Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 03/23/2020 | Report No: ESRSC00466
# BASIC INFORMATION

## A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Rwanda</td>
<td>AFRICA</td>
<td>P165017</td>
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**Project Name**: Rwanda Urban Development Project II

**Practice Area (Lead)**: Urban, Resilience and Land

**Financing Instrument**:

<table>
<thead>
<tr>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
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<tbody>
<tr>
<td>Investment Project Financing</td>
<td>4/13/2020</td>
<td>7/15/2020</td>
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**Borrower(s)**: Ministry of Finance and Economic Planning (MINECOFIN)

**Implementing Agency(ies)**:

- Ministry of Infrastructure (MININFRA), Local Administrative Entities Development Agency (LODA), Rwanda Environmental Management Authority (REMA), City Administration of Kigali

### Proposed Development Objective(s)

To strengthen urban management and improve access to sustainable infrastructure and services in the City of Kigali and the six secondary cities of Rwanda

### Financing (in USD Million)

<table>
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<tr>
<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
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## B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

## C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project aims to strengthen urban management in the City of Kigali (CoK) and six secondary cities (Huye, Muhanga, Musanze, Nyagatare, Rubavu and Rusizi) by providing support to the restructuring of the CoK and the establishment
of the proposed City Management Unit (under review by the Cabinet) in secondary cities in strengthening core urban functions such as spatial and economic planning, revenue and expenditure management, and capital investment planning and project management, and operation and maintenance. Stronger urban management will be instrumental for delivering improved basic infrastructure and services in the participating cities, including urban roads, storm water drainage and unplanned settlements upgrading.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The project is a follow-up operation of the already on-going RUDP I project (Rwanda Urban Development Project (P150844), with additional activities for wetland reclamation/restoration, flood control and urban planning. RUDP II will support: i) basic urban infrastructure (roads, drainage works, footpaths, street lighting) in six secondary cities (Huye, Muhanga, Musanze, Nyagatare, Rubavu and Rusizi) and in the City of Kigali (CoK), including here flood control works; ii) restoration of modified/urban wetlands and recover them to support the greening urban strategy of Rwanda with support of the GEF 7 funding; iii) technical assistance for urban planning, waste management, among other topics.

Social: The project sites in the six secondary cities are characterized by a concentration of residential and commercial buildings, including informal settlements. The percentage of people living in an informal settlement is 60% in Nyarugenge, 36.6% in Musanze, 14.7% in Huye, 13.4% in Muhanga, 8.7% in Rubavu and 4.3 in Rusizi District respectively. The urban poverty rate is high in Nyagatare with 37.1%, Rubavu 35.5%, 28.6% in Musanze and low in Nyarugenge District with 10.1%. The six secondary cities generally have few urban roads estimated at 25% on average paved.

Environment: Rwanda is characterized by the geography of hills, high slopes, wetlands, and valleys. The land is vulnerable to erosion and flooding. The urban areas of Kigali are mostly degraded. More natural vegetation is found in the rural areas of the six cities. Wetlands have been declared of national interest in its protection and restoration; in the City of Kigali, wetlands have been degraded due to their conversion in agricultural land and intensive urban development.

The urban works will be developed in different villages and neighborhoods (some are not yet selected) 1-Kigali which holds about 10% of the country population and some of the main environmental issues includes water and air pollution, solid waste and soil erosion. The city is committed to implementing a green growth path and important efforts in passing regulations to ban the use of plastic and protect wetlands is helping to improve environmental urban management.

2- Six secondary cities (Huye, Muhanga, Musanze, Nyagatare, Rubavu, and Rusizi) where environmental issues are: drainage, water pollution, and erosion. The natural vegetation in most cases has disappeared and has been replaced by crops and exotic species (eucalyptus, pinus, palms).

Wetlands proposed for restoration under the GEF7 - Sustainable Cities: the location of the actual remediation works has not yet been selected. The remediation of the wetlands will include restoration ( revegetation, flow improvement, increase infiltration, red

1-Nyabugogo: The Nyabugogo wetland (located around Kigali City) has been converted largely into agricultural land (plantains, cassava, avocado, etc.) of local communities. The natural flow regime of the river and tributaries have been
changing and control (by dams, bridges, culverts). There are isolated patches of natural vegetation (Cyperus papyrus, bamboo) that sustain local biodiversity. The area receives all kinds of untreated wastewaters, including those from industrial areas. Several studies have found high concentrations of heavy metals what makes the use of the water no suitable for agriculture or drinking.

2-Gikondo: This wetland was converted to an Industrial informal Park which covers around 30% of the Gikondo valley. The area has an industrial, residential and commercial building that lacks proper waste disposal mechanisms and sewage treatment. The presence of point source of pollution, drainage issues, demolition debris, old pipelines, hazardous and industrial waste will be considered in the ESIA before the wetland restoration plan is designed and implemented. The government has initiated a resettlement plan and currently, the industrial park is been relocated to another area.

