

## ESMS Screening & Clearance Report

### Project Data

*The fields below are completed by the project proponent*

Project Title:	TREPA Project: Transforming Eastern Province through Adaptation		
Project proponent (e.g. IUCN programme):	IUCN ESARO		
Project ID	PO2953	Funding agency:	GCF
Name and function of staff leading project development:	Charles Karangwa	Entity executing/managing the project:	Rwanda Water and Forestry Authority (RWFA), an implementation agency of the Rwanda Ministry of Environment; one or more other entities or NGOs to execute specific field activities will be selected via a procurement process
Expected start date and duration:		Contract value (in CHF):	
Country:	Rwanda	Geography/landscape:	Eastern Province

### Step 1: Completing the ESMS Questionnaire (enclosed as Annex)

*The fields below are completed by the project proponent*

	Name and function of individual representing project proponent	Date
ESMS Questionnaire completed by:	Dr. Jean N. Namugize, Ph.D (consultants)	15.3.2020
Has a safeguard screening or ESIA <sup>1</sup> of the project been done before? Or any form of an environmental and/or social assessment related to the project or to its components? For GEF projects see footnote <sup>2</sup>		<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
If yes, provide details (content of assessment, what gaps may exist, whether data is still current enough and whether the relevance and quality of data has been assessed by proponent):		

### Step 2: Formal ESMS Screening

*To be completed by the IUCN ESMS reviewer(s); only needed when the options 1 or 2 above (marked in red) are ticked*

	Name	IUCN unit and function	Date
IUCN ESMS Reviewer:	Linda Klare	ESMS Coordinator	20.5.2020, update 19.4.2021
	Francis Musau	Regional M&E officer for Eastern and Southern Africa and ESMS Lead	20.5.2020

<sup>1</sup> Environmental and Social Impact Assessment (ESIA) or any other type of impact assessment (a partial ESIA, a targeted assessment of environmental and/or social risks etc.)

<sup>2</sup> Safeguard screening of GEF projects is the responsibility of the IA. If IUCN is an EA, screening by IUCN is usually not needed. It is however advised to review the IA's screening report.

	Title	Date
Documents submitted at Screening stage:	TREPA Funding Proposal v 0-9-3	9.3.2020
	TREPA Feasibility study v1 CLEAN	23.12.2019
	20200315_Stakeholder Engagement Plan_TREPA_25mar2020	25.3.2020

The below Screening Report is completed by the IUCN ESMS reviewer(s) after having gone through the ESMS Questionnaire. It summarizes the main findings of the ESMS Screening and represents a consensus between ESMS reviewers.

ESMS Screening Report		Required assessment topics or management measures/plans	Rating of environmental and social risks <sup>3</sup>		
B. Environmental and Social Risks (potential negative impacts) (see section B of the questionnaire for details)			Likelihood (1-5)	Impact (1-5)	Significance (L, M, H)
B.1 Gender equality and risks	Measures to prevent GBV as precautionary measure		2	2	Low
B.2 Risks of affecting vulnerable groups			3	3	Moderate
B.3 Risks of infringing on human rights			3	2	Low
B.4 Community health, safety and security risks	Review of SOP of law enforcement		2	3	Low
B.5 Labour and working conditions			2	2	Low
B.6 Resource efficiency, pollution, wastes, chemicals and GHG emissions			1	1	Low
Other environmental or social risks (add new rows below for each risk):			n/a	n/a	n/a
ESMS Standards	Trigger <sup>4</sup>	Required management measures/plans	Likelihood (1-5)	Impact (1-5)	Significance (L, M, S, H)
Involuntary Resettlement & Access Restrictions (see section C1 of the questionnaire for details)	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Resettlement Action Plan <input type="checkbox"/> Resettlement Policy Framework <input type="checkbox"/> Action Plan to Mitigate Impacts Access Restriction <input checked="" type="checkbox"/> Access Restrictions Mitigation Process Framework <input type="checkbox"/> Other:	To be determined when implementing the process framework	To be determined when implementing the process framework	To be determined when implementing the process framework
Indigenous Peoples (see section C2 of the questionnaire for details)	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Indigenous Peoples Plan <input type="checkbox"/> Indigenous Peoples Planning Framework <input type="checkbox"/> Other:	n/a	n/a	n/a

<sup>3</sup> The entries for likelihood and impact are taken from the ratings established at the end of each section in the questionnaire. Guidance for rating the likelihood, impact and significance is provided below (see heading in purple). For more information on these ratings, please see the Guidance Note on Assessment and Management of Environmental and Social Risks available at [www.iucn.org/esms](http://www.iucn.org/esms).

<sup>4</sup> The decision of triggering a standard does not mean that a safeguard instruments or plans has to be prepared right away. The ESMS Reviewer will specify the consequences of triggering the standard in the respective ESMS reviewer section of the questionnaire in C1-C4. Often plans might be required immediately (prior to project approval), in other cases only at a certain point in time (e.g. plans might need to be complete and accepted before the relevant activity can begin). In cases where the risk issues are less substantive, a plan might not be needed at all and mitigation measures are incorporated into the ESMP.

Cultural Heritage (see section C3 of the questionnaire for details)	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> TBD	<input checked="" type="checkbox"/> Chance Find Procedures <input checked="" type="checkbox"/> Other: ESMF includes screening of sub-projects on cultural heritage risks	2	1	Low
Biodiversity & Sustainable Use Natural Resources (see section C4 of the questionnaire for details)	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Pest Management Plan <input type="checkbox"/> Other:	2	2	Low
Quality of stakeholder consultation during project design so far (see section D4 for details)	<input type="checkbox"/> good <input checked="" type="checkbox"/> adequate <input type="checkbox"/> not sufficient	Required action:	Further consultation is foreseen once the sites for field interventions have been selected as instructed in the ESMF		
<b>Project Risk Category:</b>	The project risk category rates the overall project; it is based on the rating of likelihood and magnitude established for each E&S risk area and for the ESMS Standards. The overall rating is usually that of the highest risk.		<input type="checkbox"/> low risk	<input checked="" type="checkbox"/> moderate risk	<input type="checkbox"/> high risk
<b>Required assessments and management measures/plans:</b>	<input type="checkbox"/> Full Environmental and Social Impact Assessment (Full ESIA) <input type="checkbox"/> Partial ESIA <input type="checkbox"/> Targeted Assessment (social assessment, targeted environmental studies etc.)	<input type="checkbox"/> Environmental and Social Management Plan (ESMP) <input checked="" type="checkbox"/> Environmental and Social Management Framework (ESMF) <input type="checkbox"/> Abbreviated ESMF (including GRM) <input type="checkbox"/> Other:			
<b>Brief summary of the main findings:</b> main risk issues, their significance and justification of the overall project risk categorization; assessments and measures / plans to address risks and to meet provisions of the ESMS Standards and timing of each	<p>The project (in the following referred to by its acronym TREPA) is expected to lead to highly positive environmental and social impacts as its aim is to transform the drought-degraded Eastern Province into restored, productive and climate-resilient ecosystems. In addition to environmental benefits, the project will also improve livelihood conditions through enhanced ecosystem services relevant for local communities including water and enhance food security and will further provide tangible economic benefits for small holders and households – including energy efficient cooking stoves and new income opportunities associated with the promoted value chains.</p> <p>However, some risk issues have been identified when completing the ESMS questionnaire. A complete list of identified impacts is presented in the ESMS Questionnaire in the Annex. The main risk area is the potential need for mostly short-term restrictions on the use of natural resources which might trigger livelihood impacts of resource users. While project activities are already foreseen to provide alternative resources or income, the Standard on Involuntary Resettlement and Access Restrictions is still triggered and a Process Framework (PF) need to be developed in order to ensure that all people affected by access restrictions put in place by the project will be able to benefit from these measures and as such that livelihood impacts are avoided. Any gaps would need to be addressed through an action plan that would establish additional measures (guidance to be provided in the PF).</p> <p>Overall it is not expected that any of the identified risks would likely cause significant adverse environmental and/or social impacts that severely affects sensitive receptors (biodiversity, humans etc.), that were diverse, unprecedented, irreversible or permanent. Most of the risk issues are judged as low risks, only one as moderate and it is expected that the low risk issues can be readily addressed through good management practices and mitigation measures.</p> <p>While the geographical focus has been defined as the Eastern Province and its seven districts, it is important to understand that the actual sites for field interventions will be selected only during project implementation. Hence, the screening has been done as a high-level analysis of impacts, but a more detailed analysis will be needed once the sites have been selected and the activities are formulated in form of sub-projects. Therefore, an Environmental and Social Management Framework (ESMF) is required. The ESMF delineates the process of assessing risks and identifying suitable mitigation measures, spells out requirements for consultation and disclosure, establishes implementation arrangements and identifies financial resources needed for ESMF implementation.</p> <p>The project is classified as a moderate risk projects, because of risks related to access restrictions and the uncertainties inherent with the lack of knowing the actual sites for field interventions.</p>				

## Guidance for rating environmental and social risks

The rating of risks is based on the assumptions that the management measures and plans specified in the respective column are implemented and effective in mitigating the risk. It is good practice that the plans are available before ESMS Clearance. Risk rating is based on the two elements: likelihood and the expected impacts (consequence).

