

Resettlement Policy Framework



Republic of Rwanda
Ministry of Health

STUNTING PREVENTION AND REDUCTION PROJECT (P179499)

RESETTLEMENT POLICY FRAMEWORK

FOR THE ADDITIONAL FINANCING

November 2023

Resettlement Policy Framework

Table of Contents

List of Tables	6
Abbreviations	7
Definitions	8
EXECUTIVE SUMMARY	10
1.0 Project Description	11
1.1. The Project Development Objective	11
1.2. The Project Components	12
2.0 Rationale for preparation of the Resettlement Policy Framework.....	16
3.0 Objectives, Principles and Methodology used for the preparation of RPF.	17
3.1 Objectives of the RPF	17
3.2 RPF Methodology and Stakeholder Engagement.....	20
3.2.1 Methodology	20
3.2.2 Stakeholder Engagement	20
3.2.3. Field Works	21
4.0 Literature Review	22
5.0 Legal and regulatory Framework	23
5.1. National Resettlement Regulations:	23
5.1.1. Constitution of Rwanda	23
5.1.2. Expropriation Law in the Public interest	23
5.1.3. Law N° 43/2013 of 16/06/2013 governing land in Rwanda.....	24
5.1.4. National Land Policy	25
5.1.5. Law establishing and Organizing the Real Property Valuation Profession in Rwanda	25
5.1.6. Grievance Redress Mechanism	25
5.1.7. World Bank Environmental and Social Framework.....	26
5.2. Comparative Analysis between Rwanda Legislations and World bank ESS5	31
6.0. Institutional Framework.....	36
7.0 POTENTIAL IMPACTS AND PROJECT AFFECTED PERSONS	37
7.1. Definition of Project Affected People (PAPs).....	37
7.2. Anticipated Project Impacts.....	38
7.2.1. Project Activities requiring Land Acquisition	38
7.2.2. Program impacts	38

Resettlement Policy Framework

7.2.3. Categories of PAPs.....	39
7.3. Approximate number of PAPs.....	39
7.4 Preparation of Resettlement instruments.....	40
7.5. Environmental project impacts.....	40
7.6 Anticipated project challenges.....	40
7.8 Mitigation measures	43
7.9 Valuation and Compensation.....	43
7.10. Projects Screening	43
8.0 Preparation of RAPs	44
9.0 Stakeholders' consultation and participation	44
10. Grievance Redress Mechanism	45
11. Monitoring and evaluation aspects	46
12. Institutional capacity assessment for RPF implementation	46
13. Capacity building and training	46
14. Budget.....	47
15. Public disclosure of resettlement instruments	47
PROCESS FOR SCREENING, PREPARING AND APPROVING RESETTLEMENT ACTION PLANS	48
I. Process for preparing and approving Resettlement Plans	48
1.1. Screening Mechanism for Resettlement Plans.....	48
1.2. Scope of Resettlement Action Plans	48
1.3. Preliminary Assessments	49
1.4. Baseline and socio-economic data	49
II. Preparation of Resettlement Action plans and approval process	50
2.1. Process for identifying need for Resettlement Plan.....	51
2.2. Sub-project screening.....	51
2.3. Socio-economic Survey	51
2.4. Project Affected Person's (PAPs) Census	51
2.5. Preparation of asset inventory	52
III. Public consultations and participation	52
3.1. Indicative timings for the consultation processes.....	53
3.2. Consultation at inception phase	54
3.3. Consultation at data collection and resettlement preparation phase.....	54
3.4. Consultation at implementation, monitoring, and evaluation phases	54

Resettlement Policy Framework

IV. Eligibility criteria for various categories of PAPs	55
4.1. Principles of resettlement	55
4.2 Eligibility criteria for compensation	56
4.3. Cut-off date	56
4.4. Assets inventory and valuation methods	56
4.5 Valuation methods	57
4.6. Calculation of compensation by assets	58
V. Legal framework for the Institute of the Real Property Valuers in Rwanda (IRPV) and Land Surveyors	63
5.1. Preparation of Asset Inventory and PAPs identification	63
5.2. Forms of compensation	64
5.3. Consultation and Participatory Approaches	65
5.4. Disclosure and notification	65
5.5. Documentation and verification of land and other assets	65
5.6. Individual / household compensation	66
5.7. Procedures for delivery of compensation	66
VI. Resettlement Action Plan and Grievance Redress Mechanism	66
6.1. Community expectations when grievances arise	66
6.2. Anticipated grievances during the implementation of proposed project	67
6.3. Procedures and timeframe	67
6.4. Grievance Prevention	67
VII. GRIEVANCE REDRESS MECHANISM	68
7.1 Introduction	68
7.2. Objectives of Grievance Redress Mechanism (GRM)	69
7.3. Grievance Redress process	69
7.4. Grievance channel for Gender-Based Violence	72
7.5. Judiciary Level Grievance Redress Mechanism	72
7.6. Grievance Logbook	75
7.7. Monitoring Complaints	75
VII. Approval of Resettlement Action Plans	75
8.1. Organs determining projects of expropriation in the public interest	75
8.2. Organs supervising projects of expropriation in the public interest	75
8.3. Organs approving expropriation in the public interest	76
8.4. Procedure for expropriation in the public interest	76

Resettlement Policy Framework

8.5. Resettlement Action Plan Implementing Agencies	77
9.0 COMMUNITY ENGAGEMENT	77
9.1. Public consultation	77
9.1.1. Overview	77
9.1.2. Purpose	77
9.2. Public consultations and participation	78
9.3. Stakeholders	78
9.4. Disclosure of resettlement Instruments	79
9.5. Feedback from consultation with stakeholders	79
X. IMPLEMENTATION, MONITORING AND BUDGET	80
10.1. Institutional arrangement	81
10.2. RPF Monitoring and Evaluation Framework	82
10.2.1. Monitoring indicators	82
10.2.2. Monitoring of RPF implementation	84
10.2.3. Storage of PAPs Details	84
10.2.4. Annual Audit	85
10.2.5. Socio-economic monitoring	85
10.3. Capacity Assessment and Capacity building	85
10.4. Documents Consulted and Resource Material	86
10.5. Stakeholder engagement with SPRP district beneficiaries	87

Resettlement Policy Framework

List of Tables

Table 1. Comparison of Rwandan legislations and World Bank standards on Resettlement and Compensation	32
Table 2: Anticipated challenges and Proposed mitigation measures.....	41
Table 3: Time frame for consultation and involved stakeholders.	53
Table 4: Fruits Compensation	60
Table 5: Proposed schedule for mango trees cut down.	61
Table 6: Individual compensation	62
Table 7: Process, stage and timeframe for grievance resolution.....	72
Table 8: Proposed Members of GRC and their roles.....	73
Table 9: Proposed members of the GBV taskforce.	Error! Bookmark not defined.
Table 10: Other methods of communication with the stakeholders.....	74
Table 11: Timeframe for RPF stakeholder’s consultation	80
Table 12: Summary of roles and responsibilities of various institutions involved in resettlement process for the proposed program.	81

Resettlement Policy Framework

Abbreviations

WB	World Bank
RBC	Rwanda Biomedical Centre
IDA	International Development Association
GoR	Government of Rwanda
WASAC	Water and Sanitation Corporation
NCDA	National Child Development Agency
CBO	Community Based Organization
DD	Demographic Dividend
CSO	Civil Society Organization
EICV	Integrated Household Living Survey
ESMF	Environment and Social Management Framework
ESMP	Environmental and Social Management Plan
GRCs	Grievance Redress Committees
IDP's	Internally Displaced Persons
SDS	Safeguards Data Sheet
M&E	Monitoring and Evaluation
SPIU	Single Project Implementation Unit
SPRP	Stunting Prevention and Reduction Project
NLA	National Land Authority
NGO	Non-Governmental Organization
REMA	Rwanda Environment Management Authority
NST	National Transformation Strategy
GRM	Grievance Redress Mechanism
GRC	Grievance Redress Committee
PDO	Project Development Objective
RAP	Resettlement Action Plan
RDB	Rwanda Development Board
RPF	Resettlement Policy Framework
VLD	Voluntary Land Donation
ECD	Early Child Development

Resettlement Policy Framework

Definitions

Unless the context dictates otherwise, the following terms shall have the following meanings:

- **“Project affected persons”** (PAPs) means persons who, for reasons of the involuntary taking of their land and other assets under the project, result in direct economic and or social adverse impacts, regardless of whether the PAPs physically relocate. These people may have their:
 - I. Standard of living adversely affected, whether or not the PAP must move to another location;
 - II. Right, title, investment in any house, land (including premises, agricultural and grazing land) or any other fixed or movable asset temporarily or permanently possessed or adversely affected;
 - III. Access to productive assets temporarily or permanently adversely affected; or
 - IV. Business, occupation, work or place of residence or habitat adversely affected.
 - V. The cost of any registration and transfer taxes.
- **“Involuntary resettlement”** means the involuntary taking of land resulting in direct or indirect economic and social impacts caused by:
 - a) Loss of benefits from use of such land;
 - b) Relocation or loss of shelter;
 - c) Loss of assets or access to assets; or
 - d) Loss of income sources or means of livelihood, whether the PAP has moved to another location.
- **“Cut-off date”** is the date of commencement of the census of PAPs within the project area boundaries (including unidentified owners). Beyond this date, any person not included in the census who lays claim to land, or assets affected by the project (which they did not own before the cut-off date) will not be eligible for compensation.
- **“Expropriation”** the taking of private property in the public interest aimed at development, social welfare, security, and the territorial integrity.
- **“Environmental and Social Standards” (ESSs)** set out the requirements for Borrowers/Clients relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. Ten ESSs establish the standards that the Borrower/Client and the project should meet through the project life cycle.
- **“Land”** refers to agricultural and/or non-agricultural land whether temporary or permanent and which may be required for the Project.
- **“Land acquisition”** means the taking of or alienation of land, buildings, or other assets thereon for purposes of the Project under eminent domain.
- **“Livelihood”** refers to the full range of means that individuals, families and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade and bartering.
- **“Just compensation”** an indemnity equivalent to the value of land and the activities performed thereon given to the expropriated person and calculated in consideration of market prices.

Resettlement Policy Framework

- **"Involuntary Land Acquisition"** is the taking of land by government or other government agencies for compensation, for the purposes of a public project. The landowner may be left with the right to negotiate the amount of compensation proposed. This includes land or assets for which the owner enjoys uncontested customary rights.
- **"Resettlement Plan"**: It is a resettlement instrument (document) to be prepared when subproject locations are identified. Land acquisition leads to physical displacement of persons, and/or loss of shelter, and /or loss of livelihoods and/or loss, denial, or restriction of access to economic resources. Resettlement Plans are prepared by the party impacting on the people and their livelihoods. RAPs contain specific and legally binding requirements to be abided by to resettle and compensate the affected party before implementation of the project activities causing adverse impacts.
- **"Resettlement Assistance"** means the measures to ensure that project affected persons who may require to be physically relocated are provided with assistance such as moving allowances, residential housing or rentals whichever is feasible and as required, for ease of resettlement during relocation.
- **"Resettlement Policy Framework (RPF)"** is an instrument to be used throughout the implementation of proposed project. It sets out the resettlement and compensation policy, organizational arrangements, and design criteria to be applied to all sub-projects during implementation to meet the needs of the people who may be affected by those sub-project activities. The Resettlement Plans for the specific sites will be prepared consistent with the provisions of this RPF.
- **"Restrictions on land use"** refers to limitations or prohibitions on the use of agricultural, residential, commercial, or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, and restrictions on land use within utility easements or safety zones.
- **"Stakeholders"** refers to individuals or groups who: (a) Are affected or likely to be affected by the project (project-affected parties); and (b) May have an interest in the project (other interested parties) while **"Vulnerable Groups"** refers to: Widows, the disabled, marginalized groups, low-income households and informal sector operators; Households with no labour; Child-headed households and street children.
- **"Abunzi"** Mediators an elected dispute resolution body in Rwanda at the cell level with mandatory jurisdiction over disputes involving amounts less than three million (3,000,000) Rwandan francs, which means almost all land disputes. The *Abunzi* also have mandatory jurisdiction over succession and boundary disputes involving less than three million Rwandan francs.
- **"Act of public interest"** an act of Government, public institution, nongovernmental organization, legally accepted associations operating in the country or of an individual, with an aim of a public interest.
- **"Census"** is a complete count of the population affected Project activity including collation of demographic and socioeconomic information. This will identify and determine the number of Project Affected Persons (PAPs) and the nature and levels of impact.
- **"Compensation"** means the payment in kind, cash or other assets given in exchange for the taking of land, loss of other types of assets (including fixed assets) or loss of livelihoods resulting from project activities.

EXECUTIVE SUMMARY

The Government of Rwanda and the World Bank have developed an integrated program to combat chronic malnutrition which is based on global evidence, with a focus on high stunting districts, vulnerable populations, and the critical 1,000 days beyond which stunting becomes largely irreversible. The program aims to: (i) support cross-sectoral interventions through operations in health, social protection, and agriculture; (ii) promote innovations in service delivery. The project's first additional financing costed US\$55.0 million while the second Additional Financing is US\$79.0 million supporting the delivery of nutrition, health and WASH. WASH Interventions will focus on increasing access to clean water to communities in the SPRP are of intervention, ECDs, Schools, as well as Health Centers.

Access to safe drinking water and sanitation is critical not just for people's health and well-being, but also for poverty reduction and economic growth. Recognizing this important role of the WASH sector, the Government of Rwanda has committed to achieving universal access to the services by 2024 as per NST-1. Recognizing this important role of the WASH sector, the Government of Rwanda has committed to achieving universal access to the services by 2024 as per NST-1. Currently, the data availed by Rwanda Population and Housing Census (PHC 2022) indicates an improved access of 82.3% countrywide, and the target is to reach 100% of water access by 2024 as per the Government strategy for transformation (NST1).

With the current project, we intend to increase water access rates in the targeted Districts, with a special focus on water access to ECD centers, schools, and communities within the project area; to contribute to the fight against children stunting.

"Poor water supply and sanitary conditions due to the lack of adequate water supply promote diarrhea, intestinal parasites, and environmental enteropathy, and have complex and reciprocal links to malnutrition in children. Existing evidence demonstrates that water, sanitation, and hygiene (WASH) can affect a child's nutritional status via at least three direct pathways: (i) diarrhea diseases, (ii) intestinal parasites and (iii) environmental enteropathy. Moreover, lack of adequate WASH services also impacts the nutritional status indirectly through increased workload (walking long distances in search of water facilities) and diverting mothers' time from childcare. Malnutrition weakens the body's defenses and makes children more vulnerable to disease" (NWSP 2016). In addition to this, according to the impact pathway hypothesis, baby WASH interventions would reduce fecal exposure and fecal-oral transmission, through the improvement of WASH environmental conditions, maternal and childcare practices. This would lead to an improvement in child's health status (Diarrhea, soil-transmitted infections), which will have a positive effect on stunting reduction, and ultimately a positive impact on child growth and development.

With this project, it is expected to improve household sanitary and hygienic conditions of the project beneficiaries, personal hygiene practices, and good hygiene practices in complementary food preparation and storage. Reducing stunting requires multi-sectorial collaboration, to ensure that any driver to stunting is addressed and response actions are properly monitored to FastTrack the country progress regarding stunting reduction. It is in this regard that the National Child Development Agency (NCDA) is currently leading an initiative called "**2 Year Special Plan to Fight Stunting**" that aims to address stunting through a multi sectoral approach. Within this plan, the WASH sector is responsible for improving the water,

Resettlement Policy Framework

sanitation, and hygiene environment, which is a contributing factor to stunting. As stunting has a significant impact on early childhood and later stages of childhood, improving the WASH environment in ECDs, health centers, nurseries, kindergartens, primary and secondary schools is an urgent priority.

1.0 Project Description

The Stunting Prevention and Reduction Project (SPRP) will support the GOR to adopt a bold, new national approach to improve intervention in eliminating chronic malnutrition that has serious long-term negative consequences to our population. It will draw on Rwanda's unique experiences in promoting village based ECD centers, community health, positive deviance and performance-based approaches, technological innovations in the health sector and in making decentralized service delivery work for the poor and vulnerable. While the project will promote a national approach, targeted districts will benefit from more intensive support to maximize the impact on stunting reduction. At the local government level, the District Plan for Eliminating Malnutrition (DPEM) will serve as the basis for financing a comprehensive package of health and nutrition interventions in a coordinated fashion with other development partners funded activities at the district level. Centralized activities that will complement and enable effective operationalization of DPEMs implementation will be supported through the Ministry of Health, Rwanda Biomedical Center, and the National Early Childhood Development Program.

1.1. The Project Development Objective

The proposed Project Development Objective (PDO) is to contribute to the reduction in the stunting rate among children under five years of age (with a focus on those under two) in the targeted districts. Progress towards stunting reduction will be monitored through appropriate impact indicators and intermediate indicators that focus on practices and behaviors that are known to have an impact on the nutritional status of infants and children and pregnant and lactating women. The main PDO level indicators will include: (1a) percentage of children under five years with height-for-age z-score below -2 standard deviations of the median for the WHO reference population; (1b) percentage of children under 2 years with height-for-age z-score below -2 standard deviations of the median for the WHO reference population. (2) percentage of children 6-23 months old who are fed a diverse diet; (3) percentage of women who attended four or more antenatal care visits during their most recent pregnancy; and (4) number of beneficiaries of project interventions. All indicators will be calculated based on denominators in the geographic areas covered by the project and disaggregated by district and gender, as relevant.

The Results Framework (Annex I) was discussed and finalized during negotiations. On the stunting reduction target, the government team noted that all districts are expected to reach the 19 percent target by 2024, in line with 2018-2024 Health Sector Strategic Plan. Given that the 13 districts currently have an average stunting rate for children under five of about 43.6 percent (37.1 percent for children under two), based on global evidence, it may prove exceedingly difficult to attain this ambitious 19 percent target in such a short time span, albeit it may be possible to do so over a longer time frame. In the spirit of bending the arc, and better aligning the targets for the 13 districts with the national target, it was discussed and agreed during negotiations to set an ambitious target of 32.0 percent for the 13 districts by the end of the five-year period. This scenario assumes complementary funding from other development partners and from the broader

Resettlement Policy Framework

World Bank program; enhanced multi-sectoral coordination; a rapid start-up with immediate and significant effect of these interventions on stunting; and no exogenous shocks that undermine food security in the 13 districts. Finally, it was agreed that the baseline data would be collected for the 13 districts, using the forthcoming Comprehensive Food Security and Vulnerability Analysis Survey. This will serve as the basis for updating the baseline and target figures.

The project will also support the achievement of key indicators through the national performance based financing scheme, including: (i) percentage of women who attended four or more antenatal care visits during their most recent pregnancy (PDO indicator); (ii) percentage of women and children who attended at least four postnatal care visits after delivery; (iii) percentage of women who use modern contraceptives; (iv) percentage of children participating in height monitoring and growth promotion at health facilities and followed up by CHWs; (v) number of pregnancies identified by CHWs during the first trimester; and (vi) percentage of CHWs who receive a quarterly supervision visit from health facility.

1.2. The Project Components

The project will support the government to adopt and implement a bold, new national strategy to improve the visibility of stunting in Rwanda, and to deliver harmonized behavior change messages across various platforms. While other development partners have engaged in important ways to combat malnutrition, what is transformational and ambitious in this project is the engagement in interventions across multiple sectors, leveraging and strengthening existing and new institutional structures to mobilize stakeholders; improve ownership and accountability; and ensure convergence of key interventions at the household and individual levels. Interventions span the full 1,000 days window, with innovations to also target the health and nutrition of adolescent girls.

The project will strengthen accountability by aligning incentives and actions at several critical levels:

- (i) incentivizing frontline CHWs;
- (ii) improving accountability of health personnel through the national PBF schemes;
- (iii) providing grant funds to district authorities to support the convergence agenda, build capacity to mount the multi-sectoral response, and ensure effective implementation and monitoring of the DPEMs; and
- (iv) incorporating nutrition indicators in the imihigo contracts between the President and respective mayors. The project will adopt a phased, learn-by-doing approach, underpinned by a solid operational research agenda around convergence, behavioral change, and performance-based approaches.

The grant funds from the MDTF and GFF will co-finance IDA credit resources for both this project and the social protection operation, two projects that have been prepared in tandem, and to be implemented in a coordinated fashion. With respect to the Stunting Prevention and Reduction Project, the MDTF grant will fund the full scale up of the delivery of a package of high impact health nutrition specific interventions; and co-finance communication campaigns and learning, knowledge sharing, and monitoring and evaluation (M&E). The GFF grant will co-finance the: (i) CHW program; (ii) district multi-sectoral response; and (ii) learning, knowledge sharing and M&E. The IDA credit will fund the bulk of the remaining activities under component 1; and project management.

Resettlement Policy Framework

The GFF will bring about several key benefits for Rwanda. First, it will strengthen multi-sectoral coordination, promote evidence-based multi-sectoral interventions, and leverage/improve key platforms (CHW), to implement the convergence approach. Second, it will support the government to improve efficiency and expand spending on high-impact, evidence-based nutrition specific and nutrition sensitive interventions. Third, it will put in place mechanisms for measuring and tracking progress, as well as supporting continuous learning and knowledge sharing on innovations supported through the World Bank project/program. The GFF process will be guided by an investment case that includes well-prioritized high impact multi-sectoral interventions to address stunting with a clear focus on results and alignment of financing to the priorities. The design, implementation and monitoring of the investment case will be driven by a government-led country platform that brings together key stakeholders.

The Results Chain in Annex I depict the proposed activities and expected results. It illustrates how the project will leverage two of Rwanda's strongest platforms (i.e. CHW, PBF); improve knowledge and promote behavior change; reach key beneficiaries with a comprehensive set of interventions; and strengthen home-based ECD to contribute to stunting prevention at the community level. DPEMs will serve as the basis for financing activities at the decentralized level. Districts will be expected to prepare updated, consolidated work plans for financing under the project, with clear strategies and targets, showing what other partners are financing and what gaps persist. The project bolsters coordination, strengthens country systems, and empowers and mobilizes local stakeholders.

The Government of Rwanda has selected 13 priority districts for World Bank support, based on three criteria: (i) high stunting levels; (ii) proportion of the population who are poor or extremely poor; and (iii) percent of households with moderate or severe food insecurity, with the highest weight given to stunting prevalence. The proposed districts are as follows: Nyabihu, Ngororero, Karongi, Rubavu, Rutsiro, Rusizi, Nyamagabe, Huye, Nyaruguru, Ruhango, Gakenke, Kayonza, and Bugesera. Three of the districts (Nyabihu, Karongi, and Kayonza) are part of the World Bank-funded agriculture project, allowing for targeted complementary interventions at the household level. The social protection project is designed to target poor and vulnerable households with pregnant women and young children in selected sectors of the same districts, thereby reaching beneficiaries with an appropriate mix of supply and demand side interventions. Figure 3 (Annex II) illustrates the geographic coverage of the program. Interventions to be funded under each component are described below.