D. 2. Borrower’s Institutional Capacity

The implementation arrangements of the project include several agencies at the national and district levels:

**National Level**
- The Ministry of Infrastructure (MININFRA) and Rwanda Housing Authority (RHA) are the institutions in charge of urban development, planning and housing. MININFRA has two environmental and social specialists in the Division of Urbanization, Human Settlement, and Housing Development but it is not sure their participation yet in the project.
- Ministry of Local Government (MINALOC) and the Local Administrative Entities Development Agency (LODA) jointly provide institutional and financial support to local governments (Districts).
- LODA current Project Implementation Unit (PIU) for the RUDP I project will continue in the RUDP II. LODA has one environment and social specialist working in the RUDP I project. LODA has experience working with the Bank and is currently implementing four bank funded operations following the safeguards policies.
- Ministry of Environment (MoE) - REMA is the National Environmental Agency. They will coordinate with the CoK the implementation of the GEF component and the flood control activities.

**Rwanda Water Resources Board**- the agency in charge of flood control. REMA and RWB have no experience in the ESF of WB safeguard policies.

**Cities- district level**
- Districts have staff with the role of environmental officers, however, there is no position of a social specialist at the District level. Environmental officers are in charge of several duties and projects. The project will involve them in the supervision as much as they can and the project will hire one professional to work as a combined environmental and social specialist (full time) for the project implementation.
- CoK has assigned a social specialist for the project preparation and has promised to recruit full-time environmental specialist. The Districts and CoK have experience working on various bank funded operations.

Some of the lessons learnt during the implementation of the current RUDP I project are:

1. Upgrading works of unplanned settlement in Agatare area in CoK, experienced significant challenges associated with expropriation and compensation from 2018 until now.
2. Securing the budget for expropriation has been and continues to be a challenge to CoK and the same for the secondary cities and will also be for the new project. With expansion of new works in informal settlement in the same secondary Cities, this challenge is likely to continue for this project.
3. There is a need for closer coordination between the procurement and environmental and social teams of the implementing agencies with fiduciary responsibilities to ensure the environmental and social assessments are prepared ahead of tendering processes.

4. A high number of unexpected damages were caused to houses during road construction especially while compacting the roads/vibration and excavations. Contracting clauses are needed to ensure the obligation of the contractors for repairing the impacts/damages caused to properties.

5. Cumulative impacts on the environment and people, project constructions across the seven cities have not yet been considered and will be considered in RUDP II.

6. Supervision and monitoring records are on paper and found mostly at the district. RUDP II will support new tools like those been applied in transport projects in other regions where IT tools are helping in supervision.

7. Application of Environmental/Social instruments is not consistent across many contractors’ construction sites/districts/agencies. Under RUDP II, all implementing agencies and Districts will be trained in the new ESF and in the ESF instruments prepared for the project.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)  

Environmental Risk Rating

Substantial

The project Environmental rating is Substantial because of the following reasons:

- The project will support a large number of civil works dispersed in 7 cities in populated urban areas (with informal communities, high vehicle traffic, cyclists transit, and high pedestrian presence).
- The limited experience of the seven cities in the application of the new Environmental and Social Framework (ESF) and the high coordination that will be needed for proper supervision.
- The high number of stakeholders that will be affected from urban and rural communities (due to the civil works to be undertaken in front of their houses) and drivers and pedestrians from unknown areas that will be exposed to potential collisions, transit changes, accidents or falls in public areas (sidewalks, roads).
- The challenges to manage many different contractors in different cities and at the same time to supervise compliance of the ESF instruments.
- Expected delays (which increase the exposure of people to impacts) and issues with contractors that try to avoid responsibility for fixing impacts caused by the works.
- The cumulative impacts local residents will experience within a community, a district or city (noise, water and electricity interruptions, damages of home entrances, etc).

Potential impacts: at the sub-project area level are related to (i) disruption of normal life in populated areas, ii) damages in public services (roads, water services, bus stations, access to schools, homes, etc in a period of time unknown), iii) waste generated at construction sites which can pollute land and water bodies (cement mixing areas, metal, wood and paint residues, diesel and other residues); iv) excavations, open ditches and slope cutting over long periods which can cause accidents to local residents; (v) cutting of slopes and sedimentation of streets, drainage, (vi) cutting of trees and damage to vegetation when debris or soils are pushed in slopes edges; (vii) road accidents; among others. The cumulative impact of the works and presence of contractors and machinery at each targeted district is unknown at the moment, careful supervision will be needed to avoid accidents and potential conflicts with the pedestrian, school children, urban areas and rural local communities. Other potential impacts at
Occupational Health and Safety (OHS): this will be challenging to monitor and enforce because: i) presence of different contractors in the same city with different approaches to manage OHS and the engineers and environmental officials in the district are few (often only 1 of each); ii) the ESF is a new instrument and there will a need to reinforced a culture of safety and maintaining records (accidents, injuries, emergencies). During the due diligence, the team will review carefully the implication of ESS2 and who will be responsible for medical attention or compensation when a worker suffers an injury or a fatal accident due to the construction. ESIA/ESMP to be prepared will include measures to address OHS aspects of the project and protocols to be enforced and complied with.