**Likelihood** represents the possibility that a given risk event is expected to occur. The likelihood should be established using the following five ratings:

- *Very unlikely to occur (1)*
- *Not expected to occur (2)*
- *Likely – could occur (3)*
- *Known to occur - almost certain (4)*
- *Common occurrence (5)*

**Impact** (or consequence) refers to the extent to which a risk event might negatively affect environmental or social receptors – see below criteria distinguishing five levels of impacts:

Table 1: Rating impact of a risk event

<i>Severe (5)</i>	Adverse impacts on people and/or environment of <b>very high magnitude</b> , including <b>very large scale</b> and/or spatial extent (large geographic area, large number of people, transboundary impacts), cumulative, <b>long-term (permanent and irreversible)</b> ; <b>receptors</b> are considered <b>highly sensitive</b> ; examples are severe adverse impacts on areas with high biodiversity value <sup>5</sup> ; severe adverse impacts to lands, resources and territories of indigenous peoples; significant levels of displacement or resettlement with long-term consequences on peoples' livelihood; impacts give rise to severe and cumulative social conflicts with long-term consequences.
<i>Major (4)</i>	Adverse impacts on people and/or environment of <b>high magnitude</b> , including <b>large scale</b> and/or spatial extent (large geographic area, large number of people, transboundary impacts), of certain duration <b>but still reversible</b> if sufficient effort is provided for mitigation; receptors are considered sensitive; examples are adverse impacts on areas with high biodiversity value; adverse impacts to lands, resources and territories of indigenous peoples; significant levels of displacement or resettlement with temporary consequences on peoples' livelihood; impacts give rise to social conflicts which are expected to be of limited duration.
<i>Medium (3)</i>	Adverse impacts of <b>medium magnitude, limited in scale</b> (small area and low number of people affected), <b>limited in duration</b> (temporary), impacts are relatively predictable and can be avoided, managed and/or mitigated with known solutions and straight forward measures.
<i>Minor (2)</i>	Adverse impacts of <b>minor magnitude, very small scale</b> (e.g. very small affected area, very low number of people affected) and only short duration, may be easily avoided, managed, mitigated.
<i>Negligible (1)</i>	Negligible or no adverse impacts on communities, individuals, and/or on the environment.

**Significance of risks** is established by combining likelihood and expected impact (consequence) of a risk event as demonstrated in the table 2. The significance rating signals how much attention the risk event will require during project development and implementation and the extent of control actions to be put in place. See the Guidance Note on Assessment and Management of Environmental and Social Risks for further details on the rating (including factors influencing the likelihood and impact).

Table 2: Rating significance of a risk event

		<b>Likelihood of occurrence</b>				
		<i>Very unlikely to occur (1)</i>	<i>Not expected to occur (2)</i>	<i>Likely – could occur (3)</i>	<i>Known to occur - almost certain (4)</i>	<i>Common occurrence (5)</i>
<b>Impact</b>	<i>Severe (5)</i>	Moderate	Moderate	High	High	High
	<i>Major (4)</i>	Low	Moderate	Moderate	Moderate	High
	<i>Medium (3)</i>	Low	Low	Moderate	Moderate	Moderate
	<i>Minor (2)</i>	Low	Low	Low	Moderate	Moderate
	<i>Negligible (1)</i>	Low	Low	Low	Low	Low

<sup>5</sup> For the definition see IUCN ESMS Standard on Biodiversity Conservation and Sustainable Use of Natural Resources.

## Annex: ESMS Questionnaire – to be completed as a preparation for the Formal ESMS Screening or the ESMS Self-Assessment

### A. Project summary

*To be completed by project proponent*

*Please summarise the project briefly using no more than one page. The summary can be in form of bullet points. Include goal/objectives, expected results/outcomes, outputs (project deliverables) and in particular the project's main **activities**. Please also describe the **project sites** and the **project area of influence**<sup>6</sup>.*

The TREPA project is in development as a proposal to the GCF by IUCN's ESARPO office and its Rwanda FLR Hub office and ENABEL, the Belgian Development Agency office in Rwanda (funding proposal development).

- The project overall goal is to achieve lasting transformative change within the drought-degraded Eastern Province transforming it into restored, productive and climate-resilient ecosystems and communities.
- The project main objective is to lead to a paradigm shift from degraded and vulnerable land in the Eastern Province unable to sustain livelihoods to a climate resilient landscape providing development opportunities for smallholder farmers.

The project will be implemented in Eastern Province, one of the four large provinces in the country of Rwanda, with activities mostly on private farm lands in all 7 Districts within the Province. Each district will have a different set of activities on a small percentage of its lands, so that all districts are involved and the Province begins to undergo a transition to more sustainable, climate-resilient ecosystems, communities and institutions to support this transition. Eastern province was prioritized based on biophysical and social factors, which underpin the high climate vulnerability of Rwanda's economy, the ecosystems and people in the area.

**Three major outcomes and the respective outputs within each are the following:**

#### **Component 1. Restored landscapes that support climate resilient agro-ecological systems and livelihoods in Eastern Province**

Output 1.1 Diversified agroforestry packages scaled-up

Output 1.2. Woodlots and tree plantations are rehabilitated and sustainably managed for productive and ecological services

Output 1.3 Scale-up climate resilient silvopastoral packages to restore degraded rangelands

Output 1.4 Protective restoration measures are scaled up to climate-proof fragile, ecologically sensitive and erosion prone lands

#### **Component 2. Farmers and communities have resources and capacity to restore, benefit from, and maintain climate resilient landscapes**

Output 2.1 Farmers' groups strengthened to adopt climate resilient land use practices with access to market and finances

Output 2.2 Enhanced climate resilience of agricultural value chains and commodities

Output 2.3 Enhanced financial inclusion and investments in climate resilient value chains

#### **Comp. 3. Strengthened enabling environment to effectively plan, manage and monitor climate adaptation outcomes from improved land use at national and decentralized levels**

Output 3.1 Mainstreamed gender-responsive climate resilience for coordination cross-sectoral planning & community landscape restoration plans developed

Output 3.2 Enhanced and coordinated knowledge and information systems for decision and negotiation support

Output 3.3 Seed and seedling supply systems are enhanced to provide diverse climate adapted species and varieties

Output 3.4 Evidence from best practices generated and disseminated

#### **The project activities to achieve the project outputs:**

- Identify 100 sub-areas of intervention (400 ha each) for agroforestry dissemination over *Eastern Province*.
- Train 160 farmers groups on agroforestry techniques and establish 160 MoUs with local authorities
- Establish and sustain one agroforestry/fruit trees nursery in each of the 100 sub-areas of intervention
- Provide technical assistance to farmers in planting agroforestry/fruit trees and in implementation of agroforestry technologies in their owned parcels

<sup>6</sup> The project area of influence is the area likely to be affected 1) by direct impacts from project activities, 2) by project partner's activities and facilities that are directly owned, operated or managed by the partner and that are a component of the project, 3) by indirect project impacts (unplanned but predictable activities enabled by the project) or 4) cumulative impacts (incremental impacts added to impacts from other developments/projects).

## B. Assessment of social or environmental impacts

Please consider not only direct environmental and social impacts but also potential <b>indirect, cumulative<sup>7</sup> and transboundary</b> impacts as well as impacts of <b>associated facilities<sup>8</sup></b>		
	<b>Project proponent</b>	<b>IUCN ESMS Reviewer</b>
	<i>Yes, no, n/a, TBD</i>	<i>Answer question and describe how the risks are <b>being assessed, avoided or managed</b></i>
<b>B.1 Gender equality and risks (including gender-based violence)</b>		
1. Is there a risk that the project may <b>discriminate</b> against women or other groups <b>based on gender</b> with regards to participation in the design and implementation of project activities or to access to resources, services, or benefits provided by the project?	No	<p>The project has been designed with consultation of women stakeholder (see section D for more details).</p> <p>A gender analysis has been carried out and a gender action plan (GAP) has been developed to ensure that project activities are gender-sensitive and that affirmative action is taken in areas where there are risks of discrimination based on gender. Examples are women being discriminated on access to resources (e.g. training, credit etc.) due to lack of land rights, ownership of the agriculture products and of collateral. These constraints are being addressed in the GAP. The GAP will also ensure balanced participation of men and women in the processes of fine-tuning project design and equal decision making power among community members</p>
2. Is there a risk that project activities inadvertently <b>create, aggravate or perpetuate inequalities</b> between women and men?	No	<p>The project works with existing institutions that may be dominated by men and as such perpetuate inequalities. Examples are governance structures / bodies or extension services (farmer promoters and farmer field schools). The GAP includes measures to avoid these risks and provide affirmative action to reduce inequalities. For example, consultations with women individually and with women and men farmers and cooperative members in 5 districts indicated that women should have a greater role in land restoration activities. As such, in establishment of agroforestry/fruit trees nursery in each of the 100 sub-areas of intervention, the project will target a ratio 1:1 men to women in order to integrate women in the labour employment. Another example is providing support to access improved cooked stoves (ICS) for over 100,000 rural households of Eastern Province. This will improve the working conditions of women (saving time for fuel wood collection and reducing respiratory health issues).</p>

<sup>7</sup> Cumulative Impact means the collective impact of a project's incremental impact added to the impacts of other relevant past, present and reasonably foreseeable future developments, as well as the unplanned but predictable activities enabled by the project that may occur later or at a different location. Example: Substantial increase in number of tourists that frequent a site turns a project-funded PA access road into a major cause for disturbance for wildlife.