Component 1: Prevention of Stunting at Community & Household Levels (US\$61.4.0 million equivalent)

This component will support the government to improve awareness of stunting, and deliver harmonized behavior change messages at all levels (i.e. national, local government, and household) and across several key sectors (i.e. health, social protection, agriculture, water, and sanitation). It will support the Ministry of Health (MoH)/RBC to implement, monitor and evaluate the revamped national, multi-sectoral behavioral change communication strategy, building on work funded by USAID and the European Union.

This component will boost the productivity and performance of CHWs and explore options for professionalizing them. CHWs will benefit from enhanced training on a revised curriculum focused on reinforcing household behavior change on complementary feeding, early childhood stimulation, and hygiene; improved supportive supervision and mentorship; innovative technologies to enhance their effectiveness and strengthen links to the health system; will be incentivized through the PBF scheme; and

Resettlement Policy Framework

will benefit from strengthening of the commodity supply chain. These interventions, to be supported at scale by both the World Bank and other partners, are critical for enhancing the performance of CHWs and driving the program's success. CHWs will continue playing a role in raising awareness about stunting, carrying outgrowth promotion activities, and sensitizing ECD caregivers and communities on the importance of proper child growth.

In addition, a \$10 million Recipient Executed Grant from the Early Learning Partnership Trust Fund (ELP) will co-finance the proposed AF by supporting the establishment of additional childcare settings including model, center-based and community-based ECD settings; training of caregivers and other stakeholders involved in ECD service provision at all levels (from village to central levels); provision of tools and materials to existing home-based and newly established ECD settings in the Project districts, and; support peer-to-peer learning amongst home-based ECD centers to promote innovative practices. This support will thus contribute to bridging the gap in quality of ECD service provision across the different ECD settings and as well as increasing ECD services to more children.

In parallel, the World Bank team is sharing with the Rwandan authorities the experience of other countries in professionalizing CHWs and has engaged in a policy dialogue to explore different options. These inputs will enable the generation of empirical lessons from implementation experiences and inform the government on the pros and cons of different models. The World Bank team is currently discussing several strategies that could be tested as part of the project, including (a) designing a new cadre of CHWs with higher qualifications, diplomas/certificates, who are remunerated; and (b) revamping the current CHW cooperative model to generate more income and better incentivize the delivery of priority health interventions. Given the fast-track preparation of this project, and the intrinsically complex nature of these issues, the goal is to incorporate these activities as part of the learning agenda that allows for innovation, continuous assessment and incorporation of lessons learned into the national program.

Component 1 will also roll out different community-based approaches and strategies for bringing about behavioral change such as home-based early childhood development models and positive deviance strategy. While the bulk of the proposed interventions address behavioral change, to address deficits in access to clean water and improve sanitation facilities that contribute to the high stunting rates, the component will also support complementary WASH interventions targeted to the most vulnerable groups (ubudehe 1 households) in the 13 participating districts. Finally, Component 1 will strengthen accountability mechanisms and governance structures at the community and district levels to bolster the multi-sectoral response. More specifically, the project will: (i) support the design and implementation of a new national communication strategy, including a state of the art media campaign and innovative communications tools customized to the Rwandan context; (ii) train, mentor, and equip CHWs to conduct growth promotion, including early identification and follow-up of children falling behind; behavior change communications on enhanced infant and young child care, feeding, and WASH practices; health and nutrition education for pregnant and lactating women and early referral to health facilities for nutrition services and health checkups; and to work closely with agricultural officers and the Twigire Muhinzi extension model, the local adaptation of the Farmer Field School (FFS) approach, on nutrition related content for extension services, such as nutrition-sensitive agriculture practices, and food preparation, processing and cooking demonstrations, and hygiene and sanitation during food preparation to maintain nutrition value of foods); this would include developing strategies and approaches based on the positive deviance methodology (i.e.

Resettlement Policy Framework

focusing on factors that explain nutritional success rather than failure), in collaboration with other key stakeholders (i.e. Ministry of Local Government, MINALOC, Ministry of Gender and Family Promotion, MIGEPROF, Ministry of Agriculture and Animal Resources, MINAGRI); likewise, the component would also support innovations to improve pre-conception nutrition of women through support for the development and testing of strategies for reaching adolescent girls with nutrition counseling and weekly iron and folic acid supplementation; (iii) incentivize CHWs through the performance-based financing scheme; (iv) strengthen and/or establish home-based, early childhood development models of care that serve as platforms for enhanced infant and child feeding, hygiene and sanitation practices and early learning and stimulation (Box 3); (v) provide targeted support to vulnerable households with young children to improve access to WASH interventions (i.e. sanitary latrines, handwashing stations with soap, household water treatment and safe water storage); and (vi) strengthen multi-sectoral district planning, budgeting, coordination, supervision, and monitoring.

Component 2: High-impact Health and Nutrition Services (US\$13 million equivalent)

To address key gaps in service delivery, health centers in the targeted districts will be supported and incentivized to improve utilization and coverage of an enhanced package of high-impact nutrition and health interventions. These interventions include those identified in the government's Acceleration of Reduction of Stunting Strategy which are in line with the 2008/2013 Lancet recommendations: (i) height monitoring and growth promotion and effective tracking of faltering children, early initiation and exclusive breast feeding, deworming, micronutrient supplementation (i.e. Vitamin A supplementation; therapeutic zinc supplementation with ORS; multiple micronutrient supplement powders); and (ii) critical nutrition and health interventions for women (i.e. four antenatal care visits, four postnatal care, iron/folic acid supplementation, family planning, counseling on child care, complementary feeding and hygiene). Health facilities will be held accountable and incentivized to provide these interventions through the national PBF program. The project will also support health facilities with training, information technologies, and logistical support from the national level. To this end, support will be provided for the design and roll out of new information technologies (i.e. two-way messaging system using smart phones and tablets) and interactive systems for tracking every pregnant woman and child, ensuring prompt identification of growth faltering and effective response at the facility and household levels. Performance Based Payments to the Health Centers and also to CHWs under Component 1 of the Project will be provided in accordance with the PBF Manual and a Supplemental PBF Manual for the Targeted Districts to be prepared by RBC that summarizes the proposed indicators; unit costs; weights; source of data; and verification/ counter verification procedures, along with a financial analysis of the impact of the incremental revenues for participating facilities and CHW cooperatives, prior to disbursing the PBF funds.

Component 3: M&E and Project Management (US\$4.6 million equivalent)

This component will support M&E, and project management. To this end, it will support the following activities: (i) conducting rigorous evaluations to draw timely lessons on what works, how much it costs, and how it can be scaled up; (ii) facilitating learning and knowledge sharing at both the community and district level; and (iii) supervising, coordinating, and providing oversight.

As participating districts scale up interventions, this component would support learning, knowledge sharing and innovations in service delivery. It would support the Ministry of Health and the Rwanda Biomedical

Resettlement Policy Framework

Centre in collaboration with NCDA under the Ministry of Gender and Family Promotion and MINALOC to: (i) review and revise nutrition and health related guidelines and protocols; (ii) develop strategies based on the positive deviance methodology (i.e. focusing on factors that explain nutritional success rather than failure); (iii) support the Rwanda health Communications Center to lead the design of a revamped national communication/ behavioral change communication strategy that would address issues related to infant/child care feeding practices, hygiene, sanitation, and safe water to be disseminated through different channels and ministries; (iv) adopt innovative technologies and interactive systems for tracking every pregnant woman and child until the child completes 1000 days, ensuring prompt identification of growth faltering and effective response at the household level; (v) facilitate learning and knowledge sharing among districts, as they scale up interventions and introduce innovations; and (vi) conduct rigorous evaluations to draw timely lessons on what works, how much it costs, and how it can be scaled up.

2.0 Rationale for preparation of the Resettlement Policy Framework

The newly adopted World Bank Environmental and Social Standards (October 2018) set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. The standards will:

- a) Support Borrowers in achieving good international practice relating to environmental and social sustainability;
- b) Assist Borrowers in fulfilling their national and international environmental and social obligations;
- c) Enhance nondiscrimination, transparency, participation, accountability, and governance; and
- d) Enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

The WB ESF ten Environmental and Social Standards establish the standards that the Borrower and the project will meet through the project life cycle. In this regard, ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement recognizes that project can have adverse impacts on communities and persons associated with related land acquisition, restrictions on land use, and involuntary resettlement.

The Stunting Reduction and Prevention project triggers various safeguard policies. The World Bank's new Environment and Social Framework (ESF) also sets out standards which among those can be relevant. These include (i) ESS1: Assessment and management of environmental and social risks and impacts; (ii) ESS2: Labour and Working Conditions; (iii) ESS3: Resource Efficiency and Pollution Prevention and Management; (iv) ESS4: Community health and safety; (v) ESS5: Land Acquisition, Restriction on Land Use and Involuntary Resettlement; (vi) ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; (vii) ESS8: Cultural Heritage; and (viii) ESS10: Stakeholder engagement and information disclosure.

Resettlement Policy Framework

This Resettlement Framework is developed to provide guidance on how to:

- (i) Avoid or minimize involuntary resettlement by exploring project design alternatives,
- (ii) Avoid forced eviction,
- (iii) Mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use through timely compensation for loss of assets at replacement cost and assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- (iv) To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure;
- (v) To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, and
- (vi) To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

RBC has prepared this Resettlement Policy Framework (RPF) as a standalone document to address the needs of those who might be affected when the project is supported by the Bank causes the involuntary resettlement and other assets resulting in: (a) relocation or loss of shelter, (b) loss of assets or access to assets (c) loss of income resources or means of livelihoods, whether or not the affected person must move to another location. RBC has reinforced its safeguards capacity with 2 safeguards staff members to support the compliance and safeguarding the community and indirect beneficiaries from the initiation to completion of the project.

3.0 Objectives, Principles and Methodology used for the preparation of RPF.

3.1 Objectives of the RPF

The Resettlement Policy Framework (RPF) will guide the implementation of land acquisition activities to facilitate SPTP civil works; ensure that displacement issues are resolved and that the livelihoods of the affected persons are not negatively impacted on and, where it is unavoidable, they are duly compensated and/or resettled. The project will be implemented in line with the World Bank Environmental and Social Framework and the RPF is prepared under the requirements of ESS5 that requires all World Bank funded projects to avoid involuntary displacement of people in project areas as much as possible. Where involuntary resettlement is unavoidable, ESS5 requires it to be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) to be carefully planned and implemented.

Resettlement Policy Framework

The RPF will state the principle and guide any resettlement action plans for avoidance of involuntary resettlement and management of the negative impacts where inevitable. A project A/RAP or site-specific A/RAPs will be prepared on confirmation of the project designs and locations which will inform the project land requirements.

Specifically, the objective of this Resettlement Policy Framework (RPF) is to provide the following:

- a. Brief description of the project and components for which land acquisition and resettlement are required;
- b. Principles and objectives governing resettlement preparation and implementation;
- c. A description of the process for preparing and approving resettlement plans;
- d. Estimated displacement impacts and estimated numbers and categories of displaced persons, to the extent feasible;
- e. Eligibility criteria for compensation;
- f. A gap analysis of the borrower's laws and regulations and the Bank policy requirements and propose measures to bridge any identified gaps between them;
- g. Methods of valuing affected assets;
- h. Administrative structures and mandates in the delivery of compensation and other resettlement assistance;
- i. A description of the implementation process, linking resettlement implementation to civil works;
- j. A description of grievance redress mechanisms;
- k. A description of the arrangements for funding resettlement, including the preparation and review of cost estimates, the flow of funds, and contingency arrangements;
- l. A description of mechanisms for consultations with, and participation of, affected persons in planning, implementation, and monitoring; and
- m. Arrangements for monitoring by the implementing agency and, if required, by third-party monitors.

The RPF will provide principles, organizational arrangements, and funding mechanisms for any resettlement (if encountered), that may arise during implementation. Therefore, the RPF will guide the preparation of Abbreviated/Resettlement Action Plans (A/RAPs), as needed, for the projects.

Principles of the RPF

This RPF adheres to the guidance and requirements provided in the WB ESS5: Land Acquisition, Restriction on Land Use and Involuntary Resettlement. Hence, it is framed by the following policy principles:

- Involuntary resettlement and land acquisition will be avoided where feasible, or minimized, by exploring all viable alternatives.
- In case where involuntary resettlement and land acquisition is inevitable, the RPF seeks to ensure that affected communities are meaningfully consulted, have participated in the planning process, are adequately compensated to the extent that their pre-displacement incomes and living standards have been restored, and the process is fair and transparent. It aims to make certain that any possible adverse impacts of proposed SPRP activities are properly addressed through appropriate mitigation measures, particularly against potential impoverishment risks. Displaced and compensated persons will be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them.

Resettlement Policy Framework

Required measures for the RPF shall ensure displaced persons are informed about their options and rights pertaining to resettlement, consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and provided prompt and effective compensation at full replacement cost for losses of assets. If the impacts include physical relocation, measures shall be provided to assist (such as moving allowances) during relocation; and affected persons will be provided with residential housing, or housing sites, or, as required, agricultural sites for which a combination of productive potential, location advantages, and other factors is at least equivalent to the advantages of the old site.

The RPF includes measures to ensure that PAPs are:

- Informed about their options and rights pertaining to resettlement;
- Consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and
- Provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the Project.
- Provided assistance to at least restore and possibly improve their livelihoods and living standards.

The RPF is based on the following principles:

- Involuntary resettlement is to be avoided or at least minimized;
- PAPs are to be suitably assisted in their efforts to improve, or at least restore, incomes and living standards.
- PAPs are fully informed and consulted on compensation options.
- Lack of formal legal land title is not a barrier to compensation or alternative forms of rehabilitation assistance.
- Particular attention is paid to socially vulnerable groups, such as ethnic minorities, female headed households, elderly households, extremely poor and illiterate Households, etc. and appropriate assistance is provided to help them adapt to project-related changes.
- Land acquisition and resettlement is conceived and executed as a part of the project, and the full costs of compensation are included in project costs and benefits.
- Compensation/rehabilitation assistance will be paid prior to displacement and prior to ground leveling, demolition, and in any case, before an impact occurs.
- Compensation is to be paid at full replacement cost to PAPs, without deductions for depreciation or any other purpose.

It should be noted that according to World Bank's ESS5, the term "involuntary resettlement" encompasses more than the 'physical relocation or resettlement' of affected people. It is defined as the direct social and economic impacts of a project that are permanent or temporary and are caused by the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets or access to assets; (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or (iv) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. The ESS5 also applies in case any land acquisition for subproject activities found as 'linked' or 'associated facility' has caused such physical or economic displacement.

Resettlement Policy Framework

The policy applies to all PAPs regardless of the total number affected, the severity of the impact and whether or not they have legal title to the land. Informal or traditional tenure is to be treated as an entitlement. This RPF covers direct economic and social impacts that will result from SPRP and thereby cause involuntary taking of land resulting in relocation or loss of shelter; loss of assets or access to assets; or loss of income sources or means of livelihood, or access to natural resources whether or not the affected persons must move to another location.

3.2 RPF Methodology and Stakeholder Engagement

3.2.1 Methodology

The general approach for the assignment consisted of identifying the major project stakeholders and background documents pertinent to the project operations, environment sectors, to interview the major stakeholders, and to visit some of the proposed administrative Districts to assess potential resettlement implications. During the consultation meetings with the different project stakeholders, effective communication, transparency, collaboration, inclusiveness, and integrity were used to attain the intended project objectives. Stakeholders involved in this project range from central and local government, national and international organizations, private entities, project affected communities, civil society organizations and grassroots authority.

Specifically, the RPF was prepared based on the following methodology:

- a) Review of project documents
- b) Regulatory review
- c) Review of the World Bank Environmental and Social Standards/Policies
- d) Visit to some potential project sites/Districts
- e) Key stakeholder consultation

3.2.2 Stakeholder Engagement

In compliance with National regulations and the World Bank Environmental and Social framework (ESF), Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. The consultations were with stakeholders and beneficiaries involved in project implementation and land management, acquisition and compensation process as well as some of the potential affected people near identified administrative Districts. However, a comprehensive community engagement and consultation will be required when final project design is available and site specific for civil works are known and potential project affected persons identified.

The main purpose of the consultation meetings with stakeholders include:

1. To introduce the project to the stakeholders,
2. To discuss and learn about the national and World Bank, and Environmental and Social safeguards requirements right from the project designs and down to implementation,
3. To identify some of the possible social and environmental project related impacts,

Resettlement Policy Framework

4. To understand and assess the different roles and responsibilities of different stakeholders during the project implementation,
5. To understand the social economic baseline indicators of the project intervention areas.
6. To understand the purpose of establishing grievance committees and their different role in handling grievances.
7. To receive feedback from participants on project anticipated impacts, benefits, and suggested mitigation measures.

3.2.3. Field Works

Field visit will be conducted in all 13 administrative Districts and consists of data collection and field observations in terms of land requirements and land use, contribution of the water in their development specifically in the proposed project area. In addition, the field work will be an opportunity to interact with district officials and some members of the community as stakeholders around the selected administrative districts where the projects activities will be implemented. Assessment and discussion will focus on data collection especially on availability of land, the growing crops (perennial and seasonal) land ownership status, land acquisition process and schedule as well as roles and responsibilities in project implementation and land acquisition. It's worth to note that the number and details of project affected people will be determined during detailed census during the preparation of resettlement action plans based on the sub-projects and approval of the project designs.

The RBC team organized public and stakeholder consultations in September/October 2017 to collect views and concerns with respect to the project design and discuss proposals to remedy potential adverse impacts. Participants were briefed on the scope and content of the project, and local authorities, CHWs, and opinion leaders in targeted districts were given the opportunity to share their insights. Most stakeholders raised concerns with respect to the challenge of changing the “mindset on stunting”, challenges of families with many children who are at high risk of stunting, lack of regular growth monitoring and health screening, family conflict and polygamy, difficulties of health personnel to conduct visits at community and household level, and the absence of nutritionists at the health center level. Among the key recommendations were the need to strengthen outreach activities to reach families and children who do not attend health facilities regularly, and support and reinforce village-level activities, such as kitchen gardens and parent evenings.

Physical/face-to-face consultation meetings were conducted within SPRP districts including Kayonza, Huye, Nyaruguru, Nyamagabe, Ruhango, Nyabihu and Rubavu from the 7th to the 30th of November 2022. The participants included and Vice Mayors in Charge of Social Affairs, Directors of Health Unit, Director General of Hospitals, CHWs Supervisors at Hospital level, Environmental Health Officers (EHOs) at Hospital level, Sector Executive Secretaries (ES), Head of Health Centers, and CHWs Coordinators among others. Specifically, the following attended the meeting:

- Vice Mayors in Charge of Social Affairs: 7
- Directors of Health Unit: 7
- Director General of Hospital 7
- CHWs Supervisors: 7
- Environmental Health Officers (EHOs): 8
- Sector Executive Secretaries: 78
- Head of Health Centre: 95

Resettlement Policy Framework

- CHWs Coordinators: 452

The participants expressed gratitude to the Government of Rwanda through RBC and emphasized on the benefits of SPRP in their respective districts. Some mentioned that there is now sense of security with their children being left at the ECD centers which give them a chance at basic education and nutrition and allow parents the opportunity to work for them. They highlighted more effort is needed to change minds about stunting and food security as parents take more responsibility to provide nutritious food to their kids and give to the markets after their families have been well catered for.

Other interactive discussions included clarifications on the Grievance Redress Committees and their responsibilities. They sought to understand the time frame of these committees since the project was ongoing and the reporting procedures. The CHW coordinators requested clarifications on the indicators to be used while giving them PBF since already had other indicators they report on under this project. They pointed out that these should be well explained during the upcoming training to ensure everyone understands the operationalization of the GRM. The RBC E&S risk management team provided answers and clarifications to the issues raised and ensured the participants that they will gain even deeper explanations in the training.

Another session of consultation meetings with beneficiaries was carried out from 27th November to the 1st of December 2023. The meetings ensured to highlight the SPRP development objectives and the rationale for additional financing. These also emphasized new activities including WASH and construction of new ECDs that will involve different activities such as civil works and extension of water pipes to improve access to clean water in health centers, ECDs and schools. Discussion on the likely impacts and mitigations measures were held, and stakeholders were given a chance to ask concerning issues and propose solutions on the raised issues. This allowed the beneficiaries to gain ownership of the project hence sustainability of the project. A Summary of key issues raised in the stakeholder consultation meetings is provided as an annex.

4.0 Literature Review

Literature review focused on existing policies, regulations, strategic plans, and institutions related to water, environment, and land acquisition/expropriation as well as the review of World Bank ESF especially the Environmental and Social Standard 5. This review helped in describing the policy and regulatory context (e.g. laws, regulations, and procedures) of the Government of Rwanda on resettlement and displacement. Further the review allowed to make gap analysis between the World Bank's standard on involuntary resettlement (ESS5) and national Regulations.

Key documents consulted include but not limited to:

- Project Concept Note;
- Water related national Policies;
- WASAC Strategic plan;
- Land policy, laws and regulations;
- Environmental Policy and regulations;
- Rwanda Expropriation law in public interest;
- World Bank Environmental and Social Framework (ESF)/World Bank Environment and Social Standards/ESS5 on Land acquisition, Restrictions on Land use and involuntary Resettlement;
- Integrated Household Living Survey 3,4 and 5;

Resettlement Policy Framework

- National Population Census;
- National Transformation Strategy one (NST1);
- Land Use Master Plan;
- List of identified administrative Districts/Assessed and consulted administrative Districts;

All consulted documents are provided as references and included in this RPF.

5.0 Legal and regulatory Framework

This Resettlement Policy Framework will consider the existing national regulatory framework as well as the World Bank environmental and social framework.

5.1. National Resettlement Regulations:

Rwanda has numerous legal and policy framework relating to land and resettlement issues. These include:

- The Rwandan Constitution promulgated in 2015,
- Land Valuation Law promulgated in 2010,
- Expropriation Law No. 32/2015 of 11/06/2015,
- Law N° 43/2013 of 16/06/2013 governing land in Rwanda;
- **Relevant National Policies and Strategies:** Vision 2050, National Strategy for Transformation (NST1), National Land Policy, Land Tenure System and Provisions in Rwanda, National Urbanization Policy;
- **World Bank ESF especially ESS5:** Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.

5.1.1. Constitution of Rwanda

The constitution is the supreme law in Rwanda. Under Article 34 of the Rwanda constitution, it is stated that: “everyone has the right to private property, whether individually or collectively owned”. Furthermore, it mentions private property, whether individually or collectively owned, is inviolable. However, this right can be interfered with in case of public interest, in circumstances and procedures determined by law and subject to fair and prior compensation. Article 35 stipulates that private ownership of land and other rights related to land are granted by the State. The constitution provides that a law should be in place to specify modalities of acquisition, transfer, and use of land (expropriation law). The constitution also provides for a healthy and satisfying environment. It states that every person has the duty to protect, safeguard and promote the environment. The State shall protect the environment.

