attach photos if needed)	*Describe in detail what has happened in a chronological manner. Who was involved? Which activities were performed? Under which external circumstances did the incident occur? What was the reason for the Incident? Etc.*
Describe victims and damage	*Fatalities (including number deceased and differentiating between employee/ contractor fatalities and members of the public).* *Number injured (mention hospitalisations/ loss of limb).* *Number of injured in the community (if any).* *Loss/ damage to company facilities or operating environment.* *Environmental damage (e.g., water pollution).*
Describe immediate response	*Which immediate activity was taken? E.g., Construction activities interrupted, first aid given, injured person taken to hospital, police informed, task force implemented etc.*

Describe long-term response	*Describe long-term activities to prevent this incident to happen again. Describe further investigations if any. Describe how lessons learned will be shared among employees.*		
Incident Report Approval			
	Position	Name	Date
Prepared by			
Approved by			

Appendix 6: Complaint Form

Date:	COMPLAINT FORM	

SECTION 1: COMPLAINANT DETAILS (if wished a grievance can be filed anonymously)

Grievance No:	Date Submitted:	EHSC Manager Notified? Y / N	Target Date for Resolution:
Name:			
Address and Contact Details:			
Complaint received by:			
Name of Complaint Coordinator:			
Description of Grievance:			

SECTION 2: REMEDIAL ACTIONS

Action	Who	When	Completed (Y/N & Date)
Response/Resolution:			

Strategy to communicate Response:			

SECTION 3: CONCLUSION

Complainant satisfied ? Y / N **Comments :**	**Complaint closed?** **Y / N**	**Date :** **Signature (District and Complainant):**

Appendix 7:
Chance Finds Procedure

Date:__/__/____	COMPLAINT FORM	

SECTION 1: COMPLAINANT DETAILS (if wished a grievance can be filed anonymously)

Grievance No:	Date Submitted:	EHSC Manager Notified? Y / N	Target Date for Resolution:
Name:			
Address and Contact Details:			
Complaint received by:			
Name of Complaint Coordinator:			
Description of Grievance:			

SECTION 2: REMEDIAL ACTIONS

Action	Who	When	Completed (Y/N & Date)
Response/Resolution:			
Strategy to communicate Response:			

SECTION 3: CONCLUSION

Complaint satisfied ? Y / N **Comments :**	**Complaint closed?** **Y / N**	**Date :** **Signature (District and Complainant):**