Regulations: Rwanda has an ample body of regulations to protect the environment and reduce pollution. However, wetlands have been much transformed in agricultural land and therefore biodiversity loss and waste management are issues, and despite regulations these habitats are affected by degradation. The participation of REMA and CoK authorities in the implementation of the wetlands component is very positive to increase engagement of government officials of the impacts urban development is causing on the wetlands remanents in the city, and support its remediation and monitoring plans.

The institutional arrangements and roles of each institution must be clearly defined for each component to avoid conflict and ensure project implementation following the ESSs. LODA will play an important coordination role for the overall project environmental, health and safety aspects.

Social Risk Rating

The project social risk rating (SRR) is substantial at this stage because, the potential adverse social impacts of the project and the associated mitigation measures may give rise to a limited degree of social conflict, harm or risk to human security through the potential substantial number of households to be affected with regard to resettlement. The proposed project plans to invest in urban informal settlement upgrading in all secondary cities and in the CoK. These activities are anticipated to affect high number of informal settlement dwellers in terms of involuntary resettlement to pave way for road and drainage construction. As a result, a significant loss of informal business and livelihoods is likely to result from the implementation of components 1 & 2 of the project. The project will try to minimize resettlement wherever possible especially during detailed engineering designs for the planned roads to be upgraded in the informal settlements under RUDP II. The experience of the borrower and the implementing agencies in dealing with complex projects such as informal settlement upgrade is limited which posses an implementation challenge. Experience from the implementation of RUDP I, with regard to the environment and social risk management, suggest capacity concerns that can be readily addressed through staffing and implementation support. The required staffing for PIUs will be further assessed during project preparation and proportionate mitigation integrated into the implementation arrangement to address potential social risks. Mobilization of the required compensation budget has been a challenge under RUDP I. This is anticipated to continue under RUDP II with the expected relatively high compensation budget required for informal settlement upgrade for CoK and the 6 Secondary Cities.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

*Overview of the relevance of the Standard for the Project:*
Following the ESF, the team has performed a due diligence assessment to determine capacities and the experience of the government to implement the project according to the ESS. The Bank team participated in preparation missions, performed field visits to current RUDP I constructions, review aide memories, Implementation Status Reports (ISR) and supervision reports of the ongoing RUDP I. The team also met with the counterparts provide training on the ESF and support the review of the ESF documents in preparation.

Project components
Subcomponent 1a: Integrated urban planning for resilient, inclusive infrastructure delivery - will support civil works for basic services (access streets, pedestrian walkways, drainage, streetlights) flood control (culverts, channels, and drains to increase drainage as well as suitable nature-based solutions (NBS) to increase infiltration) and potentially water supply sanitation, community centers, public parks, green spaces and local market improvements in four unplanned settlements of Kigali – Mpazi, Gatenga, Nyagatovu, and Nyabisundu).

Subcomponent 1b: Evidence-based, citywide flood risk management – GEF activities will support: i) the remediation of wetlands (nature-based solutions NBS) and flood risk reduction in the Gikondo valley and the Nyabugogo wetland; ii) stormwater management master plan for Kigali will integrate NBS with grey infrastructure, iii) assessment of flood hazard and vulnerability in Kigali under different urban growth and climate change scenarios, iv) monitoring system for rainfall, water level, discharge data and a high-resolution digital terrain model (DTM) CoK.

Subcomponent 2a: Infrastructure delivery and service delivery in secondary cities - will support basic services, upgrading of selected unplanned settlements in the secondary cities and community resilience six secondary cities– Huye, Muhanga, Musanze, Nyagatare, Rubavu, and Rusizi– (roads, drainage networks, pedestrian walkways, street-lighting, storm-water management, landslide protection, energy-efficient street lighting, flood mitigation and control, storm-water management, Technical assistance for planning, design and supervision social and environmental supervision and monitoring.

Subcomponent 2b: Institutional capacity development of secondary cities (US$ 4.0 million) will support: i) establishing and supporting City Management Organizations (CMO) and ii) strengthening urban planning, urban investment planning, and operations and maintenance functions).