5.1.2. Expropriation Law in the Public interest

Law No. 32/2015 of 11/06/2015, related to expropriation in the public interests, determines the procedures relating to expropriation of land in the interest of the public. Article 3 of the law stipulates that it is only the government that has authority to carry out expropriation. However, the project, at any level, which intends

Resettlement Policy Framework

to carry out acts of expropriation in the public interest, shall provide funds for inventory of assets of the person to be expropriated and for just compensation in its budget. According to the organic law, no person shall hinder the implementation of the program of expropriation on pretext of self-centered justifications and no landowner shall oppose any underground or surface activity carried out on his or her land with an aim of public interest. In case it causes any loss to him or her, he or she shall receive fair and just compensation for it. The law identifies properties to be valued for just and fair compensation including land and activities that were carried out on the land such as different crops, forests, any buildings, or any other activity aimed at efficient use of land or its productivity. However, as per Article 27 of the law No 32/2015 of 11/06/2015, the owner of land designated for expropriation in the public interest shall provide proof of rights to land and property incorporated thereon like land titles or any other documentary evidence showing he/she has property ownership.

5.1.3. Law N° 43/2013 of 16/06/2013 governing land in Rwanda

This is the law that determines the use and management of land in Rwanda. It also institutes the principles that are to be respected on land legal rights accepted on any land in the country as well as all other appendages whether natural or artificial. According to the Law, Land in Rwanda is categorized into two types: private land and public land. The latter is subdivided into two categories: the state land in public domain and the state land in private domain.

Article 12 and 13 of the Land Law stipulates that State land in the public domain consists of all land meant to be used by the public or land reserved for organs of State services as well as national land reserved for environmental conservation. Land occupied by national roads and their boundaries; Districts and City of Kigali roads and that of other urban areas linking different Sectors' headquarters within the same District, or those roads that are used within the same Sector with their boundaries; arterial roads that connect District roads to rural community centers that are inhabited as an agglomeration with their boundaries is among the State land in the public domain.

The Land Use Master Plan (Land law No 43/2013 of 16/06/2013, article 6) states that all types of land tenure must follow the designated land use. The organic land law provides two types of formal land tenure: full ownership/ freehold and long-term leasehold. As a result of the recent privatization of State-owned lands, many land users don't hold either type of land tenure. As a result of this, the Organic Land Law recognizes existing rights, whether written or unwritten, under both civil law and customary practices through new national land tenure arrangements. Article 7 of the law formalizes land ownership, especially those acquired through customary means should be registered. In such cases, populations with customary/indigenous land rights are being encouraged to register their land through decentralized District Land Bureau, Sector Land Committees and Cell Land Committees.

Rwandan Constitution of 2003 revised in 2015, the National Land Policy of 2004 and the Organic Land Law of 2005 all incorporated land ownership and gave it a formal legal basis. The Land Tenure Regularization (LTR) programme was established to register and administer land ownership in Rwanda. The titling began officially in 2009. The land registration process successfully completed the recording of 10.4 million parcels of land into the national land registry by 2012. The land titles provide for full equal rights to both wife and

Resettlement Policy Framework

husband, through the systematic land registration process. Article 20 of the law governing land in Rwanda which was enacted in June 2013 states that registering land is mandatory for anyone (who owns it).

In any case of Government program or projects, the government is obliged to full expropriation and compensation of the affected land in accordance with the national expropriation law (Article 26 of the Expropriation Law N° 32/2015 of 11/06/2015) and the World Bank requirements under ESS5. In Rwanda there is no customary ownership of land, every landowner has a land title provided by the Rwanda land management and use authority (RLMUA). For this project all affected landowners have land titles and will be fully compensated for their affected land.

5.1.4. National Land Policy

The policy is premised in the National Strategy for transformation one (NST1). Its main objective is to Strengthen land administration and management to ensure optimal allocation and use of land. This will include rationalization and harmonization of land use master plans at both national and districts level. This will be supported by a fully functioning Land Administration Information System (LAIS).

The policy provides for land tenure systems, guiding principles of land management, an effective & efficient land registry, and land transactions. According to the National Land Policy, all Rwandese enjoy the same rights of access to land, implying no discrimination against women. All land should be registered for security. The National Land Policy specifies that marshlands are a special category of public land and their use, for those earmarked for it, must be done in the form of concession. All marshlands must be governed by a special legislation which must be vigorously enforced. Marshlands meant for agriculture should not be cultivated except after adequate planning and environmental impact assessment.

5.1.5. Law establishing and Organizing the Real Property Valuation Profession in Rwanda

Law No.17/2010 of 12/05/2010 Establishing and Organizing the Real Property Valuation Profession provides conditions for registration of land valuers in Rwanda, establishes the Institute for real property Valuers and sets conditions to exercise the profession. The law also allows the Government to conduct valuation when mandated by their government institutions. Articles 27, 29, 30 and 31 of the law deals with valuation methods. These articles stipulate that price for the real property shall be close or equal to the market value. The valuation could also compare land values country wide. Where sufficient comparable prices are not available to determine the value of improved land, the replacement cost approach shall be used to determine the value of improvements to land by taking real property as a reference. The law also allows the use of international methods not covered in the law after approval from the Institute of Valuers council.

5.1.6. Grievance Redress Mechanism

Grievance redress mechanism in Rwanda is catered in the Ministerial Order No. 002/2008 of 2008 Determining Modalities of Land Registration. Annex 3 of the Ministerial order provides for dispute resolutions procedures and some provisions related to the Cell Adjudication Committee (CAC). Articles 17, 20, 22, and 23 provide the process for resolving disputes. Article 17 grants parties with a dispute, the right

Resettlement Policy Framework

to take that dispute to the mediation committee. That article also provides that where a dispute arose during demarcation and adjudication but, with the assistance of the CAC, the parties were able to resolve the dispute, the parties are bound by that agreement, and may not later attempt to raise the issue. Article 20 provides procedures for the CAC when hearing disputes, including that the hearing is open to the public and announced eight days in advance, among other requirements. Articles 22 and 23 govern the lodging and processing of objections and corrections during a 60-day period.

The CAC is comprised of all five members of the cell land committee and five members of the Village where demarcation and adjudication is taking place. The cell Executive Secretary acts as the CAC secretary, although he or she has no voting rights. This order can be used to resolve resettlement conflict in the project area. The Expropriation Law in public interests Article 26 provides complaints procedures for individuals dissatisfied with the value of their compensation. The Law stipulates that the dissatisfied person has a period of 30 days after the project approval decision has been taken to appeal (Article 19). The first step of redress is to inform those to be expropriated of their rights during the expropriation process. Articles 17-20 of the Expropriation Law obliges the representative government authority (that which is implementing the project requiring expropriation) to inform affected people of their rights at each stage of the process.

According to Article 26, all the grievances concerning non-compliance with the provisions of the contract, the value or timing of compensation or seizure of land assets without compensation shall be addressed to the Land Commission at the level at which the issue is based. The aggrieved party is provided with a legal expert in the matters of Land Law or any other survey expert with value verification skills, who will proceed to recalculate the value of compensation due. If the new value is rejected by the Land Commission hearing the complaint, the aggrieved party may appeal to the immediate higher Land Commission within 15 working days which must then deliver its verdict within 30 days. If the aggrieved party is still dissatisfied with the decision, their final resort shall be to file the case with the competent Court of Law. According to Article 26, filing a case in courts of law does not stop the expropriation process from being affected.

To ensure that the affected parties are fully aware and to reduce possible backlog of complaints, it should be noted in advance that most members of the rural communities take time to decide to complain when aggrieved and as a result, may miss the 30-day period required to file their complaints. As per international standards, grievances logged outside this timeframe may still be valid and legitimate. Customarily, the government expropriation authorities ensure that all affected people are fully informed and will issue warnings about the consequences of failure to lodge their complaints in time. Within this customary procedure, affected people are informed of the procedures before their assets or properties are taken.

5.1.7. World Bank Environmental and Social Framework

5.1.7.1. Environmental and Social Standard (ESS) 10

Stakeholder Engagement and Information Disclosure This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social

Resettlement Policy Framework

sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

This ESS must be read in conjunction with ESS1. Requirements regarding engagement with workers are found in ESS2. Special provisions on emergency preparedness and response are covered in ESS2 and ESS4. In the case of projects involving involuntary resettlement, Indigenous Peoples or cultural heritage, the Borrower will also apply the special disclosure and consultation requirements set out in ESS5, ESS7 and ESS8.

In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Plan (SEP) proportionately to the nature and scale of the project and its potential risks and impacts. A draft of the SEP will be disclosed as early as possible, and before project appraisal, and the Borrower will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP.

The Borrower will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The Borrower will provide stakeholders with access to the following information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design:

- a. The purpose, nature and scale of the project;
- b. The duration of proposed project activities;
- c. Potential risks and impacts of the project on local communities, and the proposals for mitigating these, highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and describing the differentiated measures taken to avoid and minimize these;
- d. The proposed stakeholder engagement process highlighting the ways in which stakeholders can participate;
- e. The time and venue of any proposed public consultation meetings, and the process by which meetings will be notified, summarized, and reported; and
- f. The process and means by which grievances can be raised and will be addressed.

5.1.7.2. Environmental and Social Standard (ESS) 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement:

ESS5 recognizes that project-related land acquisition and restrictions on land use can 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,

Resettlement Policy Framework

assets, or access to assets, leading to loss of income sources or other means of livelihood), or both. The term “involuntary resettlement” refers to these impacts. 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.

This standard has the following objectives:

- To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- To avoid forced eviction.
- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.
- ESS5 requires that particular attention be paid to the needs of vulnerable groups among those displaced such as those below the poverty line, landless, elderly, women and children and indigenous peoples and ethnic minorities.
- Guard against poorly prepared and implemented resettlement plans by setting up a mechanism for monitoring the performance of involuntary resettlement program in Bank operations and remedying problems as they arise.

The categories of PAPs and corresponding compensation according to operational safeguard 2 on involuntary resettlement: land acquisition, population displacement and compensation are:

Those who have formal legal rights to land or other assets recognized under the national law. This category generally includes people who are physically residing at the project site and those who will be displaced or may lose access or suffer a loss in their livelihood because of project activities.

Those who may not have formal legal rights to land or other assets at the time of the census/ evaluation but can prove that they have a claim that would be recognized under the customary laws of the country. This category may include people who may not be physically residing at the project site or persons who may not have any assets or direct sources of livelihood derived from the project site, but who have spiritual and/or ancestral ties with the land and are locally recognized by communities as customary inheritors. Depending on the country's customary land use rights, they may also be considered to have a claim if they are sharecroppers, tenant farmers, and seasonal migrants or nomadic families losing user rights.

Those who have no recognizable legal right or claim to the land they are occupying in the project area of influence and who do not fall into either of the two categories described above, if they themselves or witnesses can demonstrate that they occupied the project area of influence for at least six months prior to

Resettlement Policy Framework

a cut-off date established by the PCU and acceptable to the Bank. These groups may be entitled to resettlement assistance other than compensation for land to improve their former living standards (compensation for loss of livelihood activities, common property resources, structures, and crops, etc.). The Government of Rwanda will cover the compensation of the properties in accordance with the national expropriation law and Bank/Development Partners requirements.

5.1.7.3. ESS5 Scope of application

The ESS5 applies to all PAPs regardless of the total number affected, the severity of the impact and whether they have legal title to the land. Informal or traditional tenure is to be treated in the same manner as formal, legal titles. Therefore, this RPF covers permanent or temporary physical and economic displacement resulting from the following types of land acquisition or restrictions on land use undertaken or imposed in connection with project implementation:

- a) Land rights or land use rights acquired or restricted through expropriation or other compulsory procedures in accordance with national law;
- b) Land rights or land use rights acquired or restricted through negotiated settlements with property owners or those with legal rights to the land, if failure to reach settlement would have resulted in expropriation or other compulsory procedures;
- c) Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or recognizable usage rights;
- d) Relocation of people without formal, traditional, or recognizable usage rights, who are occupying or utilizing land prior to a project-specific cut-off date;
- e) Displacement of people because of project impacts that render their land unusable or inaccessible.
- f) Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas;
- g) Land rights or claims to land, or resources relinquished by individuals or communities without full payment of compensation; and
- h) Land acquisition or land use restrictions occurring prior to the project, but which were undertaken or initiated in anticipation of, or in preparation for, the project.

5.1.7.4. Key ESS5 requirements

(a) Compensation measures

The Standard also requires that resettlement plans are implemented before any project-related impacts on project affected people. Therefore, the land acquisition, displacement or any restriction of access should not occur before necessary measures for resettlement and compensation are in place. For selected sites involving land acquisition temporarily or expropriation of the affected assets, it is further required that these measures include provision of compensation and/or other assistance to the PAPs, prior to remove their assets where required. In particular, the taking of land and related assets may take place only after compensation has been paid, and where applicable. All project activities requiring relocation, loss of shelter or other impacts, the policy requires that measures to assist affected persons are implemented in accordance with the project resettlement action plans, note that no relocation will occur during the

Resettlement Policy Framework

implementation of the Rwanda Energy Access and Quality Improvement Project. The policy aims to have a fair and transparent process. Where there is a conflict between the Laws of Rwanda and the WB ESS5, the latter will take precedence if the Bank is to fund the project activity.

(b) Eligibility criteria

Affected persons may be classified as persons:

- Who have formal legal rights to land or assets;
- Who do not have formal legal rights to land or assets, but have a claim to land or assets that is recognized or recognizable under national law; or
- Who have no recognizable legal right or claim to the land or assets they occupy or use.

(c) Assessment of alternatives

While the national regulations are silent on project alternatives, the ESS5 requires borrower to consider feasible alternative project designs to avoid or minimize land acquisition or restrictions on land use, especially where this would result in physical or economic displacement, while balancing environmental, social, and financial costs and benefits, and paying particular attention to gender, poor and vulnerable people's impacts.

(d) Consultation and community engagement

ESS5 requires borrower to engage with affected communities, including host communities, through the process of stakeholder engagement described in ESS10. Decision-making processes related to resettlement and livelihood restoration will include options and alternatives from which affected persons may choose. Disclosure of relevant information and meaningful participation of affected communities and persons will take place during the consideration of alternative project designs, and thereafter throughout the planning, implementation, monitoring, and evaluation of the compensation process.

(e) Grievance redress Mechanism

ESS5 requires the borrower to establish grievance redress mechanism as early as possible in project development to address specific concerns about compensation, relocation or livelihood restoration measures raised by displaced persons or other stakeholders in a timely manner. Where possible, such grievance mechanisms will utilize existing formal or informal grievance mechanisms suitable for project purposes, supplemented as needed with project-specific arrangements designed to resolve disputes in an impartial manner.

5.2. Comparative Analysis between Rwanda Legislations and World bank ESS5

Although Rwanda has developed and enacted land and expropriation laws that are responsive to land acquisition and property compensation especially in case of expropriation, there are some gaps when compared to ESS5 of the WB. The following table summarizes findings of gap analysis between national regulations and ESS5 as well as proposed measures to bridge identified breaches.

For SPRP project, where the Rwanda law differs with the Bank ESF and ESS5, the latter will apply or take precedence. The promulgation of the 2015 Expropriation Law introduced a legal framework within which expropriation activities must be conducted, and above all, attempts to bring Rwandan legislation more in line with international best practice requirements.

Despite this, there are still some gaps between the national Rwandan legislation and the World Bank ESS5. These relate to the general principles for resettlement, eligibility criteria, the notification period for expropriation and resettlement, and the procedures required throughout the resettlement process, project design, consultation, participation and broad community support, resettlement planning, host community, vulnerable groups, implementation, monitoring, and evaluation. The table below highlights the differences between Rwandan laws and the World Bank ESS 5 on resettlement and compensation

Resettlement Policy Framework

Table 1. Comparison of Rwandan legislations and World Bank standards on Resettlement and Compensation

Category of PAPs/Types of lost assets	Rwandan law	WB Environmental and Social Standard 5	Gap filling measure
Landowners (loss of land)	According to the National Land Policy, all Rwandans enjoy the same rights of access to land. All land should be registered for security. The title is tradable. Landowners, under Rwandan Law, received cash compensation based upon market value.	Identification of PAPs is done through census and socio-economic surveys of the affected population, PAPs with titles as well as PAPs who do not have formal titles but have customary and traditional rights recognized under Rwandan law or who have a recognized claim to the land at time the census begins – are entitled to compensation for land that they lose (besides other assistance). Land-for-land exchange is the preferred option; compensation is to be based on replacement cost.	Landowners will be compensated as per the principles of ESS5.
Land Squatters (i.e., those who have no recognizable legal right of claim to the land that they are occupying.	Rwandan legislations entitle only those who are “landholders” with legal possession of property land tenants, under Rwandan law, are entitled to compensation based on the number of rights they hold upon land under relevant laws. The Organic Land Law recognizes existing rights, whether written or unwritten, under both civil law and customary practices through new national land tenure arrangements. Rural populations with customary/indigenous land rights are encouraged to register their land through decentralized land institutions like the District Land Bureau, Sector Land Committees and Cell Land Committees.	Land squatters must be compensated for houses and other structures whatever the legal recognition of their occupancy. Entitled to compensation for loss of crops, and assistance for relocation and assistance for restoration of livelihoods.	Consider all forms of Tenancy based on formal or informal rights/agreements between land owner and tenants as well as those not legally recognized as long as they assist will be compensated as per the principles of ESS5.
Owners of non-Permanent buildings	Owners of “non-permanent” buildings are entitled to cash compensation based on market value or entitled to new housing on authorized land under government (state or local) housing programs.	Recommends in-kind compensation or cash compensation at full replacement cost including labor. Recommends resettlement assistance	Families should be consulted on and offered options to choose from between in-kind compensation or cash compensation at full Replacement cost including labor.
Perennial and annual Crops	Perennial crops are compensated with cash based upon rate calculated as an average net agricultural income.	Market value for lost crops. Income restoration assistance (such as land preparation, credit facilities, training etc.). Land for land compensation allows people to re-establish annual crops immediately.	Follow the ESS5 guidelines and principles.

Resettlement Policy Framework

Seasonal crops	There are no explicit provisions on livelihood restoration.	Seasonal crops There are no explicit provisions on livelihood restoration. Livelihoods and living standards are to be restored in real terms to pre displacement levels or better offer support after displacement, for a transition period, based on a reasonable estimate of the time likely to be Follow the ESS5. Category of PAPs/types of lost assets. Rwandan law WB ESS5 Gap filling measure needed to restore their livelihood and standards of living (for ex. land preparation, jobs, credits facilities);	Follow the ESS5 guidelines and principles.
Timing of compensation payments	Resettlement must take place only when PAPs have been fully and compensated, and Compensation must be completed within 120 days after the valuation report is submitted and decision taken by the expropriator.	Implement all relevant resettlement plans before project completion and provide resettlement entitlements before displacement or restriction of access. For projects involving restrictions of access, impose the restrictions in accordance with the timetable in the plan of actions.	Follow the ESS5 guidelines and principles.
Consultation and Disclosure	<p>The Expropriation Law governs the specifics of land acquisition. The law provides for public dissemination on the importance of the project to be established and the need for expropriation.</p> <p>In addition to dissemination, the Expropriation Law requires prior consultative meetings and examination of the project proposal involving expropriation, with a view to avoid eventual prejudice on the person or entity subject to expropriation.</p> <p>Normally, a consultative meeting is held within 30 days after receipt of the application for expropriation. Based on these consultations, the relevant Land Commission or Committee (from the Cell level to the National level) takes a decision to approve the project within a period of 15 days.</p>	<p>Consult project-affected persons, host communities and local NGOs, as appropriate.</p> <p>Provide them opportunities to participate in the planning, implementation, and monitoring of the resettlement program, especially in the process of developing and implementing the procedures for determining eligibility for compensation benefits and development assistance (as documented in a resettlement plan), and for establishing appropriate and accessible grievance mechanisms.</p>	Follow the ESS5 Guidelines and principles.
Relocation assistance and resettlement assistance	The person to be expropriated is defined to mean any person or legal entity who is to have his or her private property transferred due to public interest, in which case they shall be legally entitled to payment of compensation.	Avoid or minimize involuntary resettlement and, where this is not feasible, assist displaced persons in improving or at least restoring their livelihoods and standards of living in real terms relative to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. Moving allowances	Resettlement facilitation and support to follow WB ESS5 requirements.
Vulnerable groups	The Rwandan expropriation law has no special provisions for vulnerable groups.	ESS5 paragraph 26 demands that during the preparation of the resettlement action plan Particular attention be paid to gender aspects and the needs of the poor and the vulnerable	Resettlement facilitation and support to follow WB ESS5 requirements.

Resettlement Policy Framework

		and paragraph 27 demands that provided relocation assistance be suited to the needs of each group of displaced persons.	
Grievance mechanism and dispute resolution	The Expropriation Law Article 233 & 34 stipulate the process and procedures for contesting the valuation by individuals dissatisfied with the value of their compensation. The Law stipulates that the dissatisfied person has a period of 30 days after the project approval decision has been taken to Appeal (Article 19).	<p>ESS5 paragraph 19: The Borrower will ensure that a grievance mechanism for the project is in place, in accordance with ESS10 as early as possible in project development to address specific concerns about compensation, Relocation or livelihood restoration measures raised by displaced persons (or others) in a timely fashion.</p> <p>Where possible, such grievance mechanisms will utilize existing formal or informal grievance Mechanisms suitable for project purposes, supplemented as needed with project-specific arrangements designed to resolve disputes in an impartial manner.</p>	<p>Requirements of ESS5 will be followed for the establishment of a GRC.</p> <p>In case of escalation of disagreement on compensation cost, the Rwandan expropriation law will be applied to settle the grievance.</p>
The cut-off date	Article 2 of the Rwandan expropriation law demands the expropriating entity to inform the persons to be expropriated in the public interest of the expected start date of measurement of land and inventory of property incorporated thereon. Such a communication shall be made through an announcement posted on the office of the Cell of the place designated for the implementation of the project. The communication shall also be made through at least one radio station with a wide audience in Rwanda and at least one of Rwanda-based newspapers with a wide readership for the relevant parties to be informed thereof. If necessary, use shall be made of any other means of communication.	ESS 5 In conjunction with the census, the Borrower will establish a cut-off date for eligibility. Information regarding the cut-off date will be well documented and will be disseminated throughout the project area at regular intervals in written and (as appropriate) non-written forms and in relevant local languages. This will include posted warnings that persons settling in the project area after the cut-off date may be subject to removal.	Requirements of ESS5 will be followed.

