



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 06/17/2020 | Report No: ESRSC01445



## BASIC INFORMATION

### A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Rwanda	AFRICA EAST	P172862	
Project Name	Rwanda: Advancing Citizen Engagement Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social	Investment Project Financing		8/14/2020
Borrower(s)	Implementing Agency(ies)		
Comic Relief	Spark Microgrants		

### Proposed Development Objective

To improve livelihoods for 19,600 households/85,000 people and capacity of communities and national and local government for citizen engagement in 245 villages in Rwanda.\*

The PDO will be achieved through a set of activities combining sustainable livelihood grants for poor, rural communities and capacity-building for district, sector, cell and village officials and communities on inclusive, participatory planning. The experience of the grants and the capacity-building support in the JSDF pilot areas will be captured through partnership with national and local government officials in a new framework for participatory village planning, which will be applied across Rwanda.

\* The project will be implemented in 245 villages, which constitutes 10-12 percent of the villages in each of the project districts, assuming 4-5 districts will be covered. Each village has approximately 160-170 households (HHs), with an average HH size of 4.35 people. This results in approximately 178,000 people in the target villages. This entire number is expected to benefit from improved village planning and engagement with local government, including enhanced understanding of and access to government social protection programs. On average, approximately 80 households in each target village will attend meetings and benefit from a range of activities, including capacity-building for planning and savings groups. This equates to 19,600 HH, for a total of 85,260 direct beneficiaries.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>2.73</b>



**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

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

Strong state institutions and capable public administration have been the cornerstones of Rwanda's post-genocide transformation. Rwanda is one of Africa's fastest growing economies, with growth averaging more than seven percent every year since 2000. Sustained economic growth rates have seen gross domestic product (GDP) per capita increase from US\$242 in 2000 to US\$787 by 2018. Rwanda's official poverty estimates suggest a continued decrease in poverty from 45 percent in 2010/11 to 38 percent in 2016/17. These impressive results have been driven by strong economic growth and improved agricultural productivity as well as a commitment to good governance, both in terms of economic management and service delivery.

Despite the impressive progress on reducing poverty and building human capital, Rwanda remains one of the poorest countries in the world. Even before the onset of the COVID-19 global pandemic, Rwanda continued to face major development challenges, including high levels of rural poverty (peaking at 69 percent in Nyamasheke district) and stunting (38 percent). Since 2014, poverty reduction has stagnated despite continued growth, particularly in rural areas. Two-thirds of households face seasonal food shortages. This situation limits the productive capacity of the next generation as well as Rwanda's future competitiveness. The COVID-19 pandemic will exacerbate Rwanda's development challenges, with growth projected to slow to 5.1 percent in 2020. Headcount poverty is expected to rise this year and only recover slightly by 2022.

Rwanda's National Strategy for Transformation 1 (2017-2024) seeks to address the challenge of persistently high rates of poverty through continued economic growth and effective management of public sector investments. Rwanda ranks well in global governance metrics, including corruption in the World Governance Indicator rankings and competitiveness in the World Economic Forum's Global Competitiveness Index. The country's Vision 2050 aims to deliver an improved standard of living for all Rwandans. This entails providing food security and nutrition, universal access to water and sanitation, affordable and reliable energy, and universal access to quality health care, education, financial services and housing. Delivering on these ambitious goals will require enhanced local government capacity as Rwanda continues to actively decentralize development planning and the delivery of services across multiple sectors. The National Decentralization Policy, adopted in 2001, aims to promote good governance and effective and transparent service delivery, and reduce poverty. As a result of the policy, local governments (primarily District Governments) are now the primary implementers of national policies and programs.

The decentralization policy has established the institutional architecture for subnational government, but citizen voice and participation remains limited and planning processes are still centralized and top-down. Improving implementation of decentralization, including by enhancing citizen engagement, has been identified by the Government of Rwanda and development partners as necessary to accelerate poverty reduction. The Rwanda Governance Board has recommended strengthening citizen engagement (CE), particularly in terms of bottom-up planning. The Local Administrative Entities Agency (LODA) of the Ministry of Local Government (MINALOC), has also highlighted the ongoing centralized nature of decision making in Rwanda and asserted that village planning processes need to be strengthened to ensure that local leaders represent the needs of communities. This is expected to improve



the alignment between community needs and public spending, in the process leading to more effective use of government resources and better development outcomes for the rural poor.

The GoR is increasingly committed to strengthening citizen engagement for decentralization but lacks a framework for village-level planning. Local government capacity for participatory village planning is also limited, with many officials feeling ill-equipped to mobilize citizens to own and lead change.