Subcomponent 3a: Institutional capacity development at the national level (US$ 3.0 million) TAs to increase institutional and capacity building needs in the CoK and secondary cities. It will support: i) secondary cities to establish CMOs and make them functional through collaboration with other development partners, which can be jointly led by MINALOC and MININFRA; ii) Development of a CMOS’s roadmap that RUDP II can support, iii) TA under the housing policy to build on and expand investments in upgrading and potential sites and services under RUDP II, iv) national waste management strategy and greenhouse gas accounting and reporting framework for the CoK

Subcomponent 3b: Project management activities to be supported include project coordination, planning, fiduciary (financial management and procurement), safeguards compliance and monitoring, monitoring and evaluation (M&E), and communication and citizen engagement.

Component 4: Contingency Emergency Response in case it is requested by the government.
Potential Environmental
Direct, indirect and cumulative impacts of the project interventions will be generated due to:
Civil works: traffic disruption; noise and dust; sedimentation of streets and rivers because of slope cuts and soil excavations; cutting of vegetation, damages to house entrances, cracking of houses due to vibrations from operating heavy equipment, blasting or slope works, etc; workers and pedestrian accidents and injuries; rainwater accumulation affecting neighboring properties, solid waste generation, among others. Also, impacts related to camps, borrow pits, spoil areas, etc. Issues related to Occupational health and safety will require detailed plans. Also, the ESF instruments under preparation will use the World Bank’s Environmental, Health, and Safety Guidelines (EHSG).

Wetlands: most of the activities planned will be positive for recovering the structure and functions of wetlands; no exotic species will be supported only native species for restoration; water quality and flow must be improved to reduce the risks of water-borne risks (malaria, dengue, tse-tse);
Flood control: construction of culverts, drain, drainage can affect the rivers and wetlands ecosystems, a careful assessment of overlapping efforts with wetlands restoration should be considered in the ESIA/ESMP.
Technical Assistance: urban planning might consider the expansion of the city over current natural areas or wetlands areas. The environmental and social team of the project will review all proposed reports to add the green approaches to the TAs, ensuring that sensitive habitats are considered for protection or restoration (riparian areas for city parks), ensure green action plans are considered and mitigation measures.

Potential Social impacts
The impact may include acquisition of land for road expansion; temporary removal of access to properties (residences, shops, schools, markets etc); Prominent GBV risks associated with the target areas include public harassment, which may involve verbal insults and physical abuse of project workers by contractors. The women seeking employment under this project could likely exacerbate these risks as contractors tend to take advantage of those women seeking opportunities.

The project will include direct workers, contracted workers, primary supply workers, and government workers, which will, therefore, need to meet requirements for terms and conditions of employment, non-discrimination and equal opportunity, worker’s organizations, child labor, forced labor, a grievance mechanism.

Based on preliminary due diligence at the concept stage, the project will need to prepare prior to appraisal:
(i) An Environmental and Social Management Framework (ESMF) which will need to cover all risks and impacts associated with ESS1, ESS2, ESS3, ESS4, ESS6, ESS8, ESS10 and will define the scope for ESIA/ESMP for the individual subprojects.
(ii) Labour Management Procedures (LMP)
(iii) Resettlement Policy Framework (RPF) to guide the development of site-specific RAPs which will be prepared during project implementation;
(iv) Stakeholder Engagement Plan (SEP)
(v) Environmental and Social Commitment Plan (ESCP), will be agreed upon with the borrower and will set out the main measures and actions that will be required for the project to meet environmental and social requirements over the project implementation.
During project implementation, the implementing agencies will prepare for the subprojects ESIA/ESMP which will define the measures and protocols to be followed by the contractors to comply with the ESMF and subproject ESIA/ESMP. ESIA/ESMP will be completed prior to the preparation of bidding/tender documents (regardless if the process is post or pre-review), and the signing of contracts and commencement of civil works; In turn, the Contractor’s will prepare and present to the Government and the Bank for approval the Site-Specific Environmental and Social Management Plans (CSS-ESMPs) and RAPs that will respond to: i) the ESMF, ii) the ESIA and ESMP prepared for the subproject, iii) the SEP, LMP and ESCP and the iii) national EIA, labor, wetlands, etc. regulations.

**Areas where “Use of Borrower Framework” is being considered:**
The project will be using the ESF during project preparation and implementation. Use of Borrower's Framework for environmental and social management is not expected, and the Borrower's Framework will not be used in whole or in part for this project.