Resettlement Policy Framework

<p>Monitoring and Evaluation</p>	<p>Monitoring measures are provided for in Rwandan legislation, the focus is to ensure that contracted compensation has been provided in full and before any relocation.</p> <p>However, it does not require assessment as to whether the compensation provided was appropriate to the context and circumstances and does not establish a follow up mechanism to assess whether the PAPs livelihoods have been restored or improved as stipulated by law.</p>	<p>The World Bank's ESS5 requires that after relocation monitoring be carried out to ensure compensation provided was appropriate to the context and circumstances.</p>	<p>Follow the ESS5 Guidelines and principles.</p>
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6.0. Institutional Framework

The Ministry of Health (MoH) through Rwanda Biomedical Center (RBC) is the main executing agency for the Stunting Prevention and Reduction Project (SPRP). The project will be coordinated under the Single Projects Implementation Unit (SPIU) of RBC. Through its existing SPIU, RBC will oversee the compensation exercise done by Districts with guidance from WASAC, for activities related to WASH and will ensure that PAPs are fully compensated. Other stakeholders include National Child Development Agency (NCDA), Water and Sanitation Corporation (WASAC) are Ministry of Environment (MoE), Rwanda Environmental Management Authority (REMA), Rwanda Land Management and Use Authority (RLMUA), Rwanda Development Board (RDB) and Districts with the following responsibilities:

National Child Development Agency (NCDA)

The National Child Development Agency is currently leading an initiative called "2 Year Special Plan to Fight Stunting" that aims to address stunting through a multi-sectoral approach. Within this plan, the WASH sector is responsible for improving the water, sanitation, and hygiene environment, which is a contributing factor to stunting. As stunting has a significant impact on early childhood and later stages of childhood, improving the WASH environment in ECDs, nurseries, kindergartens, primary and secondary schools is an urgent priority. The NCDA will also lead ECD construction activities to ensure the project satisfies the need of the beneficiaries with the project implementation area.

Water and Sanitation Corporation (WASAC)

The Water and Sanitation Corporation will lead activities under this component regarding WASH. This will improve the water, sanitation, and hygiene environment, which is a contributing factor to stunting. As stunting has a significant impact on early childhood and later stages of childhood, improving the environment in ECDs, nurseries, kindergartens, primary and secondary schools is an urgent priority which will be the focus for the WASH activities.

The Ministry of Environment (MoE) and Rwanda Environmental Management Authority (REMA) are responsible for developing the policies, laws, and regulations as well as coordination of all activities related to efficient land, water resources and environmental management as well as their follow up and evaluation and overall management, including advisory to the government on all matters pertinent to the environment and climate change.

Rwanda Land Management and Use Authority (RLMUA) is an authority that is responsible for putting in place and operationalizing an efficient system of land administration, use and land management that secures land ownership in the country.

The Rwanda Development Board (RDB), a national authorized organ, approves the environmental and social impact assessments for developmental projects. However, given the nature of the Stunting Prevention and Reduction Project and its unlikely to inflict severe environmental and social impacts. The project might not need ESIA certificates. It will only need District authorization, and the World Bank required safeguards instruments.

Districts will manage social protection works under the project and therefore determine and approve projects of expropriation in the public interest. Districts also initiate the expropriation and implement/

Resettlement Policy Framework

supervise the expropriation after considering the decision of the Committee in charge of monitoring projects for expropriation in the public interest according to the expropriation law of 2015.

7.0 POTENTIAL IMPACTS AND PROJECT AFFECTED PERSONS

7.1. Definition of Project Affected People (PAPs)

The ESS5 defines three categories of affected persons who are eligible for compensation and resettlement benefits. While people in all three categories are entitled to assistance of some sort under ESS5, the nature of that assistance may vary, as subsequent paragraphs of ESS5 make clear.

Category (a): Affected persons who have formal legal rights to land or assets are those who have formal documentation under national law to prove their rights or are specifically recognized in national law as not requiring documentation. In the simplest case, an area is registered in the name of individuals or communities. In other cases, persons may have a lease on the land and therefore have legal rights.

Category (b): Affected persons who do not have formal rights to land or assets, but who have a recognized or recognizable claim under national law can fall into several groups. They may have been using the land for generations without formal documentation under customary or traditional tenure arrangements that are accepted by the community and recognized by national law. In other cases, they may have never been provided with formal title or their documents may be incomplete or lost. They may have a claim for adverse possession if they have occupied land for a certain period as defined by national law, without the formal owner contesting the occupation. In such cases, national law often has legal procedures by which such claims can become recognized.

Category (c): Affected persons who have no recognizable legal right or claim to the land or assets they occupy, or use are eligible for assistance under ESS5. These can be seasonal resource users, such as herders, grazers, fishers, or hunters (although if the rights of such users are recognized by national law, they may fall into category (a) or (b)). They can also be people occupying land in violation of applicable laws. Affected persons in these groups are ineligible for compensation for land but are eligible for resettlement and livelihood assistance and compensation for assets.

Based on the above classification and the national land law, this Resettlement Policy Framework considers project affected people as those who stand to lose as a result of the project, all or part of their physical and non-physical assets, including homes, communities, productive lands, resources such as forests, fishing areas or important cultural sites, commercial properties, tenancy, income-earning opportunities as well as social and cultural networks and activities. Such impacts may be permanent or temporary. This might occur through assets expropriation.

The Policy Framework applies to all economically and/or physically displaced persons regardless of the total number affected, the severity of impact and whether they have legal title to the land. Particular attention will be paid to the needs of vulnerable groups among those economically and/or physically displaced especially those below the poverty line, the landless, the elderly, women and children, indigenous groups, ethnic minorities, and other historically disadvantaged groups or other economically and/or physically displaced persons who may not be protected through Rwanda's land compensation legislation.

7.2. Anticipated Project Impacts

Public consultation carried out in 13 administrative Districts with District Officials including Vice Mayor in charge of economic development, Director of One stop Centre, District Water and Sanitation Officer and District Environmental Officer and at Sector level the executive Secretaries and Sector Land managers and within the local beneficiary community representatives where local people residing in non-connected areas revealed that households wait for water connectivity for their economic development. In all 13 administrative Districts assessed, none of them will require physical displacement given that during rehabilitation and extension of water supply systems. The project will avoid to the extent possible damage to houses and any other structures and, only plant or crops (perennial or seasonal) and trees will be affected given that the WASAC Group in collaboration with Contractors and Consultants will approve all pipelines routes as approach after making sure that all efforts are conjugated to avoid any damage to houses or structures. However, the pipeline routes will use the public land in the right of way where some restrictions will be applied in accordance with Expropriation law No.32/2015. The compensation of the loses will require the preparation of the appropriate resettlement action plans.

Regarding ECD construction, the NCDA in collaboration with RBC will ensure that the hired contractors carry out environmental and social management plans for the construction works that will take place. These will then be jointly supervised and monitored throughout the project implementation to ensure compliance with the ESF instruments.

The other potential social impacts related to the program may include HIV/AIDS and other communication diseases escalation due to labor influx, conflict with local communities, Sexual Exploitation and Abuse (SEA), Child labour and gender-based Violence, sexual harassment, violence against children (VAC), etc. All these impacts will be mitigated.

7.2.1. Project Activities requiring Land Acquisition

The ECD construction works might require land acquisition. There is however a possibility to use government land and/or the Faith Based Organisation land which would not require land acquisition but rather need consent forms and confirmation letters form the landowners and districts officials. With the WASH component, only main infrastructures (water tanks, pumping stations, collection chambers and concrete water tanks) will require land acquisition for the rehabilitation and extension works.

7.2.2. Program impacts

The project will affect the properties of the people, this will require the expropriation in public interest after being approved by the concerned Districts, the request for expropriation will be initiated by the project developer and will be approved by the District as stipulated in the expropriation law in public interest, the administrative Districts will be involved in the assets inventory of the assets to be affected based on the decision from the central government and RAP will be developed as guidance during expropriation process

Resettlement Policy Framework

7.2.3. Categories of PAPs

7.2.3.1. Affected Individuals

These are individuals who risk losing assets, investments, temporarily land, property and/or access to natural and/or economic resources. These communities are considered as project affected people and proper land acquisition or expropriation need to be done and documented as per ESS5 and OS 2 and national law on expropriation in public interest and other national land requirements.

7.2.3.2. Affected Households

A household is affected if one or more of its members are affected by project. This includes:

- i. Any member in the households, men, women, children, dependent relatives and friends, tenants;
- ii. Vulnerable individuals who may be too old or ill to farm along with the others;
- iii. Members of households who cannot reside together because of cultural rules, but who depend on one another for their daily existence;
- iv. Members of households who may not eat together but provide housekeeping or other activities critical to the family's maintenance; and
- v. Other vulnerable people who cannot participate, due to being physically challenged or for cultural reasons, in production, consumption, or co-residence.

7.2.3.3. Vulnerable group or households

Vulnerable Households, this may have different land needs from most households or needs unrelated to the amount of land available to them, the Resettlement Action Plan (RAP) will be prepared for each of sub-project in compliance of this RPF and will provide more details on livelihood restoration program for the vulnerable groups or households. Vulnerable households include disabled, elderly persons (above 65 years old), HIV/AIDS affected persons, Orphans, Widow-Female-headed households, child-headed households, and households with extreme poverty.

Special consideration should be paid to these groups outlined above by identifying their needs from the socio-economic and baseline studies undertaken as part of the Resettlement Action Plan process once project sites are identified and PAPs known. In addition to that, these groups should be individually consulted and given opportunities to participate in the resettlement decision-making process, as well as project activities, including the identification of mitigation measures that are commensurate with the impacts they experience and appropriate to their circumstances. Consultation with these groups should ensure that resulting resettlement and compensation restores and or improves their pre-project livelihood.

7.2.3.4. Organizations

During the field work and consultation meeting held with local government officials, community (Centres without access to clean Water) it was noted that some of the properties or assets belong to the religious, government institutions and farmers organization (cooperatives and water user associations) therefore the compensation will be given to the damaged properties for all institutions but for the government properties, the authorization will be provided by the relevant officials.

7.3. Approximate number of PAPs

To ensure accurate information, studies will be carried out prior to project activity implementation to determine the number of Project Affected People in the project area given that the exact pipelines routes are not yet determined.

Resettlement Policy Framework

7.4 Preparation of Resettlement instruments

A resettlement or abbreviated Action Plan will be prepared and implemented before the implementation of project civil works activities.

7.5. Environmental project impacts.

Potential environmental impacts such as:

- a. Increased environmental pollution with waste, noise, dust;
- b. Health and safety hazards and other problems resulting from construction activities; increased contamination of surface water as a result of inadequate avoidance and mitigation measures;
- c. Pollution; and
- d. Threats to human health because of improper handling of heavy machinery during construction activities can as well negatively impacts the wellbeing of the society by affecting their production capacity hence damaging livelihoods.

7.6 Anticipated project challenges

The resettlement impacts present different challenges which should be handled fully so that the project be implemented smoothly. With respect to previous project implementation the main challenges included relocation issues, compensation payment delays, encroachment, disclosures meeting participation, contractors delaying starting which affect the relevancy of the RAP, certified valuers using outdated asset prices and contractors using inexperienced safeguards staffs. All challenges were addressed in the previous project, but also, they served as a lesson learnt for this project to mitigate such potential challenges. The table below illustrate the challenges anticipated and mitigation measures for timely project implementation.

Resettlement Policy Framework

Table 2: Anticipated challenges and Proposed mitigation measures

Anticipated challenges	Reason	Proposed mitigations measures
Relocation issues from the WASH activities	<p>PAPs with family conflicts will pose a serious issue to the project involving physical relocation.</p> <p>Some other social issues like assets which were given like a collateral also may delay the relocation process.</p> <p>PAPs which are not on board due to different reason especially when they are not in the country and refuse to give the power of attorney to family members.</p>	<ul style="list-style-type: none"> - Engage fully local authorities and community court known as ABUNZI to handle family and social issues involving litigation to be resolved in advance. - To use escrow account as stipulated in the expropriation law 32/2015 of 11/6/2015. - Involvement of the affected persons in all phases of the project activities. - Effective collaboration with other interested parties to assist in relocation such as Rwanda Housing Authority. - Implement as prescribed bylaw the expropriation law 32/2015 of 11/6/20015 in public interest.
Compensation payment delays	<p>PAPs with family conflicts pose a serious issue to the project involving physical relocation.</p> <p>Some other social issues like asset which were given like a collateral also may delay the relocation process.</p> <p>PAPs which are not on board due to different reason especially when they are not in the country and deny giving the power of attorney.</p> <p>PAPs who do not have the land titles.</p> <p>PAPs without the Bank account.</p> <p>PAPs without National ID.</p>	<ul style="list-style-type: none"> - Engage fully local authorities and community court known as ABUNZI to handle family and social issues involving litigation to be resolved in advance. - To use escrow account as stipulated in the expropriation law 32/2015 of 11/6/20015. - Work closely with Local Government Officials to deliver the required document for compensation on time and the District One Stop Center role will be crucial.
Encroachment	<p>PAPs who can build houses in the Right of Way with intention to be compensated for their houses after the cut-off date is proclaimed.</p>	<ul style="list-style-type: none"> - To work closely with local Government Officials for timely information transmission. - Contractor staff on board should regular check the irregular activities in the line routes. - To establish Grievance Redress Committees at all cell levels and make sure that they are trained for timely reporting.

Resettlement Policy Framework

Anticipated challenges	Reason	Proposed mitigations measures
		<ul style="list-style-type: none"> - To announce the cutoff date to all concerned PAPs using UMUGANDA (Community works) and community assemblies' meetings.
Disclosures meeting participation	PAPs who are not available during the public disclosure and hence do not raise their issues on time due to different reason such as people who are not in localities during the disclosure time, people who were not informed of the disclosure activity, People who neglected the attending due to their mindset.	<ul style="list-style-type: none"> - Work closely with Local Government Officials and GRC for mobilization to attend, and the relevancy of the meeting. - Prepare in advance the disclosure and be communicated publicly in different meetings assembling public.
Contractors delaying starting which affect the relevancy of the RAP	Some contractors may delay starting the works or may even fail to deliver and quit without any single and this can result in the contract termination after delay.	<ul style="list-style-type: none"> - Procurement should consider the past experiences of the contractor within the country for the same duties where possible.
Certified valuers outdated asset prices.	Valuers who use the prices which are not up to date and result in over valuation or under valuation of assets because the prices that are set by IRPV are updated annually and based on real market value.	<ul style="list-style-type: none"> - Regular inspection of valuers during asset inventory exercises and be ready to notice any inconsistency in the valuation on time. - To work closely with IRPV to handle the insolvent valuers.
Contractors using not enough skilled safeguards staff	Contractors who make internal recruitment and recruit inexperienced staff due to different reason including the reason that experienced worker are expensive, hence they fail to perform the safeguards duties properly.	<ul style="list-style-type: none"> - Implementing agencies will make sure that every safeguard staff's CV is approved by the project for competitiveness.

Resettlement Policy Framework

7.8 Mitigation measures

Provisions are made under this RPF to minimize all potential negative impacts including those of socio-economic significance. Provisions are also made in this RPF to accommodate all potential situations, including cases that entail actual livelihood restoration assistance in accordance with the World Bank ESS5. The potential social impacts to be addressed within the context of preparing this Resettlement Policy Framework have been identified. It is expected that site specific social assessment studies will be carried out within specific sites, as and when required. Further, the project should consider mitigation hierarchy: avoid, minimise, and compensate. The framework for the compensation/ resettlement will then be applied incorporating specific (1) institutional arrangements, (2) resettlement/compensation eligibility criteria, (3) implementation procedures, (4) financial responsibilities, and (5) monitoring and evaluation plan.

7.9 Valuation and Compensation

As per the Rwanda expropriation Law number 32/2015 of 11/06/2015, all peoples affected by the project must receive fair and just compensation before the start of any civil works. The calculation of fair and just compensation is to be made by independent certified valuer based on the market price of the property. The RPF provides for methods and valuation templates in line with the Rwandan expropriation law and applicable internationally equivalent to market value. To ensure that ESS5 requirements are met for valuation, these valuation methods are to be adopted for all activities requiring expropriation where the project activities will be implemented. This will include a screening process, a socio-economic census including establishing and disseminating the cut-off date and this must be announced before the census starts, asset inventory of the area and identification of Project Affected Persons (PAPs) and a clear entitlement matrix. All resettlement instruments developed under the program will be shared with World Bank for review and clearance.

7.10. Projects Screening

The land requirement assessment shows that resettlement is needed where the pipelines routes and water tanks will be constructed this might have a social impact on the community. Potential socio-economic impacts that will require mitigation measures, resettlement and compensation will have to be identified. All projects will be screened by the social and environmental safeguards specialist under the consultant to know whether involuntary resettlement, land acquisition, or loss, denial, or restriction of access to land and other economic resources will be caused by the implementation of the projects under this program activities requiring the civil works. Further, the screening process will determine whether the construction will result in the permanent or temporary loss of land, perennial or seasonal crops, fruits, trees, and other structures.

Resettlement Policy Framework

8.0 Preparation of RAPs

This RPF provides guidance on the preparation of site-specific Resettlement Action Plans when all project details are known, and affected people identified. No physical relocation is anticipated under this project. For this reason, a detail Resettlement Plan is recommended per project. Alternatively, abbreviated Resettlement plan per site would be adequate if the project is in the area which has less than 200 people with minor impact on the people. The Resettlement Plan will define actions to be taken to properly resettle and compensate affected people and communities when identified.

The SPRP might require a Resettlement Plan since it will finance productive investments that may result in minimal temporary livelihood disruption. As the specific sites for the implementation of subprojects are yet to be identified, a RPF has been prepared that will guide the preparation of site-specific A/RAPs during implementation. However, during implementation of the project, in a process defined below, the identification of these areas will be made. This RPF provides a framework for resettlement associated with the project. Each subproject will need to go through a process to identify the level of resettlement required, and if so, the development of a plan for resettlement.

At this stage, the World Bank ESS 5 may call for the preparation of individual A/RAPs consistent with this RPF. To address the impacts under this policy, resettlement and compensation plans must include measures to ensure that impacted persons are:

- Informed about their options and rights pertaining to the project, resettlement, and compensation.
- Consulted on, offered choices among, and provided with technically and economically feasible resettlement and compensation alternatives and
- Provided with prompt and effective compensation at full replacement value for losses of assets and access, attributable to the project.

According to the WB ESS 5, for all subprojects included in a project, the Bank requires that a satisfactory Abbreviated/Resettlement Action Plan (A/RAP) that is consistent with the RPF be submitted to the Bank for approval. However, ESS 5 also suggests that: "For certain projects, subproject abbreviated/RAPs maybe approved by the project implementing agency or a responsible government agency or financial intermediary without prior Bank review, if that agency has demonstrated adequate institutional capacity to review resettlement plans and ensure their consistency with this policy. In all cases, implementation of the resettlement plans is subject to ex post review by the Bank.

9.0 Stakeholders' consultation and participation

Public consultations in relation to the resettlement plans will occur at all stages, starting with inception and planning when the potential lands and alternative sites are being considered. A participatory approach is to be adopted as an on-going strategy throughout the entire program cycle starting with the Resettlement Plan preparation. As part of the preparation of this RPF several stakeholders were consulted to obtain an informed view of the land acquisition and expropriation processes and current expropriation challenges, institutional capacities to hand land acquisition in their respective districts, to solicit their suggestions and recommendations on how to handle land acquisition issues that may arise during the implementation of the project.

Resettlement Policy Framework

The program has prepared the Stakeholders Engagement Plan (SEP) that will guide project consultation arrangement throughout the project cycle as per World Bank ESS 10 requirements. The key outcome or issues raised during the public consultation include:

- The capacity building especially in WB environmental and social standards (ESS),
- The involvement and consultation of districts in selection of electrification area to be covered under the program is seen as key important activity in planning of the project and this will help the administrative districts to be involved in the implementation of the project activities.
- The administrative Districts have requested also to share the information on the program progress specifically after the program appraisal to mobilize the local people to harvest their crops, to avail required documents for speeding up the expropriation assignment, given that the identified issue behind the delay in compensation of the affected assets is due to the lack of the required supporting documents by the affected persons.
- The consultative meetings with the local government officials and local population informed on the above issues.
- The local government officials promised to support the program by sensitizing and mobilizing the PAPs which will be identified to avoid any delay related to the compensation of all affected properties which also delays other project activities like construction.

10. Grievance Redress Mechanism

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

RBC will establish the Grievance Redress Mechanism (GRM). The grievance redress mechanism (GRM) is detailed in the Stakeholder Engagement Plan (SEP). For the implementation of GRM, different Grievance Redress Committees (GRCs) across the project intervention area, will be established from cell Level up to district level.

The grievance mechanism should be appropriate to the scale of impacts and risks presented by a program and beneficial for both a proponent/operator and stakeholders, especially PAPs.

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

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

Resettlement Policy Framework

- iv. Relocation of public utilities, and
- v. Unacceptable behavior by staff or employees.

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

11. Monitoring and evaluation aspects

The monitoring and evaluation will be the main mechanism of measuring and reporting progress of compliance and to alert the project management of any delays and problems and these activities will help to measure the extent to which the main objectives of proposed project have been achieved. To ensure that the implementation of resettlement is undertaken in line with this RPF, the activities will be monitored and evaluated internally by a Monitoring and Evaluation Specialists at WASAC Group at the national level and on ground at the district level. The PIU will undertake the routine internal monitoring and evaluation of the implementation of the resettlement issues to ensure that all the responsible units follow the schedule and comply with the principles of the resettlement plan. Several indicators shall be identified and used to monitor the impacts of the asset's loss and resettlement activities and the subproject implementation in general.

12. Institutional capacity assessment for RPF implementation

The involvement of the different institutions will facilitate the easy implementation of this RPF. RBC as an implementing agency of the parent project will have the responsibility to oversee and coordinate the implementation of the additional financing interventions of the project, working closely with relevant institutions directly involved in the implementation and providing technical support for the smooth operationalization of the project.

With regards to WASH activities, WASAC Group will have the responsibility of Preparation of E&S documents (SEP, LMP, ESMF, RPF, ESIA/ESMP, Resettlement Action Plan and Gender Action Plan (GAP)), Supervision of ESMPs and OHS plans, Implementation, and supervision of the RAP (where applicable), Contractor management, Stakeholder engagement and GRM. For the Supervising Engineers, the main responsibility will be the supervision of ESMP and OHS plan implementation by contractors. The contractor will be involved in preparation and implementation of CESMPs and OHS plans. MINECOFIN will be responsible for payment of the compensation to all PAPs who provide ID, bank account, land title and a signed consent form acknowledging their acceptance of the compensation value.

13. Capacity building and training

The RBC E&S team has received training on the new ESF and OHS for the WB projects in the health sector. The existing E&S team will provide daily support and supervision of Supervising Engineers and Contractor E&S compliance and will receive training on the ESF as well as on Occupational Health and Safety (OHS) to ensure familiarity with Bank policies and requirements throughout the project implementation. Relevant institutions will be capacitated including all safeguard staff from WASAC and NCDA.