In 2017, the government approached Spark MicroGrants to request support to strengthen citizen engagement, increase the uptake of government social programs and improve rural livelihoods. Founded in Rwanda in 2010, Spark has formulated a participatory village development approach that leverages historical Rwandan social organizing practices. In March 2019 (updated January 2020), the Local Administrative Entities Development Agency (LODA) of the Ministry of Local Government signed a Memorandum of Understanding (MoU) with Spark for a strategic collaboration to: (a) develop a National Framework for Participatory Village Planning for all 14,000 villages in Rwanda; and (b) strengthen existing decentralization initiatives by building on historical Rwandan traditions.

#### Project Activities

The project will combine grassroots and policy activities to strengthen rural livelihood and establish a National Framework for Participatory Village Planning that will institutionalize participatory and socially inclusive community development planning in Rwanda. The project will support community-driven planning and livelihood programs in 245 villages. Experience from the community-level activities will then be translated, in partnership with central and local government, into a national policy framework for participatory village planning.

The project development objective is “to improve livelihoods for 85,000 people and the capacity of communities and national and local government for citizen engagement in 245 villages in Rwanda.”.

The project budget is US\$2.73 million, which is expected to come from the Japan Social Development Fund (JSDF). The grant recipient will be Comic Relief, a United Kingdom-based non-governmental organization, which will contribute US\$2.73 million in complementary funding. The implementing agency will be Spark Microgrants, working under a Project Steering Committee comprising the Ministries in charge of finance and local government. The project will run for four years, from 2020-2024.

The project will be implemented through four components, as described below:

#### Component 1: Village and Local Government Capacity Building (US\$516,435)

This component will build the capacity of local government at the district, sector and cell levels to facilitate community-driven village development processes to enhance citizen engagement in development activities and improve rural livelihoods. It will also build community capacity to engage in development planning and to manage village level subprojects.

District, sector and cell level local Government officials will be trained on a Facilitated Collective Action Process (the ‘FCAP’, also known as Inzira Y’Iterambere in Kinyarwanda). The FCAP is a two-year village mobilization and capacity building process to establish a platform for development coordination at the village level that will include the creation



of a Village Leadership Committee and the formulation of a Village Development Plan (VDP). FCAP fully aligns with existing planning frameworks and provides structure and purpose to the government's citizen engagement initiatives.

#### Component 2: Microgrants (US\$1,951,292)

Component two will finance priority sub projects identified in the VDPs to improve livelihood. The project will provide a village grant of \$8000, disbursed over two years for each target village. The District Government in each of the target districts will contribute five percent of the total grant amount, while community members will make contributions in-kind. Microgrant eligibility is guaranteed for every target village provided all eligibility conditions are met, including election of a Village Leadership Committee, completion of the VDP and submission, review and approval of the sub project proposal.

Communities will choose the subproject(s) to be financed by the microgrant to improve the social and/or economic welfare of the village, in support of the VDP. Other than a limited set of disallowed costs, communities will have a free choice of project, as long as it meets proposal review criteria – designed to bring communal benefits to the village in support of their stated goals, gender mainstreamed, etc. – and is decided through community consensus. Technical assistance will be provided to ensure business viability and linkages to local market opportunities.

The small size of the grant and relatively high levels of public infrastructure in Rwanda means that it is anticipated that most subprojects will be small-scale, communally managed livelihoods activities, such as a cattle-rearing, small livestock (goats, sheep) and moto-taxi businesses. Other community development priorities, such as public infrastructure or services, will be captured in the VDP but are expected to be financed by government or other development partner programs.

#### Component 3: National Framework for Participatory Village Planning (US\$25,100)

Component Three will consolidate lessons from the pilot activities under components one and two and support the government of Rwanda to prepare a National Framework for Participatory Village Planning.

Activities under this component will: (a) integrate the FCAP into existing planning systems; (b) promote the effectiveness of community-driven planning methodologies among Government stakeholders; and (c) develop a framework for a government-owned national scale initiative to strengthen participatory, village-led planning and development - a National Framework for Participatory Village Planning.

The project will support a working group comprising the Ministry of Finance and Economic Planning (MINECOFIN), the Ministry of Local Government (MINALOC) and LODA to prepare the National Framework. District mayors and vice-mayors from the project target areas will also be represented on the working group to bring the implementation experience from component two to bear in the policy-making process. JSDF financing will ensure strong local government and community involvement in the policy process.