<sup>8</sup> Associated Facility or Activities means a facility or activity not funded as part of the project that is necessary for the financial and/or operational viability of the project, and would not have been constructed or expanded if the project did not exist. Example: a visitor centre built by the project might require an access road as associated facility – the construction of which might trigger environmental impacts.

3. Is there a risk that the project potentially <b>limits</b> women's <b>ability to use, develop</b> or protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services?	No	Unlikely as the project promotes inclusion of governance and decision making about natural resources.	
4. Is there a risk that persons employed or engaged by the project executing agency or through third parties to perform work related to core functions of the project might engage in <b>gender based violence</b> (including sexual exploitation, sexual abuse, or sexual harassment)? Have any such incidents been reported in the past?	No	GBV is still a widespread problem in Rwanda and is a complex issue rooted in patriarchy, which itself is enshrined in cultural/religious notions, and various social conditions creating unequal gender norms and power relations (see for instance a recent <a href="#">World Bank blog</a> ). However, innovative national strategies and policies have been initiated by the government to eliminate GBV. The proposed actions (within the boundaries of the TREPA project) is to conduct awareness campaign on gender and GBV in the community.	The project should put in place measures to prevent GBV such as awareness raising and communicate procedures for reporting incidents.
<b>Conclusion of ESMS Reviewer on<sup>9</sup></b>		<b>Estimated likelihood of risks (1-5): 2</b>	<b>Estimated impact (1-5): 2</b>
<b>B.2 Risk of affecting vulnerable groups</b>			
5. Has the project site been assessed on the <b>presence</b> of vulnerable or disadvantaged groups or individuals. Please name the groups and ensure that groups referred to in footnote <sup>10</sup> are considered.		Consultation during project design have not revealed the presence of particular vulnerable groups or individuals. For instance, there is no evidence yet whether individuals from the Batwa / Twa community which are often affected by marginalisation, poor health and living conditions, lack of education, inadequate housing etc. are present in the project site. The Twa people are recognized by the Government as historically marginalized people (HMP).	As part of the process framework (see section C1), after selecting the sites for field interventions, the project will assess whether there are vulnerable groups, e.g Batwa/ Twa people but also other groups or individuals which may be vulnerable or marginalized in the specific context, including people with disabilities and others as specified in footnote 10
6. Is there a likelihood that project <b>risks</b> and negative impacts fall disproportionately on disadvantaged or <b>vulnerable individuals</b> or groups? Consider impacts on material and on non-material livelihood conditions. Also consider changes in <b>land use</b> and/or <b>tenure arrangements</b> with a risk of disproportionately affecting vulnerable groups, including people coming from outside the project area such as internally displaced people.	No	The project activities are generally not expected to create social risks as the project aims to restore landscapes to improve livelihoods. However, restoration measures might require temporary access restrictions that might be disproportionately affect certain vulnerable groups that do not have other options for sustaining livelihood needs (e.g. fuel wood). The risk is being mitigated as described in section C1 for further details.	The process framework (see section C1) will assess on social impacts falling disproportionately on vulnerable groups or individuals.
7. Is there a risk that the project might <b>discriminate</b> against vulnerable groups with regards to participation in the design and implementation of project activities or to access to resources, services, or benefits provided by the project?	Yes	It is not the objective of the project to provide for social protection or to go against root causes of vulnerability or marginalization. However, the project will, to the extent possible, take social vulnerabilities into consideration when selecting sites for specific field interventions and fine-tuning these interventions and ensure that project activities do not discriminate against vulnerable groups.	The social analysis carried out as part of the process framework will ensure identification of vulnerable groups; but it will be further important to consult these groups in the process of fine-tuning field interventions to understand specific constraints they might face in accessing resources or services provided by the project
<b>Conclusion of ESMS Reviewer on</b>		<b>Estimated likelihood of risks (1-5): 3</b>	<b>Estimated impact (1-5): 3</b>

<sup>9</sup> Please see guidance given above for estimating the **probability** of the event to occur and its **impact** (consequence) on the receptor. It is understood that there might still be a considerable degree of uncertainty.

<sup>10</sup> Depending on the context vulnerable groups could be landless or elderly people, persons with disabilities, children, ethnic minorities, displaced people, people living in poverty, marginalised or discriminated individuals or groups, among others.

B.3 Risks of infringing in human rights, including substantive and procedural rights			
8. Could the project lead to adverse impacts on enjoyment of the <b>rights</b> (civil, political, economic, social or cultural) of individuals or groups? In terms of economic rights, consider in particular their ability to access services or resources essential to basic needs (e.g. health or education, drinking water, productive resources, sources of income, subsistence food production).	No	The project aims at improving livelihoods through restored landscapes, and as such contributes to improved access to basic economic needs provided through ecosystem services such as water and productive resources. The project further promotes participatory decision making about land use (e.g. when defining priority criteria and select primary target intervention areas for restoration) and as such is expected to have a positive influence on improving procedural rights of rights holders.	See in section B.2 and C.1 on social risks from access/use restrictions
9. Is there a likelihood that the project might lead to <b>unjustified preferential treatment</b> of individuals or groups (e.g. in terms of access to resources or services provided by the project) or to the formal or de facto restriction or exclusion <sup>11</sup> of groups from access to such resources or services?	Yes	A number of services and benefits are provided by the project and sites will be selected for interventions. While not intended, such decisions may inadvertently lead to preferential treatment if the social and biophysical context is not fully understood. E.g. cooperative of farmers or a village where a tree nursery is established might benefit more than an adjacent village.	The project needs to develop fair and transparent criteria for site selection and for eligibility to benefits and services; and communicate these clearly in the decision making process. The process framework will establish eligibility criteria for people affected by access restrictions.
10. Is there a likelihood that the project would <b>exclude</b> individuals or groups from fully <b>participating</b> in decisions that may affect them?	Yes	During project design a stakeholder analysis has been undertaken in order to identify who will need to be consulted. However, this does not provide a very detailed level of granularity to ensure that individuals are not excluded inadvertently.	Project staff needs to ensure that decision making processes during the development of sub-projects are inclusive. This is ensured through the SH Engagement plan
11. Is there a likelihood that the project might contribute to the <b>discrimination</b> or marginalization of specific groups? (only mention situations not specified in any of the questions above)	No	No additional groups or issues identified.	The social analysis carried out as part of the process framework after site selection to ensure that no groups have been overlooked.
12. Within the project area, are there any indications of <b>legacy issues</b> , current conflicts or <b>human rights infractions</b> ? Have any of the project's potential partner organizations and stakeholders been involved in human rights conflicts in the past? Consider in particular situations such as failing to respect the rights or livelihood needs of indigenous or local communities during the process of protected area establishment, forced eviction of people, resettlement process where agreed arrangements and compensations were not complied with or other actions that resulted in historical injustice.	No	Involuntary resettlements processes conducted by the Ministry of Environment that resulted in human rights infractions are not known. The two most recent resettlement processes occurred in the City of Kigali, one with the purpose of protecting people living in high <a href="#">risk zones</a> from floods and landslides, the other for <a href="#">wetland protection</a> involving both physical and economic displacement.	
<b>Conclusion of ESMS Reviewer on</b>		<b>Estimated likelihood of risks (1-5): 3</b>	<b>Estimated impact (1-5): 2</b>
B.4 Community health, safety and security			
13. Is there a risk that the project could exacerbate existing <b>conflicts among communities</b> , groups or individuals (e.g. by increasing resource competition when promoting economic opportunities,	Yes	Potential conflicts due to perception of unjustified preferential treatment (see above). This can happen	Decisions about land use and management might cause further contention in particular

<sup>11</sup> Examples for *de facto* restriction or exclusion are: information is not made available in appropriate languages, individuals with no/low income or without tenure rights (or registered titles) can't access services (e.g. agricultural extension services, persons with disabilities are confronted with physical barriers that block their access; certain groups are stigmatised by society and thus have no access services.