Resettlement Policy Framework

14. Budget

At this stage, it is not easy to clearly estimate the likely number of people who may be affected. This is because the technical designs and details have not yet been developed and the properties to be affected have not yet been fully identified. However, preparation of specific resettlement instrument where applicable such as RAPs and implementation and Monitoring of these instruments will be done in consideration of the number of Kilometres of pipelines routes to be constructed in 13 Districts. The final budget will also be calculated during the preparation of resettlement instruments.

15. Public disclosure of resettlement instruments

This RPF and Associated resettlement plans, when available and approved by the relevant officials, will be disclosed in compliance with relevant Rwandan regulations and the World Bank ESS5 and 10. The documents will be disclosed in-country, a summary of the document in the local language available to any interested persons through the media, at the WASAC Group website and at the World Bank external website and the date for RPF public disclosure must precede the date for appraisal of the project and an executive summary will be translated in local language to facilitate the interested people for easy understanding, prior to disclose the RPF and all final ARAPs/RAPs, they will be cleared or approved by the GoR and World Bank. For any revision made to the final disclosed instruments, the same approval disclosure protocol will be followed. This Resettlement Policy Framework (RPF) will be used for the social screening and assessment of the project components and subcomponents.

The RPF will guide the implementation of project works under the components and sub-components to ensure that displacement issues are resolved. It will also ensure that livelihoods of the affected persons are not negatively impacted on and where it is unavoidable; they are appropriately being compensated and/or resettled. The RPF was prepared based on the review of other project documents, relevant Rwandan laws, review of World Bank Environmental and Social Framework, visit to project sites/Districts, as well as key stakeholder consultations.

Resettlement Policy Framework

PROCESS FOR SCREENING, PREPARING AND APPROVING RESETTLEMENT ACTION PLANS

I. Process for preparing and approving Resettlement Plans

This section provides guidelines that shall guide the preparation and implementation of Resettlement Action Plan during the implementation.

1.1. Screening Mechanism for Resettlement Plans

Resettlement Action Plans will be prepared and shall include measures to ensure compliance with Rwanda and WB environmental and Social Framework. The implementation of these Resettlement Action Plan will be done before any individual or affected households are impacted by project, and before the start of any activities on site. Screening is used to identify the types and nature of potential impacts related to the activities proposed under the project and to provide adequate measures to address the impacts. Screening for resettlement issues shall be part of the environmental and social screening. Measures to address resettlement shall ensure that PAPs are:

- Informed about their options and rights pertaining to resettlement;
- Included in the consultation process and given the opportunity to participate in the selection of technically and economically feasible alternatives.
- Provided prompt and effective compensation at full replacement cost for; and
- Losses of assets and access attributable to the subprojects.
- Enabled to restore and preferably improve their living standards compared to pre-project ones.

Therefore, the first stage in the process of preparing the individual site-specific resettlement plans is the screening process to identify the land acquisition and land use needs that will cause resettlement. The required information shall include a description of the nature, scope, and location of the proposed project impacts, accompanied by location maps and any other details as may be required. If the screening indicates that a subproject requires in its present layout the physical or economic resettlement, advice to consider feasible alternative designs to avoid or at least minimize physical or economic displacement, while balancing environmental, social, and financial costs and benefits will be sought.

1.2. Scope of Resettlement Action Plans

Overall responsibility for preparing a resettlement Action Plan will be of WASAC Development through Project Implementation Unit and in accordance with this RPF for WASH activities implemented under the SPRP-AF. The resettlement action plan should outline the following among others: General description of the project and identification of the project area, Potential impacts, main objectives of the resettlement program, survey and baseline socio-economic studies, Legal framework and institutional arrangement, community engagement and participation, Valuation of and compensation for losses, implementation schedule, grievance redress mechanism Including GBV/SH, cost and budget, Monitoring and evaluation, and arrangements for adaptive management.

Resettlement Policy Framework

1.3. Preliminary Assessments

The initial preliminary assessments and surveys should include (i) potential social impacts, (ii) direct consultations with individuals and groups who are expected to be directly affected by project activities; and (iii) identification of the major population groups that may be affected by the proposed project.

1.4. Baseline and socio-economic data

An important aspect of preparing a resettlement plan is to establish appropriate socioeconomic baseline census including establishing and disseminating the cut-off date to identify the persons who will be affected by the individual subproject, to determine who will be eligible for compensation and assistance, and to discourage inflow of people who are ineligible for these benefits. This shall be carried out to provide baseline data on various factors including the following:

- Identification of current occupants and users of the affected area, to establish the basis for the design of the resettlement plan and to exclude subsequent inflows of people from eligibility for compensation and resettlement assistance. It's worth to note that multiple users may be identified on the same land such as owners and tenants.
- Standard characteristics of affected households, including a description of production systems, labor, and household organization; and baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the PAPs;
- The magnitude of the expected loss of assets, total or partial, and the extent of impact; Baseline data for Resettlement Action Plan will include number of persons; number, type of the properties to be affected; number, category and area of residential plots and agricultural land and crops to be affected; and productive assets to be affected as a percentage of total productive assets.
- Information on vulnerable groups or persons for whom special provisions may have to be made; Identification of the potentially affected people on the individual and household levels, vulnerable groups (persons with disabilities, women, children, the elderly, female headed households, affected internally displaced people, affected internally displaced households, etc.);
- Land tenure and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance and any issues raised by different tenure systems in the project area;
 - o Those who have formal legal rights to the land they occupy;
 - o Those who do not have formal legal rights to land, but have a claim to land that is recognized or recognizable under the national laws including those measures put in place by the draft land policy; or
 - o Those who have no recognizable legal right or claim to the land they have occupied before the cut-off date.
- The patterns of social interaction in the affected communities, including social networks and social support systems, and how they will be affected by the project;
- Public infrastructure and social services that will be affected; and
- Social and cultural characteristics of affected communities, including a description of formal and informal institutions (e.g., community organizations, ritual groups; and Non-Governmental

Resettlement Policy Framework

Organizations (NGOs)) that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.

The preliminary assessments, information and the socio-economic baseline data will assist in determining the cut-off date which will be established and announced before the census starts, period of registration of claims and valuation of land and immovable assets. In summary, the census consolidates information that:

- a) provides initial information on the scale of resettlement to be undertaken;
- b) gives an indication of further socio-economic research needed to quantify losses to be compensated and, if required, to design appropriate development interventions; and
- c) establishes indicators that can be measured at a later date during monitoring and evaluation.

The purpose of the socio-economic study is also to collect baseline data within the chosen/targeted sites/areas/homesteads/villages thereby enabling the social assessment of potentially affected populations/communities/homesteads/villages. Detailed calculation of individual and household economies and identification of all impacts will be undertaken as part of the socioeconomic study and be the determinant in the potential compensation process.

The site-specific socio-economic studies and baseline census will be carried out by an independent consultant or firm which will be hired by WASAC Group based on skills and experience to conduct the same studies on the development program. An independent consultant or firm hired on the above purpose will prepare the completion report of the socio- economic study and the baseline census in line with this RPF guidelines, the same independent consultant/firm will prepare a Resettlement Action Plan. Alternatively, an abbreviated Resettlement Plan where required will be prepared per province depending on the project magnitude and level of an impact on the project Affected Persons (PAPs).

II. Preparation of Resettlement Action plans and approval process

Resettlement Plans shall be prepared by an independent consultant or firm, in consultation with the local authorities and community leaders for construction of the Pipeline Routes that have been determined to result in involuntary resettlement and/or temporal land acquisition. The resettlement and compensation plans would then be forwarded for review, approval to the World Bank and will provide a clearance and compensation fully done before land is temporarily acquired or access to resources is lost, denied, or restricted. This is to ensure that individual resettlement and compensation plans are consistent with World bank ESS5 and national regulations. Borrowers also disclose assessment documents in appropriate national and local settings under the direct responsibility and supervision of relevant national/local authorities.

Resettlement Policy Framework

2.1. Process for identifying need for Resettlement Plan

To establish whether the Resettlement Plan is indeed needed, screening will be undertaken at the sub project design stage. After screening is indicate that land acquisition is required, the RAP preparation process will proceed. The Resettlement Action Plan will entail identification of PAPs, socio-economic survey of the PAPs, census, and land asset inventory of the area. Throughout the Resettlement Action Plan process, transparent consultation and public disclosure will take place with all the stakeholders including the PAPs for ensuring that the affected persons are informed about the process and their rights.

2.2. Sub-project screening

Screening will take place as early as possible, and it will identify land that will be required for resettlement. This process will be carried out in consultation with the PAPs to ensure that it takes all considerations into account, and that all potential impacts are identified. The screening form will then be submitted to the WASAC for review. Should the screening process show that resettlement will be required, the next step will be to conduct a socio-economic survey, census, and land asset inventory to determine the extent of resettlement required. This will be followed by the preparation of a Resettlement Action Plan.

2.3. Socio-economic Survey

To enable identifying the level of socio-economic impact of PAPs, a socio-economic survey has to be organized and conducted. This should include quantitative household survey of the project affected persons or households. The objective of the quantitative household survey will be to generate a baseline description of pertinent demographic and social characteristics of the affected households. The target population for the quantitative household survey will be those affected persons within the project activities. The consultant will use the sample of socio-economic survey as annexed to this RPF during the process of Resettlement Action Plan Preparation.

2.4. Project Affected Person's (PAPs) Census

To determine the number of affected persons, PAPs census will be undertaken for the affected persons. The methodology will encompass all people adversely affected by the project, regardless of their legal status – landowner, holder of land rights, tenant, and illegal squatter – or whether they are actually living on an affected site at the time of the census. The lack of land title does not disqualify people from resettlement assistance. Private landowners and holders of rights to land as well as any person currently occupying public or private land for shelter, business purposes or other sources of livelihood (caretakers, squatters) should be included in the census. The census will serve five important and interrelated functions:

- Establishing a list of legitimate beneficiaries before the subproject's onset that counters spurious claims from those moving into the project area solely in anticipation of benefits,
- Provide indicators for monitoring and evaluation;
- Provide initial information on the scale of resettlement to be undertaken
- Laying a framework for subsequent socio-economic research needed to establish fair compensation rates and to design, monitor and evaluate sustainable income restoration or development interventions.

It's advisable that an independent consultant will need to be contracted to undertake the socio-economic survey including inventory of affected properties in collaboration with sub-project Resettlement and Compensation Committees.

Resettlement Policy Framework

2.5. Preparation of asset inventory

To prepare inventory of the land and development on it, a field team will visit the affected area to carry out an asset valuation survey. The team should include village resettlement committee representative, local administration, a representative of the PAPs among others. During the survey, each asset should be enumerated and inscribed on an inventory and a valuation of the asset carried out using the approach described above. The values of each asset should then be recorded in a register and shown to the affected person for agreement. The register will be signed, and a copy given on the spot to the affected person. Where the affected is illiterate, he/she will have identified a trusted person to assist him/her in the process of knowing the affected assets and associated value.

The document will say when the affected person will be notified, and that the inventory will not be official until a second signed copy, verified by project supervisory staff, is returned to the affected person. Information on Grievance Redress Mechanism (GRM) should be provided to the affected person during community mobilisation stage so that PAPs understand the process, means and places of GRM. A copy of the grievance procedure will also be given to the affected person as stated in the grievance redress mechanism and should be displayed in public institutions notice board of the concerned Sector/Cell Offices. A standard Compensation Assessment Form/evaluation sheet has been developed by the Institute of Real Property valuers in Rwanda to be used country wide. Since the asset inventory and valuation exercise cannot be done by a person other than a certified real property valuer, the standardized sheet will be used to avoid speculation or other unfairness practices that may bring conflicts related to asset inventory and valuation in the area.

III. Public consultations and participation

Public consultation and participation by the affected communities and individuals is an essential element of the land acquisition, compensation, and resettlement process. Throughout the process, and particularly during screening, all stakeholders must be adequately consulted and involved. The need for stakeholder's consultation is to secure the informed participation and consent of all people affected consultation should be particularly in the following areas:

- Alternative project design;
- Assessment of project impacts;
- Resettlement strategy;
- Compensation rates and eligibility for entitlements;
- Development of opportunities and initiatives;
- Development of procedures for redressing grievances and resolving disputes;
- Mechanisms for monitoring and evaluation and for implementing corrective actions.

Resettlement Policy Framework

3.1. Indicative timings for the consultation processes

Table 3: Time frame for consultation and involved stakeholders.

Timeline	Phase	Stakeholders to be consulted	Description of the activities to be undertaken
Post project appraisal	Consultation at inception	Local Government Officials; concerned Ministries, Opinion Leaders; National Youth Council (NYC) National Women Council (NWC), interested NGOs, FBO, Vulnerable groups representatives; Private Sector Federation (PFS), Academician and researchers, interested or concerned Public institutions, project beneficiaries, Etc.	<ul style="list-style-type: none"> - The socio-economic study; - The resettlement and compensation plan; - The environmental impact assessment; - During the drafting and reading of the compensation contract.
During all project lifecycle	Consultation during socio economic data collection and resettlement Preparation	Local Government Officials; Opinion Leaders; GRC National Women Council (NWC), National Youth Council (NYC), interested NGOs (Local and Int'l), Institute of Real Property Valuation (IRPV), Rwanda Association of Professional Environment Practitioners (RAPEP) Vulnerable groups representatives; Private Sector Federation (PFS), FBOs, Contractors, Supervising Firm, identified Project Affected Persons (PAPs), etc.	<ul style="list-style-type: none"> - PAPs will be consulted through meetings to share with them the information about the project, discuss social impacts of project operations and the mitigation measures suggested; - When all the data about the PAPs will be collected and valuation undertaken; - Provision of all endorsements which will be detailed during the preparation of sub-project specific resettlement action plans; - Participation in the assets inventory exercise and in the whole process of preparation of the required documents and setting up the GRC.
During full project cycle	Consultation at implementation, monitoring and evaluation	Local Government Officials; Opinion Leaders; GRC National Women Council (NWC), interested NGOs (Local and Int'l), National Youth Council (NYC) Vulnerable groups representatives; Private Sector Federation (PFS), FBO, Contractors, Supervising Firm, identified Project Affected Persons (PAPs), etc.	<ul style="list-style-type: none"> - Displaying the information to all PAPs about their rights and options; - The PAPs representatives will participate in the project completion workshops; - PAPs will be consulted during GRM implementation. - The PAPs will be consulted in a household survey to be undertaken as a monitoring and evaluation; - The PAPs will participate in GRC formation and in the disclosure of the results from the inventoried assets under each sub-project RoW.

Resettlement Policy Framework

3.2. Consultation at inception phase

Public consultation will take place at the inception of the planning stage when the potential land areas are being considered. The participation strategy would evolve around the provision of a full opportunity for involvement. Therefore, as a matter of strategy, public consultation would be an on-going activity taking place throughout the entire project cycle. For example, public consultation would also occur during the preparation of the (i) the socio-economic study, (ii) the resettlement and compensation plan (iii) the environmental impact assessment and (iv) during the drafting and signing of the compensation agreement.

Public participation and consultation will take place through meetings, focused group discussion, open meetings, radio programs, request for written proposals/comments, using survey questionnaires, publishing project documents, and requesting for public feedback, local and homestead levels at suitable locations like the official residences/offices of local elders. These measures would consider the low literacy levels prevalent in these rural communities by allowing enough time for responses and feedback.

Monitoring of this process would be through the village/umudugudu leaders as part of the individual resettlement and compensation plans and overall, the monitoring and evaluation mechanism of the entire project. This requirement is in line with the Bank policy on disclosure. The target group for this phase will consist of Local Government Officials; Opinion Leaders; National Youth Council (NYC), National Women Council (NWC), interested NGOs, FBO, Vulnerable groups representatives; Private Sector Federation (PFS), Academician and researchers, interested or concerned public institutions, RBC/WASAC/NCDA Group representatives will be involved as lead of the consultation in all stage of the program.

3.3. Consultation at data collection and resettlement preparation phase

The PAPs will be consulted through meetings to share information about the project, discuss social impacts of project operations and the mitigation measures suggested. The contribution of PAPs will be integrated into the resettlement action plan and subproject implementation process, from planning to evaluation. Furthermore, data about socio-economic impacts of the subprojects and the mitigation measures suggested will be provided to the media. This data will serve as instruments for the monitoring of the social mitigation measures. Once all the data about the PAPs have been collected and valuation undertaken, cash compensation amount and size of land offered for compensation will be presented to each eligible PAP for consideration and endorsement before cash payment. The endorsements will be detailed during the preparation of sub-project specific resettlement plans. At this stage, the stakeholders are Local Government Officials; Opinion Leaders; GRC, National Women Council (NWC), National Youth Council (NYC), interested NGOs (Local and Int'l), IRPV, RAPEP Vulnerable groups representatives; Private Sector Federation (PFS), FBOs, Contractors, Supervising Firm, etc.

3.4. Consultation at implementation, monitoring, and evaluation phases

Before implementation of the resettlement action plan, the PAPs will be informed about their rights and options, at which point they will provide their inputs. The PAPs representatives will participate in the project completion workshops, to give their evaluation of the impacts of the project. They will also suggest corrective measures, which may be used to improve implementation of other subprojects. After

Resettlement Policy Framework

completion of all expropriation/compensation operations, the PAPs will be consulted in a household survey to be undertaken as a monitoring and evaluation exercise, the stakeholders of this step are Local Government Officials; Opinion Leaders; GRC, National Women Council (NWC), interested NGOs (Local and Int'l), National Youth Council (NYC) Vulnerable groups representatives; Private Sector Federation (PSF), FBO, Contractors, Supervising Firm.

IV. Eligibility criteria for various categories of PAPs

This section sets out eligibility criteria, which are necessary to determine who will be eligible for resettlement and benefits, and to discourage inflow of ineligible people to encroach the project area. The eligibility criteria for compensation and resettlement that will be followed for the different categories of Project affected persons will follow the Bank ESF. The valuation and payment of compensation will follow the Rwanda Expropriation laws, GoR policies and the ESS5 guidelines. The replacement value will be determined based on current market of the assets, plus necessary transaction costs associated with asset replacement and the independent real estate valuation from IRPV, plus transaction costs, it will also be determined as calculation of output value for land or productive assets, or the underpreciated value of replacement material and labour for construction of structures or other fixed assets, plus transaction costs. In all instances where physical displacement results in loss of shelter, replacement cost must at least be sufficient to enable purchase or construction of housing that meets acceptable minimum community standards of quality and safety. Transaction costs include administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons. The salvage material value will also be considered because it will be offered to the property owner.

4.1. Principles of resettlement

The involuntary taking of land resulting in relocation or loss of shelter; and loss of assets or access to assets or loss of source of income or means of livelihood, whether the PAPs must move to another location or not must involve the compensation for the loss. Meaningful consultations with the affected persons, local authorities and community leaders will therefore allow for establishment of criteria by which displaced persons will be deemed eligible for compensation and another resettlement assistance.

The WB ESS5 categorizes those eligible for compensation and resettlement in three groups as shown below.

- a) Those who have formal rights to land including customary/communal land, traditional and religious rights recognized under Rwandan Law.
- b) Those who do not have formal legal rights to land at the time the census begins but have a claim to such land or assets provided that such claims are recognized under the laws of Rwanda or become recognized through a process identified in the resettlement plan.
- c) Those who have no recognizable legal right or claim to the land they are occupying, using or getting their livelihood from before the cut of date, but are recognized under World Bank ESS5.

Those covered under (a) and (b) above are to be provided with compensation for the land, structures, trees and crops lost, and other assistance in accordance with this RPF. Persons covered under (c) above are to be provided with compensation for assets such as structures, crops, and trees other assistance, as necessary, to achieve the objectives set out in this RPF, if they occupy the project area prior to a cut-off date which is the date when the census starts. Persons who encroach on the area after the cut-off date are

Resettlement Policy Framework

not entitled to compensation or any other form of resettlement assistance. All persons included in (a), (b) or (c) above are to be provided with compensation for loss of assets other than land. It is therefore clear that all PAPs irrespective of their status or whether he/she has formal titles, legal rights or not, squatters or otherwise encroaching illegally on land, are eligible for some kind of assistance if they occupied the land before the cut-off date. Persons who occupy the area after cut-off date are not eligible for compensation or any form of resettlement assistance, but they may be entitled to resettlement assistance other than compensation for land to improve their former living standards.

4.2 Eligibility criteria for compensation

Determination of the eligibility of PAPs to be compensated shall be done through a transparent and legal process, taking into consideration all the existing laws of Rwanda and the World Bank ESF requirement under ESS 5. Compensation will be paid only to those persons:

- The process will involve review of tenure documents owned by occupants, interviews with households and groups in the affected area. Local Authorities and the Ministry in charge of lands will also help in this assignment that will be undertaken by Social Safeguards Specialist and consultants if needed.
- PAPs covered in (a) and (b) will be compensated for the land they lose, and other assistance ensuring that they are (i) informed about their options and rights pertaining to resettlement, (ii) consulted and provided with technically and economically feasible resettlement and (iii) provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project.

The safeguard retains the requirement to provide compensation at full replacement cost; reiterates the importance of a resettlement that improves standards of living, income earning capacity, and overall means of livelihood; and emphasizes the need to ensure that social considerations, such as gender, age, and stakes in the project outcome, do not disenfranchise particular project-affected people, the eligibilities and entitlements have been shown in 5.4.1 on principles of resettlement.

Persons who encroach on the area after the socio-economic study (census and valuation) are not eligible for compensation or any form of resettlement assistance. There will therefore be a package of compensation and other resettlement measures to assist each category of eligible PAPs to achieve the objectives of the policy. Eligibility criteria will also be determined by loss of property, loss of wages and cut-off date.

4.3. Cut-off date

Compensation eligibility will be limited by a cut-off date which should be date of commencement of the census survey of PAPs. The precise cut-off date will be publicly announced by the local leaders in advance and the census of PAPs and assets inventory will commence immediately following this announcement.

4.4. Assets inventory and valuation methods

This section describes the methods to be used in valuing assets that will be eligible for compensation consistent with either Rwandan laws or policies or World Bank ESS5. Law No.17/2010 of 2010 establishes and organizes the Real Property Valuation Profession in Rwanda. It provides the registration of land valuers in Rwanda and conditions for registration. The law also allows the Government to conduct valuation when mandated by their government institutions. Articles 27, 29, 30 and 31 of the law deals with valuation

Resettlement Policy Framework

methods and stipulate that the price for the real property shall be close or equal to the market value. Land values could also be compared country wide. Where comparable prices are not available to determine the value of improved land, the replacement cost approach shall be used to determine the value of improvements to land by taking real property as a reference. The law also allows the use of international methods not covered by the law after approval of the counsel of the Institute of Valuers.