#### Component 4: Project Management, Monitoring and Evaluation (M&E) and Knowledge Dissemination (US\$237,173)

This component will support project management, rigorous and innovative M&E and knowledge dissemination through a comprehensive communications plan. M&E will include digital platforms for regular monitoring and a



mixed-methods impact evaluation to explore the impact participatory processes and better engagement between local government and communities can have on poverty reduction. This impact evaluation will generate policy and program-relevant lessons for Spark, the Government of Rwanda, and the World Bank.

#### **D. Environmental and Social Overview**

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will support community-driven planning and livelihood programs in 245 villages in two of Rwanda's five provinces (Northern and Southern provinces), where Spark Microgrants has a successful track record of implementing community-based development programming with local governments. Within the targeted provinces, the specific districts and sectors, and benefiting villages are yet to be determined based on official data and priorities on malnutrition and poverty. The project seeks to improve livelihoods for 178,000 people and capacity of communities and national and local government for citizen engagement in 245 villages in Rwanda. In this regard, it will empower the poor beneficiary people directly and strengthen governance through strengthening local community associations, inclusive/transparent planning processes and capacity building, among others.

The potential adverse environmental and social impacts of the project related to CCD subprojects could include local air pollution, greenhouse gas emissions, safety (such as injuries and fatal accidents) and crime (theft, gender-based violence (GBV)/violence against women and girls, etc.) problems mainly linked to moto-taxi business, and related environmental and health problems, including noise pollution. However, they are not expected to generate severe adverse effects to human health and the environment as the earmarked budget for all CDD subprojects per village is limited to USD 8000. The project will also finance the preparation of a National Framework for Participatory Village Planning (NFPVP) which may have direct and/or indirect environmental/social risks and impacts on issues related to ESSs 3, 4, 6 and 8, among others. As part of the environmental and social assessment, all these issues will be assessed in detail during the preparation stage and incorporated in the project design and the ESF instruments, including the ESMF.

#### **D. 2. Borrower's Institutional Capacity**

Comic Relief, a United Kingdom-based non-governmental organization, will be the grant recipient. It will contribute US\$2.73 million of counterpart funding for supporting knowledge dissemination and promotion of the project. Spark Microgrants, implementing agency of the project, is an International Non-Government Organization (INGO) that has been operating in Rwanda since 2010. Both Comic Relief and Spark Microgrants have no prior experience working with the Bank. The project will be supervised by a Project Steering Committee, comprised of LODA, MINALOC, MINECOFIN, District Government Officials, and Spark, which will review overall project progress and outcomes on an annual basis. Further assessment of the institutional capacity will be conducted throughout project preparation and gap filling measures for environment and social risk management will be agreed upon during project preparation and integrated in the project design.

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

### **A. Environmental and Social Risk Classification (ESRC)**

Moderate



## Environmental Risk Rating

Moderate

The project's environmental risk rating is currently Moderate considering the anticipated risks and impacts mainly related to components 2 and 3. Component 2 will finance small-scale community-driven development (CDD) and poverty reduction priority subprojects such as cattle-rearing, small livestock (goats, sheep) and moto-taxi businesses in 245 villages in two provinces (Northern and Southern provinces) of Rwanda. The environmental impacts of the small-scale CDD subprojects related to cattle- and goats/sheep-fattening/rearing are expected to be temporary, predictable, and easily mitigated. Moreover, they are not expected to be carried out in environmentally sensitive areas. Also, though there will be some increases in local air pollution and greenhouse gas emissions, they are not expected to generate severe adverse effects to human health and the environment as the earmarked budget for all CDD subprojects per village is limited to USD 8000. On the other hand, CDD project activities/subprojects related to the moto-taxi business, in addition to safety (such as injuries and fatal accidents), may/will have some undesired effects like crime (theft, GBV, etc.), health and environmental (air/greenhouse gas emissions and noise) problems. Under Component 3, the project will finance the preparation of a National Framework for Participatory Village Planning (NFPVP), followed by more detailed design and implementation manuals to support adoption of the National Framework, which may have direct and/or indirect environmental risks and impacts. Thus, the preparation of NFPVP is expected to integrate the principles and objectives of all relevant Environmental and Social Standards. As Spark Microgrants has no prior experience in implementing WB financed projects, capacity building required to manage adequately potential environmental risks and impacts of the project will be assessed during the project preparation. In this regard, terms of references (ToRs) for any capacity building (e.g. under components 1 and 4) and technical assistance activities of the project are required to incorporate reference to the ESSs in order to ensure that activities and outputs are consistent with the WB Environment and Social Framework.