aggravating conflicts about land or natural resources or by causing an influx of in-migrants). Consider in particular situations where the project sites are affected by fragility, violence and conflicts (war, inter-ethnic conflict, insurgency or high levels of drug trafficking or other organised crime) and dynamics of recent or expected migration (e.g. return of displaced people).		especially as the project want to increase the involvement of women in its activities. This can be a threat to men being used to play a major role in incoming generating activities, due to the culture. Conflicts may arise due to internal migration of people who can move from other provinces to the project areas, attracted by the project activities. However, it is envisaged the priority for employment will be given to the local population, except for expertise which is not available.	where restrictions are involved – this is addressed in section C1.
14. Is there a risk that project activities might <b>weaken community institutions</b> or <b>disrupt social interactions</b> within the communities or the cohesion of communities?	No	The project will strengthen the social cohesion of communities and their institutions, by increasing their incomes and improving their livelihood conditions	Increased income might not be realized in an even way and give rise to increased inequalities that could weaken social cohesion.
15. Does the project potentially increase risk of <b>human–wildlife conflicts</b> including the risk of injury or loss of life of humans?	No	The project will reduce the human-wildlife potential risk, By planting tree in the buffer zones of the park, this will reduce enroachment of people to the park. The same by planting trees on the shoreline of lakes and rivers, more space of for wildlife will be created. And the land to be used for these activities belongs to the state.	
16. Does the project or project partners engage or work with <b>law enforcement personnel</b> (including collaboration with government forest guards, protected area or community rangers, police, military or paramilitary forces) that may pose a potential <b>security risk for communities</b> and/or individuals? Consider causes such as inadequate training or lack of accountability mechanism and practices such as violent interrogation practices, harassment of members of particular ethnic groups, detention of arrested people without legal proceedings etc.	Yes	In Rwanda, communities work together on a day to day basis with local community police and rangers from the parks to protect wildlife and environment in general. for example, in some community works commonly known as Umuganda, involving tree plantation or construction of anti-erosive measures, which is a joint community and other stakeholders efforts. As these organs are highly trained, we do not expect violent practices with the population and in case this happens, the law does apply.	
17. Do any of the law enforcement personnel carry <b>firearms</b> in the course of their duty?	Yes	Some law enforcement personnel (Police) may carry firearms in course of their duties but for the sake of security.	While the project itself does not fund law enforcement, for precautionary reasons the SOP of law enforcement organs and in particular the use of firearms will need to be reviewed in the inception phase.
18. Is there a possible risk that the project exposes communities to <b>accidental hazards</b> or increases their vulnerability to <b>natural hazards</b> ? This would cover exposure to hazardous substances (explosives, fuel and other chemicals), the use of vehicles and equipment and risks related to new constructions or failure of structural elements built by the project (e.g. through failure to secure construction sites or water infrastructure, collapse of buildings, exposure to risks from earthquake or subsidence etc.).	No	The project does not involve hazardous substances or large infrastructure, only minor low-impact infrastructure such as boreholes for livestock groundwater and no heavy machinery is expected to be used in the project activities. Considering the topographic set up of the project sites, we do not expect land sliding, earthquakes and land subsidence.	
19. Is there a likelihood that the project causes <b>health and safety</b> risks through construction or management changes of <b>water infrastructure</b> (e.g. by changing flows into water infrastructure, triggering water-born or -based diseases) or through increasing risks of other vector-borne <b>diseases</b> or communicable infections?	Yes	Water spillage around the boreholes during operation may provide breeding ground for vectors of waterborne diseases such as worms, mosquitoes, dysentery etc. Impacts of this may persist through the lifecycle of the project, but are considered very small in agnitude.	

Examples include the creation of stagnant water bodies, livestock activities affecting quality of portable water etc.		Already some of these diseases (like malaria) are endemic in the project area and the population has preventive measures (for example the use of mosquito net for preventing malaria, use of SUR EAU for spring water disinfection or boiling of drinking water) which will need to be reinforced by through community sensitization meetings	
20. Is there a probability that the project could have adverse impacts on community <b>health and safety</b> through reduction in local <b>air quality</b> (e.g. through generation of dusts, burning of wastes, or burning fossil fuels and other materials in improperly ventilated areas)?	No	Not likely. The main activities are growing seedlings in small nurseries within 1-2 km of the targeted lands. Farmers and other land users will plant seedling in disaggregated parcels that are not contiguous blocs. Thus seedling movement will be by farmers coming to the nursery and carrying a small number of seedlings (say 3-200 per farmer) predominately via foot, bicycles or motorcycles back to their small farm	
<b>Conclusion of ESMS Reviewer on</b>		<b>Estimated likelihood of risks (1-5):</b>	<b>Estimated impact (1-5):</b>
<b>B.5 Labor and working conditions affecting project workers<sup>12</sup></b>			
21. Would the project potentially lead to working conditions that fail to comply with <b>national labor laws</b> and international commitments? Consider the following minimum requirements <sup>13</sup> : <ul style="list-style-type: none"> <li>• clear documentation of employment terms and conditions (including their rights under national law related to hours of work, wages, overtime, compensation and benefits);</li> <li>• regular and timely payment of wages; adequate periods of rest (incl. holiday, sick, maternity, paternity, and family leave);</li> <li>• principles of non-discrimination, equal opportunity and fair treatment relating to any aspect of employment relationships in the context of the project (e.g. hiring and treatment of workers);</li> <li>• prevention of harassment, intimidation, and exploitation in the workplace, in particular of vulnerable workers, including but not limited to women, children of working age, migrants and persons with disabilities;</li> <li>• freedom of association and collective bargaining.</li> </ul>	No	The project executing agencies and third parties will make sure that the hiring of the project's employees and labour forces does comply with the Rwanda Labor Law of 2018. The law stipulates a number of prohibited forms of work for the child, pregnant or breastfeeding woman, the minimum age of work is 16 years. It is prohibited all forms of forced labour, sexual harassment and discrimination at work place. The daily working hours applicable in Rwanda (9 hours) and payment of workers on time should be respected	Project implementation manual to spell out labour provisions and the requirement of the EA to provide evidence of compliance (for own employees, third party contracting including public works).
22. Is there a risk that project workers might be exposed to <b>occupational health and safety</b> (OHS) risks including specific <b>hazards in the work areas</b> (e.g. dangerous machinery, chemical or biological hazards, hazardous transport activities, increased exposure to infectious diseases and specific threats to women)? Also consider risks for people engaged in <b>community work programs</b> or <b>volunteers</b> engaged by the project or project partners.	No	It is not expected that the low-impact activities (e.g. tree planting, establishment of nurseries, landscape restoration works and construction and dissemination of ICS) will cause occupational health and safety (OHS) concerns.	
23. Are any <b>project staff</b> or people engaged for the project (e.g. rangers, community rangers) exposed to the <b>risk of violence</b> in the course of their duties (e.g. exposure to armed poachers or criminal groups involved in drug trafficking)? If yes, explain how risks are managed	TBD	The project area is not prone to specific issues of violence such as drug trafficking or poaching. However, monitoring of risks for project workers is recommended.	

<sup>12</sup> Project workers refer to (i) people employed or engaged directly by the project executing entity to work specifically in relation to the project, (ii) people employed or engaged through third parties to perform work related to core functions of the project, (iii) community workers employed or voluntarily engaged in a project.

<sup>13</sup> The minimum requirements are established in the ESMS Guidance Note on Assessment and Management of Environmental and Social Risks available at: [www.iucn.org/esms](http://www.iucn.org/esms)

(e.g. access to adequate healthcare, systems of evacuation in case of emergencies)?			
24. Might the project be directly or indirectly involved in either <b>forced labor</b> (e.g. any work or service which someone has not volunteered for and is forced to do) or <b>harmful child labor</b> <sup>14</sup> ? Child labor would be considered harmful if it interferes with the child's education or be detrimental to the child's health or mental, spiritual, moral, or social development.	No	The project does not foresee hiring minors for any public work (e.g. tree planting). As indicated in (21) and 23 project activities will comply with the National Labour Law. Each labourer to be employed by the project will have to present his/her national identity card and the project executing entity will closely collaborate with the decentralised entity at all levels, to make sure children age of attending schools do not drop school seeking for money.	The Project Operational Manual should specify that public works (e.g. tree planting or other restoration work) would not involve harmful child labour conditions.
<b>Conclusion of ESMS Reviewer on</b>		<b>Estimated likelihood of risks (1-5): 2</b>	<b>Estimated impact (1-5): 2</b>
<b>B.6 Resource efficiency, pollution, wastes, chemicals and GHG emissions</b>			
25. Is there a risk that the project might lead to releasing <b>pollutants</b> to the environment or increased generation of <b>waste</b> or <b>waste water</b> due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts? Consider in particular hazardous waste.	Yes	This may happen during the initial phase of the project, but is not very likely. This phase will not last for long and appropriate measures will be put in place prior to commencement of the project activities. Example, temporal sanitation facilities, collection facilities for solid and liquid waste, holding tanks for grease and oil. The magnitude of these impact is small, short duration and at local scale.	
26. Does the project activities involve a significant use of <b>energy, water or other resources</b> ? If yes, explain how it will be ensured that resources are used efficiently.	No	Not likely. The main activities are growing seedlings in small nurseries within 1-2 km of the targeted lands. Farmers and other land users will plant seedling in disaggregated parcels that are not contiguous blocs. Thus seedling movement will be by farmers coming to the nursery and carrying a small number of seedlings (say 3-200 per farmer) predominately via foot, bicycles or motorcycles back to their small farms. In contrast, the project will contribute to energy saving technologies via the promotion and dissemination of energy saving technologies such as improved cooking stoves. While seedling production requires water, negative impacts are not expected as nurseries are generally placed in sites where there is availability of water (e.g. close to wetlands or to exploited agriculture land with sufficient quantity of irrigation water or in sites with rain water collection ponds	
27. Might the project use or promote the use of <b>chemicals or other hazardous materials</b> subject to international bans, restrictions or	No	As Rwanda is signatory to the Stockholm convention on POPs. These POPS are prohibited, banned for	

<sup>14</sup> Child labor for these purposes refers to children under the age of 14, unless national law specifies a higher age. Children between 14-18 employed or engaged in the project would not be considered as child labor (unless national law specifies a different age), but would require special conditions related to their engagement.

phase-outs?) <sup>15</sup> Please note that the use of pesticides are covered in the Biodiversity Standard (Section C4).		importation to the country. Besides, the project does not promote the use, transport or storage of pesticides.	
28. Will the project lead to significant increases of <b>greenhouse gas</b> emissions or to a substantial reduction of carbon pools (e.g. through loss in vegetation cover or below and above ground carbon stocks)?	No	No, instead this project will mitigate greenhouse gas emissions in the area, through reforestation, agroforestry, afforestation and improved cooking stoves	
<b>Conclusion of ESMS Reviewer on</b>		<b>Estimated likelihood of risks (1-5):</b>	<b>Estimated impact (1-5):</b>
<b>Other environmental or social risks</b>			
29. Please list in the row(s) below any other direct, indirect (induced or cumulative), and transboundary environmental and social risks, and the risks and impacts of associated facilities: <sup>16</sup>		n/a	n/a
<b>Conclusion of ESMS Reviewer on</b>		<b>Estimated likelihood of risks (1-5): n/a</b>	<b>Estimated impact (1-5): n/a</b>
<b>Overall conclusion of ESMS Reviewer on negative Social and/or Environmental Impacts</b>			
<i>Have negative environmental or social impacts been identified? Are assessments required to better understand the impacts? What specific topics are to be assessed? Have measures for avoiding impacts already been considered? Are they sufficient?</i>		Environmental impacts are largely very positive. Some social risks have been identified that are currently . To be assessed by the rapid social analysis once the sites for field interventions have been identified.	