4.5 Valuation methods

Valuation methods recognized under valuation law in Rwanda include:

- **Use of Standard Valuation Tables**

The implementation of the proposed project will be done in all 13 administrative districts and it is anticipated that a relatively large number of small-scale asset valuations will need to be carried out during the course of the project. It would therefore be cumbersome and inefficient to deploy an individual valuation expert in every case. Therefore, it is recommended that the independent valuer is hired to provide the list of properties value and this list will be used by administrative district to calculate the compensation package for affected people when the need arises.

The compensation rates / valuation tables would be developed using legally acceptable valuation procedures accepted by the Government of Rwanda and World Bank for purposes of fairness and consistency. The approach will consider replacement costs and types and levels of compensation under the Rwanda expropriation law in public interest. Valuation of lost assets will be made at their replacement cost.

- **Comparison of Land/Property Values Countrywide**

In case there are no compensation rates, the Valuer shall compare prices by referring to the prices recently assigned to a real property that is similar or comparable to the real property subject to valuation. Where comparable prices are not available for land in a particular area, the Valuer may use comparable prices of similarly classified land from other areas of the country.

- **Replacement Cost Approach**

The replacement cost approach is based on the premise that the costs of replacing productive assets is based on damages caused by project operations. These costs are taken as a minimum estimate of the value of measures that will reduce the damage or improve on on-site management practices and thereby prevent damage. The approach involves direct replacement of expropriated assets and covers an amount that is sufficient for asset replacement and other transaction costs.

- **Gross Current Replacement Cost**

Gross Current Replacement Cost (GCRC) is defined as the estimated cost of erecting a new building having the same gross external area as that of the existing one, with the same site works and services and on a similar piece of land.

- **Other methods**

Rates from Contractors: When rate schedules do not exist or are out of date, recent quotations by contractors for similar types of construction in the vicinity of the project can be used for calculating replacement costs. In projects offering the options of cash compensation or alternative accommodation, the construction cost estimates for alternative accommodation could be used for calculating cash compensation payable.

It is recommended that the replacement Cost is used as valuation methods and results can be used to prepare standardised valuation tables. This is because the replacement cost valuation methods is

Resettlement Policy Framework

recommended by ESS5 and recognised by valuation law in Rwanda. Standardized table will ease the valuation process given that small scarce valuation sites are scattered in different places.

4.6. Calculation of compensation by assets

The following methods of calculation should be adopted for the preparation of the standardized asset valuation tables and/or the application of specific case by case valuations in the case of projects that have significant impacts.

- Compensation for land

Compensation for land is aimed at providing a farmer whose land is acquired and used for project purposes, with compensation for land labour and crop, trees loss. For this reason, and for transparency, land is defined as an area or homestead (i) in cultivation, (ii) being prepared for cultivation, or (iii) cultivated during the last agricultural season. This definition recognizes the farmer's labour as the biggest investment he/she makes in producing a crop which is higher than all other inputs such as seed and fertilizers. As a result, compensation relating to land will cover the market price of labour invested as well as the market price of the crops lost, in this project there will no land compensation, only temporally land acquisition will be used, therefore, the assets planted on it will be compensated.

- Land measurement

For purposes of measuring land, the unit of measurement would be that which is used and understood by the affected farmers and if a traditional unit of measure exists in the rural areas, that unit should be used. If a traditional unit of measurement does not exist in a particular area, then it is recommended that land should be measured in meters or any other internationally accepted unit of measurement.

However, in such an event, the unit that is being used must be explained to the affected farmers/users and must somehow be related to easily recognizable land features that the communities are familiar with, such as using location of trees, stumps, etc as immovable pegs. The most important concern of this exercise is to ensure that the affected person can verify using his/her own standards/units of measurement, the size of land that is being lost. This will ensure transparency in the system and will thus avoid subsequent accusations of wrong measurements or miscalculation of areas. A farmer should know how much land he/she is losing, in terms of size and the replacement land must be at least of that same size and comparable value as land lost.

- Calculation of crops compensation rate

The current prices for cash crops will be determined and all crops will be valued using a single rate considering the crop at mature age in accordance with Institute of Real Property Valuers in Rwanda. This rate incorporates the value of crops and the value of the labour invested in preparing new land. Determining compensation using a single rate creates transparency because anyone can measure the area of land for which compensation is due and multiply that by a single rate known to all. This approach also allows assignment of values to previous year's land (land in which a farmer has already invested labour) and land that have been planted but crops have not germinated. Further, it avoids contention over crop density and quality of intercropping.

Resettlement Policy Framework

The value of the labour invested in preparing agricultural land will be compensated at the average wage in the community for the same period and this will be calculated based on the payment of different casual workers during the seasonal period and several casual workers' payment in the same period will provide the average wage within the community where the project will be implemented. The rate used for land compensation should be updated to reflect values at the time compensation is paid.

- Compensation for Sacred Sites

This policy does not permit the use of land that is defined to be cultural property by the Bank's Environmental and Social Framework. Sacred war memorial sites include but not restricted only to; museums, altars, initiation centres, ritual sites, tombs, genocide memorial sites and cemeteries. It includes other such sites or places/features that are accepted by local laws (including customary), practice, tradition and culture as sacred. To avoid any possible conflicts between individuals and/or communities/homesteads/chiefdoms the use of sacred sites for any project activity, is not permitted under this project.

- Compensation for vegetable gardens

Until a replacement garden starts to bear, the family displaced (economically or physically), will have to purchase vegetables in the market for daily use. The replacement costs, therefore, will be calculated based on the average amount that an average town dweller spends on buying these items for one year from the local market.

- Compensation for horticultural, floricultural and fruit trees

Banana and Mango trees are featured here below as two examples of the set of primary fruit trees that are likely to be found in project targeted area and are estimated to account for a significant amount of all fruit bearing trees. They are primarily important as a source of:

- Subsistence food for families;
- Cash produce that contribute to the export economy;
- Petty market income in some areas, and
- Shade (in the case of mango trees).

For banana plantation, they have a relatively much shorter productive life, normally, than mango trees. For species, banana plantation will not bear fruit more than once. Therefore, compensation for banana plantation would be compensated at the full market rates for bananas harvested in that year and for another year. The second-year payment is for the replacement cost of planting a new tree, looking after it and harvesting it which could all be done in one year. Therefore, the farmer should have restored his pre-project position by the end of the second year. This example of bananas is an example for trees/plants that have a relatively short life.

Given their significance to the local subsistence economy, which this project intends to positively impact, mango trees will be compensated on a combined replacement/market value. Mango trees used for commercial purposes will be compensated based on the updated annual price from the Institute of Real Properties Valuers in Rwanda, the annually updated prices are available at www.irpv.rw.

Resettlement Policy Framework

If households chose to resettle, they will be compensated for the labour invested in the trees they leave behind, because they will continue to own the trees left behind under customary rights. It is not uncommon for individuals to own trees in other villages in which they formally lived and, in some cases, to continue to harvest fruit from those trees for subsistence purposes and/or sale to traders. If a household chooses to transfer ownership of the trees, transfer costs will be paid in addition to labour costs. The compensation rate will be based on information obtained from the socio-economic study. From this study, a compensation schedule for mango trees can be developed incorporating the following objectives:

- Replace subsistence mango production yields as quickly as possible.
- Provide subsistence farmers with trees to extend the number of months of the year during which mangoes are produced and can be harvested as a supplemental source of food for their families during their “hungry season”;
- Provide farmers with the opportunity to derive additional production income from trees bearing more valuable fruits at offseason periods;
- Provide cash payments to farmers to replace pre-project income derived from the sale of excess mango production until replacement trees produce the equivalent (or more) in projected cash income.

The compensation schedule is based on providing a combination of new grafted and local trees to farmers, as well as cash payments to offset lost yearly income.

The schedule could assume the following (the figures in Rwandan Francs (X no.) to be determined in the socio-economic survey):

Table 4: Fruits Compensation

Local Mangoes	
Estimated Avg. Fruit Yield (kg) of Mature tree	800 to 1,300 kg/year
Estimated Yield used	Ten sacks (1,000kg)/tree/year
Market Price, Height of harvest season (March/April) End of season (late May)	Rwandese Franc/kg Rwandese Franc/kg
Price used as basis of this estimate	80% height of season;20% end of season
Years to Production	Six to seven
Years to Maximum Production	Twenty
Costs of Sapling	RWANDESE FRANC, locally available
Grafted Mangoes	
Estimated Avg. Fruit Yield (kg) of Mature tree	800 to 1,300 kg/year
Estimated Yield used	Almost entire yield due to market value
Market Price, (varies according to variety) Height of harvest season (June/September)	Rwandan Franc /kg
Price used as basis of this estimate	Price per fruit or sac (100kg) as quoted by growers
Years to Production	four to five
Years to Maximum Production	Eight

Resettlement Policy Framework

Costs of Sapling	Rwandan Franc, not locally available.
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Table 5: Proposed schedule for mango trees cut down.

Type/Age of Tree	Est. Years	In-kind replacement for Local Mangoes	Credits/Financial Support
Sapling Trees planted after project. cut-off date in area will not be eligible for compensation	0-1	Deliver to Farmer: Choice of two mango trees (local and/or improved grafted) Supplies: fencing to protect Tree, a bucket for watering, and a spade.	Rwandan Franc
Sapling/Young Tree First minor production 12-50 fruits occur about age 4-5	1-6	Deliver to farmer: Choice of two mango trees (local and/or improved grafted) Supplies: fencing to protect Tree, a bucket for watering, and a Spade	Equivalent of X no. Rwandan Franc in credits or other financial support for labour invested in planting, fencing, and watering, made in one payment.
Mango Trees Fruit Producing	6-30+	Deliver to farmer: Choice of two mango trees (local and/or improved grafted) Supplies: fencing to protect Tree, a bucket for watering.	Equivalent of X no. Rwandan Franc in credits or other financial support for labour invested in planting, fencing, and watering, made in one payment. Equivalent of X no. Rwandan Franc in credits or other financial support, representing eight years, (8 years' x 10 sacks x Rwandan Franc /sack) lost income/subsistence until replacement trees begin production. This rate to be agreed by farmers. Total: Equivalent of X no. Rwandan Franc in cash or equivalent financial support to be paid in one instalment.
Mature Trees – Low or Non- Fruit Producing	30+	Same as for mature trees above	Same as above

Other domestic fruit and shade trees

As defined in this policy, individuals will be compensated for wild trees which are in their land. Wild productive trees belong to the community when they occur in the bush as opposed to fallow land. These trees will be compensated for under the umbrella of the community compensation.

Resettlement Policy Framework

Table 6: Individual compensation

Sub-Category	Unit	Compensation Value (X no. of Rwandan Francs)
foodstuffs & others (e.g. cocoa)	To be determined	
Rubber, wood, timber	To be determined	
Domestic Fruit Trees		
Avocado	Non-productive Productive	
Plantain	Non-productive Productive	
Lemon	Non-productive Productive	
Grapefruit	Non-productive Productive	
Papaya	Non-productive Productive	
Shade Trees		
	Young	
	Adult	
Individual owned wild productive trees		
Palm Kernel	Non- productive	
	Productive	
Coconut	Non- productive	
	Productive	
Mango Trees		
2 saplings & equipment	0-1 year	
	1-6 years	
2 saplings & equipment	6+ years	
Catch	Demonstrable loss	according to case
Kitchen Garden		
Beehive		

No compensation will be paid for minor pruning of trees. Compensation for removal of limbs will be prorated based on the number of square meters of surface area removed. The total surface area of the tree will be calculated using the following formula: $(\frac{1}{2} \text{ diameter of canopy})^2 \times 3.14$.

Resettlement Policy Framework

V. Legal framework for the Institute of the Real Property Valuers in Rwanda (IRPV) and Land Surveyors

The assets inventory and PAPs identification will be done by the established Institute of the Real Property Valuers in Rwanda (IRPV), this was established by Law N° 17/2010 of 12/05/2010 establishing and organizing the real property valuation profession in Rwanda as published in Official Gazette n° 20 of 17/05/2010. IRPV has set Valuation fees as following: Properties have been classified in different categories for ease of reference while estimating charges and fees for valuation services. Categories are set up by considering the following factors: type (land or building), use (residential, commercial, or industrial), and location (town, suburb, and rural area).

The land surveyors will work under instructions of the Rwanda Land Management and Use Authority (RLMUA), an authority established by the Law N°05/2017 of 03/02/2017 Establishing Rwanda Land Management and Use Authority and determining its mission, organisation and functioning. The same authority has in its mandate to establish the instructions to the land surveyor's professional in Rwanda as stipulated in the article 5 section 10 (b, c and d) of the above law; the current instructions are No 02/2020 of 17/02/2020.

5.1. Preparation of Asset Inventory and PAPs identification

To prepare for compensation and other resettlement benefits, it is imperative that a comprehensive asset and affected persons inventory in the designated areas for the different project components is done. The inventory will specify the different assets, properties affected in each plot of land and their owners. The Institute of the Real Property Valuers in Rwanda (IRPV) which is the entity responsible for undertaking valuation of assets will be responsible for the valuation exercise and will therefore provide independent valuation experts. The valuation document will indicate when the affected person will be notified, and that the inventory will not be official until a second signed copy, verified by project supervisory staff, is returned to the affected person. As part of asset inventory and PAPs identification, mobilisation meeting should be held where potential PAPs will be given information on, PAPs rights and obligations, assets inventory, PAPs identification Procedures, Valuation methods as well as information on Grievance Redress Mechanism (GRM). The RAP consultant will work hand in hand with the local leaders of the area to provide enough information to PAPs.

- Assets inventory Procedure

At each affected land/plot, an independent property valuer will take careful count of all crops and trees. In addition, the Valuer will count and measure all the affected land in the presence of the affected person and a local leader. If the household does not have a person who can read the assets inventory form, they will be requested to identify trusted member of the community to assist them, and the cost required will be provided by the project. A Compensation Assessment Form will be filled to record all the properties affected. The licensees or sharecroppers' crops will also be noted and recorded on a separate Compensation Form bearing the names of the licensee or sharecropper. The property of the sharecropper/licensee will be recorded in the presence of the landowner, the licensee/sharecropper, and the area leader. All the participating parties will verify the contents of the Compensation Assessment Form and will thereafter append their signatures to this form. The affected persons will take a copy of the Compensation Assessment while the original will be retained by the Valuer.

Resettlement Policy Framework

- Land Survey

A Land Surveyor will demarcate the line route of the project land required for acquisition. He will then demarcate individual affected property to determine the different land areas/sizes acquired from each Project Affected Person. The surveyor will work hand in hand with the affected persons, other community members and the Local Authorities Cell Executive Secretary and village leader). This is mainly for purposes of transparency and confirming line route and ownership of the affected property. In cases where the landowners will be absent, family members, caretakers or spouses will be encouraged to be present and represent the household. The land inventory will specify the different customary tenures under which the different affected plots of land fall (e.g. customary, leasehold, freehold etc.).

- Socio-economic Profile of each PAP

The socio-economic survey will reveal a substantial amount of information on the economy and social organization of the affected community. The Resettlement Expert is expected to review this data so as to identify appropriate and sustainable interventions. Special attention will be paid to the needs of vulnerable people among the PAPs especially households with incomes below the national poverty line, including the landless, elderly, disabled, women, children, and other disadvantaged groups. Given the little number of affected people, a simplified questionnaire will be prepared and used to collect information on affected people. For these reasons, the project funder should bear in mind that resettlement may provide opportunities to an affected community to improve households' conditions, public infrastructure and services and to engage in land use planning that contributes to the long-term development objectives.

5.2. Forms of compensation

Individual and household compensation will be made in cash, and/or through assistance. The type of compensation will be an individual choice although every effort will be made to instil the importance and preference of accepting in kind compensation if the loss amounts to more than 20% of the total loss of subsistence assets. Compensation payments raises issues regarding inflation, security and timing that must be considered. One purpose of providing in-kind compensation is to reduce inflationary pressure on the cost of goods and services. Local inflation may still occur and thus market prices will be monitored within the time that compensation is being made to allow for adjustments in compensation values. The issue of security, especially for people who will be receiving cash compensation payments should be addressed by the local administration officials. The RPF has provided an entitlement matrix that shows type of compensation for each category.

In addition to the above, compensation will be done in the following forms;

- **Cash payment** - compensation will be calculated at new replacement (i.e. un-depreciated) value and paid in Rwandan Francs. Rates will be adjusted for inflation.
- **In-kind compensation** - Compensation may include items such as land, houses other buildings, of equal or better value. If building materials are provided transport and labor costs must also be provided. Additional assistance - Resettlement assistance will comprise of disturbance allowance valued at 5% of the value of the land and property thereon.

Resettlement Policy Framework

The livelihood restoration program will include direct compensation with 5% of disturbance allowance to PAHs whose assets will be affected prior to construction activities; provision of employment to the local communities during construction activities, cash/Financial Management Training Program; right to salvage materials (perennial or seasonal crops) without deduction from compensation and they will have sufficient time to harvest their crops and trees prior to civil works activities; linkage of vulnerable PAPs to microfinance institutions (MFI). The Government of Rwanda will oversee providing and covering the compensation budget including livelihood restoration program budget.

5.3. Consultation and Participatory Approaches

For all stages of the resettlement plan all relevant stakeholders' groups as mentioned in this RPF including the PAPs will be consulted and sensitized. This will be done through a series of individual and public meetings. All types of compensation and valuation principles to be followed will clearly be explained to the individuals or households involved. A participatory approach will be adopted for all meetings. Stakeholders and PAPs will be given a chance to freely participate in the meetings and to raise any queries, concerns or questions. All concerns raised will be taken into consideration when preparing the Resettlement Action Plans for each sub-project.

5.4. Disclosure and notification

All eligible PAPs and stakeholders will be informed about the project and the resettlement process. Disclosure and notification of entitlements will be carried out by the compensation teams responsible for implementing the respective Resettlement Plans to enable the dissemination of the results of the land and property compensation assessment process. The individual household database will be updated after individual consultation disclosure. A cut-off date is established as part of determining PAPs eligibility. In special cases where there are no clearly identifiable owners or users of the land or asset, the Resettlement team must notify the respective local authorities and leaders. A "triangulation" of information – affected persons; local leaders and representatives – may help to identify eligible PAPs.

5.5. Documentation and verification of land and other assets

The inventory of all assets and persons shall be compiled in a Valuation Report and a strip map which shall be submitted to the RBC. A Resettlement Plan Report shall also be prepared and submitted to the World Bank, as financier of the project for approval. The Resettlement Plan report will contain all the necessary personal information on the PAPs and their household members; their total land holdings; inventory of assets affected; and demographic and socio-economic information for monitoring of impacts. The list of PAPs will also identify individuals/households that are vulnerable to adverse impacts. The verification of ownership of land and other assets shall be done with the help of local authorities, neighbours, clan members, family members and documents like land titles and land sale agreements. At this stage GRM committees should be in place and involved in resolution of complaints that may arise from RAP preparation process including those related to assets inventory and PAPs identification.

A form (Consent Form) detailing the quantities of the affected properties and the total compensation shall be signed by each PAP and witnessed by a spouse, or child above 18 years or any other person as chosen by the PAPs. In addition, the property valuer, the respective village leaders, the implementing agency's representative and representatives of the Sector and Cell will also append their signatures to the consent form.

Resettlement Policy Framework

The implementing agency will keep all copies of the documentation of the whole process. The documents will be referred to during monitoring and evaluation of the resettlement activities. The RAP implementing team shall consider several aspects for proof of eligibility and these will include among others the following: Identity Card or passport or the replacement document provided by local government officials.

Consultations with and witnesses like local authorities (Sector/Cell Land Committees and Community leaders, neighbours, family members, elders and the general community will also be undertaken and a copy of Identity Card and a copy of bank cheque or book to prove the right beneficiaries. Identity Card and the Account number of the eligible PAPs will be attached to each PAPs file. This will ensure that the right beneficiaries of the project are compensated.

5.6. Individual / household compensation

Individual and household compensation will be made in cash, and/or through assistance. The type of compensation will be an individual choice. However, PAPs will be advised on the importance of accepting in-kind compensation especially when more than 20% of the land has been affected as stated in ESS5. All in kind compensation will be handed over to the PAP in the presence of the local leaders (Sector, Cell and village), district representatives and representatives of the RBC/WASAC/NCDA.

5.7. Procedures for delivery of compensation

It is recommended that compensation be made through reputable local banks (Umurenge SACCO). This will ensure security of the PAPs money especially for those receiving large amount. Forms acknowledging receipt of the compensation packages shall be signed by each PAP and SACCO will provide the financial report for the fund transferred from RBC/WASAC/NCDA.

VI. Resettlement Action Plan and Grievance Redress Mechanism

Impacts on property by Project activities could be inevitable and may give rise to grievances among affected people. This could vary from rates of valuation, compensation eligibility criteria and actual compensation payments. Timely redress or resolution of such grievances is vital to ensure successful implementation of the project. Grievance mechanisms provide a way to reduce risk for projects, provide an effective avenue for expressing concerns and achieving remedies for communities, and promote a mutually constructive relationship and enhance the achievement of project development objectives. Grievance mechanisms are increasingly important for project where ongoing risks or adverse impacts are anticipated. They serve to meet requirements, prevent, and address community concerns, reduce risk, and assist larger processes that create positive social change.

6.1. Community expectations when grievances arise

When local people present a grievance, they generally expect to receive one or more of the following:

- Acknowledgment of their problem;
- An honest response to questions about project activities;
- An apology;
- Compensation;
- Modification of the conduct that caused the grievance;
- Some other fair remedy.

In voicing their concerns, they also expect to be heard and taken seriously. Therefore, the PCU must convince people that they can voice grievances and the project will work to resolve them.

Resettlement Policy Framework

6.2. Anticipated grievances during the implementation of proposed project

Potential grievances and disputes that arise during implementation of the resettlement and compensation program for proposed project may be related to the following issues:

- Inventory mistakes made during census survey as well as inadequate valuation of properties;
 - Mistakes related to identification and disagreements on boundaries between affected individual(s) and specifying their land parcels and associated development;
 - Disagreements on plot/asset valuation;
 - Divorces, successor and family issues resulting into ownership dispute or disputes shared between heirs or family;
 - Disputed ownership of a given assets (two or more affected individual(s) claim the same);
- and
- Where affected individual(s) opt for are settlement-based option, disagreement on their settlement package (the location of the resettlement site does not suit them);
 - PAPs without identity or inactive Bank accounts.

Despite best efforts regarding the public consultation and community relations, there will be times when the developer and PAPs disagree. Affected persons will be informed of their rights to raise grievances via Resettlement information sharing initiatives. Mechanisms will be put in place to ensure that grievances are recorded and considered fairly and appropriately.

6.3. Procedures and timeframe

There is no ideal model or one-size-fits-all approach to grievance resolution. The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs, and project conditions and scale. In its simplest form, a grievance mechanism can be broken down into the following primary components:

- Receive and register a complaint;
- Screen and validate the complaint;
- Carry out the investigation on complaint;
- Formulate a response;
- Select a resolution approach, based on consultation with affected person/group;
- Implement the approach;
- Settle the issues;
- Track and evaluate results;
- Learn from the experience and communicate back to all parties involved.