## Social Risk Rating

Low

The project presents low social risks. The proposed project component 2 on microgrants, the priority subprojects to be financed under this component will focus on livelihood improvement for the social and economic welfare of the beneficiaries. The size of the grant is 8,000 USD per village and the anticipated subprojects to be funded include small scale community managed livelihoods activities such as cattle-rearing, small livestock (goats, sheep) and moto-taxi businesses that communities will choose. These subprojects to be financed will be decided through community consensus. Other community priorities such as public infrastructure or services will not be financed under this project. Hence, the activities to be funded under this project will not involve any involuntary land take, expropriation or resettlement. However, there are potential risks related to GBV, concerns for ensuring inclusion in access to these microgrants, equity and avoiding elite capture which need to be adequately addressed in this project.

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

### B.1. General Assessment

#### ESS1 Assessment and Management of Environmental and Social Risks and Impacts

##### ***Overview of the relevance of the Standard for the Project:***

ESS 1 is relevant to the project. It aims to improve livelihoods for 178,000 people and capacity of communities and national and local government for citizen engagement in 245 villages in Rwanda. The Project is expected to have a significant positive social outcome as it will finance community-driven development (CDD) and poverty reduction priority subprojects to improve livelihood and empower the poorest and most vulnerable groups not reached by other programs. It will also provide capacity building support for local government to facilitate community-driven





village development processes to enhance citizen engagement in development activities and improve rural livelihoods, and for local communities to engage in development planning and to manage village level subprojects. National Framework for Participatory Village Planning (NFPVP) (component 3), and project management, including knowledge dissemination, (component 4) will also have positive social impacts. All these, in turn, will also have positive environmental impacts if environmental issues related to CDD subprojects (component 2) and NFPVP (component 3) are managed as per the GoR's policies and legal frameworks and the WB ESSs, including the integration of the principles and objectives of all relevant Environmental and Social Standards in the NFPVP.

On the other hand, small-scale CDD subprojects (Component 2) related to cattle- and goats/sheep- fattening/rearing are likely to have temporary, predictable, and easily mitigated environmental impacts if they are not carried out in environmentally sensitive areas, which is the expectation of this project. Also, there will be some increases in local air pollution and greenhouse gas emissions from small-scale livestock rearing/fattening activities; however, they are not expected to generate severe adverse effects to human health and the environment. Subprojects related to the moto-taxi business will have great importance in improving access and mobility for villagers in rural areas. However, besides safety issues (including fatalities and injuries), moto-taxis may/will have some undesired effects like crime (theft, GBV, etc.) and health and environmental (air/greenhouse gas emissions and noise) problems. It may also exclude potential women beneficiaries from becoming moto-taxi operators if there are cultural and other related issues. Consistent with the ESSs, environmental and social issues, along with mitigation measures (comprising training, awareness, etc.) related to moto-taxi business (such as personal protective equipment, including luminescent vests and passenger helmets; women engagement in moto-taxi business; availability of well-lighted moto-taxi stands) and other small-scale CDD subprojects will be assessed during the project preparation and incorporated in the project design and in the ESSs instruments. Other community priorities such as public infrastructure or services will not be financed under this project; hence, the activities to be funded under this project will not involve any involuntary land take, expropriation or resettlement. However, there are potential risks related to GBV, concerns for ensuring inclusion in access to these microgrants, equity and avoiding elite capture which need to be adequately addressed in this project. The project will prepare a GBV action plan during implementation, establish and operationalize a GRM that is accessible to the community members.

The preparation of NFPVP (Component 3), along with detailed design and implementation manuals to support adoption of the National Framework, may have direct or indirect environment and/or social impacts. Hence, it will require assessment of environmental and social implications to be included in the project design, along with integration of the principles and objectives of all relevant Environmental and Social Standards in the NFPVP during its preparation. Furthermore, the implementing agency does not have prior experience in implementing WB financed projects; thus, capacity building assessment for Spark Microgrants will be carried out during the project preparation to identify specific capacity building areas in order to manage potential environmental and social risks and impacts of the project. To address environmental and social gaps, Spark Microgrants is required to establish a timebound capacity development plan for environmental and social risks management and include it in the ESCP. For any capacity building and technical assistance activities under the project, Spark should incorporate reference to the ESSs in terms of references (ToRs) to ensure that activities and outputs are consistent with the WB Environment and Social Framework. In accordance with the WB ESSs, detail environmental and social assessment (ESA) proportionate to the potential risks and impacts will also be carried out during the project preparation; and the findings of the assessment will be included in the project design and relevant ESSs instruments (such as ESMF) in a manner consistent with the ESSs and satisfactory to the Bank.