**ESS10 Stakeholder Engagement and Information Disclosure**
The project implementation is likely to involve several key stakeholders that include the following agencies: MININFRA, LODA, CoK, REMA, Districts.
- Other key government stakeholders for the project include; Rwanda Water Resources Board (RWRB), City of Kigali (CoK), Ministry of Emergency Management (MINEMA), Rwanda Land Management and Use Authority (RLMUUA), Rwanda Transport Development Authority (RTDA), Rwanda Water and Forestry Authority (RWFA),
- Local Districts of the secondary cities (Engineers, Accounting, Environment, water, Community offers).
- NGOs working in areas of wetland conservation, disability, gender-based violence, road safety community engagement, disability commission, and Gender Monitoring Office,
- Project Affected Households that could be resettled, squatters, community members around the project sites. Also the elderly, and women, business and workers in the informal sectors such as street vendors that might be economically-displaced persons,

The implementing agencies (MININFRA, LODA, REMA, CoK) will prepare and disclose a SEP as part of the project preparation and implementation. The SEP will design techniques for engagement, define protocols for consultation, identification of stakeholders for the ESIA, proposed potential Grievance Redress Mechanism (GRM) to be included in the ESIA. The SEP will build on existing community engagement platforms such as "Umuganda, Akagoroba kababye" among other fora to engage community members.

The stakeholders at the level of the villages and wetlands areas are yet to be identified. The location, nature, and scale of planned works has been tentatively identified only in a few areas of the 6 secondary cities and Kigali.

**B.2. Specific Risks and Impacts**

A brief description of the potential environmental and social risks and impacts relevant to the Project.

**ESS2 Labor and Working Conditions**
Workforce. Anticipated key labor risks and impacts are mainly associated with the planned construction works in the urban areas, wetlands, flood control works, etc. It is estimated that an important workforce will be required for the construction implementation of all project investments which is positive to provide jobs for men and women. A contract for a road can include several contractors and subcontractors. An estimate from LODA indicates that for 15 km of road rehabilitation a total of 13,000 workers are needed. The Majority of the unskilled workers will be sourced from the community members in the project sites and a few required skilled workers from outside of the project area. Based on the experience of RUDP I, labor camps and labor influx are not anticipated. Further details in the expected number of workers and potential working conditions will be described in the ESIA/ESMP to be prepared for packages of civil works per district.

Human Resources (HR) Policies and Procedures. The implementing agencies will prepare and implement human resources policies and procedures according to Rwanda’ Labor Legislation and the requirements of ESS2, specifically in ensuring workers’ rights to form and join workers’ organizations, and procedures for hiring and allow workers to express their grievances and protect their rights without retaliation.

Social risks. The contractors will recruit as per the guidance detailed in the LMP and in full compliance to Rwanda 2018 Labor law and the ESS2. Those to be recruited must have National Identification Cards (IDs) to qualify for employment, this will help to mitigate potential child labor. The client must provide appropriate measures for the protection of vulnerable project workers such as women and people with disabilities and care will be given to both categories to ensure inclusion.

Occupational Health and Safety. The implementing agencies will ensure that contractors provide a safe and healthy work environment, taking into account the associated risks in the project area and different classes of hazards in the construction areas, including physical, chemical, biological, hydrological, and specific threats to women. The Occupational Health and Safety Plan will address matters regarding the health and well being of construction workers, (ensuring first aid kits, medication attention and insurance coverage in case of accidents). ESIA/ESMP will include measures included in the LMP and request contractors to prepare specific construction ESMP to set Health and Safety plans, use of PPE, scaffolding standards, procedures under emergencies/accidents and work protocols to reduce risks of occupational health and safety in the different type of works to be implemented.

Instruments.
All individual hired by the project implementing agencies (national and at district), contractors, and subcontractors must comply with the ESS2, the LMP, ESIA/ESMP, ESCP prepared for the project, in relation to labor and working conditions including occupational health and safety, Code of conduct (CoK) and workers grievance mechanisms. Any technical consultants contracted by the project will also need to adhere to these instruments and this standard.

The Borrower is preparing a Labor Management Procedures (LMP) that will be required for project implementation and after ESIA/ESMP elaboration, the Borrower will prepare:

i) Labor and Worker management plan - it will describe how workers will be hired, managed, the available grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns;
ii) Workers Camps, Work Sites, Workers Accommodations Management Plan – it will describe the expected number of workers to be hired by contract, ensure women are hired with equal opportunities as men as required
under country regulations; install areas for sanitation, hand washing, changing cloth, resting and eating are provided to ensure the hygiene and dignity of workers.

iii) Occupational Health and Safety Management Plan to protect workers and promote safe and healthy working conditions in line with country regulations and ESS2.

iv) Security Management Plan- it is not sure at the moment if private security will be needed in the work sites. The project will have annual audits to review the specific HR processes and contracting practices for the project, the provisions, and application of the grievance mechanisms and occupational health and safety practices to ensure compliance with the requirements of the ESS2.