6.4. Grievance Prevention

There are ways to proactively solve issues before they even become grievances. RBC/WASAC/NCDA will be aware and accept that grievances do occur, that dealing with them is part of the work, and that they should be considered in a work plan. Implementers should do the following:

- ***Provide sufficient and timely information to the affected communities.***

Many grievances arise because of misunderstandings; lack of information; or delayed, inconsistent or insufficient information. Accurate and adequate information about a project and its activities, plus an

Resettlement Policy Framework

approximate implementation schedule, should be communicated to the communities, especially PAPs, regularly. Appropriate communication channels and means of communication should be used.

- ***Conduct meaningful community consultations.***

RBC/WASAC/NCDA will continue the process of consultation and dialogue throughout the implementation of the project. Sharing information, reporting on project progress, providing community members with an opportunity to express their concerns, clarifying, and responding to their issues, eliciting community's views, and receiving feedback on interventions will benefit the communities and the project management.

- ***Build capacity for program staff and GRC.***

The RBC/WASAC/NCDA staff should be provided with adequate information on the project such as project design, activities, implementing schedules, and institutional arrangements as well as enhanced skills in effective communication, understanding community dynamics and processes, negotiation, and conflict resolution, and empathizing with communities and their needs. Building trust and maintaining good rapport with the communities by providing relevant information on the project and responding effectively to the needs and concerns of the community members will help solve issues before they even become grievances. It is also important that local leaders and field-level staff provide regular feedback on their interactions with the communities to the higher levels of the implementing agencies.

VII. GRIEVANCE REDRESS MECHANISM

7.1 Introduction

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

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

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

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

Resettlement Policy Framework

7.2. Objectives of Grievance Redress Mechanism (GRM)

The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are:

- i. Record, categorize and prioritize the grievances;
- ii. Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions);
- iii. Forward any unresolved cases to the relevant authority.

It is vital that appropriate signage is erected at the sites of all works providing the public with updated project information and summarising the GRM process, including contact details of the relevant Project Contact Person within the project implementation unit. Anyone shall be able to lodge a complaint and the methods (forms, in person, telephone, forms written in Kinyarwanda) should not inhibit the lodgement of any complaint.

7.3. Grievance Redress process

Project Level Grievance Redress Mechanism: Grievance Redress Committee (GRC)

As the GRM works within existing legal and cultural frameworks, it is organized in such a way that the Grievance Redress Committee (GRC) will comprise of local community representative, PAPs representative, local authority representative at village and cell levels, Contractor, and Supervising firm representative. Members of GRC are presented below with their roles and responsibilities.

Many projects related grievances are site-specific. Often, they are related to impacts generated during construction such as noise, dust, vibration, contamination, workers dispute etc. Most of the time, they can be resolved easily on site with the contractor commitment to implement the ESMP and proper supervision by the implementing agencies and administrative District officials. Other grievances are more sensitive especially when they are about land boundaries, or misunderstandings between affected households and the Contractor regarding access arrangements, properties accidentally damaged by construction activities, accidents on sites among others. All these grievances and claims must be resolved as soon as they are received.

The grievance procedure at project level will be simple and administered at the extent possible at the local levels to facilitate access, flexibility and ensure transparency. All the grievances will be channelled via the Grievance Resolution Committees specifically established for the project at Cell, Sector and District level. Stakeholders will be allowed to use any means easily accessible to them to voice their concerns and complaints such as filling a grievance form, sending an email, using phone, in-person etc. Complaints will be filled in a Grievance Register that will be distributed to GRC free of charge, this register will be available to the hierarchical level for verification of the complaint and an investigation will be carried out by the hierarchical committee members to verify its authenticity. Thereafter a resolution approach will be selected based on the findings. The decisions of the action to be taken will be communicated to all involved parties mainly in written form.

All measures will be undertaken to ensure that the grievance is solved amicably between the concerned parties. If the grievance is not solved at Cell level, Sector or District level, the courts of law will be the last

Resettlement Policy Framework

resort. Efficiency in solving of the grievances will be of paramount importance. The selection of members for the sub-project grievance committee will be at the discretion of the PAPs to decide basing on information provided by the RBC/WASAC/NCDA.

In practice, some complaints are expected to appear. This is on the assumption that all proposed works are within the public land where the farmer have many types of crops and trees, this will be specifically on the component one of pipeline extension and rehabilitation of the water supply systems for ECDs, health centres, schools, and households.

For complaints likely to rise from the extension and rehabilitation works will be received directly on site by the Contractor's Site Manager/Engineer who will mandatory be responsible to resolve these issues on site. The Contractor will inform and Grievance Committee (GRC) of these complaints and their outcomes, and of others not satisfactorily resolved that the Grievance Committee should take over. The GC will log these in the Complaints Register and inform the Project Implementation Unit.

At each level of the project GRC, complaints will be solved within a period of 24-48 hours or otherwise handed to the next level, this will also involve women PAPs and the GRM will be open for all PAPs as indicated in the RGM member table 8 of this RPF where the women and youth will be represented in Grievance Redress Mechanism. Once at judiciary level, due process as mandated by the law will be followed depending on what the courts will require.

Through citizen engagement meetings the PAPs will be informed of the different grievance mechanisms in place for them to lodge their complaints and dissatisfactions.

Women PAP issues and GRM access

The women PAPs are represented in the GRC Members, and they will have equal access to GRM, their issues will be raised through the same process as other PAPs and will be carefully reviewed by the committee, if the case is related to the gender-based violence, Grievance channel for Gender-Based Violence, it will be handled according to the existing laws.

Labor related grievance mechanism.

To create a working environment that provides safety and security to all workers, contractors will be required to present a worker's grievance redress mechanism that responds to the requirements of ESS2. For direct workers, the mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides feedback to those concerned, without any retribution. The contractor will inform the workers of the grievance mechanism at the time of hiring and make it easily accessible to them.

For workers and labour contracting issues.

- (i) Individual labor disputes: Article 102 of law n° 66/2018 of 30/08/2018 regulating labor in Rwanda**

Resettlement Policy Framework

Workers will elect representatives who will form a committee that will act as the Workers Grievance Redress Committee. As mandated by article 102 of the law regulating labour in Rwanda, the employees' representatives amicably settle individual labour disputes between employers and employees. If employees' representatives fail to settle the disputes amicably, the concerned party refers the matter to the labour inspector of the area where the enterprise is located. In the case of this program, it will be the district where activities are being carried out. If the Labor Inspector of the District fails to settle the dispute due to the nature of the case or conflict of interests, he/she refers the dispute to the Labor Inspector at the national level stating grounds to refer such a dispute. If amicable settlement fails at the national level, the case is referred to the competent court.

In any case, the RBC/WASAC/NCDA will be informed from the beginning of any workers grievances and provide insight and mediation if possible. The matter will be referred to the labour inspector only if the PCU fails to do the mediation.

(ii) Collective labor disputes: LAW N° 66/2018 OF 30/08/2018 regulating labor in Rwanda

The law requires that collective labour disputes be directly notified to the labour inspector of the area by the workers representatives. Within this framework, any collective labour disputes that will arise under the program, will be addressed to labour inspector at District level for assessment and settlement. In case of escalation, the matter will be referred to the national level.

Before escalating the collective labour dispute, the PCU through the Environmental and Social Specialists will be alerted. Necessary investigations will be conducted, and the contractor will be duly approached. The matter will be referred to the labour inspector only if the RBC/WASAC/NCDA and workers representatives fail at amicable settlement.

For workers safety issues

All grievances related to workers health and safety will be addressed through the Occupational Health and Safety committee as required by Article 78 of the labour law (see section 10).

Grievance process for non-labour related issues involving project workers.

In the project area there might be other conflicts related to relationships between the workers and the local community. Depending on who is the aggrieved party, the following mechanism will be used:

- (iii) **A worker- against another worker:** These grievances will be handled through the Workers Grievance Committee/representatives.
- (iv) **Community member – against a worker:** If there are any grievances from a community member against a worker, they will be handled through the Workers Grievance Committees/representatives.
- (v) **Worker- against a community member:** The project will establish a project grievance committee at various levels of the local administration scheme in Rwanda from the Cell, Sector up to the District Level as a local Government. This grievance mechanism as described in the Labor Management Procedure, Stakeholder Engagement Plan, RPF and Environmental and Social Management Framework, will have the mandate of solving all complaints and grievances

Resettlement Policy Framework

related to project activities and impacting local communities. Any grievance from a worker against a community member will be handled through this committee.

7.4. Grievance channel for Gender-Based Violence

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

7.5. Judiciary Level Grievance Redress Mechanism

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

Table 7: Process, stage and timeframe for grievance resolution

Stage	Process	Duration
1a	Since most of complaints during the execution of works directly involve the contractor, at first the Aggrieved Party (AP) will take his/her grievance to the contractor representative site Manager (CSM) of the relevant subproject who will endeavour to resolve it immediately. The contractor representative or site Manager will inform the District water engineer and ECD focal point. Where AP is not satisfied, the complaint will be transferred to the Sub-project Grievance Committee (GC) at cell level. For complaints that were satisfactorily resolved by the Contractor, he/she will inform the GC and the GC will log the grievance and the actions that were taken. There is also a possibility that the AP directly takes his/her complainants directly to the GRC without going to the Contractor or Site Manager first. In this case, the GRC will solve it working with the Contractor or Site Manager.	24hours
1b	The AP may choose to escalate the grievance to the Abunzi Mediation Committee especially if she/he is not directly linked to the sub-project.	Not fixed
2	On receipt of the complaint, the GRC at cell level will endeavour to resolve it immediately. In case the GRC at cell level fail to solve the complaint, it will be	1-2 days at Cell level

Resettlement Policy Framework

Stage	Process	Duration
	escalated to the GRC at Sector level. If unsuccessful, the GRC or the complainant then notifies District Officials.	1-2days at Sector level
3	The District Officials where the project activities are being implemented, he/she will endeavour to address and resolve the complaint and inform the aggrieved party. The District Authority will refer the complaint to the Project Implementation Unit with other unresolved grievances for their consideration.	1 – 5 days
4	If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the RBC/WASAC/NCDA, he/she is free to refer the matter to the court of law.	1 – 7 days
5	If the issue remains unresolved through the courts, then the ultimate step will be for the ombudsman. The decisions at this level are final.	Not fixed
6	The dimension represented in purple is strictly for GBV related matters. The AP will approach directly the GBV task force to ensure her/his anonymity and safety. However, in case the complaint was addressed first to the contractor's Site Manager, the latter is required to immediately refer it to the task force. The GBV task force will work with competent authorities to ensure the proposed official structure for GBV has respected to guarantee the victim the real justice and required medical care.	Not fixed

Table 8: Proposed Members of GRC and their roles

No	Member of GRC	Roles and responsibilities
1	President (PAPs representative)	<ul style="list-style-type: none"> - Chairing meetings; - Give direction on how received grievances will be processed; - Assign organizational responsibility for proposing a response; - Referring cases to next level; - Speaks on behalf of GRC and s/he is the one to report to the cell or the sector administration level; - Represents the interests of aggrieved parties. - Give feedback on the efficiency of GRM.
3	Village leader	<ul style="list-style-type: none"> - Represents local government at village level; - Resolves and lead community level grievance redress - Sends out notices for meetings; - Records all grievance received and report them to next local level
4	Cell executive secretary	<ul style="list-style-type: none"> - Proposes responses to grievances and lead in resolving community grievance unsolved from village level; - Records and reports all grievances received from village leaders; - Chairs sensitization meeting at the cell level during public consultations meetings; - Assists and guides in identifying vulnerable and disadvantaged groups within the cell. - Signs the valuations sheets for compensation facilitate a proper Resettlement Plan
5	- Women and youth representatives	<ul style="list-style-type: none"> - Represent the interests of women and youth; - Advocate for equity and equal opportunities;

Resettlement Policy Framework

No	Member of GRC	Roles and responsibilities
		<ul style="list-style-type: none"> - Help in prevention of sexual harassment and promote wellbeing of the women and youth - Take part in resolution of any grievance related to sexual harassment and any gender domestic violence that may arise; - Mobilize women and youth to be active in income generating activities specifically for opportunities in the project's intervention areas.
6	- Contractor representative	<ul style="list-style-type: none"> - Receive and log complaints/grievances, note date and time, contact details, nature of complaint and inform complainant of when to expect response; - Handle complaints revolved around nuisance resulted from construction and endeavor to handle them satisfactory; - Inform engineer (supervisor) and GRC of received complaints/grievances and outcomes and forward unresolved complaints/grievance to GRC - Attend community meetings, respond and react to PAPs complaints raised concerning the contractor.
7	- Supervising firm representative	<ul style="list-style-type: none"> - Represent client ; - Ensure that all grievances raised have been responded to, and that the contractor responds to the complaints raised concerning them, - Attend community meetings and respond to all concerns related to the project from community - Report on monthly basis the progress of GRM process.

Table 9: Other methods of communication with the stakeholders

To communicate with the project stakeholders by sending their recommendations, claims, and observations are summarized in the following table.

Methods	Description
Project webpage	<ul style="list-style-type: none"> - The ESF documents will be disclosed on the websites of the implementing agency. This will include program description, implementing arrangements and ESF documents including to communicate with the team, and the email, phone of contact of the concerned PIU Environmental Specialist or Social Safeguards Specialist.
Community project Displaying board	<ul style="list-style-type: none"> - In a community selection point or the Administrative District, a Displaying board with project information, timeline, and information of the works, contractor, announcements will be placed and box for comments/suggestions will be placed with a lock so only the environmental or social safeguards can open and respond to any messages. Any complaint from a third party can be filed using this method.
E-mail, Telephone, instant message, or other media	<ul style="list-style-type: none"> - All contacts of the environmental and social safeguards of PIU at National level will be made public to be used by any stakeholder or third party willing to ask for information, provide suggestion or file a complaint.

Resettlement Policy Framework

7.6. Grievance Logbook

The GRM Committee will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed.

The log will contain record of the person responsible for an individual complaint, and records dates for the following events:

- i. Date the complaint was reported;
- ii. Date the Grievance Log was added onto the project database;
- iii. Date information on proposed corrective action sent to complainant (if appropriate);
- iv. The date the complaint was closed out; and
- v. Date response was sent to complainant.

7.7. Monitoring Complaints

The monitoring of complaints will be done by administrative districts and PIU at RBC/WASAC/NCDA on regular basis. The monitoring team will be responsible for:

- i. Providing the sub-project Resettlement and Compensation Committee with a Monthly report detailing the number and status of complaints;
- ii. Any outstanding issues to be addressed; and
- iii. Quarterly reports, including analysis of the type of complaints, levels of complaints, actions to reduce complaints and initiator of such action.

VII. Approval of Resettlement Action Plans

In Rwanda involuntary resettlement is governed by expropriation law and valuation law. Both laws do not have provisions on Resettling Plan preparation and approval. Instead, the expropriation defines the process of expropriation and valuation while the resettlement impacts are assessed together with the ESIA report. The chapter III of the law n° 32/2015 of 11/06/2015 relating to expropriation in the public interest expropriation law defines steps to be undertaken for expropriation as follows:

8.1. Organs determining projects of expropriation in the public interest

Organs which determine projects of expropriation in the public interest are the following:

- 1) The executive committee at the district level, in case such activities concern one district;
- 2) The executive committee at the level of the City of Kigali, in case such activities concern more than one district in the boundaries of the City;
- 3) The relevant ministry, in case planned activities concern more than one district

8.2. Organs supervising projects of expropriation in the public interest

Organs in charge of supervising projects of expropriation in the public interest are hereby established as follows:

- 1) The committee in charge of supervision of projects of expropriation in the public interest at the district level where the project concerns one district;
- 2) The committee in charge of supervision of projects of expropriation in the public interest at the City of Kigali level where the project concerns more than one district within the boundaries of the City;

Resettlement Policy Framework

- 3) The committee in charge of supervision of projects of expropriation due to public interest at the national level where the project concerns more than one district or it is a project at the national level, subject to the provisions of item 2° of this article.

8.3. Organs approving expropriation in the public interest.

The organs approving expropriation in the public interest are the following:

- At the district level, it is the district council after considering the recommendation of the committee in charge of supervision of projects of expropriation in the public;
- At the level of the City of Kigali, where the project concerns more than one district within the boundaries of the City of Kigali, it is the council of the City of Kigali after considering the recommendation of the committee in charge of supervision of projects of expropriation in the public interest at the level of the City of Kigali;
- At the level of more than one district, the ministry in charge of land, upon proposal by the committee in charge of supervision of projects of expropriation in the public interest at national level subject to provisions of item 2 of this Article. A ministerial order shall be used;
- At the national level and in case of activities related to security and national sovereignty, the Prime Minister's Office upon proposal by the committee in charge of supervision of projects of expropriation in the public interest at the national level by way of a Prime Minister's order.

8.4. Procedure for expropriation in the public interest

Procedures for expropriation are as follows:

- Request for expropriation in the public interest by project proponent/ developer;
- Consideration of the relevance of the project proposal for expropriation in the public interest by relevant committee;
- Decision on the relevance of a project of expropriation in the public interest;
- Approval of expropriation in the public interest;
- Publication of the decision on a project for expropriation in the public interest;
- Valuation of assets and agreement on compensation measures;
- Compensation.

For the proposed project the preparation, approval and implementation of resettlement Plan shall be done in accordance with the organic law on expropriation for public interests but also in compliance with World Bank ESS5. Resettlement Action Plan prepared under this project will be reviewed and cleared by the Bank. Once the Resettlement Action Plan has been finalized and cleared it will be publicly disclosed by RBC and the World Bank shall also make the Resettlement Action Plan available to the public through its external website.

Resettlement Policy Framework

8.5. Resettlement Action Plan Implementing Agencies

As per national laws, only Government of Rwanda is authorized to expropriate landowners for public interest and the valuation of assets should be done by an independent valuer. To this end, PIU will work with local administration in the entire process of Resettlement preparation and Implementation specifically for signing off, consultation with the PAPs and other stakeholders, the GRC which will be established at Cell level in the project area. PIU will have overall responsibility of monitoring and evaluating the resettlement and compensation activities while the World Bank shall periodically supervise the resettlement and compensation action plan activities to ensure compliance with the prepared RPF and RAP requirements.

9.0 COMMUNITY ENGAGEMENT

Community engagement is a vital component of the resettlement process. The consultation and engagement process focuses on providing information on the proposed project in a manner that can be understood and interpreted by the relevant audience, seeking comment on key issues and concerns, sourcing accurate information, identifying potential impacts and offering the opportunity for alternatives or objections to be raised by the potentially affected parties; non-governmental organizations, members of the public and other stakeholders. Consultation has also been found to develop a sense of stakeholder ownership of the project and the realization that their concerns are taken seriously, and that the issues they raise, if relevant, are addressed in the RPF and resettlement Plan process and will be considered during project design.

Given that the project affected people and affected community are not well identified, this Resettlement Framework provides a description of mechanisms for consultations with, and participation of, displaced persons in planning, implementation, and monitoring. It provides also feedback on initial consultation held with key stakeholders and the list of people consulted and to be consulted during its implementation, the list of the consulted people shall be enclosed within the resettlement Action Plan for each sub-project.

9.1. Public consultation

9.1.1. Overview

Public consultation and stakeholder engagement are the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. Stakeholder engagement is an on-going process that involves the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism and on-going reporting to affected communities.

9.1.2. Purpose

The purpose of the public consultation meeting and stakeholder's engagement will be as follows:

- i. To prepare communities on potential emergency scenarios that could be caused by the project and can affect the community.
- ii. To build a trusting relationship with the affected communities and other interested stakeholders based on a transparent and timely supply of information and open dialogue.

Resettlement Policy Framework

- iii. To ensure effective engagement with local communities and other key stakeholders throughout all phases of the project.
- iv. To actively build and maintain productive working relationships, based on principles of transparency, accountability, accuracy, trust, respect and mutual interests with affected communities and other stakeholders.
- v. To get input on impacts and mitigation design.

9.2. Public consultations and participation

Public participation and community consultation has been taken up and should continue to be an integral part of social and environmental assessment process of the project. Consultation is used as a tool to inform project affected people, beneficiaries and stakeholders about the proposed activities both before and after the development decisions are made. It assisted in identification of the problems associated with the project as well as the needs of the population likely to be impacted. This participatory process helps in reducing the public resistance to change and enabled the participation of the local people in the decision making process. Initial Public consultation has been carried out with key institutions involved in project implementation and land acquisition. Further consultation are planned during the preparation and implementation of Resettlement Action Plans. The objectives of those consultations is to minimize probable adverse impacts of the project and to achieve speedy implementation of the project through bringing in awareness among the community on the benefits of the project.

9.3. Stakeholders

Key stakeholders have been identified and initial discussions held with decision making bodies, key stakeholders, sector institutions and specialist experts were made on the very concepts and nature of the proposed project, giving emphasis on levels of public participation, role of key stakeholders and joint contributions of these actors to the success of the project. In addition, the scope of the proposed project and possible means of maximizing local communities' social, economic, and environmental benefits from the project implementation were underlined. Key stakeholders identified for consultation during preparation and implementation of Resettlement Action Plans include but not limited to the following:

At national level:

- Ministry of Health (MoH)
- Ministry of Environment (MoE);
- Ministry of Infrastructure (MININFRA);
- Rwanda Environment Management Authority (REMA);
- Rwanda Land Management and Use Authority (RLMUA)

At local level:

- Local Government Officials (Districts and Sectors);
- Potential Project Affected People (PAPs);
- Community benefiting from the project activities;
- Community opinion leaders;
- Local NGOs interested in resettlement activities.

Resettlement Policy Framework

List of consulted people and those to be consulted during Resettlement process is provide as annex of this RPF.

9.4. Disclosure of resettlement Instruments

The WB ESF disclosure policy requires that RPF as well as Resettlement Action Plans are disclosed in country and at World Bank external website, prior to disclosure, the RPF and all final RAPs/ARAPs will be cleared/approved by the Government of Rwanda and development partner for specific subproject. For any revisions made to the final disclosed instruments the same approval disclosure protocols will be followed. These reports should be made available to project affected groups, local NGOs, and the public at large extend. Public disclosure of safeguards instruments such EIA and resettlement decisions, is also a requirement of the Rwanda's environmental procedures.

RBC will disclose this Resettlement Policy Framework, by making copies available at its head office and at concerned administrative Districts offices. Copies will be made for easy consultations every time it is needed. Further, this RPF and associated Resettlement Action Plans will be disclosed at RBC and concerned administrative Districts websites and when PAPs are known, the project will communicate to them where the Resettlement Action Plan and this RPF can be accessed and consulted. Given that most of PAPs may not understand the RAP language, the project will provide a summary translated in local language (Kinyarwanda) and copies of this summary should be available at concerned Sectors offices where the project will be implemented.