Overall, as part of the ESA, prior to project appraisal, Sparks Microgrants will develop and disclose (a) Environment and Social Management Framework (ESMF), (b) Environmental and Social Commitment Plan (ESCP), and (c) Stakeholders Engagement Plan (SEP). During the project implementation, as per the ESMF, site specific ESSs instruments such as environmental and social impact assessments (ESIAs)/environmental and social management plans (ESMPs) for subprojects will be prepared and implemented as required. The ESMF will cover, among others, environmental and social baseline of the project; review of relevant national policy, institutional and regulatory frameworks; environmental and social risks/impacts and mitigation measures; project coordination and implementation arrangements; capacity building and training; environmental and social screening process; generic environmental and social management plan (ESMP) for CDD subprojects/distinctive project activities; and terms of reference for the preparation of site specific ESIA/ESMP.

**Areas where “Use of Borrower Framework” is being considered:**

The project will apply the Bank environmental and social standards.

**ESS10 Stakeholder Engagement and Information Disclosure**

The project will involve various stakeholders that include Ministry of Local Government (MINALOC), Local Administrative Entities Development Agency (LODA ), Ministry of Finance (MINECOFIN), Districts, Sectors, Cells, Villages, local communities, SACCO's among others stakeholders. Stakeholder engagement is central to the project through component 1 and 3 and these components contribute to consultation, participation, and inclusion. As part of the project preparation appropriate citizen engagement tools will be identified to be used during implementation (scorecards, beneficiary feedback surveys) and form part of the project design.

Spark microgrants will prepare an appropriate Stakeholders Engagement Plan (SEP) and share it with the Bank for review and clearance prior to appraisal. A project specific grievance redress mechanism (GRM), proportionate to the potential environmental and social risks and impacts of the project, will also be developed through inclusive and participatory approach and put in place to respond to concerns and grievances of project-affected parties in a timely manner.

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

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

**ESS2 Labor and Working Conditions**

This project will be implemented by Sparks Microgrants in collaboration with other stakeholders. The project will have both contracted and community workers, thus ESS 2 applies to project workers including full-time, part-time, temporary, and seasonal workers. Spark microgrants will prepare a Labor Management Procedure (LMP) and submit to the Bank for review and clearance.

**ESS3 Resource Efficiency and Pollution Prevention and Management**

This standard is considered relevant as the project will have direct or indirect consequences on resource efficiency and pollution management. Small-scale CDD subprojects such as livestock rearing/fattening require efficient and



effective use of fodder, water and other resources. Also, the small-scale subprojects, including livestock and moto-taxi business, will have limited environmental pollution (air/greenhouse gas emissions and noise) problems. The preparation of NFPVP (Component 3), along with detailed design and implementation manuals to support adoption of the National Framework, may have direct or indirect risks and impacts on resource efficiency and pollution management; thus, there is a need to integrate the principles and objectives of ESS3 (and other relevant ESSs) in the NFPVP during its preparation stage. All these issues, along with their potential risks and impacts will be further assessed to address resource efficiency and pollution prevention and management during project preparation as part of the ESA process. The findings of the ESA will be addressed in the project design and in the ESMF (comprising environmental and social screening process for subprojects) during the project preparation stage and further detailed in site specific ESIAs/ESMPs for subprojects during the project implementation.

#### **ESS4 Community Health and Safety**

Though relevant, community health and safety is not critical due to the small-scale nature of the CDD subprojects and the limited financial resources. Also, the local communities will be the primary beneficiaries and owner of the subprojects as the project seeks to improve their livelihoods and build their capacities for effective, transparent and accountable development planning and inclusive leadership and decision-making, among others. However, there will be some community health and safety issues related to CDD subprojects, including livestock rearing/fattening and moto-taxi businesses, due to local air pollution and greenhouse gas emissions. Regarding the moto-taxi business, in addition to safety (fatalities/injuries), it may/will have some undesired effects like crime (theft, GBV, etc.) and health and environmental (air and noise) problems. The preparation of NFPVP, along with detailed design and implementation manuals to support adoption of the National Framework, may have direct or indirect risks and impacts on community health and safety; thus, there is a need to integrate the principles and objectives of ESS4 (and other relevant ESSs as required) in the NFPVP during its preparation stage. All these issues, along with their potential risks and impacts, will be further assessed to manage adequately community health and safety issues during the project preparation as part of the ESA process. The findings of the ESA will be included in the project design and in the ESMF during the project preparation and further detailed in the site specific ESSs instruments (ESMPs/ESIAs) for subprojects during the project implementation.