## C. Potential impacts related to ESMS standards

### C1: Standard on Involuntary Resettlement and Access Restrictions<sup>17</sup>

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, TBD	Answer question and describe how the risks are <b>being assessed, avoided or managed</b>	Comments, additional considerations
1. Will the project involve resettling people or communities involuntarily and/or acquiring their land (e.g. for the creation of a strict nature reserve or reducing the threat of wildlife related incidents for communities living in reserves)? <b>if yes, answer a-b below</b>	No	<i>Shaded cells do not need to be filled out</i>	<i>Shaded cells do not need to be filled out</i>
a. Describe the project activities that require resettlement.			
b. Have alternative project design options for avoiding resettlement been rigorously considered?			
2. Is there a risk that the project will involve forced eviction <sup>18</sup> ?	No		

<sup>15</sup> For instance, substances listed under the Stockholm Convention on Persistent Organic Pollutants, or other chemicals or hazardous materials subject to international bans, restrictions or phase-outs due to high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential depletion of the ozone layer, consistent with relevant international treaties and agreements.

<sup>16</sup> Example for cumulative impact: A project builds an access road for PA staff, but another project builds a visitor center in the PA which increases traffic on the road and causes disturbance for nesting sites etc.

<sup>17</sup> The term “**involuntary resettlement**” refers to project-related land acquisition and restrictions on land use which have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement (World Bank ESS5)

<sup>18</sup> It is important to understand that Involuntary resettlement is different from “**forced eviction**”; the latter being defined as the permanent or temporary removal **against the will** of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection (WB ESS5). Forced evictions is an extreme form of involuntary resettlement and “constitutes a gross violation of human rights, in particular the right to adequate housing” (Commission on Human Rights, Resolution 1993/77).

<p>3. Does the project include activities that might cause economic displacement by <b>restricting peoples' access</b> to land or natural resources where they have recognized rights (legally or customarily defined)? Please consider the following activities: establishing new protected areas (PA) or extending the area of an existing PA, improving enforcement of PA regulations (e.g. training guards, providing monitoring and/or enforcement equipment, providing training/tools for improving management effectiveness), constructing physical barriers that prevent people accessing certain places; changing how specific natural resources are managed to a management system that is more restrictive<sup>19</sup>; <b>if yes, answer a-h below</b></p>	TBD		
<p>Answer only if you answered yes to item 3</p>			
<p>a. Indicate the project <b>activities</b> that (might) involve restrictions <u>and</u> the <b>respective land or resources</b> to be restricted including communal property and natural resources (e.g. marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas.</p>		<p>Three activities that can involve access or use restriction: restoration of 700 ha of degraded District owned tree plantations, restoration of 700 ha of lake/river shorelines and 700 km of roadside through tree/shrub planting and participatory management and restoration and protection of 400 ha of Akagera Buffer zone through tree/shrub planting and implementation of participatory silvopastoral plants. However, the duration of restrictions will be for short term period.</p>	
<p>b. Based on a thorough analysis of the legal framework regulating land tenure and access to natural resource (broken down by different social groups including women and ethnic/indigenous groups), can it be confirmed that restrictions implemented by the project might <b>affect</b> groups or individuals who have <b>recognized rights</b> to the respective land or natural resources? Or would the restrictions potentially affect individuals who do <b>not</b> have <b>recognized rights</b> but are highly dependent on the land/resource? <b>If both questions are answered with no, skip to question 4; otherwise continue answering c-h below</b></p>	No	<p>Individuals or groups using the buffer zones of the park do not have use right of these resources. The latter is established by the law creating the Akagera National Park (Law N°33/2010). Its buffer zone estimated to 967.3 ha and is managed by the Rwanda Development Board. In addition to the buffer zone, the park is surrounded partially by an economic development zone (30,672 ha) which is managed by the bordering district authorities. Shorelines of rivers and lakes and road sides are owned by the State and individuals do not have right to use these areas as determined by the Environment and Water Laws of 2018.</p>	<p>The Standard not only applies to restrictions on land and resources to which people that are restricted have legal or recognizable rights, but also traditional/customary rights including those not formalised as well as in situations where individuals / groups are affected who do not have recognized rights but are highly dependent on the land/resource. While, the state-and district owned tree plantations and the roadside and shoreline areas are established state property, the actual use of such areas and peoples' dependence on such resources will still need to be assessed as well as the usage of the buffer zone of the Akagera NP. In this context, it is worthwhile mentioning the comprehensive land reform and registration process carried out by the Rwanda Government over the past 11 years which is internationally recognized as good practice (e.g Ngoga, Thierry Hoza, Rwanda's land tenure reform: non-existent to best practice, 2018). The reform was based on the Organic</p>
<p>c. Is there a risk that project induced access restrictions will negatively affect people's livelihoods? Consider impacts due to</p> <ul style="list-style-type: none"> <li>• Loss of access to natural resources in a particular area,</li> <li>• Loss of access to social services such as schools, health care etc,</li> <li>• Change of quality/quantity of resources a household can access,</li> <li>• Change in seasonal access to a resource,</li> <li>• Change in nature of access (i.e. from unregulated to regulated),</li> <li>• Change in types of assets needed to access resources;</li> </ul> <p>If yes, please elaborate on the different livelihood elements that are affected, explain who might be affected and describe impacts. Distinguish between social groups (incl. vulnerable groups,</p>			

<sup>19</sup> Note that the Standard "does not apply to restrictions of access to natural resources under community-based natural resource management projects, i.e., where the community using the resources collectively decides to restrict access to these resources" (e.g. introduction of restrictions to ensure continued access to these resources) "provided that an assessment establishes that the community decision-making process is adequate and reflects voluntary, informed consensus, and that appropriate measures have been agreed and put in place to mitigate adverse impacts, if any, on the vulnerable members of the community" (WB ESS5).

<p>indigenous peoples), men and women; also consider impacts of restrictions on people coming from outside of the project area. <b>If yes, answer d-h below; otherwise skip to question 4</b></p>			<p>Land Law No 08/2005 which recognize the rights of persons who not only owns land through written law but also through customs and the land registration process also provided for systematic registration of all occupied land (incl. under customary arrangements) and issuance of new land title. It is expected that this process has contributed to addressing land needs in rural areas and significantly reduced the dependency on natural resources and on forest areas.</p>
<p>d. Have strategies been considered to <b>avoid restrictions</b> by making changes to project design? If yes, explain.</p>			<p>TBD in the Process Framework</p>
<p>e. If it is not possible to avoid restrictions, will the project include <b>measures</b> to minimize or compensate for impacts from loss or restrictions of access? Please describe the measures.</p>			<p>The Project by design already includes a range of measures (e.g. distribution of cookstoves, measures to increase agricultural and forest productivity) that provide alternatives to the use of forest resources. The PF will ensure that these are complemented by additional measures, if needed and as determined by the impact assessment, to ensure that potential livelihood impacts of all people affected by restrictions are avoided.</p>
<p>f. Are <b>eligibility criteria</b> established that define who is entitled to benefit from these measures? Are they transparent and fair (e.g. in proportion to their losses and to their needs if they are poor and vulnerable)?</p>			<p>TBD in the Process Framework</p>
<p>g. Are these measures culturally <b>appropriate</b> and gender inclusive? Does the geographical scale of the measures match the scale of the restrictions (e.g. will measures be <b>accessible to all groups affected</b> by the restrictions)?</p>			<p>TBD in the Process Framework</p>
<p>h. Has a process been implemented or started to obtain <b>consent</b> from groups that are likely to be negatively affected by restrictions? Please describe the process (who has been consulted and how).</p>		<p>Not yet as we do not know exactly the sites of the project interventions</p>	<p>Procedures will be described in the Process Framework</p>
<p>4. Will/might the project require the <b>acquisition of land</b> for purposes other than the conservation objectives described above? E.g. for building (communal) infrastructure (development of water tanks, irrigation canals, access roads etc.). If yes, describe the legal status/ownership of the land that might be subject to land acquisition. If voluntary donations are considered, explain how it will be ensured that no pressure or coercion is involved.</p>	<p>No</p>	<p>The project will not require land. Activities will be executed on state and privately owned lands. In case of the latter, infrastructure and agriculture practices are considered to be beneficial to the owner and providing such services will be done on the request of the legal owner of the land.</p>	