Tender documents and contracts will require contractors to comply with the agreed Labor and working conditions, occupational health and safety plans and procedures. Contractors will be requested to prepare Construction - Occupational Health and Safety Plans (COHSP) based on the measures described in the LMP, ESMF, ESIA/ESMP and the requirements of ESS2. The project and its contractors will ensure application of the World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines), Health and Safety Good industry practices (GIIP, such as OSHA) to minimize or reduce adverse impacts on human health and the environment.

The COHSP will include procedures on incident investigation and reporting, recording and reporting of non-conformity, emergency preparedness and response procedures and continuous training and awareness to workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

This policy is relevant to project interventions such as the construction of basic services civil works, flood control measures, wetlands remediation, waste management strategy, and urban planning.

Resource efficiency. The project and its contractors will implement effective measures for improving efficiency in its consumption of paper, energy, water, diesel, road materials, aggregates, as well as other resources and material inputs needed to construct the works to be supported by the project. It will also incorporate measures to reduce project-related GHG emissions during the construction and operation of the project. Organic soil will be preserved to be used in restoration activities in the urban areas. The use of IT tools can reduce the use of paper and improve efficiency in the supervision of multiple works and contracts. The Final ESIA/ESMP will define appropriate measures/protocols to be transferred in the tender documents to ensure resource efficiency in the project.

Pollution prevention. Due diligence process has identified various potential project impacts on air quality, water quality, solid waste, noise level, vibration, etc. During construction of civil works, some of the potential pollution impacts to be addressed include the contamination of soil, air, and water of neighborhoods, streets, streams, and wetlands due to excavations, slope conformation, drainage works, construction debris, runoff of cement, sand, gravel, etc. Contamination sources can be also hazardous substances such as diesel, gasoline, oils, etc needed for the contractor fleet.

In one of the wetlands (Gikondo) significant contaminant activities took place (the area was an industrial area with large garage areas with dismantled trucks, mechanic shops, cargo areas, etc.). In the other wetland (Nyabugogo), land
cultivation and urban drainage have potentially contaminated the sediments and water quality. It was agreed with REMA the undertaking of technical studies to determine the level of contamination and the potential areas to be used for remediation and public access. The ESIA/ESMP will define the potential alternatives for remediation of contaminated sites if needed.

Instruments. The project has prepared an ESMF which will guide the preparation of the ESIA/ESMP for the civil works in order to evaluate the impacts associated with pollution issues and resource efficiency. Appropriate measures to prevent, minimize, mitigate, manage and monitor resource efficiency, pollution and emissions during all phases of project development will be included in the ESIA/ESMP. Contractors will develop environmental management project-specific plans to ensure resource conservation and efficiency of resources; pollution prevention and control (including for hazardous waste); waste management procedures for the construction and operation phases of the project, consistent with national regulations and requirements of PS3, World Bank Group Environmental, Health, and Safety Guidelines (EHS Guidelines) to minimize or reduce adverse impacts on human health and the environment.

For the waste management strategy and urban master plans, during implementation a SESA will be prepared and the environmental and social management team of the project will guide its participation and will participate in its review of the proposals to ensure measures for proper zoning is considered, distance to natural areas, conservation of existing green spaces is ensured, restoration of riparian habitats is considered, actions plans to follow the national Biodiversity Strategy to comply with the country international agreements relevant to this project are considered, among others.

**ESS4 Community Health and Safety**

This standard is relevant to the project because of the potential impacts on local communities living in the project areas, but also to people who are users of roads, wetlands, health centers, schools that might face increased risks while driving/walking/farming in the intervention sites.

**Potential Risks/impacts.**

During construction, potential safety risks include: increase in road accidents due to an increased number of vehicles during the construction phase especially informal settlement where these have a large number of people walking/crossing the project sites. Other potential risks include; i) spread of communicable diseases due to the increased number of workers in small villages/project or in search of work; ii) contamination of water supplies (several people use water from the wetlands or near springs); fly rocks from trucks or excavations; damages to houses or house entrances increasing the risks to fall; conflicts between communities and workers or contractors. The project is not anticipated to contribute to significant labor influx in the project sites. However, potential community health and safety risks in the project sites such as the increase in crime, prostitution, gender-based violence (GBV), Child Labor and Violence Against Children and other related social risks are anticipated.

**Hazardous Materials Management and Safety.** The ESMF will include measures to be further defined in the ESIA/ESMP to reduce risks/impact during construction due to generation of hazardous waste by applying best measures to avoid burning of wastes, exposure of wildlife to hazardous and contaminated waste, store and transport
hazardous materials (fuel, oils, paints), reduce noise and vibration (for fauna and people) and reduce contamination of soil, air, and river ecosystems in order to avoid accidents, fires, spills, and explosions. A specific protocol will be prepared in the ESIA/ESMP to describe acceptable methods for contractors for mechanical excavations (no blasting will be allowed), transport of materials to the project site and out of the project site (debris, equipment, diesel), waste collection and disposal (to ensure public health, reduce the attraction to animals), among others.