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The project will not involve any land acquisition, restriction on land use or involuntary resettlement under this project and therefore ESS 5 is not relevant at this stage.

#### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

ESS6 is relevant to the project. The CDD subprojects envisaged by the project are small in scale and expected to be carried out in existing villages. Also, they are not expected to be carried out in environmentally sensitive areas, including natural critical habitats. The project will also take into consideration good practice on animal welfare, per the IFC Good Practice Note (<https://www.ifc.org/wps/wcm/connect/c39e4771-d5ae-441a-9942-dfa4add8b679/IFC+Good+Practice+Note+Animal+Welfare+2014.pdf?MOD=AJPERES&CVID=kGxNx5m>), which is in line with the World Bank ESF. The preparation of National Framework for Participatory Village Planning (NFPVP) may have direct or indirect environment and/or social impacts on biodiversity and living natural resources; thus, it will



require assessment, and need to integrate the principles and objectives of ESS6 (and other relevant ESSs as required) in the NFPVP during its preparation stage. All these issues will be further assessed to identify and manage potential risks and impacts of the project on biodiversity conservation and living natural resources as part of the ESA process during the preparation stage. The findings of the ESA will be addressed in the project design and in the ESMF (comprising environmental and social screening process for subprojects) and further detailed in site specific ESIA/ESMPs for subprojects during the project implementation.

#### **ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

ESS 7 is not currently relevant at this stage, as there are no anticipated IPs in the potential project areas. However, further assessment will be conducted during project preparation to determine if ESS 7 applies.

#### **ESS8 Cultural Heritage**

ESS8 is currently relevant, as the project, including its small-scale CDD subprojects, may have risks and impacts on cultural heritage, including graves/small memorial shrines, or access to those. The preparation of NFPVP (and its subsequent implementation) may have direct or indirect risks and impacts on cultural heritage; thus, it will require assessment, and need to integrate the principles and objectives of ESS8 (and other relevant ESSs as required) in the NFPVP during its preparation stage. Also, further assessment will be carried out during the project preparation. The findings of the ESA will be addressed in the project design and in the ESMF (comprising environmental and social screening process for subprojects and chance finds procedure) and further detailed in site specific ESIA/ESMPs for subprojects during the project implementation.

#### **ESS9 Financial Intermediaries**

Spark Microgrants is an international non-government organization (INGO); thus, ESS9 is not relevant.

### **C. Legal Operational Policies that Apply**

<b>OP 7.50 Projects on International Waterways</b>	No
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<b>OP 7.60 Projects in Disputed Areas</b>	No
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## **III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

<b>A. Is a common approach being considered?</b>	No
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#### **Financing Partners**

None



## **B. Proposed Measures, Actions and Timing (Borrower's commitments)**

### **Actions to be completed prior to Bank Board Approval:**

Spark will prepare and disclose the following prior to project appraisal.

1. Environmental and Social Management Framework (ESMF)
2. Stakeholders Engagement Plan (SEP) with a project specific grievance redress mechanism (GRM)
3. Environment and Social Commitment Plan (ESCP)

### **Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

1. Preparation of project implementation manual, including ESSs management
2. Sub-grantees agreement and implementation
3. Environment and social risk management in terms of staffing proportionate to the project scope and risks
4. Preparation and implementation of a timebound capacity development plan for E&S risks management
5. Preparation and implementation of labor management procedures (LMP)
6. Updating and implementation of GRM for project affected parties
7. Timelines for the preparation of ESIs/ESMPs
8. Environment and social risk monitoring and reporting arrangements for this operation

## **C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

15-Jul-2020

## **IV. CONTACT POINTS**

### **World Bank**

Contact:	Matthew Stephens	Title:	Senior Social Development Specialist
Telephone No:	+1-202-473-2874	Email:	mstephens@worldbank.org

### **Borrower/Client/Recipient**

Borrower: Comic Relief

### **Implementing Agency(ies)**

Implementing Agency: Spark Microgrants

## **V. FOR MORE INFORMATION CONTACT**



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

## **VI. APPROVAL**

Task Team Leader(s):	Matthew Stephens
Practice Manager (ENR/Social)	Robin Mearns Recommended on 17-Jun-2020 at 17:12:37 EDT