**Conclusion of ESMS Reviewer on the Standard on Involuntary Resettlement and Access Restrictions**

<p>What are the main gaps with regards to the provisions of the Standard?          What are the main risks and who are the main groups potentially affected?          Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?          Have measures for avoiding impacts already been considered? Are they sufficient? What safeguard tools are to be prepared (e.g. Process Framework)?          When would the tools need to be available (complete and accepted)? When would the tools need to be available (complete and accepted)?</p>	<p>Forest management practices promoted by the project are expected to increase the productivity of woodlots / tree plantations and as such have a beneficial impact for resource users in the long run. However, short-term use restrictions are likely, which might affect the livelihood of people who are dependent on these forest resources, in particular vulnerable groups. The Standard is triggered as it also applies in situations where people don't have formal/legal rights but are still affected by restrictions. As the sites and the restrictions are not known, a Process Framework needs to be established prior to project approval. The PF will establish the process by which impacts or restrictions are assessed, how mitigation measures are developed and respective eligibility criteria, among others. Details are established in the IUCN Guidance Note.<sup>20</sup> The project already foresees measures for addressing resource needs (e.g. cookstoves, measures to increase agricultural and forest productivity, employment opportunities). Hence the main focus of the PF will be to ensure that all people affected by access restrictions put in place by the project will be able to benefit from these measures and that they are adequate for avoiding livelihood impacts. Any gaps would need to be addressed through an action plan that would establish additional mitigations measures.</p>		
<p>Standard triggered? (Yes / No / TBD)</p>	<p>Yes</p>	<p>Estimated likelihood of risks (1-5): to be determined by the assessment carried out as part of the process framework</p>	<p>Estimated impact (1-5): to be determined by the assessment carried out as part of the process framework</p>

## C2: Standard on Indigenous Peoples <sup>21</sup>

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, TBD	Answer question and describe how the risks are <b>being assessed, avoided or managed</b>	Comments, additional considerations
<p>1. Does the project site<sup>22</sup> overlap with lands or territories claimed indigenous peoples, tribal peoples or other traditional peoples? <b>If yes, answer questions a-k</b></p>	<p>No</p>	<p>The project sites are located in the Eastern Province does not overlap with indigenous people's territory. According to the constitution of the Republic of Rwanda, there is no indigenous people in the country, all Rwanda speak the same language, have the same tribe of Banyarwanda and have equal rights. Twa are considered by the Government as historically marginalized people (HMPs) in Rwanda, but originally they are from Western Rwanda.</p>	<p>Agreed. The Batwa (or Twa) people identify themselves as indigenous and this is supported for instance by the International working group for indigenous affairs (IWGIA). However, ancestral lands of Twa people do not overlap with the project sites which are located in the Eastern province.</p>
<p>2. Even if indigenous groups are not found at the project sites, is there still a risk that the project could affect the rights and livelihood of indigenous peoples?. <b>If yes, answer questions a-i</b></p>	<p>No</p>		
<p>Answer only if you answered yes to 1 or 2 above.</p>			

<sup>20</sup> IUCN ESMS Access Restriction Mitigation Process Framework - Guidance Note, available at: [https://www.iucn.org/sites/dev/files/iucn\\_esms\\_process\\_framework\\_guidance\\_note.pdf](https://www.iucn.org/sites/dev/files/iucn_esms_process_framework_guidance_note.pdf)

<sup>21</sup> The coverage of indigenous peoples includes: (i) peoples who identify themselves as "indigenous" in strict sense; (ii) tribal peoples whose social, cultural, and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations; and (iii) traditional peoples not necessarily called indigenous or tribal but who share the same characteristics of social, cultural, and economic conditions that distinguish them from other sections of the national community, whose status is regulated wholly or partially by their own customs or traditions, and whose livelihoods are closely connected to ecosystems and their goods and services

<sup>22</sup> The project site is defined as the project's area of influence. This is often larger than the site where actual project activities are located as it considers the area impacted by the activities. For example, a project that intervenes in a PA through strengthening law enforcement will also impact groups that live just outside a PA but have historically hunted inside the PA, even before it was created.

a. Name the groups; distinguish, if applicable, the geographical areas of their presence (including the areas of resource use) and how these relate to the project's area of influence.			
b. What are the key characteristics that qualify the identified groups as indigenous groups? Do these groups identify themselves as indigenous? And how does the host country's Government refer to these groups?			
c. Explain whether communities have traditionally lived in the project site or whether there are groups or some households who have moved from their traditional area to the project site to be in or near a protected area for economic reasons. <sup>23</sup>			
d. Is there a risk that the project affects their livelihood through <b>physical or economic displacement</b> ? While this is covered in section C2, if yes, please specify the indigenous groups affected. For projects promoting protected areas, distinguish between communities whose traditional resource use areas overlap with the PA, even before it was created, from those who have a recent history and presence there.	n/a		
e. Is there a risk that the project affects indigenous peoples' <b>rights or livelihood</b> by using or commercially developing natural resources on lands and territories claimed by them, by affecting their traditional livelihood, their self-determination, cultural identity, values and practices, or their development priorities?	n/a		
f. Is there a risk of affecting the cultural heritage of indigenous peoples by using or contributing to the <b>commercialisation</b> of indigenous peoples' <b>traditional knowledge</b> (including ecological) or practices?	n/a		
g. Are any indigenous groups living in <b>voluntary isolation</b> ? If yes, how does the project respect their rights (paying attention to national laws on the matter) and avoid any negative impacts?	n/a		
h. Explain whether and how legitimate representatives of indigenous groups have been <b>consulted</b> to discuss the project and better understand potential impacts upon them? Has a process been started or implemented to achieve their free, prior and informed consent ( <b>FPIC</b> ) to activities that might affect them (positively or negatively)?	n/a		
i. Explain whether opportunities are considered to provide <b>benefits</b> for indigenous peoples? If yes, is it ensured that this is done in a way agreed with them and is culturally appropriate and gender inclusive?			

**Conclusion of ESMS Reviewer on the Standard on Indigenous Peoples**

<sup>23</sup> It is important to bear in mind that the Standard is seen to generally apply to the community and not to an individual that may have left the community.



<p>What are the main gaps with regards to the provisions of the Standard?  What are the main risks and who are the main groups potentially affected?  Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?  Have measures for avoiding impacts already been considered? Are they sufficient? What safeguard tools are to be prepared (e.g. Indigenous Peoples Plan)? When would the plans need to be available (complete and accepted)?</p>	<p>The standard is not triggered as the project sites do not overlap with indigenous peoples' territory. For precautionary reasons, it is recommended that all sites, where concrete field interventions will take place, should undergo a quick socio-economic screening in order to identify vulnerable or marginalized groups (including groups considered as historically marginalized) and ensure that they are not negatively impacted by project activities (covered in section B). Note that potential impacts from access restrictions are covered by the provisions under C1 and the respective requirements for consultation determined by the Standard on Involuntary Resettlement and Access Restrictions (including FPIC) apply.</p>		
Standard triggered? (Yes / No / TBD)	No	Estimated likelihood of risks (1-5): n/a	Estimated impact (1-5): n/a

### C3: Standard on Cultural Heritage<sup>24</sup>

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, TBD	Answer question and describe how the risks are <b>being assessed, avoided or managed</b>	Comments, additional considerations
1. Is the project located in or near a site officially designated or proposed as a cultural heritage site (e.g., UNESCO World Cultural or Mixed Heritage Sites, or Cultural Landscapes) or a nationally designated site for cultural heritage protection? <b>if yes, answer a-c below</b>	No		
2. Does the project site include important cultural resources such as burial sites, buildings or monuments of archaeological, historical, artistic, religious, spiritual or symbolic value? <b>if yes, answer a-c below</b>	TBD	None that the project team is aware of; however, the final sites of the interventions are not known yet.	
3. Does the project area site include any natural features or resources that are of cultural, spiritual, or symbolic significance (such as sacred natural sites, ceremonial areas, or sacred species)? <b>if yes, answer a-c below</b>	TBD	Eastern Province does contain such features or resources; this will be determined when exact sites for interventions are known.	
a. Will the project involve development of <b>infrastructure</b> (e.g. roads, building, dams) or construction of buildings (e.g. visitor centre, watch tower)?	No	Only small groundwater boreholes for livestock water will be drilled.	
b. Will the project involve <b>excavation</b> or movement of earth (e.g. for slope restoration, landslides stabilisation), flooding or physical environmental changes (e.g., as part of ecosystem restoration)?	Yes	There might be some movement of earth but very small-scale (e.g. shallow trenching across fields to slow erosion, digging of shallow boreholes to reduce drought stress for the livestock).	
c. Is there a risk that physical interventions described in items a. and b. might affect known or unknown (buried) cultural resources?	No	Given the very small-scale nature of the earth movements size, no impacts are expected	
4. Will the project restrict local users' <b>access</b> to cultural resources or natural features/sites with cultural, spiritual or symbolic significance?	No	The project will work with individual privately owned farm lands predominantly, and some public forest or degraded	

<sup>24</sup> Cultural heritage is defined as tangible or intangible, movable or immovable cultural resource or site with paleontological, archaeological, historical, cultural, artistic, religious, spiritual or symbolic value for a nation, people or community, or natural feature or resource with cultural, religious, spiritual or symbolic significance for a nation, people or community associated with that feature.