The RAP consultant will be responsible to arrange this summary in local and understandable language during the process of RAP preparation. The World Bank will review, Approve, and provide clearance for all subprojects' safeguards instruments (RAP/ARAP) before being disclosed.

Furthermore, the Government of Rwanda will authorize the World Bank to disclose electronically this RPF through its external website. Likewise, all Resettlement Action Plan to be prepared under the project, will be disclosed by RBC at national level after having the clearance from the World Bank, at administrative District level the same way as RPF. The Government of Rwanda will also authorize the World Bank to disclose electronically cleared Resettlement Action Plans through its external website.

9.5. Feedback from consultation with stakeholders

Consultation meetings will be held with government institutions, concerned administrative districts officials, Administrative Sector level, and community beneficiaries.

Resettlement Policy Framework

10.1. Institutional arrangement

Table 11: Summary of roles and responsibilities of various institutions involved in resettlement process for the proposed program.

Organization	Roles and responsibility
RBC/WASAC/NCDA	<ul style="list-style-type: none"> - Screening of sub-projects to identify resettlement and compensation requirements; - Overall monitoring and evaluation of resettlement implementation (i.e. annual audits and review of sub-project level monitoring by affected districts); - Close monitoring and enforcement of the procedures and requirements of the Rwandan laws and that of the WB ESF along the project implementation; - Review all RAPs prepared by the contactor and other resettlement-related documentation to ensure that all procedures have been adhered to and that there is consistency in approach between sub-projects; - Undertake the main monitoring and evaluation role of resettlement activities during and post implementation.
Ministry of Environment	<ul style="list-style-type: none"> - Providing guidelines on the implementation and application of law 48/2018 on Environment and the Land Use Master Plan through Districts' land bureaus; - Providing clarifications on land tenancy schemes (freehold or leasehold), resettlement arrangements, - Mobilizing the public to participate in the management and protection of natural resources;
Rwanda Land Use and Management Authority	<ul style="list-style-type: none"> - RLMUA through its department of land administration and mapping is the organ responsible for overall management and coordination of all activities related to land administration, land use planning and management in Rwanda. - In RAP process, advise on matters related to land ownership and expropriation. District land bureau in close collaboration with project staff will check the inventory carried out during valuation exercise.
District administrative officials,	<ul style="list-style-type: none"> - Review and sign off of all documentation; - Participation in the different consultation meetings that will be held; - Participate in the census activities for the PAPs affected assets; - Sign and approve the individual PAPs file that indicates their affected assets and value for payment; - Following up and participate in resolving issues raised within the elected Grievance committees; - Monitor proper and effective implementation of RAP.
Institute of Real Property Valuers (IRPV)	<ul style="list-style-type: none"> - Proposes regulations, guidelines and standards for valuation while the function of approval lies with the Council; - Play a revision role for any PAP likely to be dissatisfied with a real property valuation; - Selection of other certified Valuers who shall decide other valuation methods to be used in case of misunderstanding on the used valuation methodology.

Resettlement Policy Framework

Organization	Roles and responsibility
District Land Bureaus,	<ul style="list-style-type: none"> - Public Awareness, including extensive consultation with the affected people; - The administrative District land bureau will be engaged in the preparation of all the RAPs; - Provision of information on current land use, land tenure; - Ensuring grievance mechanisms meet legislative requirements; - Interface with administrative District Land Bureau as mandated by revised Land Law; - Approving land use changes at administrative District/ Sector/ Cell level and ensuring alignment with the Land Use Master Plan; - Approving land expropriation.
Resettlement Committees at Cell level	<ul style="list-style-type: none"> - The administrative District Resettlement Committee will facilitate the RAP implementation along with compensation, land valuation, and grievance redress; - The Resettlement Committee will plan for, coordinate and monitor resettlement, compensation and relocation activities and supervise compensation payments to the project affected parties (PAPs) from Village, Cell, Sector to District levels; - Participate in Public Awareness; - Development and implementation of RAP, including assistance during resettlement, effective consultation with PAPs; - Facilitate coordination of information collation activities (such as surveys, sign-off) for monitoring purposes, in accordance with procedures put in place by the district authorities; - Elect representative of the Committee to act as Project Liaison Officer who has regular contact with PAPs and can lead consultation, public participation and grievance mechanisms; - To participate receiving and complains resolution; - Complete the Grievance log.

Note: The PIU will be at central level whereby the decentralized level will have the representatives at District as described in labour management procedures prepared for the project. There will be the E&S safeguards specialists at PIU level while at the decentralized level there will be ECD focal point and water engineer one at each administrative District.

10.2. RPF Monitoring and Evaluation Framework

To assess whether the goals of the resettlement and compensation plan are being met, a monitoring plan should be developed. The monitoring plan defines and identifies monitoring activities that will take place, when and by whom and identifies the indicators and data collection methods, and training and capacity building needs of the institutions and persons to implement the plan.

10.2.1. Monitoring indicators

Verifiable indicators for measuring the impact of physical or economic relocation on the health and welfare of affected population and the effectiveness of impact mitigation measures, including livelihood restoration and development initiatives. These verifiable indicators shall be used to monitor the impacts of the compensation and resettlement activities. These indicators will be targeted at measuring the physical and socio-economic status of the PAPs, to determine and guide improvement in their social wellbeing. Monitoring indicators to be used for the Resettlement Action Plan will have to be developed to respond to specific site conditions.

Resettlement Policy Framework

- Indicators to determine status of affected people.

A number of indicators would be used in order to determine the status of affected people (land being used compared to before, standard of house compared to before, level of participation in project activities compared to before, how many new created works compared to before electrification, health service delivery due to the electrification of the health facilities, service delivery improvement of public servants due to the electrification of the public offices, health standards, etc). Therefore, the resettlement and compensation plans will set two major socio-economic goals by which to evaluate its success: Affected individuals, households, and communities are able to maintain their pre-project standard of living, and even improve on it; and the local communities remain supportive of the project.

- Indicators to measure resettlement.

To access whether these goals are met, the resettlement and compensation plans will indicate parameters to be monitored, institute monitoring milestones and provide resources necessary to carry out the monitoring activities. The following provides a list of potential indicators for monitoring, which assess the change in the following for those who have been resettled. In terms of the resettlement process, the following indicators could be used to understand the success of the measures identified and the working of the relevant parties in implementation the Resettlement Action Plan:

- Percentage of individuals selecting cash or a combination of cash and in-kind compensation;
- The number of contentious cases as a percentage of the total cases;
- Number of people raising grievances in relation to each sub-project;
- The number of grievances and time and quality of resolution through the GRC;
- The ability of individuals and families to re-establish their pre-displacement activities, crops or other alternative incomes;
- Number of impacted locals employed by the civil works;
- Length of time from sub-project identification to payment of compensation to PAPs
- General relations between the project and the local communities;
- Number of the victims of GBV or Sexual Harassment received by GRC;
- Number of the case of GBV transferred to the specialized healthcare;
- Number of the cases of GBV under investigation or in competent court.

The GBV cases shall be monitored in collaboration with the Rwanda Investigation Bureau (RIB) and healthcare where the victim has been treated.

These will be determined through the following activities:

- Questionnaire data collection will be entered into a database;
- Everyone will have a compensation dossier recording his or her initial situation, all subsequent project use of assets/improvements, and compensation agreed upon and received.

Resettlement Policy Framework

The PIU Management will maintain a complete database on every individual impacted by the project land use requirements including relocation/resettlement and compensation, land impacts or damages; and should prepare Resettlement Completion Reports for each Resettlement Action Plan, in addition to other regular monitoring reports.

The subproject Resettlement and Compensation Committee will facilitate coordination of information collation activities (such as surveys, supervising documentation) in accordance with procedures put in place. To assess whether these goals are met, the resettlement and compensation plans will indicate parameters to be monitored, institute monitoring milestones to be achieved and will provide resources necessary to carry out the monitoring activities.

10.2.2. Monitoring of RPF implementation

RBC will compile basic information on all physical or economic displacement arising from the project, and convey this information to the WB on a quarterly basis. They will compile the following statistics:

- Number of households and individuals physically or economically displaced by each sub-project;
- Length of time from identification to payment of compensation to PAPs;
- Timing of compensation in relation to commencement of physical works;
- Amount of compensation paid to each PAP household in cash;
- Nature of compensation in regard to Project Affected Households-PAHs;
- Number of people raising grievances in relation to each sub-project;
- Number of unresolved grievances;
- Number of grievances transferred and level where they are pending;
- Number of sub-projects requiring preparation of a RAP.

RBC will scrutinize these statistics to determine whether the resettlement planning arrangements as set out in this RPF are being adhered to. RBC/WASAC/NCDA PIU will monitor compensation and loss of wages. Financial records will be maintained by RBC/WASAC/NCDA PIU to permit calculation of the final cost of resettlement and compensation per individual or household.

The indicators which will be used to monitor implementation of the RPF will include:

- Outstanding compensation not completed;
- Public works activities unable to settle compensation after one year;
- Grievances recognized as legitimate out of all complaints lodged;

Financial records will be maintained by RBC/WASAC-PIU to allow calculation of the final cost of resettlement action plan and compensation per individual or household.

10.2.3. Storage of PAPs Details

Each PAP household will be provided with a signed report recording his or her initial situation, all subsequent project use of assets and compensation agreed upon and received. At the same time, before compensation all household heads representing the PAPs will be required to provide Identity Card (ID) or passport or other document to facilitate identification. The Local Government officials and PIU will

Resettlement Policy Framework

maintain a complete database on every individual impacted by the project land use requirements including relocation, resettlement and compensation, land impacts or damages.

Each recipient of compensation will have a record containing individual biodata, number of household dependents and amount of land available to the individual or household when the report is opened. Additional information to be acquired for individuals eligible for resettlement and/or compensation include the level of income and of production, inventory of material assets and improvements in land and debts.

10.2.4. Annual Audit

The annual audit of RPF implementation will include (i) a summary of the performance of each sub-project vis-à-vis its Resettlement Action Plan, (ii) a summary of compliance and progress in implementation of the process and (iii) a presentation of compliance and progress in the implementation of the RPF.

The audit should verify payment of compensation, provision of entitlements, and implementation of livelihood restoration measures. The audit will also assess the resettlement efficiency, effectiveness, impact, and sustainability, drawing lessons for future resettlement activities and recommending corrections in the implementation. Finally, the audit will ascertain whether the resettlement entitlements were appropriate to meeting the objectives and whether the objectives were suited to PAPs conditions. Annual audit reports will be submitted for scrutiny to the World Bank.

10.2.5. Socio-economic monitoring

The purpose of socio-economic monitoring is to ensure that PAPs are compensated and recovering on time. During implementation of each sub-project Resettlement Action Plan, an assessment will be undertaken on payment of compensation, restoration of income delivery of resettlement objectives. Monitoring of living standards will continue following resettlement.

Several indicators will be used to determine the status of affected people and appropriate parameters and verifiable indicators will be used to measure the resettlement and compensation plans performance. For each sub-project with adverse social impacts, a monitoring and evaluation plan of the mitigation measures will be established. As part of the preparation of each Resettlement Action Plan, a household survey will be conducted of all PAPs, prior to physical or economic displacement, and this will provide baseline data against which to monitor the performance of the Resettlement Action Plan.

10.3. Capacity Assessment and Capacity building

The principal institutions that will provide overall coordination including administration of the program is PIU under RBC/WASAC/NCDA. Therefore, the PIU have the Social Safeguards Specialist, and the Environmental Safeguards Specialist. A capacity building session will be conducted to ensure that the team is well equipped with the necessary knowledge for project implementation.

Resettlement Policy Framework

10.4. Documents Consulted and Resource Material

1. GoR, 2012. Resettlement Policy Framework, the Third Rural Sector Support Project;
2. GoR, 2010. Resettlement Policy Framework. Land husbandry, Water harvesting and Hill sides irrigation;
3. GoR, 2004. Rwanda National Land Policy. Ministry of Lands, Environment, Forests, Water and Mines;
4. MININFRA, 2020. Concept note Integrating WASH into SPRP for Accelerated Stunting Reduction
5. Project Implementation Manual (PIM)
6. Stakeholder Engagement Plan (SEP)

7. MINIRENA, 2013. Law N° 43/2013 of 16/06/2013 governing land in Rwanda;
8. MINIRENA, 2010. Law No 17/2010 of 12/05/2010 establishing and organizing the real property valuation profession in Rwanda;
9. MININFRA, 2015. Water Policy
10. MININFRA, 2018. Water Sector strategic plan;
11. PRIMATURE, 2015. Law No. 32/2015 of 11/06/2015 Relating to Expropriation in the Public Interest;
12. National Institute of Statistics of Rwanda, November 2018. EICV5
13. REG, 2019. WASAC Strategic plan;
14. MININFRA, 2020. Project Concept Note;
15. WB, Environmental and Social Framework;
16. WB, Environmental and Social Review Summary.

Resettlement Policy Framework

10.5. Stakeholder engagement with SPRP district beneficiaries

Summary of discussions with stakeholders during the consultation meetings in SPRP districts (Kayonza, Huye, Nyamagabe, Nyaruguru, Ruhango, Nyabihu, Rusizi, Rutsiro, Ngororero, Ruhango, Gakenke, Bugesera and Rubavu) -from November 27th to 01st December.

No.	Comments and/or Issues raised	Participants who raised the issue	Response from the E&S Team
1	<p>For water pipes that will pass through citizens' lands, there is a need for consistent awareness raising to ensure awareness across PAPs.</p> <p>There is a need for certified land valuers to avoid misleading information</p>	Vice Mayor in charge of Social Economic	<p>To ensure awareness throughout project implementation frequent site visits and stakeholder engagement sessions with beneficiaries to ensure any issues that would arise would be taken care of early enough to avoid complaints.</p> <p>The project must use certified land valuers to ensure the information provided is satisfying to both implementers and beneficiaries.</p>
2	Regarding ECD construction sites, for government land, there is no need for a copy of the registered land since the UPI has all the information kept by the National Land Center.	Vice Mayor in charge of Social Economic	<p>The team assured district officials that that is okay for the government land however requested the district to respond to the official letter sent by NCDCA that shows how those lands are free.</p> <p>For the land that belongs to FBO, a consent form will have to be signed to ensure that the owner agrees and there are no objections.</p>
3	We are excited about the newly added components and appreciative of the initiative and will be committed to protecting and being part of the project. However, what about the compensation issues that might arise during project implementation?	Beneficiary representative	The team assured the participants that RBC as the overall implementer will ensure that the institutions directly involved with compensation do it early enough to allow all activities to commence.
4	<p>To avoid expropriation issues there is a proposal to use this strategy proposed.</p> <p>1- Creating employment for the beneficiaries within the vicinity of the project</p> <p>2- Putting more effort into where pipes will pass through houses for expropriations</p>	Director/Social	The team appreciated this incredible insight and assured this would be considered moving forward.
5	For ECD sites, there is a need to conduct feasibility studies to ensure no future environmental or social issues. e.g lightning incidents and others	Engineer	A feasibility study will be conducted to ensure there are no environmental and social issues in the future.
6.	<p>Continued effort for awareness creation is very important.</p> <p>Is there room to support other district initiatives that complement SPRP project</p>	V/M	<p>There will be continued sessions with project beneficiaries throughout project implementation.</p> <p>The team mentioned that there is always room for advocacy and whenever there are</p>

Resettlement Policy Framework

No.	Comments and/or Issues raised	Participants who raised the issue	Response from the E&S Team
	objectives regarding stunting reduction? e.g <i>we have an initiative called Sezerea igwingira</i>		resources, relevant stakeholders will be informed to ensure project sustainability.
7	We would like to benefit in terms of employment opportunities since these activities will benefit us directly.	Beneficiary	There is no doubt that the beneficiaries will be directly involved in the construction works and ensure the employment of the beneficiaries
8	Now that the project secured AF, are PBF issues also resolved?	CHW Beneficiary	Yes. The team assured the participant that they are working to resolve the PBF issues at the central level and will resume this program in no time
9	Regarding ECDs, we appreciate the impact that SPRP has brought to the beneficiaries. We wish to have IDP Model ECDs (e.g in Gashenyi sector: Rukura, taba, and rutenderi cells that can benefit from it)	Social affairs	The team appreciated this great idea and assured the participants to have it considered soon projects.
10	WASH activities- How long is it going to take for the activities to begin?	Social affairs	As soon as we have concluded these consultations and have the documents reviewed and cleared by the WB, then these activities can commence.
11	If we do get employment opportunities, please ensure that the payments are made on time	Beneficiary	This will be taken into consideration and ensure the employees are paid on time by the contractors.
12	ECD construction should be scaled up to allow all children in the country to benefit from this program	Beneficiary	The team appreciated the participants for this concern and assured them that as resources are mobilized, there is going to be a scale-up. They also assured them of advocacy.
13	Is it possible to connect everyone who wants to be connected to the Water Supply System after the completion of the Water Supply system?	Ndago Cell representative	Household connections will be possible
14	The WSS passes near households without serving them.	CHW representative	The authorities will continue to advocate for new HH connections.
15	The high cost of getting land titles.	Opinion leader	The new law for land prices will be applied
16	Some ECDs have meals others don't have.	One of the community health workers.	The parents must contribute to the meals of their children.
17	Most water supply schemes are old. They need to be rehabilitated.	Vice Mayor Social affairs	WASAC to advocate for further planning.
18	The property compensation be before or after project implementation?	District Division manager	The compensation will be before project implementation.
19	Properties valuation process	Headteacher	The closer partnership between the valuer, People Affected by the project, and local leaders is the response to the sustainability of water infrastructure.
20	The land dimension for the construction of ECDs must be determined.	School construction engineer, Gakanka Primary school headmaster & Vice Mayor social affairs	ECD will have 3 rooms, soon NCDCA will determine the size of land needed.
21	Considering the usual tendering processes, won't this delay the project implementation especially when only one and a half years are remaining?	District official	It was assured to the participants that the processes were being fastened and that the sooner the consultations were done the quicker the process would resume.
22	We have encountered situations where we get water during rainy seasons and no	Beneficiary	There is a need for WASAC to continue advocacy and mobilize funds for further

Resettlement Policy Framework

No.	Comments and/or Issues raised	Participants who raised the issue	Response from the E&S Team
	access during the dry season which is very frustrating		rehabilitation and pipe extension to avoid this issue.
23	Is there a possibility to build technical schools/training centers for the children graduating from primary schools?	President/Cell technical committee	There are relevant institutions that already have such projects however, resource mobilization and advocacy will continue to be done at all levels
24	We have seen FBFs being given to those who are well off, what's being done to avoid this issue?	Beneficiary	The revamping of the old system of categorization will allow room for accuracy. The new categories will ensure that the FBF is being given to the right person.
25	People are not happy with the property price given by the valuer during the compensation process.	ES Kamatimba Cell.	Every year, the Institute of Real Property Valuers in Rwanda sets the property prices to be used in different areas of the country from the minimum to the highest price based on the market value.
26	The difference between the functionality of new ECDS and existing Ones	In charge of social affairs from Nkanga Sector	It was explained that 2/3 of ECDs will be center-based ECDs. Those 2 ECDs will have caregivers who will be paid by the Ministry of Education, Parents shall contribute to the meals of children. 1/3 ECDs will model be an ECD center. This ECD will have improved shelter, caregivers paid by the Ministry of Education, and appropriate equipment to serve as a model for other ECDS. The contribution of parents shall also be the meal of kids.

Resettlement Policy Framework

No	Name	Title	Account Number	National ID	Telephone	Signature
1	Jumana MIRAMBAWA	Health and Sanitation Sector Social Affairs	0007865020353 BK	119847009877273	0788662117	
2	WUSUMIYIMANA Andreas	Health and Sanitation Sector	002780676308745 BK	11992701420006	0785539923	
3	NBATUBA Gnespize	Health and Sanitation Officer	0000018908	11980800354060	0788000978	
4	WASHIMUNDA Alexis	Health Sector	4491679614 BPR	1198980070252	0782495723	
5	NIKAMERE Medicine	H.T. Umwajimu SACCO	900005909200	119747001927005	0788843657	
6	Bizumungu Emmanuel	SFAO/ Kinshasha	Umwajimu SACCO 42174	11976801026 44156	078885472	
7	Uwimana Sifa	SFAO/Mwinda	1143214086210172	119860021892092	0788676925	
8	Abiel lebasie	NP/Paraiye	02718-0600000000	11962800184016	0782354515	
9	HABIMANA Assiel	Umwajimu SACCO MARIMBA PS	900000344500	1196780013318075	0788873761	

No	Name	Title	Account Number	National ID	Telephone	Signature
1	RWERU NTAKURUYO Emmanuel	Umujoboka wa Umujoboka	4009100450574	1198930032184039	0787226015	
2	RILIMA SEMUTAZA Alexis	Umujoboka wa Umujoboka	3933 Sacco elima	119648000297007	0788418567	
3	RILIMA Ndababwira	Umujoboka wa Umujoboka	0202700 RIM	11971600532005	0780394345	
4	RWERU NBATUBA Andreas	Umujoboka wa Umujoboka	90-0025719-00	1198680143255039	0783654878	
5	RWERU NIZONZINA Etienne	ES/Sector (ki)	000520038913442 BK	119878007163199	0782669686	
6	MUSUNYI MURUGANYA Jean-Louis	Umujoboka wa Umujoboka	4154 Sacco Umujoboka	1198280148301010	0788514939	
7	MUSEMUYI KANYAMBA Benjamin	Umujoboka wa Umujoboka	00063-06766898-406K	1198180116515076	0783390218	
8	RWERU Munyanyany Aphorse	VPR Nyanama	00257-00678396-13 BK	119638005851143	0788694596	
9	RWERU SAFURI Eliizer	Umujoboka wa Umujoboka	422302865210166 BPR	1195680054538092	078302779	

Resettlement Policy Framework



MINISTRY OF HEALTH



Consultation Meeting with SPRP Stakeholders on Environmental and Social Safeguards Instruments- Kayonza District. 01st December 2023

No	Name	Title	Account Number	National ID	Telephone	Signature
1	BIKEMUNYANA Vikana	School Consultant Supervisor	—	119848006365040	0788490865	
2	ROSELETA P. SIZO	Environment Coordinator	—	119880066704101	0784704030	
3	MUSABYIMANA Emmanuel	ECS Focal point	—	1198780190664162	0783532862	
4	NGARIMBE J. Paul	WATER officer	—	1199180142879028	0788270053	
5	MUSAFO FIDA	DHP & DO	—	11974800783052 05	0783382158	
6	Diver KAMU	Environmed. Specialist	—	—	0783465055	
7	Karegesa Kifanyi	PLS	—	—	0787443683	
8	Hatacha MUNGARJINKA	Social safeguard specialist	—	—	0781981774	
9	Phillip NENA	WASH specialist	—	—	078891916	
10	GAKUBA Fidele	Project Manager	—	—	0788307990	

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