For use and operational stage, roads need to be well-marked (horizontal and vertically) with traffic signs according to national or international standards to ensure public safety, safe driving and pedestrian safety. Very important will be to include velocity reductor ahead of community’s centers (schools, churches, markets, bus stops, etc); drains and culverts will need to have proper slope and energy dissipators to reduce water erosion of downstream river or properties. Operation and maintenance arrangements for financed works will be discussed with the government and technical team to ensure sustainability and safe use of the works/investments.

Security Personnel. At this stage is not clear if the project will hire security personnel. In case this type of services are contracted, the ESMF will include acceptable measures and protocols for their participation in the project to ensure they are not implicated in past abuses, have received training and will apply agreed protocols to maintain appropriate conduct toward workers and Affected Communities; and adhere to country regulations. Issues pertaining to the management of security personnel will also be appropriately specified in line with country regulations, ESS4 and other World Bank requirements. The ESIA/ESMP will describe a grievance mechanism for Affected Communities to be able to express concerns about the security arrangements and acts of security personnel.

Infrastructure and Safety. No works connected to dams controlling the river flow of the Nyabugogo will be supported. Thus, the project does not need to consider dam safety risks to the communities.

Instrument.

The ESMF and LMP will include prevention/mitigation measures and protocols to guide the preparation of the ESIA/ESMP to reduce the risks and other potential community health and safety identified during the project preparation. The ESIA/ESMP will contain a Community Health and Safety Plan that will include measures to ensure social safety to communities through (Codes of Conduct, HIV Sensitization/Measures); road safety plan (transport of materials/road signs/visibility at night of hazard areas); Emergency Preparedness Plan that include procedures to respond to accidental leaks, spills, emissions, fires, and other unforeseen impacts (including natural disaster events such as landslides, unstable terrain, seismic activities, floods). The Safety and Emergency Response Plans will also include procedures to respond to accidental leaks, spills, emissions, fires, and other unforeseen events. Contractors will implement all these plans.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project will involve civil works in road construction as part of informal settlements upgrading in six secondary cities and in the three Districts of the City of Kigali. These activities will involve land acquisition and involuntary resettlement. The experience from RUDP I especially informal settlement upgrade in the Agatare Area of Kigali City, which commenced in 2018 has faced tremendous delays in implementation due to compensation. Securing the budget for compensation was a challenge in Agatare informal settlement upgrade and the project should draw
lessons from this experience to better plan and secure the required compensation budget on time to avoid unnecessary implementation delays. Where possible, the detailed designs, especially for roads, should minimize resettlement by adapting flexible road designs in informal settlements and in densely populated areas in the urban areas without compromising road safety.

The client will prepare RAPs during implementation to address the risks mentioned under this standard. The client will prepare an RPF that will guide project implementation and this will be disclosed prior to the appraisal.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
This standard is relevant because the project might affect negatively and positively natural, critical and modified habitats. Rwanda is home of many different endemic, migratory, vulnerable and endangered species. The project in general is not anticipated to cause large impacts on biodiversity but in the project areas such as the urban areas, modified habitats still include small patches of natural vegetation, streams and wetlands which become refuge for many species. In the wetlands, natural vegetation is characterized by the presence of Cladium sp., Typha sp., Cyperus latifolius, C. papyrus, Echninochloa pyramidalis, among others. According to IBAT, in the project area of City of Kigali and the wetlands which are part of the Nyabarongo River basin, the following species could be found, Critical endangered, Labeo victorianus (Ningu); Endangered: Ardeola idea, Bradopterurus graueri, Carpha angustissima, Balearica regulorum; Vulnerable: Agriocnemis palaearctica (Papyrus wisp), Calamonastides gracilirostris (Papyrus yellow warbler), Genlisea angolensis, Hirundo atrocaerulea, Rotala fontinalis, Synodontis ruandae; Near Threatened: Laniarius mufumbiri, among others.

Some of potential risks associated with the project are related to contamination that civil works can produce (noise, sediments, clearing of vegetation, waste disposal, etc), reduce river flow due to flood control works, urban planning that might expand urbanization into areas now with green areas, potential new wastes disposal sites that can be proposed in the waste management strategy, use of exotic species for landscape in roads and parks, etc.

On the positive aspects, the project will intervene with the GEF7 (Sustainable cities) support important wetland areas that the government wants to restore and remediate (two potential wetlands Gikondo and Nyabarongo). Wetlands are protected by regulations and are important habitat for birds, fish and aquatic fauna. The agriculture and urban development have degraded these and thus the project will be beneficial to biodiversity and ecosystem services. The project will no introduce exotic species or reproduce species that can alter even more these ecosystems.