		lands on hillsides. While it is theoretical possible, it seems highly unlikely that the landscape restoration work and the work on tree plantations require restricting people's access to cultural resource.	
5. Is there a risk that project activities might affect <b>in-tangible cultural resources</b> such as values, norms or practices of local communities?	No	Very unlikely. Some individual farmers may voluntarily shift from traditional agricultural practices to climate smart agriculture practices, improved water management practices, and different crops.	
6. Will the project promote the use of or the development of economic <b>benefits from cultural heritage</b> resources or natural features/sites with cultural significance to which local communities have recognized rights (legally or customarily defined)?	No	No, cultural and natural heritage resources are not involved in project activities.	
<b>Conclusion of ESMS Reviewer on the Standard on Cultural Heritage</b>			
<p>What are the main gaps with regards to the provisions of the Standard?  What are the main risks and what are the main receptors (groups, resources) potentially affected?  Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?  Have measures for avoiding impacts already been considered? Are they sufficient? What are the safeguard tools to be prepared (e.g. Chance Find procedures)? When would these need to be available (complete and accepted)?</p>		<p>There is a very small likelihood of encountering hidden cultural resources when undertaking earth movements caused by works related to erosion control or digging of shallow boreholes. The likelihood and impacts need to be determined for each sub-project but can be readily addressed by providing Chance Find Procedures hence reducing the risk to being negligible status.</p>	
Standard triggered? (Yes / No / TBD)		TBD	<p>Estimated likelihood of risks (1-5): 2</p> <p>Estimated impact (1-5): 1</p>

#### C4: Standard on Biodiversity Conservation and Sustainable Use of Natural Resources

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, TBD	Answer question and describe how the risks are <b>being assessed, avoided or managed</b>	Comments, additional considerations
<p>1. Is the project located in or near areas</p> <ul style="list-style-type: none"> <li>legally protected or officially proposed for protection including reserves according to IUCN Protected Area Management Categories I - VI, UNESCO Natural World Heritage Sites, UNESCO Biosphere Reserves, Ramsar Convention on Wetlands</li> <li>recognized for their high biodiversity value and protected as such by indigenous peoples or other local users</li> <li>which are not covered in existing protection systems but identified by authoritative sources for their high biodiversity value<sup>25</sup></li> </ul>	Yes	A small % of project lands are located in the buffer zone of Akagera National Park, where approximately 400 ha of its buffer zone will be restored and protected through tree/shrub planting and implementation of participatory silvopastoral systems. Akagera National Park was founded in 1934 to protect animals and vegetation. The park used to cover 2.500 km <sup>2</sup> but in 1997, it was reduced in size by close to 50%. A lot of the land was reallocated	

<sup>25</sup> Areas important to threatened species according to IUCN Red List of Threatened Species, important to endemic or restricted-range species or to migratory and congregatory species; areas representing key evolutionary processes, providing connectivity with other critical habitats or key ecosystem services; highly threatened and/or unique ecosystems (e.g. to be determined in future by the evolving IUCN Red List of Ecosystems); areas identified as Key Biodiversity Areas (KBA) and subsets such as important Bird and Biodiversity Areas (IBAs), important Plant Areas (IPAs), important Sites for Freshwater Biodiversity or Alliance for Zero Extinction (AZE) sites.

		<p>to refugees returning to Rwanda around 1995 to 1997, many refugees returning to Rwanda had resettled in the area and the conservation was harmed by poaching and cultivation.</p> <p>There is also in Eastern Province the Gashora-Mugesera-Rweru Complex wetland located between Ngoma and Bugesera Districts and forming borders with Republic of Burundi in south. This is a major source of water supply to the areas, provides tourism and fishing activities to the population and is habitat to a variety of threatened bird species.</p> <p>Wetlands are expected to be involved in the project through restoration of 700 ha of lake/river shorelines through tree/shrub planting as most of the wetlands are located in the flood plains of the rivers and lakes. They are government lands, not privately owned, and their buffers are controlled by the govt. The project could possibly support a few 100 hectares of tree planting to revegetate the required govt. buffer around wetlands – but if so, this would be done directly by the project’s govt. partner and implementer, Rwanda Water and Forestry Authority.</p> <p>This Gashora-Mugesera-Rweru Complex wetland is a proposed RAMSAR wetland of international importance. According to a national wetland survey conducted by Integrated Management of Critical Ecosystem (IMCE) in 2008, in Akagera/Mugesera catchment there are 74 wetlands (39569 ha) from which 24 are proposed RAMSAR status and 6.5% were still in natural status. However these wetlands are not candidates for inclusion in the project.</p>	
<p>2. If there are any project activities proposed within or adjacent to areas high biodiversity value or critical habitats <b>described above</b>, is there a risk of <b>causing adverse impacts</b> to biodiversity and the integrity of the ecosystems? Consider activities such as infrastructure works (e.g. watch tower, facilities, access roads, small scale water infrastructure) or ecotourism activities and impacts from inadequate waste disposal, disturbance of nesting sites, slope erosion through hiking trails etc. Consider both construction and use phases.</p>	No	No project activities will take place inside of Akagera National Park or other protected areas. The only interventions planned for the existing buffer zones area around the Park are restoration activities which are expected to lead to highly positive impacts on biodiversity.	
<p>3. Is there a risk of significant <b>adverse impacts</b> on biodiversity <b>outside above described areas</b> (PA, buffer zone etc.), through infrastructure development, plantation development (even small scale) or other</p>	No	The restoration work is expected to lead to highly positive impacts on biodiversity.	

activities e.g. through the removal of vegetation cover, creation of soil erosion and/or debris deposition downslope, or other disturbances? Consider both construction and use phases.			
4. Is there a risk that the project affects areas of high biodiversity value <b>outside above described areas</b> (PA etc.), e.g. by procuring natural resource commodities (e.g. timber used for watch towers etc.)? If yes, explain whether appropriate industry-specific sustainability verification practices be used.	No		
5. Will the project introduce or use <b>non-native species</b> (flora and fauna), whether accidental or intentional? Consider activities such as reforestation, erosion control or dune stabilisation or livelihood activities (e.g. aquaculture, farming, horticulture etc.). If yes, explain how the risk of the species developing invasive characteristics is managed?	Yes	Species to be used by the project will include the most common existing economic tree species in Rwanda (eg, Grevillea, eucalyptus, etc.) and indigenous tree species in agroforestry systems. According to reference papers from ICRAF and others about 95% of forest lands in Rwanda have introduced common economic species. Local nurseries would produce up to 50 common and indigenous tree seedlings as well as grafted common fruit trees for selection by farmers to plant on their private lands (0.6 – 0.8 ha average). Most of the plant species to be used in agroforestry are commonly planted economic species desired by farmers that produce fruit, fodder for livestock, or timber. Some of the species are exotic, but have long been in very wide use in Rwanda and in Eastern province (eg, Grevillea robusta, Eucalyptus species (about 5 species), mangoes, avocado, etc. No exotic species with a danger of being released or introduced by accident will be used by the project.	While the risk is considered low given the common species selection in Rwanda for forest and agroforestry areas, the project should nevertheless develop a protocol with clear guidance what is allowed and which species are excluded. To be included in ESMP
6. Is there a risk that the project might create other pathways for spreading <b>invasive species</b> (e.g. through creation of corridors, import of commodities, tourism or movement of boats)?	No	The project is not expected to create corridors for movement of invasive species, either, since project lands are expected to be a true mosaic, with little continuous or adjacent plots since individual farmers must volunteer to participate.	
7. Is there a risk that the project negatively affects <b>water dynamics</b> or <b>water flows</b> through extraction, diversion or containment of surface or ground water (e.g., through dams, reservoirs, canals, levees, river basin developments, groundwater extraction) or through other activities and as such affects the hydrological cycle, alters existing stream flow and/or reduces seasonal availability of water resources?	Yes	Some project activities like digging of boreholes for livestock, may lead to lowering of water tables. Therefore, the control measures of water abstraction to match as possible the groundwater recharge will have to be put in place.	Control measures to be specified in the ESMP for the respective sub-project
8. Is there a risk that the project affects <b>water quality</b> of surface or groundwater (e.g., contamination, increase of salinity) through irrigation/ agricultural run-off, water extraction practices, influence of livestock or other activities?	Yes	Introduction of new agricultural practices may need the use of fertiliser which may add loadings to the soil and water resources and could increase nutrient content of water resources. In addition the drilling of boreholes for livestock can increase the salinity of surface water, operation of boreholes can lead to soil erosion which can	Control measures to be added to ESMP for the respective sub-project

		impact on downstream hydrology and water quality (through increased turbidity and siltation);	
9. Will the project involve or promote the application of pesticides, fungicides or herbicides ( <b>biocides</b> )? Also consider the use of integrated pest management.	TBD	No. Pest management is not a planned feature of this project. Individual farmers will decide, with project tech assistance, which climate-smart cropping practices to use, but the use of pesticide it outside the manageable influence of the project.	
10. Will the project involve handling or utilization of <b>genetically modified organisms</b> /living modified organisms?			
11. If the project promotes the use of living natural resources (such as non-timber forest products) from natural habitats, how will the project ensure that harvest rates are controlled/ monitored?	No	No harvesting from natural habitat is foreseen, only management of modified habitat such as plantations.	
12. Does the project promote the use of <b>genetic resources</b> from natural habitats (e.g. harvesting, market development), and if so, what are the measures for access and benefit-sharing relating to these?	No		
13. Is there a risk that the project could give rise to an increase of incoming <b>migration</b> and population increase, which could put a strain on the existing natural resource base?		The Eastern Region has received immigration flows from neighbouring countries during the period of 1994-2000. It is not expected that the project will stimulate significant additional streams as 1) there is a large amount of underemployment and unemployment in EP that can provide the required labour for tree planting etc., 2) most activities will be on private land with labor provided by the farmer families and neighbours or hired local part time labor, and 3) very little land is available for anyone – given Rwanda is one of the most densely populated countries in the world.	
14. Could the project result in <b>noise and vibration</b> from construction and maintenance equipment, traffic and activities, which may disturb sensitive fauna receptors, including underwater noise impacts on fish and marine mammals?	No	No heavy equipment and machinery that cause noise and vibration are anticipated in the project.	
<b>Conclusion of ESMS Reviewer on the Standard on Biodiversity Conservation and Sustainable Use of Natural Resources</b>			
<p><i>What are the main gaps with regards to the provisions of the Standard?</i></p> <p><i>What are the main risks and what are the main receptors (areas, species etc.) potentially affected?</i></p> <p><i>Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed?</i></p> <p><i>Have measures for avoiding impacts already been considered? Are they sufficient? What are the safeguard tools to be prepared (e.g. Pest Management Plan, Protocol for Species Selection)? When would these tools need to be available (complete and accepted)?</i></p>		<p>The standard is triggered as a few risks have been identified. The adverse impacts, however, are expected to be of minor magnitude, very small scale and can be easily avoided or managed with measures as described above that are well known and readily available. Hence, capturing them in the project's overall ESMP and then specifying control measures for each sub-project is considered sufficient.</p>	
Standard triggered? (Yes / No / TBD)	Yes	Estimated likelihood of risks (1-5): 2	Estimated impact (1-5): 2

## D. Integrating ESMS Principles in Project Design

The below table reviews the project and its design process on adherence to the ESMS Principles. The principles are described in the ESMS Manual. Please note that the Guidance Note on Stakeholder Engagement<sup>26</sup> represents a new policy provision and delineates further requirements for consultation and involvement of stakeholder during project design and implementation.

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, TBD	Answer question, provide further detail where relevant	Comments, additional considerations
1. Has a <b>Stakeholder Analysis</b> been done and documented identifying a project's key SH, assessing their interest in the project, ways in which they may influence the project's outcomes and how they might be impacted by project activities (positively or negatively)?	Yes	A stakeholder analysis has been done distinguishing government agencies at national and local level, local community, civil society organizations and NGOs, private sector, international organization and research institutions. Influence, impacts and interests of the stakeholder on the project were assessed. Details on interests of each stakeholder in the project are provided in a separated stakeholders engagement plan (SEP).	
2. Does the analysis differentiate between women and men, and along key axes of social differentiation, where relevant?	Yes	In the gender analysis, key axes of social differentiation between men and women have been elucidated	
3. In case stakeholders have been identified that might be negatively affected by the project, please name the groups.	TBD	So far, the positive impacts of the project outweigh the negative ones.	The rapid social analysis will dig deeper once intervention sites are selected
4. Has information about the project and potential risks (ESIA, ESMP) been <b>disclosed</b> ? If yes, indicate the sites. If not, explain how and when this will happen.	No	As precision on the site for project interventions are not known, only project activities were communicated during stakeholder consultation meetings.	The ESMF will be disclosed as per ESMS Manual (website of IUCN and EA) and made available locally.
5. Have <b>consultations</b> been held with relevant groups to discuss the project concept and risks? Were consultations conducted in a meaningful and culturally appropriate way? Provide details about the form of consultations and the groups involved.	Yes	During the preparatory phase of the project documents, several stakeholder engagement activities have been performed including informal and formal stakeholder mapping which was undertaken by IUCN staff, Rwanda Water and Forestry Authority (RWFA) and ENABEL in 2016-2017 that led to two early stakeholder workshops in Kigali and in Musanze, one in each year. Lists of stakeholder categories and then groups and individuals best able to represent them were developed, and invitations issued to the events. The SH consultations were conducted in four phases, which comprised individuals in the project zones of interventions, workshops with executing agencies, meetings in Kigali and focus group discussions with key stakeholders having interest in the project activities : <b>Phase 1:</b> Meetings with key stakeholder representatives in the capital, Kigali and with Eastern Province stakeholders coming to Kigali. This two days' workshop was organized at Lemigo Hotel in Kigali and its objective was to enhance unique features of the GCF "Scaling up Sustainable Forest Management, Landscape Restoration and Disaster Risks reduction Programme for Rwanda and develop an advanced version of the GCF concept note and a road map towards the full proposal for Rwanda.	

<sup>26</sup> Available at [www.iucn.org/esms](http://www.iucn.org/esms)

		<p><b>Phase 2:</b> involved individual meetings in all Eastern Province's 7 districts, with stakeholders contacted for this purpose, via a set of 6 team missions in May to July, 2018. Two, three or four TREPA consultant team members plus RWFA agency senior staff organized and made each mission, usually accompanied by one or more district staff. Missions started in the district government headquarters, meeting the mayor or vice mayor, district planners, forestry officers, agriculture support staff and trainers, water management specialists, etc. Joint Action Development Forum (JADF) staff were consulted, since they have the mission of ensuring sustainable socioeconomic development and improved service delivery through the dialogue among stakeholders; active participation; accountability; information sharing and coordination of stakeholders' interventions in decentralized entities. JADF staff helped identify other SH to consult with in the district, including: women's groups, farmer cooperatives of men and women, tree nursery operators and workers, women managing households, farmers working private farms with agroforestry and other crops, cooperative agricultural and forest product supply chain trainers and workers.</p> <p><b>Phase 3</b> of consultation continues the 3 previous broad SH meetings held in Kigali in 2017, and the Inception Retreat in Musanze, May 2-3, 2018. A district validation workshop took place 2018 August 4<sup>th</sup> in Rwamagana District, the headquarters of Eastern Province, for representatives of the 7 districts. The elements of the draft proposal were shared at those meetings with SH from districts and national governments and project partners.</p> <p><b>Phase 4:</b> Focus group discussions, during this phase a gender of expert working for TREPA project, met with various groups of SH in the project sites (all districts of Eastern Province), as well as with representatives of public, private and non-government agencies, in Kigali and in EP.</p> <p>More details on the issues and outcomes of these SH consultative meeting are provided in the SEP.</p>	
<p>6. Were women involved in the consultations or consulted separately? Please provide details.</p>	<p>Yes</p>	<p>A Gender Analysis and Gender Action Plan was produced, based on key informant interviews with a half-dozen government agencies and in four districts. The assessment part reviews national policies and programs re gender and women, and assesses how the major interventions planned in the project in Eastern Province could affect women and what steps are needed to ensure equal participation by women. Consultations held by the gender expert in the team identified and discussed potential roles women might play in the project with the women interviewed, the proposed interventions in land restoration and farming and cookstove/fuelwood efficiency upgrades. The institutional capacity building endeavours with farmer cooperatives (dominated by women in many villages), Savings Groups, SACCOs, and Farmer Field Schools were discussed with women alone or in small groups and mixed with men in most districts.</p>	

		More details of women associations consulted for TREPA project are described in the SEP	
7. Have <b>vulnerable groups</b> such as disadvantaged or marginalized people been consulted or stakeholders that might be negatively affected? Please provide details about the groups, the consultations and results of the consultations.	No	As at this stage we are not sure of the presence of historically marginalised people in the project area of interventions.	The rapid social analysis will provide for further once intervention sites are selected
8. While gender risks have been covered in section B, briefly describe how the project is likely to <b>improve gender equality</b> and women's empowerment.		The three components of the project have a number of activities which aim at improving gender equality and contributing to women empowerment. These include: training of women cooperatives, women members of mixed cooperatives and women entrepreneurs in technical and economic matters including use and maintenance of water catchment and water supply, financing products and loans; training of women trainer of trainers (ToTs) to better engage and communicate with other women farmers, increase engagement in the selected value chains, facilitating adoption of technology . In addition the project aims to build capacity of women staff in public, private, CSO and FBO's institutions. The GAP provides for indicators and targets to ensure monitoring of these gender related strategies and activities.	
9. Has a <b>project-level grievance redress mechanism (GRM)</b> been established that explains the processes for submitting, resolving and escalating grievances? If not, explain how and when this will happen. If indigenous peoples are present, explain how it will be ensured that a GRM is available that is culturally appropriate, available in local languages, accessible to affected indigenous peoples, and take into account the availability of customary dispute settlement mechanisms among indigenous peoples.	No	Not yet.	The GRM will need to be established in the ESMF
10. Is the project in full compliance with laws and regulations of the host country incl. those implementing obligations under international laws (incl. provisions for disclosure and consultation)? Are relevant licenses or permits available?	YES	Details to be provided in the ESMF	

**Conclusion of ESMS Reviewer**

*Are ESMS requirements on stakeholder engagement, disclosure and grievance fulfilled to satisfactory level? What additional actions need to be carried out and by when? What actions to be implemented during the project should be included in the ESMP or the Stakeholder Engagement Plan?*

ESMS requirements on stakeholder engagement have been fulfilled to a satisfactory level, disclosure and grievance will need to be addressed by the ESMF and the subsequent steps.