Interventions in the wetlands might include slope and bottom re-conformation, improve flow regime, revegetation, replacement of contaminated soils, biodiversity baseline studies, among other.

Instrument.
The ESMF that has been prepared by the government will define measures and protocols to protect biodiversity and comply with the requirements of the ESS6 during project implementation including the preparation of one ESIA/ESMP for the wetlands with a biodiversity action plan with specific measures to prevent, mitigate and compensate direct, indirect and cumulative impacts. Also, the ESIA will confirm the presence of endangered, vulnerable, migratory, etc species and proposed measures to restore/improve its habitat.
The project can implement many different actions to bring back the habitat of migratory birds for instance that have lost important riparian and wetland habitats due the urbanization of Kigali and secondary cities, reduce pollution to wetlands and streams and restore riparian areas with native flora species

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
Relevance of this ESS will further be assessed during project preparation as part of the ESA process and as we get more information and clarity especially about selected and confirmed locations and sites for project implementation.

ESS8 Cultural Heritage
Relevance of this ESS will be further assessed during project preparation as part of the due diligence process. Although no impacts to cultural heritage are anticipated, the project will incorporate “chance find” procedures in the ESMF, the ESIA and the contractors ESMPs when physical cultural resources are encountered during excavations and construction.

ESS9 Financial Intermediaries
The project is not anticipated to have Financial Intermediaries as project implementation entities.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways
The project will not work on international waterways and OP7.50 does not apply

OP 7.60 Projects in Disputed Areas
The project locations are not in disputed areas

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?  No

Financing Partners
At this stage the project is not considering any common approach.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:
Prior to appraisal, the following documents will be developed, consulted and disclosed:
(i) Environmental and Social Management Framework (ESMF) which will need to cover all risks and impacts associated with ESS1,2,3,4,6 and 8 as well as GBV/SEA risks during construction and operation, and exclusion and stigmatization risks.
(ii) Resettlement Policy Framework (RPF)
(iii) Labor Management Procedures (LMP)
(iv) Stakeholder Engagement Plan (SEP)
(v) Environmental and Social Commitment Plan (ESCP)

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
The ESCP will summarize the main requirements and actions needed to be implemented by the government and implementation agencies to comply with the ESF instruments prepared for the project: i) ESMF, ii) RPF, iii) LMP and the iv) SEP

Some of following issues will need to be addressed in the ESCP:
(i) The development and implementation of site specific ESIAs and ESMPs (including labor management requirements) for the works to be supported as well as any associated permits and environmental licenses as described in in the ESMF and as required by country regulations,
(ii) The development and implementation of Site Specific Plans including Resettlement Action Plans, Stakeholder Engagement Plans, Grievance Redress Mechanisms and Emergency Response Plans as required per each ESS.
(iii) Monitoring and reporting requirements on environmental and social risk management, grievances and accidents and incidents.
(iv) Assignment of a budget to cover cost of environmental and social specialists in the project team at the national and district level and provide training to build capacity for implementation/management of environmental and social risk at the implementation agencies and at the local level.
(v) Development and implementation of a GBV/SEA Action Plan during the construction and operational phase.
(vi) Specific measures related to contextual risk management described in each ESF instrument.

C. Timing
Tentative target date for preparing the Appraisal Stage ESRS 06-Apr-2020

IV. CONTACT POINTS

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<thead>
<tr>
<th>World Bank</th>
<th>Contact:</th>
<th>Title:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pablo Cesar Benitez Ponce</td>
<td>Senior Environmental Economist</td>
</tr>
<tr>
<td></td>
<td>+1-202-473-0</td>
<td><a href="mailto:pbenitez@worldbank.org">pbenitez@worldbank.org</a></td>
</tr>
<tr>
<td></td>
<td>Abebaw Alemayehu</td>
<td>Senior Urban Development Specialist</td>
</tr>
<tr>
<td></td>
<td>5396+3346 /</td>
<td><a href="mailto:aalemayehu@worldbank.org">aalemayehu@worldbank.org</a></td>
</tr>
<tr>
<td></td>
<td>Zishan Faiza Karim</td>
<td>Sr Urban Spec.</td>
</tr>
</tbody>
</table>
V. FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL

Task Team Leader(s): Pablo Cesar Benitez Ponce, Abebaw Alemayehu, Zishan Faiza Karim
Practice Manager (ENR/Social) Robin Mearns Recommended on 23-Mar-2020 at 11:33:29 EDT
Safeguards Advisor ESSA Nathalie S. Munzberg (SAESSA) Cleared on 23-Mar-2020 at 12:50:30 EDT